

## Planning Committee

Tuesday 2 April 2019

6.30 pm

Ground Floor Meeting Room G02C - 160 Tooley Street, London SE1 2QH

### Membership

Councillor Martin Seaton (Chair)  
Councillor Lorraine Lauder MBE (Vice-Chair)  
Councillor James McAsh  
Councillor Hamish McCallum  
Councillor Adele Morris  
Councillor Jason Ochere  
Councillor Cleo Soanes  
Councillor Kath Whittam

### Reserves

Councillor James Coldwell  
Councillor Tom Flynn  
Councillor Renata Hamvas  
Councillor Darren Merrill  
Councillor Jane Salmon

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### INFORMATION FOR MEMBERS OF THE PUBLIC

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#### Access to information

You have the right to request to inspect copies of minutes and reports on this agenda as well as the background documents used in the preparation of these reports.

#### Babysitting/Carers allowances

If you are a resident of the borough and have paid someone to look after your children, an elderly dependant or a dependant with disabilities so that you could attend this meeting, you may claim an allowance from the council. Please collect a claim form at the meeting.

#### Access

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#### Contact

Everton Roberts on 020 7525 7221 or email: [everton.roberts@southwark.gov.uk](mailto:everton.roberts@southwark.gov.uk)

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Members of the committee are summoned to attend this meeting

**Eleanor Kelly**

Chief Executive

Date: 25 March 2019



# Planning Committee

Tuesday 2 April 2019

6.30 pm

Ground Floor Meeting Room G02C - 160 Tooley Street, London SE1 2QH

## Order of Business

Item No.	Title	Page No.
	<b>PART A - OPEN BUSINESS</b>	
	<b>PROCEDURE NOTE</b>	
<b>1.</b>	<b>APOLOGIES</b>	
	To receive any apologies for absence.	
<b>2.</b>	<b>CONFIRMATION OF VOTING MEMBERS</b>	
	A representative of each political group will confirm the voting members of the committee.	
<b>3.</b>	<b>NOTIFICATION OF ANY ITEMS OF BUSINESS WHICH THE CHAIR DEEMS URGENT</b>	
	In special circumstances, an item of business may be added to an agenda within five clear days of the meeting.	
<b>4.</b>	<b>DISCLOSURE OF INTERESTS AND DISPENSATIONS</b>	
	Members to declare any personal interests and dispensation in respect of any item of business to be considered at this meeting.	
<b>5.</b>	<b>MINUTES</b>	3 - 5
	To approve as a correct record the Minutes of the open section of the meeting held on 19 March 2019.	

<b>Item No.</b>	<b>Title</b>	<b>Page No.</b>
<b>6.</b>	<b>DEVELOPMENT MANAGEMENT</b>	<b>6 - 10</b>
	<b>6.1. ALL SAINTS ANNEXE (IMPERIAL WAR MUSEUM) AND LAND TO THE REAR, AUSTRAL STREET, LONDON, SE11 4SJ</b>	<b>11 - 82</b>
	<b>6.2. DOCKLEY ROAD INDUSTRIAL ESTATE, 2 DOCKLEY ROAD, LONDON SE16 3SF</b>	<b>83 - 147</b>

**ANY OTHER OPEN BUSINESS AS NOTIFIED AT THE START OF THE MEETING AND ACCEPTED BY THE CHAIR AS URGENT.**

**EXCLUSION OF PRESS AND PUBLIC**

The following motion should be moved, seconded and approved if the committee wishes to exclude the press and public to deal with reports revealing exempt information:

“That the public be excluded from the meeting for the following items of business on the grounds that they involve the likely disclosure of exempt information as defined in paragraphs 1-7, Access to Information Procedure rules of the Constitution.”

**PART B - CLOSED BUSINESS**

**ANY OTHER CLOSED BUSINESS AS NOTIFIED AT THE START OF THE MEETING AND ACCEPTED BY THE CHAIR AS URGENT.**

Date: 25 March 2019



## Planning Committee

### Guidance on conduct of business for planning applications, enforcement cases and other planning proposals

1. The reports are taken in the order of business on the agenda.
2. The officers present the report and recommendations and answer points raised by members of the committee.
3. The role of members of the planning committee is to make planning decisions openly, impartially, with sound judgement and for justifiable reasons in accordance with the statutory planning framework.
4. The following may address the committee (if they are present and wish to speak) for **not more than 3 minutes each**.

- (a) One representative (spokesperson) for any objectors. If there is more than one objector wishing to speak, the time is then divided within the 3-minute time slot.
- (b) The applicant or applicant's agent.
- (c) One representative for any supporters (who live within 100 metres of the development site).
- (d) Ward councillor (spokesperson) from where the proposal is located.
- (e) The members of the committee will then debate the application and consider the recommendation.

**Note:** Members of the committee may question those who speak only on matters relevant to the roles and functions of the planning committee that are outlined in the constitution and in accordance with the statutory planning framework.

5. If there are a number of people who are objecting to, or are in support of, an application or an enforcement of action, you are requested to identify a representative to address the committee. If more than one person wishes to speak, the 3-minute time allowance must be divided amongst those who wish to speak. Where you are unable to decide who is to speak in advance of the meeting, you are advised to meet with other objectors in the foyer of the council offices prior to the start of the meeting to identify a representative. If this is not possible, the chair will ask which objector(s) would like to speak at the point the actual item is being considered.
6. Speakers should lead the committee to subjects on which they would welcome further questioning.
7. Those people nominated to speak on behalf of objectors, supporters or applicants, as well as ward members, should sit on the front row of the public seating area. This is for ease of communication between the committee and the speaker, in case any issues need to be clarified later in the proceedings; it is **not** an opportunity to take part in the debate of the committee.

8. Each speaker should restrict their comments to the planning aspects of the proposal and should avoid repeating what is already in the report. The meeting is not a hearing where all participants present evidence to be examined by other participants.
9. This is a council committee meeting which is open to the public and there should be no interruptions from the audience.
10. No smoking is allowed at committee.
11. Members of the public are welcome to film, audio record, photograph, or tweet the public proceedings of the meeting; please be considerate towards other people in the room and take care not to disturb the proceedings.

**The arrangements at the meeting may be varied at the discretion of the chair.**

**Contacts:** General Enquiries  
Planning Section, Place and Wellbeing Department  
Tel: 020 7525 5403

Planning Committee Clerk, Constitutional Team  
Finance and Governance  
Tel: 020 7525 7221



## Planning Committee

MINUTES of the OPEN section of the Planning Committee held on Tuesday 19 March 2019 at 6.30 pm at Ground Floor Meeting Room G01A - 160 Tooley Street, London SE1 2QH

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**PRESENT:** Councillor Martin Seaton (Chair)  
 Councillor Lorraine Lauder MBE  
 Councillor James McAsh  
 Councillor Hamish McCallum  
 Councillor Adele Morris  
 Councillor Jason Ochere  
 Councillor Kath Whittam

**OFFICER SUPPORT:** Simon Bevan, Director of Planning  
 Yvonne Lewis, Planning  
 Chris Kirby, Planning  
 Michael Tsoukaris, Design and Conservation  
 Alex Oyebade, Transport Management  
 Jon Gorst, Legal Team  
 Virginia Wynn-Jones, Constitutional Team

### 1. APOLOGIES

Apologies were received from Councillor Cleo Soanes.

### 2. CONFIRMATION OF VOTING MEMBERS

The members present were confirmed as the voting members.

### 3. NOTIFICATION OF ANY ITEMS OF BUSINESS WHICH THE CHAIR DEEMS URGENT

The chair gave notice of the following additional papers which were circulated at the meeting:

- Addendum report relating to item 6.1
- Members' pack relating to item 6.1.

#### 4. DISCLOSURE OF INTERESTS AND DISPENSATIONS

There were none.

#### 5. MINUTES

##### RESOLVED:

That the minutes of the meeting held on 5 March 2019 be approved as a correct record and signed by the Chair.

#### 6. DEVELOPMENT MANAGEMENT

##### 6.1 BUILDINGS 10 AND 11, WILLIAM BOOTH MEMORIAL TRAINING COLLEGE, CHAMPION PARK, LONDON, SE5 8BQ

##### PROPOSAL:

*Demolition of two existing buildings (Use Class C2) and erection of a part four, five and six storey multi-purpose building (maximum height of 23m), including basement, for offices (Use Class B1a) (6,747.3sqm GEA) and cafe (Use Class A3) (230.9sqm GEA), together with landscaping, boundary treatment, access and other associated works.*

The committee heard the officers' introduction to the report. Members of the committee asked questions of the officers.

There were no objectors present that wished to speak.

The applicant's agents addressed the committee, and answered questions by the committee.

There were no supporters who lived within 100 metres of the development site present at the meeting that wished to speak.

There were no ward councillors present.

The committee put further questions to the officers and discussed the application.

##### RESOLVED:

- a) That planning permission be granted, subject to conditions and the updated conditions in the addendum report and the applicant entering into a satisfactory legal agreement, and;
- b) That in the event that the legal agreement is not entered into by 19 June 2019 the Director of Planning be authorised to refuse planning permission if appropriate for the reasons set out in paragraph 120 of the report.

Meeting ended at 7.15 pm

**CHAIR:**

**DATED:**



<b>Item No.</b> 6.	<b>Classification:</b> Open	<b>Date:</b> 2 April 2019	<b>Meeting Name:</b> Planning Committee
<b>Report title:</b>		Development Management	
<b>Ward(s) or groups affected:</b>		All	
<b>From:</b>		Proper Constitutional Officer	

## RECOMMENDATIONS

1. That the determination of planning applications, or formal observations and comments, the instigation of enforcement action and the receipt of the reports included in the attached items be considered.
2. That the decisions made on the planning applications be subject to the conditions and/or made for the reasons set out in the attached reports unless otherwise stated.
3. That where reasons for decisions or conditions are not included or not as included in the reports relating to an individual item, they be clearly specified.

## BACKGROUND INFORMATION

4. The council's powers to consider planning business are detailed in Part 3F which describes the role and functions of the planning committee and planning sub-committees. These were agreed by the annual meeting of the council on 23 May 2012. The matters reserved to the planning committee and planning sub-committees exercising planning functions are described in part 3F of the Southwark Council constitution.

## KEY ISSUES FOR CONSIDERATION

5. In respect of the attached planning committee items members are asked, where appropriate:
  - a. To determine those applications in respect of site(s) within the borough, subject where applicable, to the consent of the Secretary of State for Housing, Communities and Local Government and any directions made by the Mayor of London.
  - b. To give observations on applications in respect of which the council is not the planning authority in planning matters but which relate to site(s) within the borough, or where the site(s) is outside the borough but may affect the amenity of residents within the borough.
  - c. To receive for information any reports on the previous determination of applications, current activities on site, or other information relating to specific planning applications requested by members.

6. Each of the following items are preceded by a map showing the location of the land/property to which the report relates. Following the report, there is a draft decision notice detailing the officer's recommendation indicating approval or refusal. Where a refusal is recommended the draft decision notice will detail the reasons for such refusal.
7. Applicants have the right to appeal to Planning Inspector against a refusal of planning permission and against any condition imposed as part of permission. Costs are incurred in presenting the council's case at appeal which maybe substantial if the matter is dealt with at a public inquiry.
8. The sanctioning of enforcement action can also involve costs such as process serving, court costs and of legal representation.
9. Where either party is felt to have acted unreasonably in an appeal the inspector can make an award of costs against the offending party.
10. All legal/counsel fees and costs as well as awards of costs against the council are borne by the budget of the relevant department.

#### **Community impact statement**

11. Community impact considerations are contained within each item.

#### **SUPPLEMENTARY ADVICE FROM OTHER OFFICERS**

##### **Director of Law and Democracy**

12. A resolution to grant planning permission shall mean that the director of planning is authorised to grant planning permission. The resolution does not itself constitute the permission and only the formal document authorised by the committee and issued under the signature of the director of planning shall constitute a planning permission. Any additional conditions required by the committee will be recorded in the minutes and the final planning permission issued will reflect the requirements of the planning committee.
13. A resolution to grant planning permission subject to legal agreement shall mean that the director of planning is authorised to issue a planning permission subject to the applicant and any other necessary party entering into a written agreement in a form of words prepared by the director of law and democracy, and which is satisfactory to the director of planning. Developers meet the council's legal costs of such agreements. Such an agreement shall be entered into under section 106 of the Town and Country Planning Act 1990 or under another appropriate enactment as shall be determined by the director of law and democracy. The planning permission will not be issued unless such an agreement is completed.
14. Section 70 of the Town and Country Planning Act 1990 as amended requires the council to have regard to the provisions of the development plan, so far as material to the application, and to any other material considerations when dealing with applications for planning permission. Where there is any conflict with any policy contained in the

development plan, the conflict must be resolved in favour of the policy which is contained in the last document to be adopted, approved or published, as the case may be (s38(5) Planning and Compulsory Purchase Act 2004).

15. Section 38(6) of the Planning and Compulsory Purchase Act 2004 provides that where, in making any determination under the planning Acts, regard is to be had to the development plan, the determination shall be made in accordance with the plan unless material considerations indicate otherwise. The development plan is currently Southwark's Core Strategy adopted by the council in April 2011, saved policies contained in the Southwark Plan 2007, the where there is any conflict with any policy contained in the development plan, the conflict must be resolved in favour of the policy which is contained in the last document to be adopted, approved or published, as the case may be (s38(5) Planning and Compulsory Purchase Act 2004).
16. On 15 January 2012 section 143 of the Localism Act 2011 came into force which provides that local finance considerations (such as government grants and other financial assistance such as New Homes Bonus) and monies received through CIL (including the Mayoral CIL) are a material consideration to be taken into account in the determination of planning applications in England. However, the weight to be attached to such matters remains a matter for the decision-maker.
17. "Regulation 122 of the Community Infrastructure Levy regulations (CIL) 2010, provides that "a planning obligation may only constitute a reason for granting planning permission if the obligation is:
  - a. necessary to make the development acceptable in planning terms;
  - b. directly related to the development; and
  - c. fairly and reasonably related to the scale and kind to the development.

A planning obligation may only constitute a reason for granting planning permission if it complies with the above statutory tests."

18. The obligation must also be such as a reasonable planning authority, duly appreciating its statutory duties can properly impose i.e. it must not be so unreasonable that no reasonable authority could have imposed it. Before resolving to grant planning permission subject to a legal agreement members should therefore satisfy themselves that the subject matter of the proposed agreement will meet these tests.
19. The National Planning Policy Framework (NPPF) came into force on 27 March 2012. The NPPF replaces previous government guidance including all planning practice guidance (PPGs) and planning policy statements (PPSs). For the purpose of decision-taking policies in the Core Strategy (and the London Plan) should not be considered out of date simply because they were adopted prior to publication of the NPPF. For 12 months from the day of publication, decision-takers may continue to give full weight to relevant policies adopted in accordance with the Planning and Compulsory Purchase Act (PCPA) 2004 even if there is a limited degree of conflict with the NPPF.
20. In other cases and following and following the 12 month period, due weight should be given to relevant policies in existing plans according to their degree of consistency with the NPPF. This is the approach to be taken when considering saved plan policies under the Southwark Plan 2007. The approach to be taken is that the closer the

policies in the Southwark Plan to the policies in the NPPF, the greater the weight that may be given.

## BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
Council assembly agenda 23 May 2012	Constitutional Team 160 Tooley Street London SE1 2QH	Virginia Wynn-Jones 020 7525 7055
Each planning committee item has a separate planning case file	Development Management 160 Tooley Street London SE1 2QH	Planning Department 020 7525 5403

## APPENDICES

No.	Title
None	

## AUDIT TRAIL

<b>Lead Officer</b>	Chidi Agada, Head of Constitutional Services		
<b>Report Author</b>	Everton Roberts, Principal Constitutional Officer Jonathan Gorst, Head of Regeneration and Development		
<b>Version</b>	Final		
<b>Dated</b>	25 March 2019		
<b>Key Decision?</b>	No		
<b>CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER</b>			
<b>Officer Title</b>	<b>Comments sought</b>	<b>Comments included</b>	
Director of Law and Democracy	Yes	Yes	
Director of Planning	No	No	
<b>Cabinet Member</b>	No	No	
<b>Date final report sent to Constitutional Team</b>			25 March 2019

**ITEMS ON AGENDA OF THE PLANNING COMMITTEE**

**on Tuesday 02 April 2019**

<b>Appl. Type</b>	Full Planning Application	<b>Reg. No.</b>	18-AP-1577
<b>Site</b>	ALL SAINTS ANNEXE (IMPERIAL WAR MUSEUM) AND LAND TO THE REAR, AUSTRAL STREET, LONDON, SE11 4SJ	<b>TP No.</b>	TP/1357-A
		<b>Ward</b>	St Georges
		<b>Officer</b>	Patrick Cronin

**Recommendation** GRANT PERMISSION

***Item 6/1***

**Proposal**

Construction of a three-storey building for Class D1 use (to provide offices and staff accommodation ancillary to the Imperial War Museum) within the rear yard, to incorporate rooftop plant and photovoltaics, together with the change of use of the existing All Saints Annexe building from Class D1 (ancillary to the museum) use to a mixed Class B1 (office) / Class D1 (ancillary to museum) use. The development will include hard and soft landscaping improvements, the provision of a cycle and refuse store, the provision of one accessible car parking space at the front of the All Saints Annexe building, the demolition of a portion of the site's boundary wall to Geraldine Mary Harmsworth Park and the incorporation of the replacement wall into the ground floor of the proposed building, the realignment of the access road into the site from the Park, demolition of the portakabins and other associated works.

<b>Appl. Type</b>	Listed Building Consent	<b>Reg. No.</b>	18-AP-4084
<b>Site</b>	ALL SAINTS ANNEXE (IMPERIAL WAR MUSEUM) AND LAND TO THE REAR, AUSTRAL STREET, LONDON, SE11 4SJ	<b>TP No.</b>	TP/1357-A
		<b>Ward</b>	St Georges
		<b>Officer</b>	Patrick Cronin

**Recommendation** GRANT PERMISSION

***Item 6/1***

**Proposal**

Listed Building Consent for the demolition of part of the existing boundary wall between the All Saints Annexe and Geraldine Mary Harmsworth Park and the construction of a new wall, incorporating gates and windows, in association with planning application 18/AP/1577

<b>Appl. Type</b>	Full Planning Application	<b>Reg. No.</b>	18-AP-0091
<b>Site</b>	DOCKLEY ROAD INDUSTRIAL ESTATE, 2 DOCKLEY ROAD, LONDON, LONDON SE16 3SF	<b>TP No.</b>	TP/361-128
		<b>Ward</b>	South Bermondsey
		<b>Officer</b>	Terence McLellan

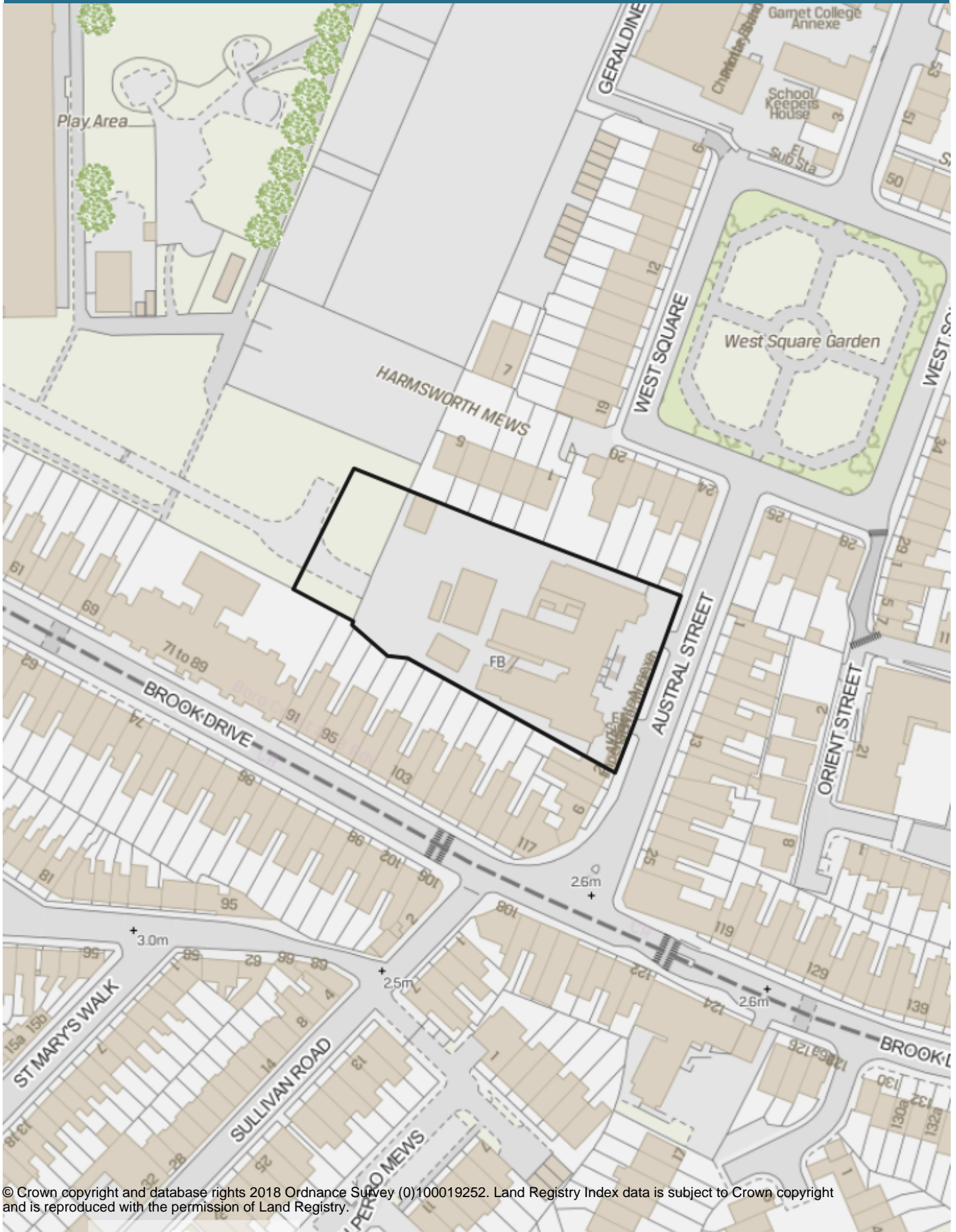
**Recommendation** GRANT SUBJECT TO LEGAL AGREEMENT

***Item 6/2***

**Proposal**

Demolition of the existing industrial units and redevelopment to provide a building ranging from one to nine storeys (32.55m AOD and 29.9m above ground) in height accommodating 1,093sqm of commercial floorspace at ground floor level incorporating industrial use (Use Class B8); retail uses (Use Class A1); and restaurants and cafe uses (Use Class A3) and 111 residential units (Class C3) at upper levels with associated works, including landscaping and 3 disabled car parking spaces.

ALL SAINTS ANNEXE (IMPERIAL WAR MUSEUM) AND LAND TO THE REAR, AUSTRAL STREET, SE16 2ET



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50 m

Scale = 1250

27-Sep-2018



<b>Item No.</b> 6.1	<b>Classification:</b> Open	<b>Date:</b> 2 April 2019	<b>Meeting Name:</b> Planning Committee
<b>Report title:</b>	<p><b>Development Management planning application:</b> Application 18/AP/1577 for Full Planning Permission, and; Application 18/AP/4084 for Listed Building Consent</p> <p><b>Address:</b> ALL SAINTS ANNEXE (IMPERIAL WAR MUSEUM) AND LAND TO THE REAR, AUSTRAL STREET, LONDON, SE11 4SJ</p> <p><b>Proposal:</b> Full Planning Permission for: Construction of a three-storey building for Class D1 use (to provide offices and staff accommodation ancillary to the Imperial War Museum) within the rear yard, to incorporate rooftop plant and photovoltaics, together with the change of use of the existing All Saints Annexe building from Class D1 (ancillary to the museum) use to a mixed Class B1 (office) / Class D1 (ancillary to museum) use. The development will include hard and soft landscaping improvements, the provision of a cycle and refuse store, the provision of one accessible car parking space at the front of the All Saints Annexe building, the demolition of a portion of the site's boundary wall to Geraldine Mary Harmsworth Park and the incorporation of the replacement wall into the ground floor of the proposed building, the realignment of the access road into the site from the Park, demolition of the portakabins and other associated works.</p> <p>Listed Building Consent for: The demolition of part of the existing boundary wall between the All Saints Annexe and Geraldine Mary Harmsworth Park and the construction of a new wall, incorporating gates and windows, in association with planning application 18/AP/1577</p>		
<b>Ward(s) affected:</b>	St George's		
<b>From:</b>	Director of Planning		
<b>Application Start Date</b> 03/05/2018		<b>Application Expiry Date</b> 02/08/2018	
<b>Earliest Decision Date</b> 16/06/2018		<b>Committee Date</b>	

### RECOMMENDATION

1. That full planning permission be granted for 18/AP/1577, subject to conditions.
2. That listed building consent be granted for 18/AP/4084, subject to conditions.

### SUMMARY OF EVENTS SINCE THE DEFERRAL OF 18/AP/1577 ON 9 OCTOBER 2018

#### The deferral of 18/AP/1577

3. 18/AP/1577 was originally submitted without an accompanying Listed Building Consent application on the understanding that the existing boundary wall between the All Saints Annexe and Geraldine Mary Harmsworth Park, which the proposed development sought to demolish and replace, was not curtilage listed. 18/AP/1577

was brought by officers to the Main Planning Committee on 9 October 2018 with a recommendation that planning permission be granted.

4. In the days immediately prior to the Committee meeting, the Local Planning Authority received information from a number of sources, some suggesting that the wall was curtilage listed and some suggesting otherwise. Curtilage listing is a complex assessment. Given the conflicting nature of the information and the varied condition of the wall, officers took a cautious view and decided to treat the wall as if it were listed. Accordingly, officers advised Members at the Committee meeting that a separate application for Listed Building Consent would be required but that this additional requirement need not impede Members in determining the planning application. Any planning permission would not authorise any works to the wall, and no works could be carried out to the wall unless and until Listed Building Consent had been granted.
5. At the Committee meeting three residents made representations in objection to the application, as did Councillor Linforth-Hall and Councillor Neale. The objections related not only to the status of the wall, but also to the potential impact of the new building on the amenity of neighbours, particularly the impact on privacy.
6. The Committee resolved to defer the determination of 18/AP/1577 pending further clarification about the Listed status of the boundary wall, and the submission of a Listed Building Consent application for the works to the wall. Members of the Committee also considered that the proposal should be amended to include frosting/obscuring of the windows on the northeast and southwest elevations at first- and second-floor level, expressing a preference for such frosting/obscuring to be applied to a height of 2 metres above the internal floor level.

#### Application for Listed Building Consent

7. The applicant submitted a Listed Building Consent application in December 2018, the reference number for which is 18/AP/4084. The application proposes the demolition of the 34 metre stretch of the boundary wall between All Saints Annexe and Geraldine Mary Harmsworth Park and the construction of a new wall in its place. The new wall would contain three window openings along its central portion where it forms part of the proposed building. It would be finished in vertically-bonded brickwork of a light grey-yellow tone to match the brick proposed for the new building. The historic cast iron plaque identifying the ownership of the Bethlem Royal Hospital grounds would be removed from the existing wall and reattached to the replacement wall.

#### Amendments to the design of the proposal

8. In light of the deferral and in addition to applying for Listed Building Consent, the applicant has amended the design of the proposed building in the following ways:
  - Reducing the overall number of windows—in particular the larger ‘picture’ windows— on the southwest and northeast elevations, and proposing in their place recessed brickwork panels featuring vertically-laid corduroy bonding;
  - Proposing an irremovable graduated treatment to all first- and second-floor glazing on the southwest and northeast elevations to partially obscure views outward towards the neighbouring dwellings;
  - Altering the design of the ‘slot window’ reveals by omitting the chocolate coloured brick and by chamfering only the cill (the original scheme proposed that all ‘slot windows’ would have chamfered sides as well as a chamfered cill);
  - Re-designing the ‘pop-out’ window at first floor level on the western corner of the building so that it now sits within the envelope of the building, and;
  - Removing the back-up refuse store from the single-storey structure adjacent to the boundary wall shared with the Harmsworth Mews properties, instead locating



it within the plaza on the southern side of the proposed building.

#### Additional consultation

9. Representatives of the Imperial War Museum (IWM) held a meeting on-site on December 4 2018 with the West Square Residents' Association and the Harmsworth Mews Residents' Association, during which a sample was shown of the proposed graduated obscuring treatment. A further meeting was held between representatives of IWM and these residents on January 17 2019 to discuss the evolution of the proposed development in light of the December meeting. Subsequent to each meeting, IWM sent the residents a letter summarising the discussions.
10. In light of the discussions with residents, the applicant submitted their amended proposals for the planning application alongside an application for Listed Building Consent. The Local Planning Authority carried out neighbour consultation on the listed building consent and neighbour re-consultation on the amended planning application. In each case, two formal responses (one in support and one in objection) were received. The material planning considerations raised by the representations are detailed in the *'Engagement with, and consultation responses from, members of the public'* section of this Committee Report.
11. The representations in support of the listed building consent and amended planning application were submitted by the Chairs of the West Square Residents' Association and the Harmsworth Mews Residents' Association. These representations stated that the Chairs now took the view that "the amended planning application and Listed Building Consent application provide the best achievable outcome for local residents" and that they "accordingly support these applications". The full content of the comment can be viewed on the Register.

#### Scope of this Committee Report

12. For the sake of completeness, this Committee Report addresses all the relevant planning issues in the same level of detail as the Report presented to Members at the 9 October 2018 Committee meeting, even where matters have remained unchanged. This Report also provides a comprehensive assessment of the application for Listed Building Consent, 18/AP/4084.
13. The respects in which this assessment differs substantively from that set out in the Report presented at the 9 October 2018 Committee are:
  - Details of proposal  
Paragraphs 32 to 48
  - Planning policy  
Paragraphs 52 to 60
  - Overlooking [within the 'Impact on the amenity of adjoining occupiers' chapter]  
Paragraphs 92 to 104
  - Quality of design  
Paragraphs 135 to 153
  - Impact on the curtilage listed wall and its contribution to other heritage  
Paragraphs 154 to 164
  - Refuse storage and collection arrangements [within the 'Transport, highways and servicing matters' chapter]

Paragraphs 184 to 187

- Trees and landscaping  
Paragraphs 198 to 200
- Engagement with, and consultation responses from, members of the public  
Paragraphs 222 to 245
- Consultation responses: Statutory consultees  
Paragraphs 246 to 252

## **BACKGROUND INFORMATION**

### **Site location and description**

14. The application site comprises a late nineteenth century three-winged building of three storeys with a raised basement, known as the All Saints Annexe, currently in a use as ancillary floorspace to the nearby Imperial War Museum London (IWML). The All Saints Annexe provides office floorspace and houses the Museum's photography, film and video archive as well as the organisation's computer servers. The site includes a forecourt, accessways along either side of the building, and a large rear yard in which portakabins and several shipping containers currently stand. There is also an emergency generator associated with the IT servers located to the rear of the All Saints Annexe. The three boundaries to the north, south and west of the site are all formed of high masonry walls.
15. The application site also includes a 0.05 hectare portion of the Geraldine Mary Harmsworth Park adjacent to the site's north-western boundary, as well as a stretch of wall separating the yard from the park of approximate length 24 metres. It is known that the wall once formed the boundary between the Annexe and King Edward's School, the latter having been demolished circa 1930. Despite extensive research and an analysis of the bricks which has shown large sections to have been constructed of 19th century stocks, the exact date of the wall remains unknown. The wall is not mentioned in the statutory list description for the Imperial War Museum (Former Bethlem Royal Hospital) and did not form the perimeter, which is further west. Additionally, the applicant has not been able to establish whether the wall ever had a functional relationship with this building. However, given that there is no firm evidence to conclude definitively that the wall is not curtilage listed; the Local Planning Authority has adopted a cautious approach of treating the wall as being curtilage listed.

16.



Figure 1: The 34 metre stretch of the boundary wall to IWML, as seen from within Geraldine Mary Harmsworth Park, which forms the north western perimeter to the application site

17. The site is bounded by:

- residential properties numbering 20-24 West Square and 1-5 Harmsworth Mews to the northeast;
- the highway of Austral Street to the southeast;
- residential properties numbering 91-111 (odds) Brook Drive, the garden of 71-89 Brook Drive and 2 Austral Street to the southwest;
- Geraldine Mary Harmsworth Park to the northwest, beyond which is IWML.



Figure 2: Site location plan, showing the boundaries of the application site edged in red. The 0.05 hectare area of Geraldine Mary Harmsworth Park, which is owned and managed by Southwark Council, can be seen within the top left hand portion of the red line boundary.

18. To the south and east of the site, surrounding uses are predominantly residential. In the vicinity of the site to the north and west, a mixture of residential, educational, cultural and open space uses can be found. The housing stock in the nearby area, including those dwellings which adjoin the application site to the north and south, is prevaillingly three or four-storeyed. In the main part, it is only the few non-residential buildings —namely the All Saints Annexe itself, IWML and the Charlotte Sharman School— which are taller.
19. The site is located within the:
  - Central Activities Zone (CAZ);
  - Elephant and Castle Opportunity Area;
  - Borough, Bermondsey and Rivers Archaeological Priority Zone;
  - Air Quality Management Area;
  - Elephant and Castle Major Town Centre, and;
  - Flood Zone 3 (area benefitting from flood defences).
20. The site is located within the West Square Conservation Area, the Appraisal for which identifies the All Saints Annexe as a key unlisted building. The site lies approximately 5 metres to the northwest of the Elliott's Row Conservation Area. Two other conservation areas, both of which are within the Borough of Lambeth, lie within the surrounding area: Walcot, which is approximately 30 metres southwest of the site, and Lambeth Walk and China Walk, which is approximately 220 metres to the west.
21. Within 100 metres of the site are the following listed structures:
  - nos. 6-45 West Square and attached railings (Grade II);
  - nos. 1-7 Orient Street and attached railings (Grade II),
  - Charlotte Sharman School (Grade II), and;
  - IWML (Grade II).
22. Geraldine Mary Harmsworth Park is designated as a Site of Importance for Nature Conservation and all but a small pocket of land in the park's southern corner (immediately to the northwest of the application site) is designated as Metropolitan Open Land. The submission version of the New Southwark Plan seeks to designate this small portion of the park, which historically contained an outdoor swimming pool, as Metropolitan Open Land.
23. The application site accommodates eight trees: four on the forecourt and four within the rear yard. Those on the forecourt are high value (grade A) specimens, while those in the rear yard are of moderate value (grade B).
24. The application site lies within the background of LVMF Protected View 23.A, which is the view towards Westminster from the bridge over the Serpentine at Hyde Park.
25. It has a Public Transport Accessibility Level (PTAL) of 6b where 1 is the lowest level and 6b the highest. Within easy walking distance are Lambeth North and Waterloo Stations to the north-west, and Elephant and Castle Station to the east. Southwark and Kennington Underground Stations can be found further away to the north and south respectively. A number of bus services operate along Kennington Road, Lambeth Road, and St George's Road. There are four London Cycle hire docking stations located nearby on Kennington Road, Walnut Tree Walk, Geraldine Street and Gaywood Street. A controlled parking zone designation applies locally.
26. The centreline of Brook Drive, which lies approximately 50 metres to the southwest of the site, demarcates the Borough of Southwark from the Borough of Lambeth.

## **Background to the proposal**

27. The IWML is the flagship branch of the Imperial War Museums. In addition to IWML, the charity's estate comprises the Imperial War Museum North, the Imperial War Museum Duxford, the Churchill Museum and Cabinet War Rooms, and HMS Belfast. IWML also acts as the administrative headquarters.
28. In 2007, the IWM Board of Trustees agreed that major capital investment was required at the IWML in order to address significant deficiencies and ensure the charity remains fit for purpose in the 21st century. The museum produced a spatial masterplan to identify how IWML could be transformed to improve existing facilities, optimise the visitor experience, and ensure the long term sustainability of the museum's flagship branch.
29. A key conclusion of the masterplan exercise was that the existing layout and room configuration of the All Saints Annexe no longer meets the operational needs of IWM. To attempt to meet these needs by converting or modernising of the premises would require substantial investment and likely prove unsuccessful in any case. The spatial masterplan exercise brought IWM to the conclusion that developing the rear yard of the All Saints Annexe was the most appropriate way to deliver purpose-built modern and flexible workspace better suited to the charity's working practices and long-term needs. Such a new building would fulfil a long-held aim of IWM to accommodate in a single location the core creative and administrative teams for the wider Imperial War Museum estate, who are currently split across a number of sites.
30. The new building would free-up the All Saints Annexe for an alternative purpose to which it is better lent functionally and spatially. Liability for the maintenance of the ageing All Saints Annexe would be transferred to the new tenant and the rent would be used to offset the running costs of the new build. IWM would retain the freehold of the All Saints Annexe.
31. The masterplan comprises the following phases:
  - Phase 1: Refurbishment of IWML and creation of the First World War galleries [completed in 2014].
  - Phase 2: Creation of new Second World War Galleries and The Holocaust Gallery [due to commence imminently, following the granting of listed building consent and planning permission in April 2018]
  - Phase 3: Creation of new and fit-for-purpose accommodation in which all IWM staff can be located
  -

As such, the works for which 18/AP/1577 seeks planning permission would realise the final phase of the IWM masterplan.

## **Details of proposal**

32. The proposal comprises two distinct parts:
  - the construction of a three-storey building containing workspace for IWM staff within the yard at the rear of the All Saints Annexe, and;
  - the change of use of the All Saints Annexe from Class D1 (ancillary to the museum) to a mixed Class B1 (office) / Class D1 (ancillary to museum) use.

Details of each part follow below.

Construction of a three-storey building within the rear yard

33. It is proposed to redevelop the yard to the rear of the All Saints Annexe through the construction of a three-storey building with rooftop plant to provide offices and staff accommodation ancillary to the IWML. In total, the proposal would deliver 1063 square metres (GIA) of floorspace. The works would include the demolition of the existing portakabins and the removal of the shipping containers.
34. The proposed building would be articulated in two parts. The main volume would be three storeyed and flat-roofed with a raised parapet. The second element, which would assume the role of an entrance pavilion, would similarly be flat roofed but two-storeyed and of a much smaller footprint.
35. The main body of the building, measuring a maximum width of 27.6 metres and a maximum length of 17.7 metres, would be oriented so that its long axis runs broadly parallel to the terraces of housing to the northeast and southwest. It would stand 12.975 metres high to the parapet level and 13.975 metres high to the top of the plant. A gap of 6.4 metres would separate the building's southeast elevation from the nearest part of the existing All Saints Annexe. Along its north-western edge, the building would extend up to the common boundary with the park at ground floor level, but the upper two storeys would be set-back by a widening distance of 1.7 to 2.8 metres. A range of bronze-framed windows would be dispersed across the brick-faced elevations.
36. The entrance pavilion would be of a rectangular footprint, measuring 12.2 metres long and 3.9 metres wide. Standing 7.5 metres high at its maximum point, it would, like the main body of the building, be flat-roofed. The entrance pavilion would be clad in curtain walling, some of which would be opaque —such as the entire first floor level of the south-west elevation— and some of which would be clear glazed. The walling would be clad externally with a regular array of deep protruding bronzed aluminium fins, which would break only around the building's main entrance on the northwest elevation.

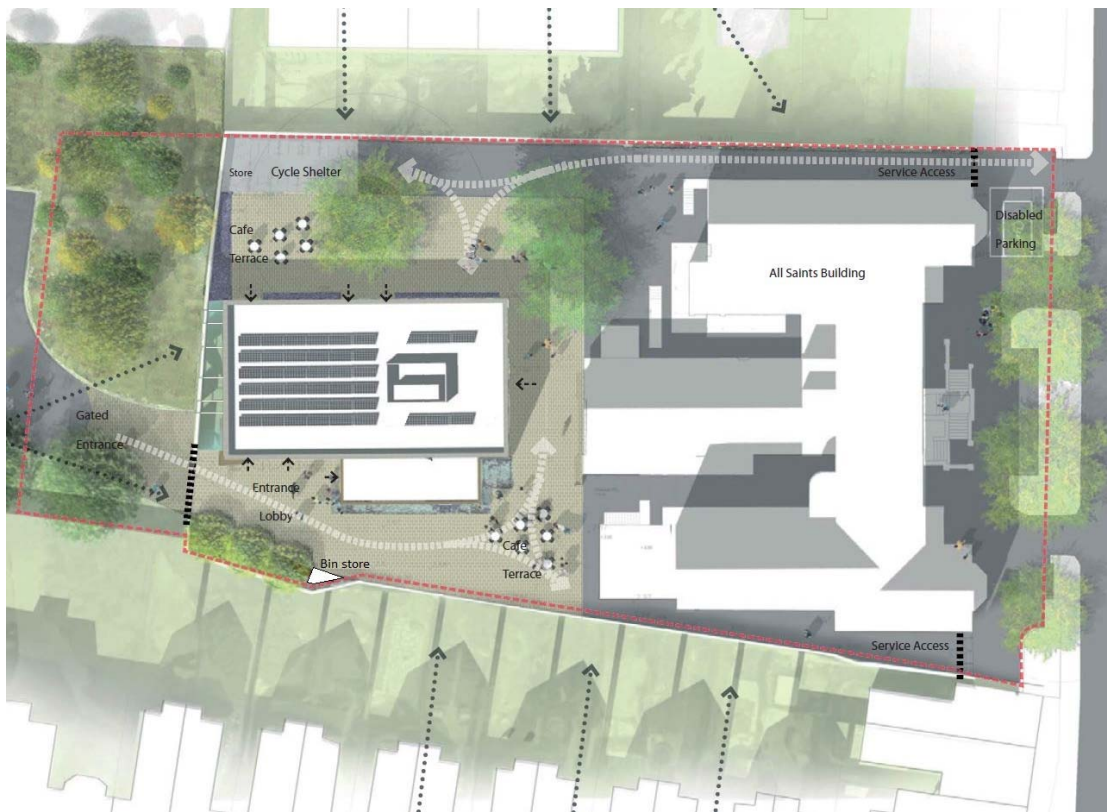


Figure 3: Illustrative site layout, showing the relationship of the proposed building to the existing All Saints Annexe.

37. The accommodation within the building would be arranged over three floors. The ground floor would be given over to canteen/café space (not open to the general public), meetings areas and the reception. The upper two floors would comprise open plan workspace and a small number of meeting rooms. Toilets and other ancillary facilities would be located on all floors, with a lift and staircore to provide vertical circulation, and a hatch positioned above the staircore to facilitate access to the roof for maintenance purposes.



Figure 4: The southwest elevation of the proposed building, featuring a mixture of glazed (but fitted with graduated obscuring treatment) and brick-faced panels.

38. Photovoltaic panels would be positioned on the roof, and all would sit beneath the building's parapet. Mechanical cooling plant, occupying an area measuring 3.2 metres

wide and 6.0 metres long, would also be located on the roof and housed in acoustic screening. The structure would be positioned towards the southeastern end of the roof, set-in by identical distances from the building's northeast and southwest edges. The acoustic screening, which would be bronzed aluminium to match the window frames and pavilion fins, would stand proud of the parapet by 1.0 metre. A biodiverse blanket green roof would cover approximately 80% of the surface area of the roof.

39. As part of the construction of the proposed building, the boundary wall separating the site from Geraldine Mary Harmsworth Park, which is considered to be curtilage listed by reason of its relationship to the Grade II listed IWML, would be demolished. In its place, a new wall would be constructed in grey-yellow brick to a height of 3.1 metres. Contained within the central stretch of the wall would be three windows, while towards the wall's southwestern end would be a double leaf pedestrian and vehicle gate providing access between the site and the park.
40. The siting of the building would create two main areas of external space — one area on the building's north-eastern side and one on its south-western side. On the south-western side of the proposed building, an entrance plaza capable of doubling-up as a 'spill-out space' for the canteen/café is proposed. This plaza would be hard-surfaced using clay brick of varying colours which reflect the building façade. The external realm would be for the sole use of the IWM workforce and would not be publicly-accessible.
41. As deliveries to the canteen would be via the alleyway running along the north-east side of the All Saints Annexe building, the external realm to the north-eastern side of the proposed building would be a more functional external space than the plaza. It is proposed to locate a single-storey structure for the storage of cycles within the open space to the north-eastern side of the new building alongside the high boundary wall to the Harmsworth Mews properties. This timber-clad shelter would have a monopitched roof with a ridge of height 2.6 metres.
42. A small refuse store would be located on the southwestern edge of the application site, close to the gates connecting the site to Geraldine Mary Harmsworth Park. The refuse store would be used only on the occasion that a bin bag's worth of refuse is generated after the daily transfer by cart from the building to IWML has occurred. As such, the maximum period of time refuse would be in the store is one day. It was previously proposed to store refuse within the single-storey timber structure on the northeastern side of the building, but the applicant has decided to make this change to the scheme in response to concerns raised by neighbours and Committee Members. Placing the store on the southern side of the building would also have the effect of shortening the journey time of the waste transfer cart between the site and IWML.
43. The layout of the site has been driven by the desire to retain the mature trees on the northern half of the yard which have high amenity value. Further tree planting is proposed within a raised bed along a section of the site's south-western boundary, together with border shrubbery and planting around the building's perimeter.
44. In the south-eastern corner of the park, due to the new gate being in a slightly different position to the existing gate, it is proposed to realign the final few metres of the tarmacadam access road. A scheme of re-planting is proposed directly in front of the rebuilt boundary wall within Geraldine Mary Harmsworth Park.
45. One accessible parking space would be located in the forecourt of the All Saints Annexe.



Change of use of the All Saints Annexe

46. In tandem with seeking permission for the construction of a building within the rear yard, this planning application seeks permission to change the use of the All Saints Annexe from wholly Class D1 (ancillary-to-museum) to 'mixed' Class B1 (office) / Class D1 (ancillary-to-museum). The change of use would apply to all 2,476 squares metres (GIA) of floorspace within the building.
47. This 'mixed' use would allow Class B1 and Class D1 functions to take place in the building concurrently, or it would enable the use of the whole space for either Class B1 or Class D1. This would facilitate the building's leasing out to a future tenant for office accommodation or, alternatively, it would enable IWM to occupy the building again in the future if required without needing to seek permission to revert the premises to Class D1. There are no other physical changes proposed to the All Saints Annexe as part of this application.
48. Although reconfiguration of the existing All Saints Annexe may be necessary to suit the needs of the new tenant, these works do not form part of this planning application and permission will be sought separately at a later time if required.

**Planning history**

49. The following planning history exists for the application site:

<p>Application reference no.: 95/AP/0389          Application type: Full Planning Permission (FUL)</p> <p><i>Erection of 3 storey rear extension to Museum to form storage area, workshops and associated offices</i></p> <p>Decision date: 22.08.1995          Decision: <b>Granted (GRA)</b></p> <p>Notes: This permission was not implemented.</p>
<p>Application reference no.: 98/AP/1109          Application type: Full Planning Permission (FUL)</p> <p><i>Construction of new basement below previously approved (22.8.95 LBS Reg.No. 9500389) 3 storey rear extension.</i></p> <p>Decision date: 22.08.1995          Decision: <b>Granted (GRA)</b></p> <p>Notes: This permission was not implemented.</p>

<p>Application reference no.: 00/AP/0069 Application type: Full Planning Permission (FUL)</p> <p><i>1. Demolition of part existing building and erection of 4/part 3 storey rear extension to form workshops, offices, archive storage and visitor facilities, together with erection of small extension to existing electricity sub-station and access ramp at front of building.</i></p> <p><i>2. Erection of separate two storey temporary building on north-east side of site and two small temporary stores and enclosing screen at front of main building for limited period.</i></p> <p>Decision date: 14.12.2000 Decision: <b>Granted (GRA)</b></p> <p>Notes: This permission was not implemented.</p>
<p>Application reference no.: 12/AP/0778 Application type: Full Planning Permission (FUL)</p> <p><i>Provision of new windows and a double door to give access to the basement from the South Elevation</i></p> <p>Decision date: 03.05.2012 Decision: <b>Granted (GRA)</b></p>
<p>Application reference no.: 13/AP/1699 Application type: Full Planning Permission (FUL)</p> <p><i>Installation of a platform lift to front entrance steps to improve accessibility to the building for wheelchair users</i></p> <p>Decision date: 19.08.2013 Decision: <b>Granted (GRA)</b></p>
<p>Application reference no.: 14/AP/1445 Application type: Full Planning Permission (FUL)</p> <p><i>Installation of emergency diesel generator, reinforced concrete base pad and acoustic enclosure located within the rear yard service compound</i></p> <p>Decision date: 02.02.2015 Decision: <b>Granted (GRA)</b></p>
<p>Application reference no.: 16/AP/4684 Application type: Non-material Amendment (VNMC)</p> <p><i>Non-material amendment to Condition 4 (materials) of permission 16/AP/1596 to amend the external finished colour of the diesel generator container and associated external input and output attenuators from the specified manufacturers standard colour [...]</i></p> <p>Decision date: 08.12.2016 Decision: <b>Agreed</b></p>

<p>Application reference no.: 16/AP/1596  Application type: Minor Material Amendment (VMC)</p> <p><i>Minor material amendments to Condition 1 (approved drawings) of planning permission 14/AP/1445 for the 'Installation of emergency diesel generator, reinforced concrete base pad and acoustic enclosure located within the rear yard service compound' to [...]</i></p> <p>Decision date: 07.10.2016  Decision: <b>Granted (GRA)</b></p>
<p>Application reference no.: 17/AP/3195  Application type: Tree Works</p> <p><i>(T1) London Plane - Fell as it is currently undermining the foundations of the listed wall, repairs to be made to the foundations of the wall will require the complete removal of the tree and the roots</i></p> <p>Decision date: 27.09.2017  Decision: <b>Works acceptable - no intervention (WANI)</b></p>
<p>Application reference no.: 17/EQ/0448  Application type: Pre-Application Enquiry (ENQ)</p> <p><i>Construction of a building of either three or four storeys on land at the rear of the All Saints Annexe, to comprise administration space for use by the Imperial War Museums (Class D1); change of use of the existing All Saints Annexe (Class D1) to a mixed office/ancillary-to-museum (Class B1/D1) use over all floors.</i></p> <p>Decision date: 14.02.2018  Decision: <b>Pre-application enquiry closed (EQC)</b></p>

50. There are no relevant cases of planning history locally except for these at IWML:

<p>Application reference no.: 12/AP/0696  Application type: Full Planning Permission (FUL)</p> <p><i>Refurbishment works comprising opening up of the existing brick arches on the west facade, creation of an ancillary cafe terrace and installation of minor plant on the roof and within the rear service yard</i></p> <p>Decision date: 08/05/2012  Decision: <b>Granted (GRA)</b></p>
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<p>Application reference no.: 12/AP/0699 Application type: Listed Building Consent (LBC)</p> <p><i>Refurbishment works comprising opening up of the existing brick arches on the west facade, ancillary cafe terrace and internal relocation of existing cafe to the west wing. Internal works to central atrium including insertion of tapered structural fins, removal of B floor, introduction of temporary stair and insertion of new floor in atrium void at E floor. Alterations and improvements to central circulation core including removal of north wall and insertion of new lifts and stair. Refurbishment of existing galleries to create First World War galleries at A floor and extended galleries at B and C floors.</i></p> <p>Decision date: 08/05/2012 Decision: <b>Granted (GRA)</b></p>
<p>Application reference no.: 18/AP/0312 Application type: Full Planning Permission (FUL)</p> <p><i>Refurbishment of windows, including new vents on East, South and West elevations.</i></p> <p>Decision date: 06.04.2018 Decision: <b>Granted (GRA)</b></p>
<p>Application reference no.: 18/AP/0313 Application type: Pre-Application Enquiry (ENQ)</p> <p><i>Internal re-configuration works to create new Second World War Galleries, Holocaust Galleries and learning and event spaces with refurbishment of windows, including new vents on East, South and West elevations.</i></p> <p>Decision date: 06.04.2018 Decision: <b>Granted (GRA)</b></p>

## KEY ISSUES FOR CONSIDERATION

### Summary of main issues

51. The main issues to be considered in respect of this application are:
- a. Preliminary principle of development matters;
  - b. Principle of development in terms of land use and conformity with strategic policies;
  - c. Environmental impact assessment;
  - d. Impact of adjoining and nearby uses on occupiers and users of proposed development;
  - e. Impact on the amenity of adjoining occupiers;
  - f. Quality of design;
  - g. Impact on the curtilage listed wall and its contribution to other heritage assets;
  - h. Impact on the West Square Conservation Area and the setting of nearby heritage assets;
  - i. Impact on views in the London View Management Framework;
  - j. Impact on the Metropolitan Open Land;
  - k. Transport, highways and servicing matters;
  - l. Flood risk and sustainable urban drainage;
  - m. Trees and landscaping;
  - n. Biodiversity and ecology;

- o. Environmental matters;
- p. Construction impacts;
- q. Sustainability;
- r. Planning obligations;
- s. Engagement with, and consultation responses from, members of the public;
- t. Consultation responses from statutory consultees.

### **Planning policy and legislation**

#### National Planning Policy Framework (the Framework) 2019

- 52. Chapter 2 - Achieving Sustainable Development
- Chapter 4 - Decision-making
- Chapter 6 - Building a Strong, Competitive Economy
- Chapter 7 - Ensuring the Vitality of Town Centres
- Chapter 8 - Promoting Healthy and Safe Communities
- Chapter 9 - Promoting Sustainable Transport
- Chapter 11 - Making Efficient Use of Land
- Chapter 12 - Achieving Well-designed Places
- Chapter 13 - Meeting the Challenge of Climate Change, Flooding and Coastal Change
- Chapter 15 - Conserving and Enhancing the Natural Environment
- Chapter 16 - Conserving and Enhancing the Historic Environment

#### The London Plan 2016

- 53. Policy 1.1 - Delivering the Strategic Vision and Objectives for London
- Policy 2.1 - London in its global, European and United Kingdom context
- Policy 2.5 - Sub-regions
- Policy 2.10 - Central Activities Zone - Strategic Priorities
- Policy 2.11 - Central Activities Zone - Strategic Functions
- Policy 2.12 - Central Activities Zone - predominantly local activities
- Policy 2.13 - Opportunity Areas and Intensification Areas
- Policy 2.15 - Town Centres
- Policy 4.1 - Developing London's Economy
- Policy 4.2 - Offices
- Policy 4.3 - Mixed Use Development and Offices
- Policy 4.5 - London's Visitor Infrastructure
- Policy 4.6 - Support for Enhancement of Arts, Culture, Sport and Entertainment
- Policy 4.7 - Retail and town centre development
- Policy 4.12 - Improving Opportunities for All
- Policy 5.1 - Climate Change Mitigation
- Policy 5.2 - Minimising Carbon Dioxide Emissions
- Policy 5.3 - Sustainable Design and Construction
- Policy 5.5 - Decentralised Energy Networks
- Policy 5.6 - Decentralised Energy in Development Proposals
- Policy 5.7 - Renewable Energy
- Policy 5.9 - Overheating and Cooling
- Policy 5.10 - Urban Greening
- Policy 5.11 - Green Roofs and Development Site Environs
- Policy 5.12 - Flood Risk Management
- Policy 5.13 - Sustainable Drainage
- Policy 5.15 - Water Use and Supplies
- Policy 5.17 - Waste Capacity
- Policy 5.18 - Construction, Excavation and Demolition Waste
- Policy 5.21 - Contaminated Land
- Policy 6.1 - Strategic Approach (Transport)

- Policy 6.2 - Providing Public Transport Capacity and Safeguarding Land for Transport
- Policy 6.3 - Assessing effects of development on transport capacity
- Policy 6.9 - Cycling
- Policy 6.10 - Walking
- Policy 6.11 - Smoothing Traffic Flow and Tackling Congestion
- Policy 6.12 - Road Network Capacity
- Policy 6.13 - Parking
- Policy 7.3 - Secured by Design
- Policy 7.4 - Local Character
- Policy 7.5 - Public Realm
- Policy 7.6 - Architecture
- Policy 7.8 - Heritage Assets and Archaeology
- Policy 7.14 - Improving Air Quality
- Policy 7.17 - Metropolitan Open Land
- Policy 7.19 - Biodiversity and Access to Nature
- Policy 7.21 - Trees and Woodlands
- Policy 8.2 - Planning Obligations
- Policy 8.3 - Community Infrastructure Levy

Mayor of London: Accessible London: Achieving an Inclusive Environment (SPG, 2004)

Mayor of London: Shaping Neighbourhoods - Character and Context (SPG, 2014)

Mayor of London: Sustainable Design and Construction (SPG, 2014)

Mayor of London: Social Infrastructure (SPG, 2015)

Mayor of London: Transport Strategy (2010)

Mayor of London: Climate Change Mitigation and Energy Strategy (2011)

Mayor of London: Climate Change Adaptation Strategy (2011)

Mayor of London: Central Activities Zone (SPG, 2016)

### Core Strategy 2011

- 54. Strategic Targets Policy 1 - Achieving Growth
- Strategic Targets Policy 2 - Improving Places
- Strategic Policy 1 - Sustainable Development
- Strategic Policy 2 - Sustainable Transport
- Strategic Policy 4 - Places for Learning, Enjoyment and Healthy Lifestyles
- Strategic Policy 10 - Jobs and Businesses
- Strategic Policy 11 - Open Spaces and Wildlife
- Strategic Policy 12 - Design and Conservation
- Strategic Policy 13 - High Environmental Standards
- Strategic Policy 14 - Implementation and Delivery

### Southwark Plan 2007 (July) - saved policies

- 55. The Council's cabinet on 19 March 2013, as required by paragraph 215 of the NPPF, considered the issue of compliance of Southwark Planning Policy with the National Planning Policy Framework. All policies and proposals were reviewed and the Council satisfied itself that the policies and proposals in use were in conformity with the NPPF. The resolution was that with the exception of Policy 1.8 (location of retail outside town centres) in the Southwark Plan all Southwark Plan policies are saved. Therefore due weight should be given to relevant policies in existing plans in accordance to their degree of consistency with the NPPF.

Policy 1.1 - Access to Employment Opportunities

Policy 1.7 - Development within Town and Local Centres

Policy 1.11 - Arts, Culture and Tourism Use

- Policy 2.1 - Enhancement of Community Facilities
- Policy 2.5 - Planning Obligations
- Policy 3.1 - Environmental Effects
- Policy 3.2 - Protection of Amenity
- Policy 3.3 - Sustainability Assessment
- Policy 3.4 - Energy Efficiency
- Policy 3.6 - Air Quality
- Policy 3.7 - Waste Reduction
- Policy 3.9 - Water
- Policy 3.11 - Efficient Use of Land
- Policy 3.12 - Quality in Design
- Policy 3.13 - Urban Design
- Policy 3.14 - Designing Out Crime
- Policy 3.15 - Conservation of the Historic Environment
- Policy 3.17 - Listed Buildings
- Policy 3.18 - Setting of Listed Buildings, Conservation Areas and World Heritage Sites
- Policy 3.19 - Archaeology
- Policy 3.28 - Biodiversity
- Policy 5.1 - Locating Developments
- Policy 5.2 - Transport Impacts
- Policy 5.3 - Walking and Cycling
- Policy 5.6 - Car Parking
- Policy 5.7 - Parking Standards for Disabled People and the Mobility Impaired

#### Relevant Supplementary Planning Documents and Conservation Area Appraisals

56. Sustainable Design and Construction (SPD, 2009)  
 Sustainable Transport (SPD, 2010)  
 Design and Access Statements (SPD, 2007)  
 Section 106 Planning Obligations / Community Infrastructure Levy (SPD, 2015)  
 Sustainability Assessment (SPD, 2009)  
 Elephant and Castle (SPD & OAPF, 2012)  
 West Square Conservation Area Appraisal (2013)

#### New Southwark Plan

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

#### Draft New London Plan

58. The draft New London Plan was published on 30 November 2017 and the first and only stage of consultation closed on 2 March 2018. Minor suggested changes to the plan were published on 13 August 2018 and an Examination in Public (EIP) began on 15 January 2019. The EIP will continue until May 2019 and until the London Plan reaches formal adoption it can only be attributed limited weight.

Listed Building and Conservation Areas Act 1991

59. Listed Building Consent is considered under the terms of the Listed Building and Conservation Areas Act 1991 [the Act] as amended and updated. The main principles of the Act are repeated in the NPPF (2019), and reinforced by the council's policies, and associated guidance documents. The main issue in these cases is the effect of the proposal on the special architectural and historic interest of the listed building/structure.
60. The Act places great weight on the 'special interest' of heritage assets and their settings, and stresses the importance of preserving and enhancing their architectural and historic significance.

**Preliminary principle of development: establishing the lawful use of the site**

61. The existing lawful use of the All Saints Annexe, and indeed whether it is ancillary to the main IWML site, has not been established as part of any previous planning applications. It is necessary, therefore, to establish the existing lawful use of the site by determining whether it is a standalone planning unit or ancillary to the nearby IWML.
62. Case law confirms that incidental or ancillary uses are *"uses which are subservient to a primary use taking place within the same planning unit"*. Importantly, one single planning unit may comprise physically separate and distinct areas, provided the areas are used for similar and related purposes. As such, it does not automatically follow that the All Saints Annexe site is a separate planning unit from the main IWML site purely because an area of parkland separates the two. From this basis, it is necessary to next consider whether the primary use of the Annexe is ancillary to the IWML.
63. It is known that the All Saints Annexe has functioned since the late 1980s as:
- an office for the Imperial War Museum technical and support staff (occupying approximately 60% of the total floor area);
  - as a publicly-accessible archive/library facility containing war-related materials (occupying approximately 40% of the total floor area), and;
  - the site of the central servers upon which both the Annexe and IWML rely (occupying a negligible percentage of the total floor area).
64. In assessing whether one use is ancillary to another, the relevant considerations as established by case law are:
1. Severability  
i.e. could one use practically and viably operate and meet the basic needs of its users independently of the other?
  2. Scale  
i.e. is one clearly subservient in size/floorspace to the other?
  3. Environmental impact  
i.e. does the alleged ancillary use have outward effects (amenity impact, traffic effects, environmental conditions, general appearance etc.) distinctly greater or more impactful than the other?
65. Turning to Test 1, the office within the Annexe is used by technical and support staff directly serving the IWML. Thus, there is a critical interdependence between these two functions: in the event that the office was to cease operating the IWML would likely not be able to function, and vice-versa. Similarly, the IWML relies upon the servers within the Annexe building to perform its essential technological functions. Officers consider that IWML and the Annexe's library/archive could practically and viably operate



independent of each other; however, because the office floorspace occupies the majority of the Annexe, it is the office use which determines the host building's primary use. As such, because the primary use of the Annexe is inseverable from IWML, Test 1 "severability" has been met.

66. The quantum of floorspace within the Annexe is less than that within the main IWML building, and thus Test 2 "scale" has been met.
67. With regard to Test 3, the Annexe site does not generate environmental impacts distinctly greater or more impactful than the main IWML building due to, amongst other things: the appointment-based nature of the archive/library facility meaning visitor numbers are controlled and relatively low at any one time; both sites accommodating similar numbers of staff; both sites having similar staff and servicing access; neither site generating any notable potential for noise or light pollution; and both buildings operating within 'daytime' hours. As such, officers consider that Test 3 "environmental impact" has been met.
68. With all three tests met, and duly recognising that this assessment is a matter of fact and degree, officers are satisfied that the lawful use of the All Saints Annexe site is ancillary to IWML (Class D1).

### **Principle of development**

#### Policy Context

69. The application site is located in the Central Activities Zone (CAZ), the Elephant and Castle Opportunity Area and the Elephant and Castle Major Town Centre.
70. At the heart of the NPPF is the presumption in favour of sustainable development. Amongst the key themes in achieving sustainable development are ensuring the vitality of town centres, promoting sustainable transport, supporting a strong economy, and delivering good design.
71. The London Plan considers Opportunity Areas to be *"the capital's major reservoir of brownfield land with significant capacity to accommodate new housing, commercial and other developments linked to existing or potential improvements to public transport."* Policy 2.13 (Opportunity Areas and Intensification) seeks to optimise residential and non-residential output and densities within Opportunity Areas, and provide social and other infrastructure to sustain growth. In locations where an Opportunity Area Planning Framework has been adopted, the policy requires new development to conform to these strategic policy directions. Policy 4.6 (Support for and Enhancement of Arts, Culture, Sport and Entertainment) sets out the principles for maintaining the capital's status as one of greatest world cities for culture and creativity. Examples of these principles include remedying deficiencies in existing cultural facilities and promoting development that will enhance and provide support to existing and new cultural and visitor attractions.
72. Southwark's Core Strategy reinforces the London Plan aspirations for development in the CAZ to support London as a world class city. The CAZ and Opportunity Areas are targeted as growth areas in the borough where development will be prioritised. The Council will allow more intense development for a mix of uses in the growth areas and will ensure development makes the most of a site's potential while protecting open space (Strategic Policy 1). Core Strategy Strategic Targets Policy 2 reflects the above London Plan targets for the opportunity areas.

Proposed D1 use of the new building within the rear yard

73. The proposed building within the rear yard would provide floorspace for IWM's technical and support staff. This constitutes an ancillary-to-museum (Class D1) use for the reasons expanded on in earlier parts of this report. In land use terms, no issues are raised by this proposed ancillary-to-D1 use because, although a new building would be constructed, there would be no change to the site's existing lawful use.
74. The quantum of ancillary-to-D1 floorspace within the proposed building would be less than that within the existing All Saints Annexe (which, as explained above, is to undergo a change of use). However, the space within the Annexe currently occupied by the photography and film archive is no longer required because this is to be moved to a state-of-the-art facility at Imperial War Museum Duxford. The application documents demonstrate that all remaining functions could be accommodated in the new building simply by virtue of its more efficient layout. Taking this into consideration together with the uplift and improvements to the D1 floorspace within IWML for which permission was granted earlier this year, officers consider that all existing D Class floorspace would be effectively re-provided. This is in line with the requirements of Saved Policies 1.11 and 2.1. As such, there is sound justification to release the floorspace within the existing Annexe building for an alternative appropriate use.
75. More broadly, the provision of Class D1 floorspace specifically for a purpose ancillary to and supportive of the future effective functioning of one of the Borough's key museums would comply with a wide range of policies, most significantly: Policies 1.11 (Delivering the Strategic Vision and Objectives for London) and 4.6 (Support for and Enhancement of Arts, Culture, Sport and Entertainment) of the London Plan 2016; Strategic Policy 4 (Places for Learning, Enjoyment and Healthy Lifestyles) of the Core Strategy 2011, and; Saved Policy 1.11 (Arts, Culture and Tourism Use), 1.7 (Developments within Town and Local Centres) of the Southwark Plan 2007.

Change of use of the existing All Saints Annexe building from D1 to 'mixed' B1/D1

76. The proposed change of use of the Annexe to 'mixed' use would allow Class B1 and D1 functions to take place simultaneously and in a spatially intertwined way but would also afford the applicant the flexibility to use the entirety of the floorspace for just one of the permitted uses without forfeiting their right to revert the space to the other use at a future time. IWM seeks this 'mixed use' because, although it is likely that the All Saints Annexe building would be leased out on a long-term basis to a future occupier for office accommodation, the flexible D1 element of the Annexe would allow IWM to re-occupy all or part of the building should they require this space in the future.
77. The proposed change of use of the Annexe from D1 (ancillary-to-museum) to B1/D1 (office/ancillary-to-museum) is acceptable because the creation of B1 floorspace, even if part of a mixed use, within the CAZ and a Major Town Centre is supported by policy. The proposed B1 use would promote jobs growth and help meet general demand for office space in this location, which benefits from the highest possible transport accessibility (PTAL) rating of 6b.
78. As explained above, although the change of use of the Annexe would potentially entail a partial or entire loss of D1 floorspace within the CAZ, this loss would be directly offset by the ancillary-to-D1 building proposed within the rear yard.
79. It is noted that, in order to support the vibrancy and vitality of the CAZ, London Plan policies 2.11 and 4.3 promote mixed use development, including housing, alongside the provision of office floorspace. The proposed development does not include a residential component. However, the London Plan allows a degree of flexibility with respect to the provision of mixed uses in the CAZ in recognition that it may not always

be suitable to provide housing on-site. The Mayor's Central Activities Zone SPG contains additional guidance on maintaining an appropriate mix of uses within the CAZ, setting out the weight that should be afforded to CAZ strategic functions, such as office and culture, relative to residential. Paragraph 4.2.2 of the SPG requires the provision of residential development within the CAZ to be managed sensitively to ensure new development neither strategically constrains the overall supply of office floorspace nor fails to support and complement other important CAZ functions, such as cultural activities.

80. There would be limited scope to introduce residential into the development without increasing the scale of the buildings or compromising the layouts and functionality of the office/support floorspace. Increasing the scale of the buildings would be inappropriate given the potential impact on surrounding residential occupiers. Given the constraints of the site it would be reasonable to conclude that priority should be given to supporting the future of the IWML as an important cultural and tourist institution.
81. Whilst it is concluded that the proposed 'mixed' use of the All Saints Annexe presents no potential adverse environmental or amenity implications, it would be important to restrict the use to that linked to the IWML and prohibit other uses within Class D1 which might have different or greater local impacts. As such it is recommended that, in the event of planning permission being granted, a condition be imposed that:
- restricts the 'D1' element to a museum use only, and;
  - removes permitted development rights afforded by the GPDO for temporary changes of D Class floorspace to uses falling within A1, A2 or A3 Classes.

#### Conformity with the aims of the Elephant and Castle SPD and OAPF

82. The vision set out in the Elephant and Castle Supplementary Planning Document and Opportunity Area Planning Framework (SPD and OAPF) (2012) is to realise the area's potential as an attractive central London destination by delivering excellent shopping, leisure facilities and cultural activities. Critical to this vision is the delivery of 5000 new jobs, which is to be achieved by bringing forward appropriate new development—in particular offices, hotels and small businesses—alongside improving the area's existing cultural offering. Additionally, the SPD recognises the significant need to improve the look and feel of the area through better architecture, street forms and new public spaces.
83. The site lies within the West Square character area, in which the Elephant and Castle SPD and OAPF seeks to, amongst other things:
- Maintain and improve the existing open spaces;
  - Support improvements to IWML and its setting, and;
  - Ensure that development conserves or enhances the character and appearance of the West Square conservation area and Elliott's Row conservation area and their settings.
84. SPD6 sets out that proposals involving arts, cultural, leisure and entertainment uses which contribute towards consolidating Elephant and Castle and Walworth Road as a major town centre will be supported.
85. The proposed development would support the ability of IWM to sustain the cultural offering of IWML by providing consolidated and modern office accommodation for its workforce. In turn, this would release the 2,476 square metres of floorspace within the All Saints Annexe for a new employment use. As detailed in a later section of this Committee Report, it is considered that the development would enhance the setting of

IWML and the character and appearance of the West Square Conservation Area without harming any other nearby designated heritage assets.

86. For the reasons given above, the proposed development accords with the Elephant and Castle SPD and OAPF in respect of both the broader vision and the location-specific development guidelines.

### Summary

87. The proposed Class D1 and 'mixed' Class B1/D1 land uses would support an important existing cultural use while delivering new employment floorspace. These uses are appropriate in this location, which is within the CAZ and the Elephant and Castle Opportunity Area, and as such the application is acceptable in principle.

### **Environmental Impact Assessment**

88. The European SEA Directive is transposed into UK law by the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. The Regulations set out the circumstances under which development needs to be underpinned 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.
89. The development is not considered to constitute EIA development, based on a review of the scheme against both the EIA Regulations and the European Commission guidance.
90. Consideration should, nevertheless, 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. This report sets out the reasons for concluding that the scale is appropriate to the site's urban setting and the users are unlikely to give rise to any significant environmental impacts.

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

91. The site is located in an area comprising residential, educational and cultural uses as well as public open space. None of the existing surrounding uses would preclude or curtail the full use of the proposed development by staff and visitors.

### **Impact on the amenity of adjoining occupiers**

#### Overlooking

92. The Residential Design Standards SPD states that in order to prevent unnecessary problems of overlooking, development should achieve the following distances:
- A minimum distance of 12 metres at the front of the building and any elevation that fronts onto a highway
  - A minimum distance of 21 metres at the rear of the building.
93. It should be noted, however, that these rules apply where the 'facing' buildings are both in residential use. The proposed building would provide employment workspace

ancillary to the nearby IWML, and thus would be akin to commercial use. Therefore, while the separation distances set out in the Residential Design Standards SPD are a useful guide, they can be applied with some degree of flexibility in this instance.

94. As there are no residential uses directly to the northwest or southeast of the site, the nearest dwellings are to the northeast and southwest at nos. 1 to 5 Harmsworth Mews and nos. 91-105 (odds) Brook Drive respectively. All of the Harmsworth Mews properties contain clear-glazed habitable room windows in their rear (site-facing) elevation at ground, first and second floor level. With respect to the Brook Drive properties, all eight contains one clear-glazed habitable room window within the rear (site-facing) elevation of the outrigger at first floor level. Only at nos. 95, 97 and 101 is there a clear-glazed aperture at ground floor level in the rear elevation of the outrigger. All eight Brook Drive properties contain clear-glazed openings at ground, first and/or second floor level within the outrigger side elevation and the main rear elevation.
95. The proposed development would contain glazed openings on all elevations except at upper (first floor) level on the southwest elevation of the pavilion element. However, in response to the concerns raised by residents and Members at the Committee on 9<sup>th</sup> October 2018, the applicant has decreased the number of glazed openings on the southwest and northeast elevations, proposing brick-faced recessed panels in their place. The diagrams below depict the reductions in the number of glazed panels.



*Figure 5: A comparison showing the southwest elevation, the windows within which face towards the Brook Drive properties, in its originally-proposed format (top) and amended format (bottom)*



*Figure 6: A comparison showing the northeast elevation, the windows within which face towards the Harmsworth Mews properties, in its originally-proposed format (top) and amended format (bottom)*

96. In addition to the omission of some of the glazing on these two elevations, and as a further response to the concerns raised by residents and Members at the Committee on 9 October 2018, the applicant proposes to fit all the windows in these elevations with a graduated obscuring treatment. This would be permanent to the glass, and its design would ensure that views 'out' for a seated worker would be almost entirely obstructed, while views 'out' from a standing position would be partially obscured.

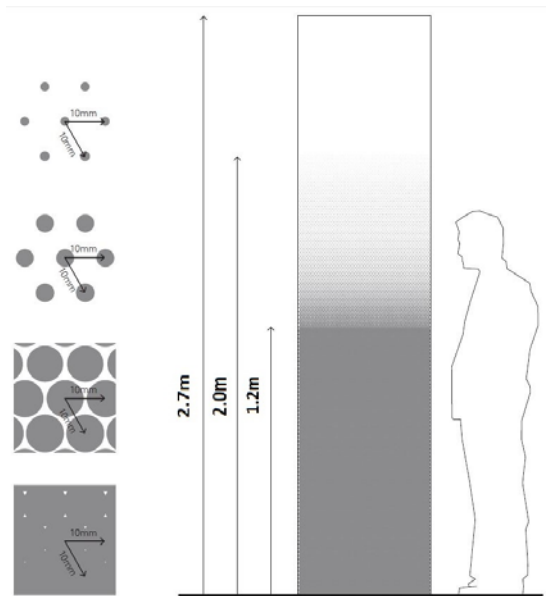


Figure 7: The design principles of the graduated window treatment.



Figure 8: An example, as provided by the applicant, of the graduated window treatment.

97. In addition to the above measures, the building has been designed to achieve good separation distances from the neighbouring properties. The planning application documents include a measured survey drawing showing the distances between the proposed building and these existing nearby residences. This drawing is provided below, with extra annotations (all in red) by the case officer identifying each of these thirteen addresses and showing two important additional dimensions.



101. With respect to the Brook Drive properties, the diagram shows that the proposed building would, with two exceptions, be more than 21.0 metres away. The two exceptions are no. 95 Brook Drive and no. 97 Brook Drive. The development would be no less than 19.40 metres from the closest window at no. 95 Brook Drive and no less than 19.60 metres from the closest window at no. 97 Brook Drive. Both of these distances are to the two-storeyed pavilion.
102. As the pavilion would not be glazed on its southwest-facing façade at first floor level, and because all first- and second-floor glazing on the southwest elevation of the main body of the building would be fitted with graduated obscuring treatment, the privacy of the occupiers of all the Brook Drive dwellings would not be harmed.
103. It is considered that the amendments made to the glazing following the meeting on 9 October 2018 properly address the concerns raised by the Committee, Ward Members and neighbouring residents. The reduction in the number of window openings, the omission of the larger picture windows, and the introduction of permanent opaquing treatment to the windows would reduce both the actual and perceived impact on the privacy of the neighbours.
104. IWML consulted with their neighbours during the process of designing these changes. Details of this engagement are set out in paragraphs 238 to 239 of this report. In response to the Council's re-consultation on the application (following submission of the changes) the Chairs of the West Square Residents Association and Harmsworth Mews Residents Association advised that the residents were now able to support the proposals.

#### Outlook and sense of enclosure

105. When seen in the context of the distances which would separate it from the Harmsworth Mews and Brook Drive properties, the proposed building is considered to be of a sympathetic height, mass and scale such that no undue sense of enclosure or curtailed outlook would be experienced by existing residents. To further reduce the impact on surrounding occupiers, careful consideration has been given to breaking up the elevations through a mixture of brick-faced and glazed panels, changes in materiality and a predominance of light-coloured yellow-grey brick. New boundary edge planting, together with the retention of a number of existing mature trees would further lessen the building's visual prominence. While residents' outlook would change to some degree, officers are satisfied that the impact on the existing residents would not be harmful.

#### Daylight

106. A daylight and sunlight report has been submitted which assesses the scheme based on the Building Research Establishments (BRE) guidelines. The changes made following the 9 October 2018 meeting have not affected the daylight and sunlight impacts and no update to the report was required.
107. The BRE 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 residential buildings which look towards the site. The target figure for VSC recommended by the BRE is 27% which is considered to be a good level of daylight and the level recommended for habitable rooms with windows on principal elevations. The BRE have determined that the daylight can be reduced by about 20% of the original value before the loss is noticeable.



108. The second method is the No Sky Line (NSL) or Daylight Distribution (DD) method which assesses the proportion of the room where the sky is visible, and plots the change in the No Sky Line between the existing and proposed situation. It advises that if there is a reduction of more than 20% in the area of sky visibility, daylight may be affected.
109. Although the proposed development has undergone some changes since the deferral by the Main Committee at the 9 October 2018 meeting, the height, footprint and location of the building have remained unchanged. As such, no update to the original daylight and sunlight report has been required.
110. Assessed as part of the daylight and sunlight report due to their risk of VSC loss as a result of the works are:
- The flats at nos. 71-89 Brook Drive;
  - Nos. 91-117 (odds) Brook Drive;
  - Nos. 2, 4 and 6 Austral Street;
  - Nos. 20, 21 and 22 West Square, and;
  - Nos. 1-5 Harmsworth Mews.
111. None of the windows at these neighbouring properties would experience a VSC reduction (as a percentage of the baseline VSC value) of 20% or more.
112. All of the properties tested for VSC loss were also tested for NSL loss. The results show that for all but two of the rooms tested the NSL loss would not exceed 20%. Where there would be a reduction of more than 20%, which is at each of the ground floor rear-facing rooms within nos. 95 and 97 Brook Drive, the reduction would be 32% and 48% respectively.



113. Figure 10: A photograph of the rear of the Brook Drive properties, highlighting the two glazed apertures which serve rooms where a reduction in NSL of more than 20% would be experienced.

114. The 32% reduction constitutes a moderate adverse impact and the 48% reduction constitutes a substantial adverse impact. However, it must be recognised that these two rooms currently benefit from an open outlook over vacant land, meaning that — notwithstanding the obstruction caused by the boundary wall— the existing area of sky visibility these rooms enjoy is uncharacteristically generous in the context of this central London location. Therefore, NSL losses will inevitably arise from any reasonable redevelopment of the yard. Taking into account the scale and modulation of the proposed development whereby the three-storeyed main body of the body is set-back behind the two-storeyed pavilion, together with the separation distance being 19.60 metres at its minimum point, it is considered that acceptable daylight levels would be retained for these two rooms, especially in light of the VSC loss at both of these glazed apertures being 16% in each case (i.e. not in breach of the 20% threshold recommended by BRE).
115. In summary, there would be no noticeable loss of VSC to any nearby dwellings as a result of the proposed development. There would be noticeable NSL losses at one ground floor room in no. 95 Brook Drive and one ground floor room in no. 97 Brook Drive. These losses are a consequence of the rooms benefitting from an unusually substantial area of sky visibility due to the yard being undeveloped at present. The level of impact is not untypical for a central London location.

#### Sunlight

116. The applicant's daylight and sunlight report has assessed the impact of the proposed development on the sunlight received at all windows facing within 90 degrees. The BRE guide states that nearby windows must be assessed to determine whether any of the following would be experienced:
- a reduction in sunlight to less than 25% Annual Probable Sunlight Hours (APSH), or;
  - a reduction in sunlight to less than 5% Winter Annual Probable Sunlight Hours (WAPSH) or;
  - both of the above.
117. Where any of the above occurs, if the window's resulting APSH is less than 0.8 times its former value, there may be an appreciable loss of sunlight.
118. Assessed as part of the Report due to their risk of sunlight loss are the south-facing windows at the following addresses:
- Nos. 20, 21 and 22 West Square, and;
  - Nos. 1-5 Harmsworth Mews.
119. The results show that, with the exception of the some of the glazed panes within the conservatory at no. 20 West Square, there would be no APSH or WAPSH reductions in excess of those recommended by the Building Research Establishments (BRE) guidelines.



Figure 11: Proposed site layout, showing the conservatory at no. 20 West Square edged in green.

120. With respect to the conservatory at no. 20 West Square, 44 individual glazed panes were tested, of which 17 fell short of the winter sunlight hour test. While in and of themselves such transgressions would indicate significant losses of APSH, because they combine to provide sunlight to a single room the effect would be much less noticeable to the users/occupiers. Moreover, the glazed panes where transgressions would be experienced currently receive low levels of winter sunlight due to their orientation and proximity to existing surrounding structures, the consequence of which is that a modest loss will generate a relatively high percentage reduction. In addition to the 44 panes tested within the conservatory, there are further (more distant) openings that have not been tested, and through which the room receives natural light. There is also a 'lip' over the conservatory leaded dome, which reduces the potential for sunlight to hit the centre of the windows directly underneath this detail.
121. In summary, while some of the glazed panes within the conservatory at no. 20 West Square would experience a reduction in sunlight to less than 5% Winter Annual Probable Sunlight Hours, the majority of the glazed panes would not experience a reduction of this magnitude. The room in question is served by windows other than those in the conservatory. Taking these factors into account in the round, it is considered that the sunlight losses at this one neighbouring property would not be detrimental to the occupiers' amenity.

#### Overshadowing

122. An overshadowing assessment, the purpose of which is to measure and compare the level of sunlighting within gardens and open spaces before and after a proposed development, has been submitted by the applicant. The BRE guidance sets out that at least 50 percent of any garden or open space should receive no less than 2 hours of

direct sun on 21 March. If, as a result of new development, the area which can receive two hours of direct sunlight on 21 March is reduced by more than 20% of its former size, the BRE guide considers this to be a transgression because the space may look more heavily overshadowed.

123. By virtue of their orientation and relationship to the application site, the properties with amenity spaces susceptible to overshadowing are:
- The flats at nos. 71-89 Brook Drive;
  - Nos. 91-117 (odds) Brook Drive;
  - Nos. 2, 4 and 6 Austral Street;
  - Nos. 20, 21 and 22 West Square, and;
  - Nos. 1-5 Harmsworth Mews.
124. The overshadowing assessment demonstrates that none of the amenity spaces at these surrounding properties would undergo a reduction of more than 20% to the area of ground which currently receives two hours of direct sunlight on March 21st.
125. In summary, the proposal would not create any undue overshadowing of neighbouring gardens and open spaces.

#### Noise disturbance

126. In terms of noise generation, the use of neither the proposed building nor the All Saints Annexe for D1/B1 purposes would be incompatible with the nearby residential uses. The proposed building would be used largely during standard daytime working hours with all activities except for spill-out from the canteen/café taking place within the confines of the building. A condition will be imposed requiring the spill-out tables and chairs to be brought inside the building or otherwise made unusable in the evening.
127. A condition will be imposed to ensure that the specific plant sound level shall be 10dB(A) or more below the background noise level.
128. It is inevitable that servicing vehicles will generate some low-level noise, but it is also reasonable that in the interests of residential amenity this activity be minimised certainly during night-time hours. As such, and in line with the request of the Council's Environmental Protection Team, a condition will be imposed to restrict deliveries to the proposed building to between the hours of 08:00 and 18:00 Monday to Friday with no deliveries on Saturdays, Sundays and Bank Holidays.

#### Light pollution

129. The proposed building is to be used by IWM staff, and as such would be occupied in the most part during daytime hours. Throughout the building, internal light fittings would be motion-sensitive with timed shut-off. As such, on the occasion that a staff member needs to work outside normal office hours, internal lighting would be isolated solely to the area where the individual is working, the effect of which is that the entire building would not be internally lit-up. This would minimise light pollution and disturbance during hours of darkness for those dwellings which back onto the application site. It should also be noted that the operational characteristics of the existing All Saints Annexe are very similar to those of the proposed building and so the degree of change to the existing conditions and use of the site would not be pronounced.
130. In terms of external lighting, an indicative strategy is contained within the Design and Access Statement and the Landscaping Report. The strategy proposes to attach up-

and down-lighters at the heads of the ground floor windows. The down components would assist with ground surface lighting while the up components would illuminate the elevations. Lighting would also be located within the grounds of the building to provide low-level illumination for wayfinding and security purposes.

131. The Environmental Protection Team has assessed the indicative lighting strategy and has raised no issues in principle. Through the imposition of a condition, the team wishes to reserve authority over the lighting's detailed design (power and position of luminaries; light intensity contours etc.) in the interests of ensuring the surrounding residential occupiers do not suffer from light pollution or have their privacy or visual amenity affected detrimentally. These details are to be agreed and approved prior to occupation of the new building.

#### Odour disturbance

132. There would be no commercial kitchen facilities associated with the canteen/café space. The food sold at the canteen/café would be sandwiches, soup and the like, most of which would be prepared off-site. There is, therefore, no risk of undue odour disturbance for neighbours.
133. Should the applicant later decide to carry out large-scale food preparation on-site requiring ventilation/extraction equipment, planning permission would be required for this. Any such planning application would be determined by the Local Planning Authority with due regard to the potential odour disturbance to neighbours.
134. In respect of the proposal which was taken to Committee on 9 October 2018, neighbours raised concerns that the proposed bin store (which was, at the time, proposed within the single-storey timber structure) would create odours in close proximity to Harmsworth Mews. In response, the applicant is now proposing to locate the bin store on the southern side of the building close to the gates separating the site from the As discussed in a later section of this report the refuse generated by the proposed development would be transferred on a daily basis to IWML. The proposed on-site store would, therefore, simply act as an occasional back-up facility and would not be used for stowing large quantities of refuse for protracted periods of time. The store would, in any case, be covered and secure, thereby adequately protecting surrounding occupiers from undue odour disturbance.

#### **Quality of design**

135. Saved Policy 3.13 (Urban Design) requires the height, scale and massing of buildings to be appropriate to the local context in order that they do not dominate their surroundings inappropriately. Saved Policy 3.12 (Quality in Design) requires developments to achieve a high quality of both architectural and urban design, enhancing the quality of the built environment as well as preserving or enhancing the historic environment.

#### Form, height and scale

136. The proposed building would be articulated as two conjoined rectilinear volumes, one of three storeys and the other of two, but with the ground floor level of the larger volume extruded so that it extends to create the boundary wall to the park. The building's crisp form and flat roof depart from the domestic architecture which characterises the properties adjoining the site. This is considered appropriate given that the proposal would serve a non-residential function.
137. No part of the main three-storeyed body of the building would be higher than the main eaves line of the Annexe building — the top of the proposed rooftop plant would be

slightly lower and the proposed parapet would be markedly lower. The proposal's flat roof helps to limit its overall height and achieve a sensitivity of scale to the existing Annexe building. The Brook Drive and Harmsworth Mews properties which border the site are also three-storeyed, but their height and scale is smaller than the Annexe building due to their residential character. The parapet of the proposed building would, nevertheless, only exceed the ridge height of these dwellings by a modest amount (approximately 1.0 metre in the case of the Harmsworth Mews properties and approximately 2.0 metres in the case of the Brook Drive properties). As such, the height and form of the proposed building strike an appropriate balance between the scale of the All Saints Annexe building and the residential dwellings to the north and south, and could not be said to dominate its context.

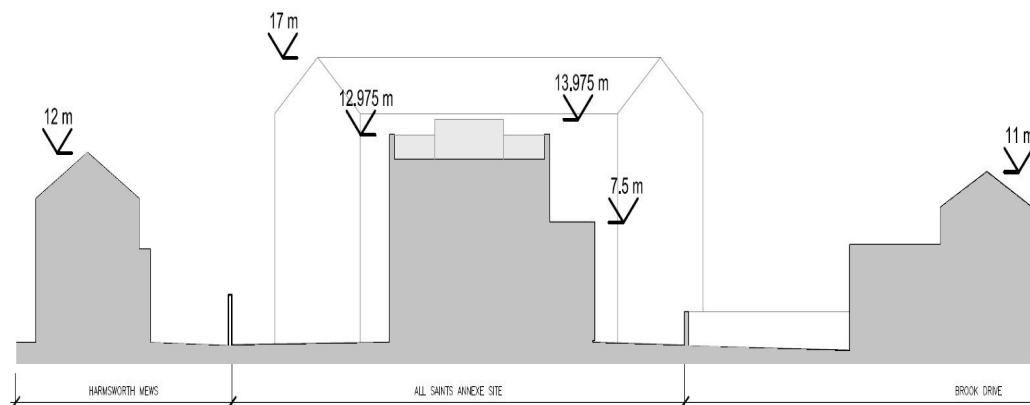


Figure 12: North-south site section, showing the proposed building in the centre of the image in relation to the All Saints Annexe (in the background), the Harmsworth Mews properties (left-hand side of image) and the Brook Drive dwellings (right-hand side of image).

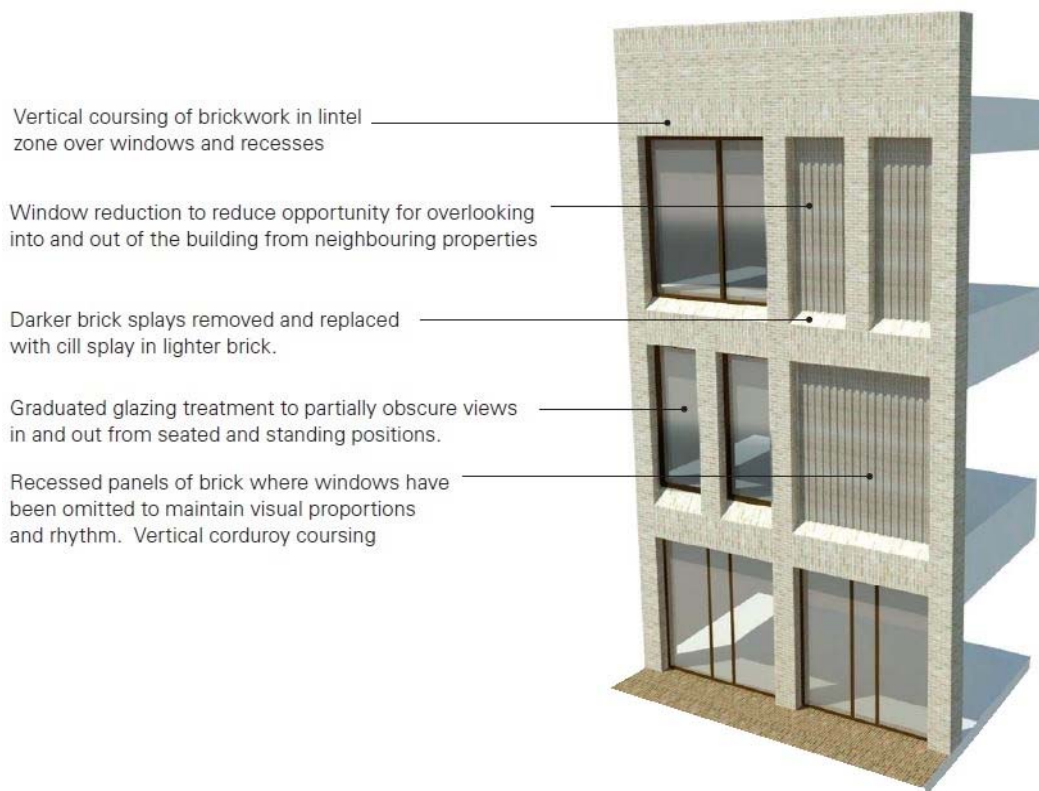
138. Within almost all views across the park, the building would appear as a single, simple form because of the entrance pavilion element being out of view due to its considerable set-back from the parkside elevation of the main volume. The rooftop plant has been positioned towards the south-eastern end of the building's footprint such that it would not be visible above the raised parapet in views from the park.
139. The cycle store, being modestly-proportioned and single-storeyed, would read very much as a subservient and ancillary volume to the new building. Due to being concealed by the new boundary wall, it would not be visible within wider views across the park or within the majority of views from surrounding dwellings. The refuse store would be a small-scale and visually discreet structure.
140. Overall, it is considered the proposed building's form is well-conceived and its scale and massing would be proportionate to its context.

#### Detailed design, fenestration and materiality

141. Drawing on a number of characteristics from the local context not only in terms of materiality but also visual rhythm, the elevational treatment of the proposed building is well-resolved. The changes to the fenestration following the 9<sup>th</sup> October Planning Committee meeting alter the proportions of glazing to solid faces, but maintain the overall rhythm and character of the building.
142. With respect to the main body of the building, a strong sense of verticality would be achieved through the use of slender panels, some brick-finished and some glazed, with further emphasis provided by stretches of upright brickwork at lintel level. Interspersing these narrow recessed openings would be some broader panels. Where non-glazed, these wider panels would be lent vertical stress by corduroy brick

coursing; where glazed, the window frames would subdivide the expanse of glass and help maintain the regular rhythm of the façade.

143.



*Figure 13: Bay study, annotated to explain the changes made by the applicant to the fenestration and detailed design since the 9 October 2018 deferral.*

144. The majority of the recessed panels would have splayed cills to accentuate their depth; these reveals would lend a subtle dynamism to the otherwise ordered and geometric façades. A few of the wider glazed panels on the park-facing elevation would be set flush to the façade but with deep internal frames visible from the exterior. Solar glazing of a neutral tone would be fitted throughout, with the graduated obscuring treatment applied to all first- and second-floor glazing on the northeast and southwest elevations.



*Figure 14: A view of the building as seen from the southern corner of Geraldine Mary*

*Harmsworth Park, showing the interrelationship of the building and the rebuilt boundary wall.*

145. All elevations of the main body of the building would be faced in a grey-yellow mottled brick with a strong textural quality. All window and door openings would have slimline bronzed aluminium frames, the colour of which would sit comfortably alongside the brick. A small number of panels on the east elevation would be fitted with bronzed aluminium louvre panels to conceal the services or back-of-house uses contained behind



*Figure 15: Physical samples of the proposed facing materials. Since the deferral of 18/AP/1577 at the 9 October 2018 Main Committee meeting, one of the materials (no.5, a brown facing brick) has been omitted from the design of the building; hence the absence of material no.5 from the above pallet.*

146. The façades of the two-storey entrance wing would comprise curtain walling on the ground floor and part of the first floor, externally affixed with vertically-oriented



bronzed aluminium fins to match the window frames on the main body of the building. This treatment would help to visually distinguish the entrance wing from the main body, in so doing reinforcing the articulation of the building as two rectilinear volumes sat side-by-side, without appearing discordant. The entrance pavilion would be of striking design, providing a suitable focal point for those entering the site from Geraldine Mary Harmsworth Park.

147. The new wall running along the site's boundary to the Park would be constructed in the same brick as used on the façades of the main building. Where the new boundary wall meets the proposed building, it would become part of the building itself, enclosing the staff welfare and canteen areas. Three windows would punctuate the wall with frames that extrude slightly above the parapet; a glazed roof would span back from each of these three windows to the main structural frame of the building. Cleverly, this allows for the ground floor level accommodation to discreetly extend up to the boundary line (in so doing facilitating natural surveillance of an area of the park dogged by antisocial behaviour) without resulting in all three storeys of the building standing hard against the boundary.
148. A new pedestrian/vehicle gate is proposed in replacement of and slightly further to the south of the existing solid gate. Sitting within and rising to the same height as the new boundary wall, the gate is to be formed of vertical slats which pick up on the materials and rhythm of the entrance wing; these slats would allow views both into and out of the site. This would form a high-quality section of boundary treatment and help the development read as an integral part of the park setting.
149. Given the function and modest scale of the cycle store, it is considered that the proposed timber cladding would achieve an acceptable quality of design.
150. Critical to the success of the building's design is achieving the depth of architectural expression, the contrast of the materials and the crispness of the geometry. Detailed construction drawings and materials samples have been submitted during the course of the application process which demonstrate that the desired effect will be achieved.
151. In summary, officers are satisfied that the key views and sensitive local receptors — listed buildings and conservation areas— have been considered in the articulation of the façade and the detailed design and materiality. The resolution is well-considered, high quality and suitably restrained.

#### External realm

152. The proposed surface treatment, planting mix and new trees would secure a high quality external realm. The retention of the existing mature trees within the northern part of the site is a significant benefit of the scheme and will help the proposed building sit more comfortably within its environs.
153. The short stretch of access road within Geraldine Mary Harmsworth Park which the application proposes to realign would be finished in the same pavers as the external realm within the application site. This is a high quality surfacing treatment that would subtly help strengthen the connection between the site and the parkland while still preserving the openness of the landscape.

#### **Impact on the curtilage listed wall and its contribution to other heritage assets**

##### Significance of the curtilage listed wall

154. Paragraph 189 of the NPPF requires applicant together with the Local Planning Authority to identify the architectural or historic significance of a designated heritage

asset and to record the effect of any proposal on that architectural or historic significance.

155. Listed Building Consent is sought for the demolition of part of the existing boundary wall between the All Saints Annex and Geraldine Mary Harmsworth Park and the construction of a new wall, incorporating gates and windows, as part of the wider development to create new staff accommodation ancillary to the Imperial War Museum. The section of wall proposed for demolition is approximately 34 metres in length and is a combination of Victorian and more recent construction.
156. The applicant has submitted a survey of the wall's structural condition, prepared by a conservation engineer. The report confirms that the wall is composed of several phases of construction from the first half of the 19th century through to the 20th century and identifies where these areas are based on analysis of brick type. Comparing the analysis of the bricks and the history of the site, the conclusion is that the oldest section of wall is likely associated with the construction of King Edward's Schools (c. 1828-30). The sections north and south of this brickwork have been rebuilt on a number of occasions, as evidenced by the existence of visible joints and type of brick used. The most recent intervention was in 1994 when a pedestrian and vehicular access was created by the Imperial War Museum, connecting the Annexe and Geraldine Mary Harmsworth Park. The report concludes that the northern section of the wall is in a fair condition with only localised defects, whereas the southern section is suffering from differential settlement of the foundations.

Contribution of the curtilage listed wall to the significance and setting of nearby heritage assets and/or their setting

157. The wall is set some distance from the Imperial War Museum (IWM) and therefore makes little contribution to the significance or setting of the listed building. Given the distance of the wall and degree of separation, the structure does not contribute to setting of the listed terraces in West Square.
158. With its secluded location, this section of wall makes only a very minor contribution to the character and appearance of the West Square Conservation Area. The wall does not feature to the same degree as the perimeter walls elsewhere in the park, nor does it feature in any prominent views across the park. Officers consider that the loss of this particular section of wall and the associated new development would not harm the appreciation of the heritage assets. Given the quality of the bricks and the various phases of construction, reuse of the bricks is not envisaged. No objection is raised to this, but it is considered appropriate to require by condition the provision of a Method Statement for the plaque's reinstatement. The applicant is presently suggesting that the plaque would be reinstated on the inner (yard-facing) side of the wall to the north of the new building. Officers consider it would be more appropriate for the plaque to be located on the park-facing side of the original wall, A condition requiring an appropriate reinstatement is recommended for inclusion on the Listed Building Consent decision notice.

Is there sufficient information to demonstrate the public benefits of the proposal or the improved usability of the heritage asset?

159. The proposed demolition of this stretch of wall would facilitate the redevelopment of the existing yard with a building of high quality design. Officers consider that the 'public benefits' of the scheme, specifically the provision of new staff accommodation ancillary to IWML (which would provide critical business support to this important cultural institution) together with landscaping both on-site and within the park, sufficiently outweighs the harm caused. Thus, to refuse Listed Building Consent would be unwarranted.

Would the harm be 'less than substantial'?

160. The demolition of this section of wall would provide a greatly strengthened physical and visual connection between the application site and IWML yet would not erase the memory of the original structure because the new wall would follow the same line and the historic plaque would be reinstated. The alternative would have been to introduce a building set back from and hidden behind the existing wall, which would have been an inferior response spatially, physically and functionally.
161. Therefore, officers consider that the perceived harm caused by the loss of fabric in removing this length of wall and the rebuilding of the structure as part of the proposed three-storey building is considered to be less than substantial.

Is any harm to the heritage asset outweighed by public benefits arising from the proposal including securing an optimal viable use?

162. The NPPF requires Local Planning Authorities to consider whether the public benefits of the proposed development outweigh the harm that may arise and whether such harm is justified. In the case of substantial harm, Local Planning Authorities should consider whether the harm is necessary to deliver the public benefits. The greater the harm the greater the justification necessary.
163. After careful consideration, the perceived harm arising to the heritage assets, the wall and the West Square Conservation Area as a result of the partial demolition and associated development within the grounds of the All Saints Annexe building, is not considered to be significant such that refusal of Listed Building Consent would be warranted. The proposed development would deliver additional office accommodation for the internationally-recognised visitor attraction and preserve the significance of the Grade II listed Imperial War Museum and West Square Conservation Area.
164. The proposal demonstrates conformity with the Listed Building and Conservation Areas Act (1991) [the Act] as amended and updated. It complies with current policy to: preserve and enhance the heritage asset and its setting; provide good design, and; address issues raised by statutory consultees. It is therefore recommended that the Listed Building Consent application 18/AP/4084 is granted.

**Impact of the proposal on the West Square Conservation Area and the setting of nearby heritage assets**

Significance of the site and its contribution to heritage assets and/or their setting

165. The All Saints Annexe is a fine late nineteenth century, three-storey building with raised basement located in the West Square Conservation Area, the appraisal for which identifies the Annexe as a key unlisted building. The Elephant and Castle OAPD and SDP also lists the All Saints Annexe on its 'Schedule of buildings which have the potential to be locally Listed'.
166. The Annexe is of an Italianate style with ended bays set forward, a pedimented Ionic porch at the head of the central flight of steps, and prominent chimney stacks. It is within views along Austral Street that the Annexe can be seen most prominently. The valuable role the building plays within the wider Conservation Area derives principally from the imposing presence of its front façade within the streetscene. The front of the building is comparatively much better preserved than the rear elevation.
167. The rear of the building, which is open to views across Geraldine Mary Harmsworth Park, has been the subject of piecemeal alterations historically including lean-to

extensions and the installation of air conditioning units. The yard is surfaced in a mixture of paving and gravel, and currently accommodates two portakabins and several shipping containers. The portakabins—which, despite never having been given planning consent, have gained lawfulness through the passage of time and consequently form part of the West Square Conservation Area—are simple structures that neither play a noteworthy townscape role nor make a positive contribution to the designated heritage asset. In its current state, the area to the rear of the Annexe building fails to contribute positively to the Conservation Area.

168. There are a number of Grade II listed buildings within the vicinity of the site, the closest of which are IWML and nos. 9 to 25 West Square. The yard can be seen in the same context as the IWML and thus forms part of the setting of this designated heritage asset. Not within any meaningful public view, however, can the yard and the West Square listed properties be seen together. This is due to the visual obstruction caused by other non-listed West Square dwellings and the All Saints Annexe building itself (the outward appearance of which is to remain unchanged as part of the proposed developments).
169. Immediately to the south-east of the site is the Elliott's Row Conservation Area. Although the front façade of the All Saints Annexe building forms part of the setting of the Elliott's Row Conservation Area, the Annexe screens the rear yard to such an extent that the yard is not a feature within the setting of this nearby Conservation Area.
170. The other two nearby conservation areas, both of which are in the Borough of Lambeth, are the Walcot Conservation Area and the Lambeth Walk and China Walk Conservation Area. These are separated from the site by low- and mid-rise housing, the vast majority of which is terraced. This tightly-knit stock, together with the relatively narrow and contained character of the local streetscape as well as the considerable tree coverage to the rear of the application site, means it is not possible even to glimpse either the yard or Annexe within the same context as the Lambeth Walk and China Walk Conservation Area. Although the All Saints Annexe features within southwards views along Austral Street towards the northern edge of the Walcot Conservation Area, the rear yard (where all development entailing a material change to the appearance of the site is proposed by this planning application) does not form part of the context of the Walcot Conservation Area. Thus, there is no need to further consider whether the setting of this piece of nearby protected historic townscape would be impacted.
171. Therefore, and aside from the wall forming the boundary with Geraldine Mary Harmsworth Park (which is assessed in detail in the preceding part of this Report)—the proposed development would affect only the following designated heritage assets or their setting:
- the West Square Conservation Area, and;
  - IWML.

#### Assessment of impact on the West Square Conservation Area

172. Paragraph 129 of the NPPF 2018 requires Local Planning Authorities to identify and assess the particular significance of any heritage asset that may be affected by a proposal. The particular significance of this conservation area derives from it being a notable example of high quality late Georgian and mid-19th century townscape, containing a number of important public buildings. The centrepiece is the Imperial War Museum, surrounded by the open space of the Mary Harmsworth Park. The proposed development would fulfil the requirement of conserving or enhancing the heritage asset by introducing to this currently underused site a modestly-proportioned and

carefully-configured new building that would sit comfortably among the surrounding buildings and trees. The detailed design pays reference to the adjacent built form and subtly interfaces with the park, while still employing a contemporary architectural style and using complementary materials.

173. Strategic Policy 12 (Design and Conservation) of Core Strategy 2011 requires development 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. To achieve this, new development must conserve or enhance the significance of Southwark's heritage assets, their settings and wider historic environment, including conservation areas. The design of this proposal—with its crisp form, well-balanced proportions, modest height and a robust and contextually-sensitive material palette— achieves a standard that is considered to be acceptable for such a sensitive site.
174. Saved Policy 3.16 (Conservation Areas) requires development within conservation areas to preserve or enhance the character or appearance of the area, use high quality materials and not introduce design details or features that are out of character with the area. For the reasons given in the preceding paragraphs, the proposal is considered to be in conformity with these three policies such that the result would be an enhancement of the character and appearance of the West Square Conservation Area.
175. The proposed development of the rear yard would necessitate the removal of the portakabins. As explained in a preceding section of this report, these modern structures neither play a noteworthy townscape role nor make a positive contribution to the designated heritage asset. Their removal from the site would, therefore, have a neutral or beneficial impact.

#### Assessment of impact on the setting of IWML

176. A considerable stretch of parkland would separate the proposed building from IWML and, within the relatively limited viewframe where it would be possible to appreciate both buildings together, the development would appear subservient in scale. Within such views, a large number of mature trees would stand in-between the two buildings; due to their proximity to the application site, these trees would seasonally screen the development from view to a large degree.
177. For these reasons, it is considered that the proposed development would not impact on the setting of IWML.

#### **Impact on views in the London View Management Framework**

178. The application site lies within the background of LVMF Protected View 23.A, which is the view towards Westminster from the bridge over the Serpentine at Hyde Park. The threshold plane within which the site is situated is 55-60 metres. The maximum height of the proposed development would be 13.975 metres, which is significantly lower than the threshold. The building would, therefore, be subordinate to the Westminster World Heritage site and would not be visible in this Townscape View.

#### **Impact on the nearby Metropolitan Open Land**

179. The application site includes a small area of open space at the southern tip of Geraldine Mary Harmsworth Park. Within this parcel of land, it is proposed to realign the existing private access route and introduce new planting. There would be no new structures.

180. Despite the majority of the park forming part of Metropolitan Open Land under adopted policy, this particular parcel remains outside of the designation. While the parcel is proposed to be MOL “new open space”, as specified in Annex 11 (Open Space Designations) of the Proposed Submission Version (Amended Policies January 2019) of the New Southwark Plan, this is not due to be adopted until late 2019 following submission and Examination in Public. In any case, the realignment of the access road (to be finished in a high-quality surfacing treatment) and the informal yet rich new planting would preserve the openness of the parkland and protect its landscape features, in line with the aims of all relevant adopted policy as well as the proposed submission version of the New Southwark Plan

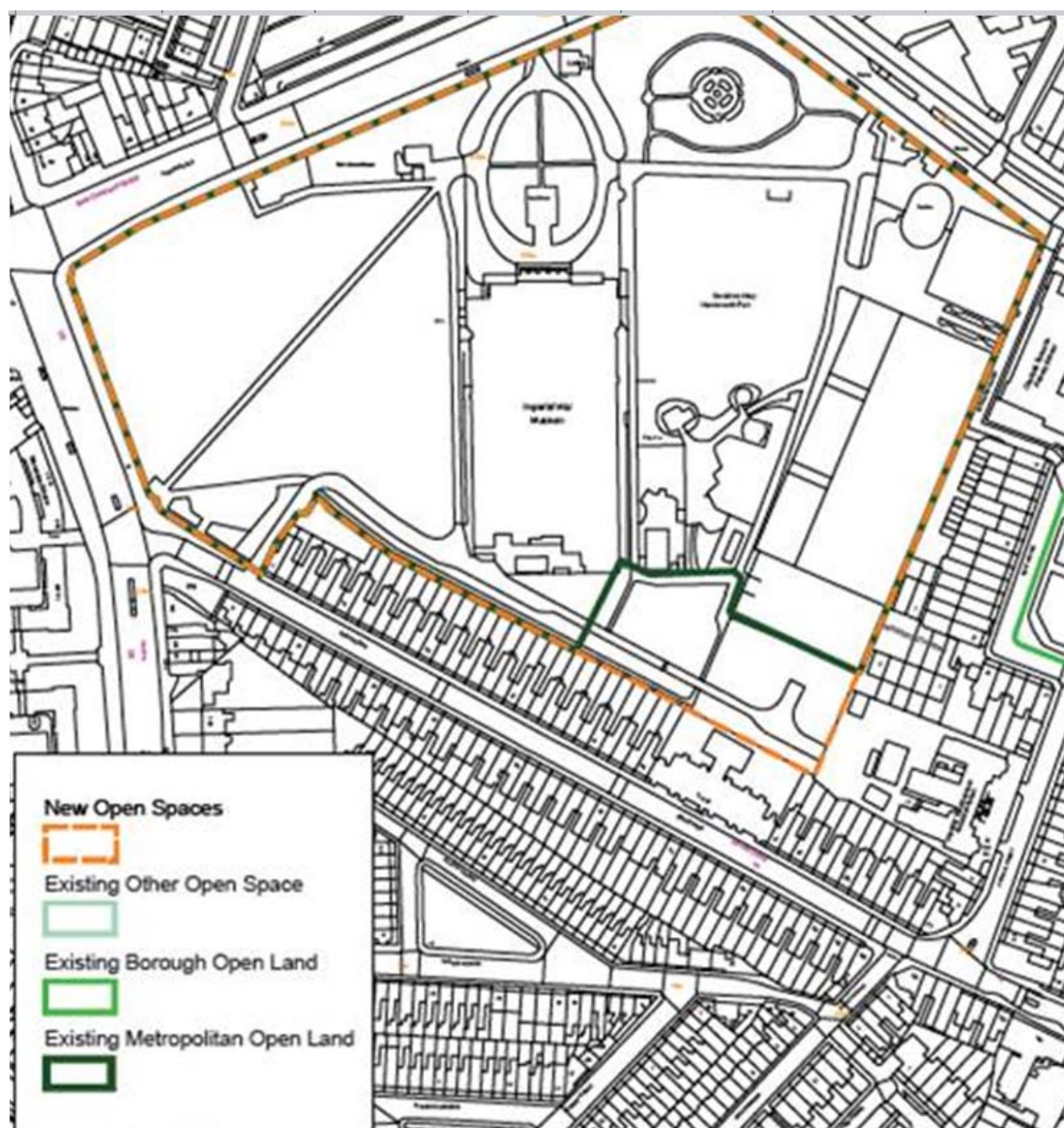


Figure 13: Map showing the adopted open space designations outlined in various shades of green, and the proposed “new open space” designation of the New Southwark Plan outlined in orange. The portion of the park which forms part of the application site lies at the southernmost tip of the parkland, outside of the areas edged in green.

### Transport, highways and servicing matters

#### Trip generation and encouraging sustainable travel

181. The application site benefits from extremely good public transport accessibility. The Transport Assessment prepared by the applicant concluded that the Annexe and the

new building together would generate seven additional two-way vehicle trips during peak hours, all of which would derive from the new 'mixed' D1/B1 use of the existing All Saints Annexe. The Assessment predicted that no net gain in trips would be generated by the new building within the rear yard because the highway network already hosts all of these trips. The Council's Transport Planning team has conducted its own independent assessment by interrogating comparable sites' travel surveys, from which it was concluded that the Annexe and the new building together would generate eleven and thirteen additional two-way vehicle movements in the morning and evening peak hours respectively. Despite the Transport Planning team's trip generation figures being higher than the applicant's, the figure is still minimal such that there would be no noticeable adverse impact on the prevailing vehicular traffic on the adjoining roads.

182. In any event, the applicant has proposed travel plan measures encompassing the provision of cycling facilities and dissemination of public transport information to staff. A travel plan survey undertaken by the applicant in 2017 revealed that most of the staff currently use sustainable travel modes, with only one person travelling by car. Moreover, the analysis of the traffic accidents occurring in the vicinity of this development in the last five years by the applicant's consultants has shown there to be no specific pattern of accidents that would warrant any ameliorative action.
183. In summary, the anticipated level of public transport trips would not have a detrimental impact on existing public transport services. This takes account of the extensive provision of rail, underground and bus routes operating in the local vicinity, alongside the mitigation measures proposed by the applicant within their Travel Plan, the implementation of which will be secured by condition.

#### Refuse storage and collection arrangements

184. Presently, a waste provider collects recycling and waste from the front of the All Saints Annexe (i.e. on Austral Street) twice a week. Separate waste and recycling collections for IWML take place from a loading bay area on Lambeth Road six days a week.
185. The applicant's Delivery and Servicing Plan details how the recycling and residual waste generated by the proposed new building would be stored and collected. The intention is for all waste and refuse to be placed onto a cart and wheeled from the building through Geraldine Mary Harmsworth Park to IWML on a daily basis. This route would be entirely off the public highway. Once brought to IWML, the waste would be amalgamated with the refuse and recycling generated by IWML, and thereafter collected from the loading bay area on Lambeth Road. Any waste waiting to be transferred from the new building to IWML could be temporarily stored within the small-scale refuse structure on the plaza to the southern side of the proposed building.
186. As such, the current collections associated with IWM on Austral Street would cease once the new building is operational. Refuse generated by any future tenants of the All Saints Annexe could, and in all likelihood would, continue to be collected from Austral Street. The quantum of refuse would not materially differ from the quantum generated by the current activities within the premises.
187. The Council's Transport Planning team has deemed the Delivery and Servicing Plan to be sound in respect of refuse storage and collection, noting that while the proposals would generate a greater volume of waste and recycling to be collected from Lambeth Road, the change would not be significant. Thus, the likelihood of needing to increase the current frequency of refuse collection services would be very low.

### Site servicing

188. With the exception of deliveries to the proposed canteen/café, all deliveries and servicing would take place via the gated private road that runs through Geraldine Mary Harmsworth Park and ultimately opens onto Brook Drive. In the event of an emergency, fire tenders and other emergency vehicles would also use this route to gain access to the proposed building. The applicant's Delivery and Servicing Plan details how the largest of these vehicles (a fire/pumping engine) would be able to enter, exit and manoeuvre on the site without obstruction. The Transport Planning team are satisfied with the content with the strategy and require no further information in respect of vehicle routing via the park.
189. Deliveries to the proposed canteen/café would arrive via the existing accessway which runs along the north-eastern side of the All Saints Annexe. The tracking diagrams within the Delivery and Servicing Plan evidence that, after having entered the rear yard via the accessway, a medium sized (5.2 metre long) delivery van could manoeuvre on site and exit onto the public highway in forward gear. These diagrams show that the swept path would not conflict with any of the three retained trees.
190. The proposed building within the rear yard is expected to generate nine fewer weekly delivery and servicing movements within Geraldine Mary Harmsworth Park than those associated with the All Saints Annexe in its current use, which is welcomed.
191. There is potential for the future occupier of the All Saints Annexe to generate up to nine additional delivery and servicing trips. The Transport Planning team is satisfied that these vehicles would be accommodated within the Annexe's forecourt (i.e. off the public highway) and thus would not significantly impact traffic flows on Austral Street.

### Car parking

192. The proposal is located within the Central Activities Zone (CAZ) and a Controlled Parking Zone (CPZ). Given the excellent accessibility to public transport, the car free nature of the development is appropriate. One on-site disabled parking space would be created, as per the requirements of the London Plan, on a portion of the All Saints Annexe forecourt but accessed off the alleyway rather than from the forecourt itself. This space would be provided with an Electric Vehicle Charging Point, in line with London Plan Policy 6.13.

### Cycle parking and promoting safer cycling

193. A cycle parking shelter with 20 'Sheffield' stands, providing a total of 40 cycle parking spaces for use by IWM staff of the new building would be provided for the new building. The storage would be secure, weatherproof and accessible, making it compliant with the London Plan 2016 and Saved Policy 5.3 of the Southwark Plan 2007. The provision of these stands, to the specification and in the locations shown on the application documents, will be secured by condition.

### Highway works

194. The access/egress to the site for delivery vehicles is to be via the existing crossovers on Austral Street and Brook Street, and so the proposal necessitates no public highway works.
195. The Highways Authority has considered the application documentation, including the Construction Management Plan, and is satisfied that there would be no impact on the public highways. The Highways Authority has suggested that, in the event of planning permission being granted, informatives be attached to the decision notice requesting



the undertaking of a joint condition survey and the carrying out of any damages to the highway within the vicinity of the development as a result of the construction works.

### **Flood risk and sustainable urban drainage**

#### Flood risk, flood resilience and the water environment

196. The Environment Agency was consulted on the application and recommended that conditions be imposed in the event of permission being granted pertaining to previously unidentified contamination. These conditions have been recommended due to the associated potential implications on the water environment. No issues were raised in respect of flood risk to users of the proposed building or users of the Annexe in its new 'mixed' Class B1/D1 use.

#### Sustainable urban drainage

197. The Council's Flood Risk Management team was consulted on the application and raised no objections to the application. A condition requiring the development to be implemented in accordance with the approved drainage strategy is included in the draft decision notice.

### **Trees and landscaping**

198. The three mature trees on site at present would be retained. Additionally, a replacement tree is proposed to the south-west corner of the site in accordance with Condition 1 of a recent tree works consent (the reference number for which is 17/AP/4228) which permitted the removal of an existing tree because it was posing structural problems for the boundary wall.
199. The applicant supplied as part of the original planning application an arboricultural survey, an arboricultural impact assessment, a tree strategy and bedding details. As part of the amended application, an arboricultural method statement was also supplied. The Council's Urban Forester has assessed all the information and considers it to be acceptable.
200. With respect to the proposed landscaping, the planting bed against the boundary wall shared with the Brook Drive properties would contain a mix of shrubs and three new trees. There would also be perimeter planting around the base of the proposed building. In addition to a detailed landscape strategy, the applicant has supplied a planting plan (specifying planting species and their locations), details of the beds and a maintenance strategy. The Council's Urban Forester has assessed this information and considers it to be acceptable. A condition is recommended to ensure that all soft landscaping is carried out and maintained in accordance with the approved details.

### **Biodiversity and ecology**

201. The proposal incorporates a biodiverse roof, details of the construction of which were supplied to the Council's Ecologist. The Ecologist has deemed these details acceptable, noting that the blanket would be placed underneath the photovoltaic array, a strategy which has been shown to optimise photovoltaic performance. The Ecologist has recommended the imposition of a condition requiring the biodiverse roof to be laid out in accordance with the plans and an agreed mix of species.
202. The proposal incorporates bird and bat boxes, the proposed specification of which has been approved by the Council's Ecologist. Constructing the development with these features incorporated will be a condition of consent.

## **Environmental matters**

### Land contamination

203. There are no land contamination concerns but a precautionary condition is recommended to ensure remediation is carried out should previously unidentified contamination be found during development.

### Archaeology

204. The application site is not within an Archaeological Priority Zone (APZ), but is within an area where archaeological remains should be anticipated. The site was partially archaeologically excavated in 1998 by the Museum of London Archaeology Service. These works revealed a post medieval cultivation soil, circa 1 metre below the present ground level.
205. The applicant has submitted an archaeological Desk Based Assessment which determines, as far as is reasonably possible, the location, extent, date, character, condition, significance and quality of any surviving archaeological remains liable to be threatened by the proposed redevelopment. A Written Scheme of Investigation has also been supplied. There is sufficient information to establish that, subject to conditions, the development is not likely to cause harm. These conditions will cover archaeological evaluation, archaeological mitigation, archaeological foundation design and archaeological reporting site work.

## **Construction impacts**

206. A Construction Environmental Management Plan (CEMP) and a Construction Traffic Management Plan (CTMP) have been submitted in support of the application.
207. Due to the pre-fabricated nature of the proposed building, construction will be 80% completed off-site, the effect of which is that on-site construction works and waste removal would be minimised. The modular units would be installed over a two week period, minimising disruption to IWML and local residents. Construction vehicles are to be routed along A roads, entering the site via the private access road through Geraldine Mary Harmsworth Park. As such, the use of residential streets would be avoided as far as possible.
208. Through the course of the application process, the CEMP has been amended at the request of the Highways Authority and the Council's Environmental Protection and Transport Planning teams. Its content is now to the satisfaction of all three consultees. A condition will be imposed to ensure the construction works are carried out in accordance with the CEMP, in its final amended form, as well as the CTMP. This will ensure minimised neighbour amenity, environmental and transport/highways impacts.

## **Sustainability**

### Carbon emissions and renewable technologies

209. London Plan Policy 5.2 requires a reduction in carbon emissions of 35% below the Part L 2013 target. There is no requirement for non-residential developments, such as the building proposed on the All Saints Annexe rear yard, to be carbon neutral.
210. A detailed energy assessment has been submitted as part of the application to demonstrate how the targets for carbon dioxide emissions reduction are to be met. Overall, the new building would achieve a carbon saving of 35.23%, thereby meeting the policy requirement. This has been achieved through passive design and a

high-specification building fabric, together with the provision of a high-energy air source heat pump and the installation of photovoltaic panels. The energy strategy is, therefore, acceptable and it is recommended that a condition be imposed to secure the details for the development.

211. The proposed change of use of the All Saints Annexe does not trigger a requirement to achieve carbon reductions.

#### BREEAM

212. A BREEAM pre-assessment has been submitted as part of the application documents, with the proposed building achieving a score of 74.38%, which translates to an 'Excellent' rating. A condition is recommended to achieve "excellent". This will ensure the works take sufficient consideration of sustainability.
213. As the change of use of the All Saints Annexe would not involve any floorspace uplift, this element of the planning application does not need to meet any BREEAM rating

#### Air quality

214. London Plan policy 7.14 states that development proposals should minimise exposure to poor air quality, being at least 'air quality neutral'. This is particularly the case where developments are located within designated Air Quality Management Areas (AQMA) as is the case with this proposal. Southwark Plan policy 3.6 advises that planning permission will not be granted where a development leads to a reduction in air quality.
215. The CEMP has considered potential dust emissions during construction and the attendant impact on air quality. A number of mitigation measures are proposed during the construction phase to alleviate any dust and particulates which may impact on local air quality. With respect to the air quality impacts of the development once operational, there would be an insignificant increase in vehicle movements to the site due to the 'car-free' nature of the scheme. The Travel Plan sets out measures to encourage IWM staff to use more sustainable transport methods.
216. The Council's Environmental Protection team has assessed the air quality information and is satisfied that the mitigation measures proposed would achieve air quality neutrality.

#### **Planning obligations**

217. The site is not within the Central London Crossrail S.106 contribution area, and thus the proposed development does not incur a Crossrail contribution.
218. The application has been assessed with regard to the Council's Section 106 and CIL SPD and it has been resolved that no obligations are required. All necessary mitigation is either captured within the application or to be achieved through compliance with or discharge of planning conditions.

#### **Community Infrastructure Levy**

##### Southwark CIL

219. The building located within the rear yard would not trigger a payment towards funding additional infrastructure under the London Borough of Southwark revised Community Infrastructure Levy charging schedule (December 2017).

Mayoral CIL

220. A payment of £52,220.47 would be required under the Mayor of London's Community Infrastructure Levy at £35 per square metre.
221. Owing to being a charity, IWM is eligible to seek relief from this liability under regulations 43 to 48 of the The Community Infrastructure Levy Regulations 2010 (as amended). Exemption will be granted subject to the development being deemed to meet the relief criteria.

**Engagement with, and consultation responses from, members of the public**Original planning application: Community engagement

222. The applicant's Statement of Community Involvement (contained within the Planning Statement) details the consultation undertaken before 18/AP/1577 was submitted. These community engagement efforts included:
- Four public exhibitions on 21.11.2017, 27.02.2018, 07.03.2018 and 11.04.2018 (for which invitations were sent by post to over 150 residents)
  - A public briefing with site walk-around on 20.02.2018
  - A questionnaire survey
223. The Statement of Community Involvement also explains how much of the feedback was used to inform the design evolution of the proposal.
224. As part of its statutory requirements, the Council sent letters to all residents, displayed site notices in the vicinity, and issued a press notice publicising the planning application.

Original application: Responses from members of the public

225. The planning application as originally submitted received the following responses from members of the public:

Planning application 18/AP/1577 (original)					
Total number of representations:		<b>32</b>			
In favour:	0	Against:	<b>31</b>	Neutral:	0
Petitions in favour:		0	Petitions against:		<b>1</b>

226. The material planning considerations raised by the consultation responses are summarised in the following paragraphs
227. Principle of development:
- Increasing office space would not be in line with the guidance set out in the Elephant and Castle OAPDF and SPD.
  - Moving the archives from the All Saints Annexe to a location outside London would represent a cultural and societal loss for the city.
  - The D1 use of the new building, if not restricted to an ancillary-to-museum use, could allow for the full range of D1 uses to take place within the building.
  - There is a lack of clarity as to how many members of staff would be accommodated within the new building.

## 228. Design quality and impact on heritage assets:

- The overall height and scale of the proposed building would be excessive.
- The proposed building would be harmful to the setting of nearby listed and key unlisted buildings.
- The proposed building would be harmful to the West Square Conservation Area, and erode its residential character.
- The proposed building would not be in conformity with the guidelines set out in the Conservation Area Appraisal.
- The proposed building would not be subservient in scale to the All Saints Annexe.
- The fenestration intensifies the height and scale of the proposed building.
- The proposed building could have incorporated a basement as a way of reducing its overall height but this option has not been pursued by IWM.
- The pre-fabricated nature of the proposed building would fail to achieve an acceptable quality of design, given the Conservation Area designation.
- The solar controlled glazing would reflect heat and create glare.
- The original Bethlem boundary wall is considered to be curtilage listed, and thus its proposed removal would be unacceptable.

## 229. Neighbour amenity impacts during construction:

- Risk of noise, dust and dirt during the construction period.
- Risk of works being undertaken outside of normal working hours.

## 230. Neighbour amenity impacts post-completion:

- Loss of daylight and sunlight to nearby properties.
- Overshadowing of outdoor amenity spaces at nearby properties.
- Increased sense of enclosure and diminished quality of outlook for nearby properties.
- Overlooking of neighbouring properties.
- Light pollution, and associated health impacts, generated by the illumination of the building during night-time hours.
- Noise disturbance generated by employees coming and going, delivery vehicles manoeuvring on site, the operations of the plant, the use of the cycle/refuse store, and chiller/extraction equipment which may be placed within the food preparation area associated with the canteen/café.
- Odour disturbance generated by the proposed refuse store and employees smoking outdoors.
- Vermin and pest disturbance due to the proposed refuse store.
- For those local residents who do not have a private garden, there would be a reduction in the availability of the nearby West Square garden due to increased use by IWM staff force and/or employees of the future tenant of the All Saints Annexe.

## 231. Transport, highways, deliveries and servicing matters:

- The proposed routing of delivery and servicing and refuse collection vehicles would be harmful to residential amenity.
- There would be an increase in the number of vehicle trips as a result of the development, especially in respect of the change-of-use of the Annexe.
- The local highways network would be placed under increased parking pressure.
- Routing vehicles through the park is unacceptable.
- Hours between which deliveries and servicing can take should be restricted.

232. Impacts on ground conditions:

- The new proposed trees would cause subsidence and/or structural issues at nearby properties.
- The proposed building would cause subsidence and/or structural issues at nearby properties.

233. Impacts on the nearby Metropolitan Open Land and Site of Importance for Nature Conservation:

- The loss of the yard as an 'open space buffer' between the MOL and the All Saints Annexe would be harmful to the MOL.
- Routing vehicles through the park for servicing/access purposes is contrary to MOL policy.

234. Impacts on trees and local ecology:

- The loss of plants and shrubs from within the site would cause ecological harm.
- The development and associated works on the park boundary would cause harm to woodland wildlife.
- The incursion of the proposed building into the root protection zone of the three trees on the northern part of the site would place the trees at risk.

235. Other matters:

- Flood risk would increase as a result of the proposed building within the rear yard.
- The Flood Risk Assessment does not properly assess the flood risk for the proposed B1/D1 use of the Annexe, the concern with which is that any D1 use other than ancillary-to-museum (such as a crèche or health centre) could pose flood risks to staff and visitors.
- The application drawings are inaccurate, in particular the measured drawing showing distances to neighbours' properties.
- The potential for weekend and evening working will create security risks because the site will not have closed-off access during these times.
- The final proposed has not taken into account the views and concerns raised by local residents during the pre-application consultation.

236. All of these matters were addressed in the Report presented to Committee Members at the 9 October 2018 meeting, and have been also been addressed where relevant in the assessment parts of this new Committee Report. Other matters were raised by the public consultation process, such as IWM's financial motives for the development, but these do not constitute material planning considerations so cannot be taken into account in the determination of 18/AP/1577.

Amended planning application and accompanying Listed Building Consent application:  
Community engagement

237. Following the deferral of the determination of application 18/AP/1577 at the 9<sup>th</sup> October 2018 Committee meeting, the applicant revised the design of the building and made their application for Listed Building Consent in respect of the boundary wall. The Local Planning Authority carried out consultation on the Listed Building Consent application (18/AP/4084) and reconsultation on the amended application for full planning permission (18/AP/1577).

238. Additionally, representatives of IWM held a meeting on-site on 4 December 2018 with the West Square Residents' Association and the Harmsworth Mews Residents' Association, during which a sample was shown of the proposed graduated obscuring treatment. Subsequent to the meeting, IWM sent a letter to the local residents summarising the on-site discussions.
239. A further meeting was held between representatives of IWM and these residents on 17 January 2019 to discuss the evolution of the proposed development in light of the December meeting, shortly after which IWM sent the residents a letter summarising the discussions.
240. On 11th March 2019, the Chairs of the West Square Residents' Association and the Harmsworth Mews Residents' Association submitted a representation via the Council's *Public Access for Planning* Register. This stated that the Chairs now took the view that "the amended planning application and Listed Building Consent application provide the best achievable outcome for local residents" and that they "accordingly support these applications". The full content of the comment can be viewed on the Register.

Amended planning application and accompanying Listed Building Consent application:  
Responses from members of the public

241. The planning application in its amended form received the following responses from members of the public:

Planning application 18/AP/1577 (amended)					
Total number of additional representations:					2
In favour:	1	Against:	1	Neutral:	0
Petitions in favour:		0	Petitions against:		0

242. The one objection raised five main concerns, as follows:

- impacts on ground conditions;
- height of the proposed building;
- overlooking;
- increased traffic, and;
- harm to the Conservation Area and the nearby listed buildings.

243. All of these material planning considerations were raised as part of the original consultation process. They were fully assessed in the Report presented at the 9<sup>th</sup> October 2018 Committee meeting, and are comprehensively assessed within the main body of this new Committee Report.

244. The Listed Building Consent application received the following responses from members of the public:

Listed Building Consent application 18/AP/4084					
Total number of representations:					2
In favour:	1	Against:	1	Neutral:	0
Petitions in favour:		0	Petitions against:		0

245. The one objection was submitted by the same individual who objected to 18/AP/1577 as amended and the objection was of identical content. As the concerns raised by the comment are not germane to the Listed Building Consent proposal, and because the

issues raised have been addressed in detail in earlier parts of this report, there are no issues to discuss.

### **Consultation responses from statutory consultees**

246. The following consultation responses were received from statutory consultees in respect of 18/AP/1577. Although other statutory consultees were consulted, these did not respond.

#### Environment Agency

247. No objections. Conditions relating to contamination and foundation design recommended.

#### Historic England

248. No objections. Instructed the LPA to proceed with determination of the planning application and the Listed Building Consent as seen fit, noting that the Listed Building Consent application is not referable because the proposed works relates solely to a curtilage listed structure.

#### Natural England

249. No objections. Instructed the LPA to proceed with determination of the applications as seen fit.

#### Metropolitan Police

250. No objections. Condition relating to Secure by Design accreditation.

#### London Underground

251. No objections, no comments.

#### Conservation Area Advisory Group (CAAG)

252. CAAG was generally supportive of the proposal. The group felt the design and the detailing were promising but the two-tone brick cladding was potentially distracting but would have preferred a single tone brick with deep angled reveals. The Group felt the landscape was underplayed and dominated by hard surfaces. The adjacency of the park provides an opportunity to introduce a complementary landscape with green roofs and trees to screen the new building from the residential properties nearby.

*Note: a green roof and further details of the planting scheme were submitted subsequent to and partly in response to the views expressed by CAAG. The CAAG comments were made in response to the original application so does not reflect the changes to the fenestration.*

### **Community impact statement**

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

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



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

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

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

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

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

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

### **Consultations**

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

### **Human rights implications**

258. 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.

259. This application has the legitimate aim of providing a new 'mixed' Class B1/D1 building together with the change of use of an existing building, and all associated works. 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.

### **Conclusion on planning and listed building issues**

260. The proposed land uses, comprising new Class D1 floorspace and 'mixed' Class D1/B1 repurposed floorspace, would support an important existing cultural use while delivering new employment floorspace. These uses are appropriate in this location, which benefits from the highest possible public transport accessibility and is within both the Central Activities Zone and an Opportunity Area.

261. In relation to overlooking and impact on privacy, it is noted that the majority of windows within the proposed building would be a distance of at least 21 metres from the Brook Drive properties to the south and the Harmsworth Mews properties to the north. In addition, and in response to concerns raised by Members and residents, all the first- and second-floor glazing on the elevations facing these nearby properties

would be fitted with a graduated obscuring treatment. This treatment would significantly obscure views 'out' to the northeast or southwest for anyone within the proposed office accommodation.

262. With respect to daylight impacts, while there would be noticeable NSL losses at two rooms within properties adjoining the site, these losses are a consequence of the rooms benefitting from an unusually substantial area of sky visibility due to the yard being undeveloped at present. The resulting NSL levels are, in any case, not untypical for a central London location. Furthermore, there would be no VSC losses at either of these rooms (or at any other affected room) in excess of the BRE recommendations. On balance, it is considered that the daylight level within the affected rooms would not noticeably change.
263. In terms of sunlight impacts, a conservatory at a property adjoining the site would experience an APSH reduction by more than the BRE recommendations. However, these losses would affect only some of the glazed panes in the conservatory, leaving the majority of the panes with a complaint APSH level. As these glazed panes combine to provide sunlight to a single room the effect would be much less noticeable to the users/occupiers. Thus, while the impact is recognised, it is considered that the sunlight losses at this one neighbouring property would not be detrimental to the occupiers' amenity.
264. The proposed building would achieve a high quality of design that would preserve the character and appearance of the West Square Conservation Area and the setting of the nearby Grade II listed IWML. Well-detailed and incorporating a high quality palette of materials, the building would relate sensitively to the historic context while also maintaining the openness and character of Geraldine Mary Harmsworth Park, most of which is designated Metropolitan Open Land.
265. The new boundary wall proposed in replacement of the curtilage listed wall would enable the delivery of a high quality building that would greatly strengthen the physical and visual connection between the application site and IWML. The memory of the original structure would be retained through the new wall following the same line as the original and through the reinstatement (in a location to be agreed) of the historic plaque. The perceived harm arising to the heritage assets, the wall and the West Square Conservation Area as a result of the partial demolition and associated development within the grounds of the All Saints Annexe building, is considered to be less than substantial. Weighing this less than substantial harm against the public benefits of the proposal, officers are satisfied that it would be appropriate to grant the Listed Building Consent application.
266. The trip generation, servicing and refuse arrangements, cycle storage and travel plan are all acceptable. Adequate measures are in place to protect the existing mature trees on site, while the high-quality scheme of hard and soft landscaping —to include some planting along the park boundary— is welcomed.
267. In line with the requirements of the NPPF, the Council has applied the presumption in favour of sustainable development. The proposed development would accord with sustainable principles and would make efficient use of the land to deliver a high quality development that is in accordance with the Council's aspirations for the area. The harm arising from the demolition of the curtilage listed wall would be less than substantial and would be outweighed by the public benefits of the proposal. It is therefore recommended that Members grant permission for 18/AP/1577 and 18/AP/4084, subject in both cases to conditions as set out in the attached draft decision notices.

**BACKGROUND DOCUMENTS**

<b>Background Papers</b>	<b>Held At</b>	<b>Contact</b>
Site history file: TP/1357-A Application file: 18/AP/1577 Southwark Local Development Framework and Development Plan Documents	Chief Executive's Department 160 Tooley Street London SE1 2QH	Planning enquiries telephone: 020 7525 5403 Planning enquiries email: planning.enquiries@southwark.gov.uk Case officer telephone: 020 7525 5535 Council website: www.southwark.gov.uk

**APPENDICES**

<b>No.</b>	<b>Title</b>
Appendix 1	Consultation undertaken
Appendix 2	Consultation responses received
Appendix 3	Recommendation (18/AP/1577)
Appendix 3	Recommendation (18/AP/4084)

**AUDIT TRAIL**

<b>Lead Officer</b>	Simon Bevan, Director of Planning	
<b>Report Author</b>	Patrick Cronin, Senior Planning Officer (for 18/AP/1577) Tracy Chapman, Team Leader (for 18/AP/4084)	
<b>Version</b>	Final	
<b>Dated</b>	20 March 2019	
<b>Key Decision</b>	No	
<b>CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER</b>		
<b>Officer Title</b>	<b>Comments sought</b>	<b>Comments included</b>
Strategic Director of Finance & Governance	No	No
Strategic Director, Environment and Social Regeneration	No	No
Strategic Director of Housing and Modernisation	No	No
Director of Regeneration	No	No
<b>Date final report sent to Constitutional Team</b>	22 March 2019	

## APPENDIX 1

**Consultation undertaken**

**18/AP/1577: Site notice date:** 25/05/2018

**18/AP/1577: Press notice date:** 17/05/2018

**18/AP/1577: Case officer site visit date:** 25/05/2018

**18/AP/1577: Neighbour consultation letters sent:** 16/05/2018

**18/AP/1577: Neighbour re-consultation letters sent:** 05/02/2019

**18/AP/4084: Site notice date:** 06/02/2019

**18/AP/4084: Press notice date:** 10/01/2019

**18/AP/4084: Case officer site visit date:** 06/02/2019

**18/AP/4084: Neighbour consultation letters sent:** 08/01/2019

**Internal services consulted:**

- Ecology Officer
- Economic Development Team
- Environmental Protection Team Formal Consultation [Noise / Air Quality / Land Contamination / Ventilation]
- Flood and Drainage Team
- HIGHWAY LICENSING
- Highway Development Management
- Highways Development Management - CMPs
- Housing Regeneration Initiatives
- Parks & Open Spaces
- Waste Management

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

- EDF Energy
- Environment Agency
- Historic England
- London Borough of Lambeth
- London Underground Limited
- Metropolitan Police Service (Designing out Crime)
- Natural England - London Region & South East Region
- Thames Water - Development Planning
- The Georgian Group
- The Victorian Society

**18/AP/1577: Neighbour and local groups consulted:**

- |                                           |                                    |
|-------------------------------------------|------------------------------------|
| • 13 Orient Street London SE11 4SR        | • 29 West Square London SE11 4SP   |
| • 47 West Square London SE11 4SP          | • 44 West Square London SE11 4SP   |
| • 34 West Square London SE11 4SP          | • 10 Hayles Street London SE11 4SS |
| • 6 Temple West Mews West Square SE11 4TJ | • 12 Hayles Street London SE11 4SS |
| • 7 Temple West Mews West Square SE11 4TJ | • 7 Orient Street London SE11 4SR  |

- Flat 21 71-89 Brook Drive SE11 4TR
  - Flat 22 71-89 Brook Drive SE11 4TR
  - 139b Brook Drive London SE11 4TQ
  - 19 Orient Street London SE11 4SR
  - Flat 8 71-89 Brook Drive SE11 4TR
  - Flat 9 71-89 Brook Drive SE11 4TR
  - Flat 7 71-89 Brook Drive SE11 4TR
  - Flat 5 71-89 Brook Drive SE11 4TR
  - Flat 6 71-89 Brook Drive SE11 4TR
  - 4 Temple West Mews West Square SE11 4TJ
  - 5 Temple West Mews West Square SE11 4TJ
  - 3 Temple West Mews West Square SE11 4TJ
  - 1 Temple West Mews West Square SE11 4TJ
  - 2 Temple West Mews West Square SE11 4TJ
  - Flat 23 71-89 Brook Drive SE11 4TR
  - Flat 37 71-89 Brook Drive SE11 4TR
  - Flat 38 71-89 Brook Drive SE11 4TR
  - Flat 36 71-89 Brook Drive SE11 4TR
  - Flat 34 71-89 Brook Drive SE11 4TR
  - Flat 35 71-89 Brook Drive SE11 4TR
  - 7 Hedger Street London SE11 4ST
  - 9 Hedger Street London SE11 4ST
  - 5 Hedger Street London SE11 4ST
  - 1 Hedger Street London SE11 4ST
  - 3 Hedger Street London SE11 4ST
  - Flat 27 71-89 Brook Drive SE11 4TR
- Flat 28 71-89 Brook Drive SE11 4TR
  - Flat 26 71-89 Brook Drive SE11 4TR
  - Flat 24 71-89 Brook Drive SE11 4TR
- Flat 25 71-89 Brook Drive SE11 4TR
  - Flat 32 71-89 Brook Drive SE11 4TR
- Flat 33 71-89 Brook Drive SE11 4TR
  - Flat 31 71-89 Brook Drive SE11 4TR
  - Flat 29 71-89 Brook Drive SE11 4TR
  - Flat 30 71-89 Brook Drive SE11 4TR
  - Flat 4 71-89 Brook Drive SE11 4TR
  - Flat A 109 Brook Drive SE11 4TU
  - Flat B 109 Brook Drive SE11 4TU
  - Flat B 107 Brook Drive SE11 4TU
  - Flat B 99 Brook Drive SE11 4TU
  - Flat A 107 Brook Drive SE11 4TU
  - Flat B 115 Brook Drive SE11 4TU
  - Flat A 111 Brook Drive SE11 4TU
  - Flat A 115 Brook Drive SE11 4TU
  - Flat A 113 Brook Drive SE11 4TU
  - Flat B 113 Brook Drive SE11 4TU
  - Flat B 55 Brook Drive SE11 4TU
  - Flat B 57 Brook Drive SE11 4TU
  - Flat B 53 Brook Drive SE11 4TU
  - Flat B 49 Brook Drive SE11 4TU
  - Flat B 51 Brook Drive SE11 4TU
  - Flat B 67 Brook Drive SE11 4TU
  - Flat B 69 Brook Drive SE11 4TU
  - Flat B 65 Brook Drive SE11 4TU
  - Flat B 59 Brook Drive SE11 4TU
  - Flat B 61 Brook Drive SE11 4TU
  - Flat B 111 Brook Drive SE11 4TU
  - Flat 1 71-89 Brook Drive SE11 4TR
  - Flat 17 71-89 Brook Drive SE11 4TR
  - Flat 16 71-89 Brook Drive SE11 4TR
  - Flat 14 71-89 Brook Drive SE11 4TR
  - Flat 15 71-89 Brook Drive SE11 4TR
  - Flat 2 71-89 Brook Drive SE11 4TR
  - Flat 3 71-89 Brook Drive SE11 4TR
  - Flat 20 71-89 Brook Drive SE11 4TR
  - Flat 18 71-89 Brook Drive SE11 4TR
  - Flat 19 71-89 Brook Drive SE11 4TR
  - 143b Brook Drive London SE11 4TQ
  - 145b Brook Drive London SE11 4TQ
  - 137b Brook Drive London SE11 4TQ
  - 125b Brook Drive London SE11 4TQ
- 3 Orient Street London SE11 4SR
  - 5 Orient Street London SE11 4SR
  - 2 Hayles Street London SE11 4SS
  - 20 Hayles Street London SE11 4SS
  - 18 Hayles Street London SE11 4SS
  - 14 Hayles Street London SE11 4SS
  - 16 Hayles Street London SE11 4SS
  - 49 West Square London SE11 4SP
  - 50 West Square London SE11 4SP
  - 48 West Square London SE11 4SP
  - 45 West Square London SE11 4SP
  - 46 West Square London SE11 4SP
  - 1 Orient Street London SE11 4SR
  - 15 Orient Street London SE11 4SR
  - 53 West Square London SE11 4SP
  - 51 West Square London SE11 4SP
  - 52 West Square London SE11 4SP
  - 24 West Square London SE11 4SN
  - 34 Hayles Street London SE11 4SS
  - Flat A 117 Brook Drive SE11 4TU
  - Sports Facility Geraldine Mary Harmsworth Park SE1 6ER
  - Garden House 44 West Square SE11 4SP
  - Flat B 117 Brook Drive SE11 4TU
  - Ground Floor Flat 30 West Square SE11 4SP
  - Third Floor Flat 30 West Square SE11 4SP
  - Second Floor And Third Floor Flat 1 Austral Street SE11 4SJ
  - Ground Floor Flat 1 Austral Street SE11 4SJ
  - First Floor Flat 1 Austral Street SE11 4SJ
  - First Floor And Second Floor Flat 22 West Square SE11 4SN
  - Imperial War Museum Annex Austral Street SE11 4SJ
  - Basement And Ground Floor Flat 22 West Square SE11 4SN
  - Flat 1 103 Brook Drive SE11 4TU
  - 6 Austral Street London SE11 4SJ
  - 7 Austral Street London SE11 4SJ
  - 4 Austral Street London SE11 4SJ
  - 27 Austral Street London SE11 4SJ
  - 3 Austral Street London SE11 4SJ
  - 23 West Square London SE11 4SN
  - 21 West Square London SE11 4SN
  - 20 West Square London SE11 4SN
  - 17 Austral Street London SE11 4SJ
  - Flat 2 103 Brook Drive SE11 4TU
  - Imperial War Museum Lambeth Road SE1 6HZ
  - 23 Austral Street London SE11 4SJ
  - 25 Austral Street London SE11 4SJ
  - 19 Austral Street London SE11 4SJ
  - 2 Austral Street London SE11 4SJ
  - Flat 2 5 Austral Street SE11 4SJ
  - Flat 3 5 Austral Street SE11 4SJ
  - Flat 1 5 Austral Street SE11 4SJ
  - Flat C 11 Austral Street SE11 4SJ
  - Flat C 13 Austral Street SE11 4SJ
  - 125a Brook Drive London SE11 4TQ
  - 131a Brook Drive London SE11 4TQ
  - 11c West Square London SE11 4SN
  - 11a West Square London SE11 4SN
  - 11b West Square London SE11 4SN
  - 6 Harmsworth Mews London SE11 4SQ
  - 7 Harmsworth Mews London SE11 4SQ
  - 5 Harmsworth Mews London SE11 4SQ
  - 3 Harmsworth Mews London SE11 4SQ
  - 4 Harmsworth Mews London SE11 4SQ
  - Flat B 11 Austral Street SE11 4SJ
  - Flat B 13 Austral Street SE11 4SJ
  - Flat A 13 Austral Street SE11 4SJ
  - Basement Flat 28 West Square SE11 4SP
  - Flat A 11 Austral Street SE11 4SJ
  - 137a Brook Drive London SE11 4TQ
  - Flat A 65 Brook Drive SE11 4TU
  - Flat A 67 Brook Drive SE11 4TU
  - Flat A 61 Brook Drive SE11 4TU

- 131b Brook Drive London SE11 4TQ
- Flat 12 71-89 Brook Drive SE11 4TR
- Flat 13 71-89 Brook Drive SE11 4TR
- Flat 11 71-89 Brook Drive SE11 4TR
- 147b Brook Drive London SE11 4TQ
- Flat 10 71-89 Brook Drive SE11 4TR
- Second Floor And Third Floor Flat 15 Austral Street SE11 4SJ
- Second Floor Flat 28 West Square SE11 4SP
- Ground Floor Flat 9 Austral Street SE11 4SJ
- Ground Floor Flat 15 Austral Street SE11 4SJ
- Ground Floor Flat 28 West Square SE11 4SP
- Southwark College West Square SE11 4SN
- Charlotte Sharman Primary School West Square SE11 4SN
- Second Floor Flat 9 Austral Street SE11 4SJ
- Third Floor Flat 28 West Square SE11 4SP
- 22b Hayles Street London SE11 4SS
- First Floor Flat 15 Austral Street SE11 4SJ
- 22a Hayles Street London SE11 4SS
- Flat 1 95 Brook Drive SE11 4TU
- 14 West Square London SE11 4SN
- First Floor And Second Floor Flat 45 Brook Drive SE11 4TU
- Ground Floor And First Floor Flat 45 Brook Drive SE11 4TU
- Basement Flat 25 West Square SE11 4SP
- First Floor Flat 28 West Square SE11 4SP
- First Floor Flat 9 Austral Street SE11 4SJ
- 63 Brook Drive London SE11 4TU
- Top Floor 97 Brook Drive SE11 4TU
- 6 West Square London SE11 4SN
- 12 West Square London SE11 4SN
- 7 West Square London SE11 4SN
- 8 West Square London SE11 4SN
- 19 West Square London SE11 4SN
- Flat 2 Two Eagles House SE11 4TQ
- Flat 3 Two Eagles House SE11 4TQ
- Flat 1 Two Eagles House SE11 4TQ
- 16 West Square London SE11 4SN
- 15 West Square London SE11 4SN
- 17 Hedger Street London SE11 4ST
- 19 Hedger Street London SE11 4ST
- 15 Hedger Street London SE11 4ST
- 11 Hedger Street London SE11 4ST
- 13 Hedger Street London SE11 4ST
- 8 Orient Street London SE11 4SR
- 18 West Square London SE11 4SN
- 6 Orient Street London SE11 4SR
- 2 Orient Street London SE11 4SR
- 4 Orient Street London SE11 4SR
- Flat 4 Two Eagles House SE11 4TQ
- 6a Austral Street London SE11 4SJ
- 141a Brook Drive London SE11 4TQ
- 141b Brook Drive London SE11 4TQ
- Ground Flat 97 Brook Drive SE11 4TU
- First Floor Flat 97 Brook Drive SE11 4TU
- Flat 3 95 Brook Drive SE11 4TU
- 93 Brook Drive London SE11 4TU
- Flat 2 95 Brook Drive SE11 4TU
- 11 West Square London SE11 4SN
- 13 West Square London SE11 4SN
- 119d Brook Drive London SE11 4TQ
- 119a Brook Drive London SE11 4TQ
- 119b Brook Drive London SE11 4TQ
- 129a Brook Drive London SE11 4TQ
- 129b Brook Drive London SE11 4TQ
- 21b Austral Street London SE11 4SJ
- 17 West Square London SE11 4SN
- 21a Austral Street London SE11 4SJ
- 37 West Square London SE11 4SP
- 38 West Square London SE11 4SP
- 36 West Square London SE11 4SP
- 33 West Square London SE11 4SP
- 35 West Square London SE11 4SP
- Flat A 57 Brook Drive SE11 4TU
- Flat A 59 Brook Drive SE11 4TU
- Flat B 105 Brook Drive SE11 4TU
- Flat B 43 Brook Drive SE11 4TU
- Flat A 99 Brook Drive SE11 4TU
- Flat A 69 Brook Drive SE11 4TU
- 147a Brook Drive London SE11 4TQ
- Flat A 105 Brook Drive SE11 4TU
- 145a Brook Drive London SE11 4TQ
- 139a Brook Drive London SE11 4TQ
- 143a Brook Drive London SE11 4TQ
- Flat A 53 Brook Drive SE11 4TU
- Flat A 55 Brook Drive SE11 4TU
- Flat A 51 Brook Drive SE11 4TU
- Flat A 43 Brook Drive SE11 4TU
- Flat A 49 Brook Drive SE11 4TU
- 2 Harmsworth Mews London SE11 4SQ
- 46 Hayles Street London SE11 4SX
- 48 Hayles Street London SE11 4SX
- 44 Hayles Street London SE11 4SX
- 40 Hayles Street London SE11 4SX
- 42 Hayles Street London SE11 4SX
- 56 Hayles Street London SE11 4SX
- 58 Hayles Street London SE11 4SX
- 54 Hayles Street London SE11 4SX
- 50 Hayles Street London SE11 4SX
- 52 Hayles Street London SE11 4SX
- 28 Hayles Street London SE11 4SS
- 30 Hayles Street London SE11 4SS
- 26 Hayles Street London SE11 4SS
- 24 Hayles Street London SE11 4SS
- 8 Hayles Street London SE11 4SS
- 38 Hayles Street London SE11 4SX
- 6 Hayles Street London SE11 4SS
- 32 Hayles Street London SE11 4SS
- 4 Hayles Street London SE11 4SS
- 60 Hayles Street London SE11 4SX
- 101 Brook Drive London SE11 4TU
- 135 Brook Drive London SE11 4TQ
- 149 Brook Drive London SE11 4TQ
- 1 Harmsworth Mews London SE11 4SQ
- 91 Brook Drive London SE11 4TU
- 47 Brook Drive London SE11 4TU
- 68 Hayles Street London SE11 4SX
- 119 Brook Drive London SE11 4TQ
- 66 Hayles Street London SE11 4SX
- 62 Hayles Street London SE11 4SX
- 64 Hayles Street London SE11 4SX
- 133 Brook Drive London SE11 4TQ
- 127 Brook Drive London SE11 4TQ
- 121 Brook Drive London SE11 4TQ
- 123 Brook Drive London SE11 4TQ
- 78 Brook Drive SE11 4TS
- 80 Brook Drive SE11 4TS
- 82 Brook Drive SE11 4TS
- 44 Brook Drive SE11 4TS
- 46 Brook Drive London SE11 4TS
- 50 Brook Drive SE11 4TS
- 52 Brook Drive SE11 4TS
- 54 Brook Drive SE11 4TS
- 56 Brook Drive SE11 4TS
- 64 Brook Drive London SE11 4TS
- 66 Brook Drive SE11 4TS
- 60 Brook Drive SE11 4TS
- 84 Brook Drive London SE11 4TS
- 30 West Square London SE11 4SP
- 157 Kennington Road London SE11 6SF
- 7 Orient Street London SE11 4SR
- 31 West Square London SE11 4SP
- 12 West Square London SE11 4SN
- 125 High Street Sevenoaks TN13 1UT

- 42 West Square London SE11 4SP
- 43 West Square London SE11 4SP
- 41 West Square London SE11 4SP
- 39 West Square London SE11 4SP
- 40 West Square London SE11 4SP
- 26 West Square London SE11 4SP
- 27 West Square London SE11 4SP
- 3 West Square London SE11 4SN
- 9 West Square London SE11 4SN
- 31 West Square London SE11 4SP
- 32 West Square London SE11 4SP
- 95 Brook Drive SE11 4TU
- 7 Orient Street London SE11 4SR
- 20, West Square London SE11 4SN
- 1c Austral Street London SE11 4SJ
- 6 Harmsworth Mews London SE11 4SQ
- 4 Harmsworth Mews London SE11 4SQ
- 4 Harmsworth Mews London SE11 4SQ
- 2 Harmsworth Mews West Square SE11 4SQ
- C/O Phillips Planning Services Ltd
- 7 Orient Street London SE11 4SR
- C/O 1 Harmsworth Mews London SE11 4SD

### **18/AP/1577 (Re-consultation): Neighbour and local groups consulted:**

- C/O 160 Tooley Street
- C/O 1 Harmsworth Mews London SE11 4SD [PETITION]
- Email representation
- Email representation
- First Floor Flat 97 Brook Drive SE11 4TU
- 1 Harmsworth Mews London SE11 4SQ
- 1 Harmsworth Mews London SE11 4SQ
- 1c Austral Street London SE11 4SJ
- 12 West Square London SE11 4SN
- 125 High Street Sevenoaks TN13 1UT
- 2 Harmsworth Mews West Square SE11 4SQ
- 2 Harmsworth Mews West Square SE11 4SQ
- 20 West Square London SE11 4SN
- 20 West Square London SE11 4SN
- 21 West Square London SE11 4SN
- 3 Harmsworth Mews London SE11 4SQ
- 3 Harmsworth Mews London SE11 4SQ
- 3 Harmsworth Mews London SE11 4SQ
- 38 West Square London SE11 4SP
- 4 Harmsworth Mews London SE11 4SQ
- 4 Harmsworth Mews London SE11 4SQ
- 4 Harmsworth Mews London SE11 4SQ
- 4 Harmsworth Mews London SE11 4SQ
- 49 West Square London SE11 4SP
- 5 Harmsworth Mews London SE11 4SQ
- 6 Harmsworth Mews London SE11 4SQ
- 6 Harmsworth Mews London SE11 4SQ
- 7 Orient Street London SE11 4SR
- 7 Orient Street London SE11 4SR
- 7 Orient Street London SE11 4SR
- 95 Brook Drive SE11 4TU
- 13 West Square SE11 4SN

### **18/AP/4084: Neighbour and local groups consulted:**

- Southwark Council
- Southwark Council
- Southwark Council
- Friends of Geraldine Mary Harmsworth Park
- West Square Residents Association
- West Square Residents Association
- West Square Residents Association
- Howard Sharp & Partners
- The Occupier 95 Brook Drive London SE11 4TU
- The Occupier 1 Harmsworth Mews Kennington London SE11 4SQ
- The Occupier c/o 1 Harmsworth Mews LONDON SE11 4SD
- The Occupier 1 HARMSWORTH MEWS LONDON SE11 4SQ
- The Occupier 13 WEST SQUARE LONDON SE11 4SN
- The Occupier 2 HARMSWORTH MEWS LONDON SE11 4SQ
- The Occupier 20 WEST SQUARE LONDON SE11 4SN
- The Occupier 21 WEST SQUARE LONDON SE11 4SN
- The Occupier 24 WEST SQUARE LONDON SE11 4SN
- The Occupier 3 HARMSWORTH MEWS LONDON SE11 4SQ
- The Occupier 38 WEST SQUARE LONDON SE11 4SP
- The Occupier 4 HARMSWORTH MEWS LONDON SE11 4SQ
- The Occupier 49 WEST SQUARE LONDON SE11 4SP
- The Occupier 5 HARMSWORTH MEWS LONDON SE11 4SQ
- The Occupier 6 HARMSWORTH MEWS LONDON SE11 4SQ
- The Occupier 7 ORIENT STREET LONDON SE11 4SR
- The Occupier 1c Austral Street London SE11 4SJ
- The Occupier 12 West Square London SE11 4SN
- The Occupier 20, West Square London SE11 4SN
- The Occupier 4 Harmsworth Mews London SE11 4SQ
- The Occupier 4 Harmsworth Mews London SE11 4SQ
- The Occupier 5 Harmsworth Mews London SE11 4SQ
- The Occupier 53 Hanover Gardens London SE11 5TN
- The Occupier 6 Harmsworth Mews London SE11 4SQ
- The Occupier 7 Orient Street London SE11 4SR
- The Occupier 2 Harmsworth Mews West Square London SE11 4SQ
- The Occupier FIRST FLOOR FLAT 97 BROOK DRIVE LONDON SE11 4TU
- The Occupier by email SE1
- The Occupier c/o Phillips Planning Services Ltd

## APPENDIX 2

### Consultation responses received

#### Internal services

As discussed in the main body of the Report.

#### Statutory and non-statutory organisations

- Environment Agency
- Historic England
- London Underground Limited
- Natural England - London Region & South East Region
- Metropolitan Police

#### 18/AP/1577: Neighbours and local groups

- C/O 160 Tooley Street
- C/O 1 Harmsworth Mews London SE11 4SD [PETITION]
- Email representation
- Email representation
- First Floor Flat 97 Brook Drive SE11 4TU
- 1 Harmsworth Mews London SE11 4SQ
- 1 Harmsworth Mews London SE11 4SQ
- 1c Austral Street London SE11 4SJ
- 12 West Square London SE11 4SN
- 125 High Street Sevenoaks TN13 1UT
- 2 Harmsworth Mews West Square SE11 4SQ
- 2 Harmsworth Mews West Square SE11 4SQ
- 20 West Square London SE11 4SN
- 20 West Square London SE11 4SN
- 21 West Square London SE11 4SN
- 3 Harmsworth Mews London SE11 4SQ
- 3 Harmsworth Mews London SE11 4SQ
- 3 Harmsworth Mews London SE11 4SQ
- 38 West Square London SE11 4SP
- 4 Harmsworth Mews London SE11 4SQ
- 4 Harmsworth Mews London SE11 4SQ
- 4 Harmsworth Mews London SE11 4SQ
- 4 Harmsworth Mews London SE11 4SQ
- 49 West Square London SE11 4SP
- 5 Harmsworth Mews London SE11 4SQ
- 6 Harmsworth Mews London SE11 4SQ
- 6 Harmsworth Mews London SE11 4SQ
- 7 Orient Street London SE11 4SR
- 7 Orient Street London SE11 4SR
- 7 Orient Street London SE11 4SR
- 95 Brook Drive SE11 4TU
- 13 West Square SE11 4SN

#### 18/AP/4084: Neighbours and local groups

- First Floor Flat 97 Brook Drive SE11 4TU
- 41 West Square London SE11 4SP



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## RECOMMENDATION

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

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<b>Applicant</b>	Imperial War Museums	<b>Reg. Number</b>	18/AP/1577
<b>Application Type</b>	Full Planning Application	<b>Case Number</b>	TP/1357-A
<b>Recommendation</b>	Grant permission		

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### Draft of Decision Notice

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#### Planning Permission was GRANTED for the following development:

Construction of a three-storey building for Class D1 use (to provide offices and staff accommodation ancillary to the Imperial War Museum) within the rear yard, to incorporate rooftop plant and photovoltaics, together with the change of use of the existing All Saints Annexe building from Class D1 (ancillary to the museum) use to a mixed Class B1 (office) / Class D1 (ancillary to museum) use. The development will include hard and soft landscaping improvements, the provision of a cycle and refuse store, the provision of one accessible car parking space at the front of the All Saints Annexe building, the demolition of a portion of the site's boundary wall to Geraldine Mary Harmsworth Park and the incorporation of the replacement wall into the ground floor of the proposed building, the realignment of the access road into the site from the Park, demolition of the portakabins and other associated works.

**At:** ALL SAINTS ANNEXE (IMPERIAL WAR MUSEUM) AND LAND TO THE REAR, AUSTRAL STREET, LONDON, SE11 4SJ

In accordance with application received on 03/05/2018

#### and Applicant's Drawing Nos.

##### Existing plans

- 2740-JW-00-ZZ-DR-A-0002 - 'Block Plan'
- 2740-JW-00-ZZ-DR-A-0001 - 'Location Plan'
- AS-BP-FL-4-001 - 'Floor Layout'
- AS-BP-FL-3-001 - 'Floor Layout'
- AS-BP-FL-2-001 - 'Floor Layout'
- AS-BP-FL-1-001 - 'Floor Layout'
- AS-BP-FL-0-001 - 'Floor Layout'

##### Proposed plans, elevations and sections

- 2740-JW-00-ZZ-DR-A-4003 - Rev P02 - 'Proposed Section C-C'
- 2740-JW-00-ZZ-DR-A-4002 - Rev P02 - 'Proposed Section B-B'
- 2740-JW-00-ZZ-DR-A-4001 - Rev P02 - 'Proposed Section A-A'
- 2740-JW-00-ZZ-DR-A-4000 - Rev P02 - 'Proposed Site Sections'
- 2740-JW-00-ZZ-DR-A-3008 - Rev P02 - 'Boundary Wall and Gates Proposed and Existing'
- 2740-JW-00-ZZ-DR-A-3007 - Rev P02 - 'Proposed West Elevation Typical Bay'
- 2740-JW-00-ZZ-DR-A-3006 - Rev P03 - 'Proposed South Elevation Typical Bay'
- 2740-JW-00-ZZ-DR-A-3005 - Rev P04 - 'Proposed North Elevation Typical Bay'
- 2740-JW-00-ZZ-DR-A-3004 - Rev P03 - 'Proposed East Elevation'
- 2740-JW-00-ZZ-DR-A-3003 - Rev P03 - 'Proposed South Elevation'
- 2740-JW-00-ZZ-DR-A-3002 - Rev P02 - 'Proposed West Elevation'
- 2740-JW-00-ZZ-DR-A-3001 - Rev P03 - 'Proposed North Elevation'
- 2740-JW-00-ZZ-DR-A-3000 - Rev P02 - 'Proposed Site Elevations'
- 2740-JW-ZZ-03-DR-A-1003 - Rev P04 - 'Proposed Roof Plan'
- 2740-JW-ZZ-02-DR-A-1002 - Rev P04 - 'Proposed Second Floor Plan'
- 2740-JW-ZZ-01-DR-A-1001 - Rev P04 - 'Proposed First Floor Plan'
- 2740-JW-ZZ-00-DR-A-1000 - Rev P04 - 'Proposed Ground Floor Plan'
- 2740-JW-00-ZZ-DR-A-0003 - Rev P03 - 'Proposed Site Plan'
- EDC22-GA-205 - Rev A - 'Biodiversity Green Roof Details'
- EDCC22-GA-100 - Rev N - 'General Arrangement Plan'
- 17373-DID-ZZ-00-DR-S-201-S2.B - 'Structural Details'
- 17373-DID-ZZ-00-DR-101-S2.B - 'Foundation GA'

- 17373-DID-ZZ-XX-DR-S-203-S2.A - 'Site Level Sections Sheet 1'
- 17373-DID-ZZ-XX-DR-S-204-S2.A - 'Site Level Sections Sheet 2'
- 17373/611 - Rev A - 'Pavement and Kerb Details'

#### Design, heritage, trees, landscaping and archaeological documentation

- 'Design and Access Statement' - Revision 1 [dated 03.05.2018, produced by Jestico and Whiles]
- 'Design and Access Statement Addendum' [dated 01.02.2019, produced by Jestico and Whiles]
- 'Archaeological Desk-Based Assessment' [dated May 2018, produced by MOLA]
- 'Written Scheme of Investigation for an Archaeological Watching Brief' [dated 26.09.2018, produced by MOLA]
- 'Imperial War Museum - All Saints Site, Arboricultural Survey' - V.2.0 [dated 18.10.2017 and produced by The Ecology Consultancy]
- 'Arboricultural Impact Assessment' [dated May 2018, produced by the Ecology Consultancy]
- 'Arboricultural Method Statement' [dated January 2019, produced by Plowman Craven]
- 'Tree Strategy' [dated May 2018, produced by Design ID]
- 'Landscaping Strategy' [dated May 2018, produced by Eden Development Consultants Ltd]
- EDC22-GA-101 - Rev D - 'Hardworks Plan'
- EDC22-GA-102 - Rev D - 'Softworks Plan'
- EDC22-SP01 - Rev D - 'Outline Landscape Specification' [dated 21/09/2018, produced by Eden Development Consultants Ltd]
- 2876-SK-139 - Rev P02 - 'Distances to surrounding buildings and heights'

#### Environmental and sustainability information

- 'Daylight and Sunlight Report' [dated May 2018, produced by CPMC Surveying]
- 'Energy Statement' [dated May 2018, produced by Delap and Waller]
- 'Ground Investigation Report' [dated May 2018, produced by Land Science]
- 'Noise Survey and Impact Assessment' [dated May 2018, produced by dbX Acoustics]
- 'Waste Management Strategy' [dated May 2018, produced by IWM]
- PURY-EP900YSLM-A1 - 'Heat Recovery Outdoor Unit' [Air Conditioning Specification by Mitsubishi Electric]

#### Flood risk and drainage documentation

- 'Flood Risk Assessment' [dated May 2018, produced by Carson Consulting]
- 'Site Drainage Strategy' [dated May 2018, produced by Design ID]

#### Transport documentation

- 'Imperial War Museum, Parkside, Construction Traffic Management Plan' [undated, produced by Local Transport Projects]
- 'Construction and Environmental Management Plan' - Rev D [dated 15/08/2018, produced by REDS10]
- 'Delivery and Servicing Plan' [dated May 2018, produced by Local Transport Projects]
- 'Transport Assessment' [dated May 2018, produced by Local Transport Projects]
- 'Travel Plan' [dated May 2018, produced by Local Transport Projects]
- 'Modal Split Derivation' [undated, produced by Local Transport Projects]

#### Other documentation

- 'Planning Statement' [revised and received 01/08/2018, produced by The Planning Lab]
- 'IWM Park Side | response to public comments (ap ref: 18/AP/1577)' [dated 26.07.2018, produced by the Planning Lab]

#### **Subject to the following thirty-four conditions:**

#### **Time limit for implementing this permission and the approved plans**

- 1 The development hereby permitted shall not be carried out otherwise than in accordance with the following approved plans:
  - 2740-JW-00-ZZ-DR-A-4003 - Rev P02 - 'Proposed Section C-C'
  - 2740-JW-00-ZZ-DR-A-4002 - Rev P02 - 'Proposed Section B-B'
  - 2740-JW-00-ZZ-DR-A-4001 - Rev P02 - 'Proposed Section A-A'
  - 2740-JW-00-ZZ-DR-A-4000 - Rev P02 - 'Proposed Site Sections'
  - 2740-JW-00-ZZ-DR-A-3008 - Rev P02 - 'Boundary Wall and Gates Proposed and Existing'
  - 2740-JW-00-ZZ-DR-A-3007 - Rev P02 - 'Proposed West Elevation Typical Bay'
  - 2740-JW-00-ZZ-DR-A-3006 - Rev P03 - 'Proposed South Elevation Typical Bay'
  - 2740-JW-00-ZZ-DR-A-3005 - Rev P04 - 'Proposed North Elevation Typical Bay'
  - 2740-JW-00-ZZ-DR-A-3004 - Rev P03 - 'Proposed East Elevation'
  - 2740-JW-00-ZZ-DR-A-3003 - Rev P03 - 'Proposed South Elevation'

- 2740-JW-00-ZZ-DR-A-3002 - Rev P02 - 'Proposed West Elevation'
- 2740-JW-00-ZZ-DR-A-3001 - Rev P03 - 'Proposed North Elevation'
- 2740-JW-00-ZZ-DR-A-3000 - Rev P02 - 'Proposed Site Elevations'
- 2740-JW-ZZ-03-DR-A-1003 - Rev P04 - 'Proposed Roof Plan'
- 2740-JW-ZZ-02-DR-A-1002 - Rev P04 - 'Proposed Second Floor Plan'
- 2740-JW-ZZ-01-DR-A-1001 - Rev P04 - 'Proposed First Floor Plan'
- 2740-JW-ZZ-00-DR-A-1000 - Rev P04 - 'Proposed Ground Floor Plan'
- 2740-JW-00-ZZ-DR-A-0003 - Rev P03 - 'Proposed Site Plan'
- EDC22-GA-205 - Rev A - 'Biodiversity Green Roof Details'
- EDCC22-GA-100 - Rev N - 'General Arrangement Plan'
- 17373-DID-ZZ-00-DR-S-201-S2.B - 'Structural Details'
- 17373-DID-ZZ-00-DR-101-S2.B - 'Foundation GA'
- 17373-DID-ZZ-XX-DR-S-203-S2.A - 'Site Level Sections Sheet 1'
- 17373-DID-ZZ-XX-DR-S-204-S2.A - 'Site Level Sections Sheet 2'
- 17373/611 - Rev A - 'Pavement and Kerb Details'

Reason:

For the avoidance of doubt and in the interests of proper planning.

- 2 The development hereby permitted shall be begun before the end of three years from the date of this permission.

Reason

As required by Section 91 of the Town and Country Planning Act 1990 as amended.

**Pre-commencement condition(s)** - the details required to be submitted for approval by the condition(s) listed below must be submitted to and approved by the council before any work in connection with implementing this permission is commenced.

3 ARCHAEOLOGICAL WATCHING BRIEF

Before commencement of any work hereby authorised other than the change-of-use of the existing All Saints Annexe and the removal of the portakabins and shipping containers, the applicant shall secure the implementation of a programme of archaeological watching brief works in accordance with the approved written scheme of investigation ('Written Scheme of Investigation for an Archaeological Watching Brief' [dated 26.09.2018, produced by MOLA]).

The watching brief should have the capacity to include full archaeological excavation if important archaeological remains are encountered during the works.

Reason:

In order that the details of the programme of works for the archaeological mitigation works are suitable with regard to the impacts of the proposed development and the nature and extent of archaeological remains on site in accordance with: the National Planning Policy Framework 2019; Strategic Policy 12 (Design and Conservation) of the Core Strategy 2011; Saved Policy 3.19 (Archaeology) of the Southwark Plan 2007.

4 TREE PROTECTION - FOUNDATION DETAILS

Before any work hereby authorised begins other than removal of the portakabins and shipping containers, details of the foundation works including changes to levels to be used in the construction of this development, showing how the roots will be protected, shall be submitted to and approved in writing by the Local Planning Authority. Details shall include the use of trial holes or trenches to check for the position of roots. The development shall not be carried out otherwise than in accordance with any such approval given. All works shall adhere to 'BS5837: Trees in relation to demolition, design and construction (2012)' and 'National Joint Utility Group, Guidance 10 - Guidelines For The Planning, Installation And Maintenance Of Utility Apparatus In Proximity To Trees (Issue 2)'.

Reason

To avoid damage to the existing trees which represent an important visual amenity in the area, in accordance with: The National Planning Policy Framework 2019; Strategic Policies 11 (Open Spaces and Wildlife), 12 (Design and Conservation) and 13 (High Environmental Standards) of the Core Strategy 2011, and; Saved Policies 3.2 (Protection of Amenity), 3.12 (Quality in Design), 3.13 (Urban Design) and 3.28 (Biodiversity) of The Southwark Plan 2007.

5 TREE PROTECTION - FURTHER INFORMATION AND ACTION

Prior to works commencing, including any demolition, an Arboricultural Method Statement including an Arboricultural Survey shall be submitted to and approved in writing by the Local Planning Authority.

- a) A pre-commencement meeting shall be arranged, the details of which shall be notified to the Local Planning Authority for agreement in writing prior to the meeting and prior to works commencing on site, including any demolition, changes to ground levels, pruning or tree removal.
- b) A detailed Arboricultural Method Statement showing the means by which any retained trees on or directly adjacent to the site are to be protected from damage by demolition works, excavation, vehicles, stored or stacked building supplies, waste or other materials, and building plant, scaffolding or other equipment, shall then be submitted to and approved in writing by the Local Planning Authority. The method statements shall include details of facilitative pruning specifications and a supervision schedule overseen by an accredited arboricultural consultant.
- c) Cross sections shall be provided to show surface and other changes to levels, special engineering or construction details and any proposed activity within root protection areas required in order to facilitate demolition, construction and excavation.

The existing trees on or adjoining the site which are to be retained shall be protected and both the site and trees managed in accordance with the recommendations contained in the method statement. Following the pre-commencement meeting all tree protection measures shall be installed, carried out and retained throughout the period of the works, unless otherwise agreed in writing by the Local Planning Authority. In any case, all works must adhere to '*BS5837: (2012) Trees in relation to demolition, design and construction*' and '*BS3998: (2010) Tree work - recommendations*'.

If within the expiration of 5 years from the date of the occupation of the building for its permitted use any retained tree is removed, uprooted is destroyed or dies, another tree shall be planted at the same place and that tree shall be of such size and species, and shall be planted at such time, as may be specified in writing by the Local Planning Authority.

#### Reason

To avoid damage to the existing trees which represent an important visual amenity in the area, in accordance with: The National Planning Policy Framework 2019; Strategic Policies 11 (Open Spaces and Wildlife), 12 (Design and Conservation) and 13 (High Environmental Standards) of the Core Strategy 2011, and; Saved Policies 3.2 (Protection of Amenity), 3.12 (Quality in Design), Policy 3.13 (Urban Design) and 3.28 (Biodiversity) of The Southwark Plan 2007.

**Commencement of works above grade** - the details required to be submitted for approval by the condition(s) listed below must be submitted to and approved by the council before any work above grade is commenced. The term 'above grade' here means any works above ground level.

#### 6 SECURED BY DESIGN

Before any above grade work hereby authorised begins (excluding demolition), details of security measures for the development shall be submitted and approved in writing by the Local Planning Authority. These security measures shall be implemented prior to occupation in accordance with the approved details which shall seek to achieve the 'Secured by Design' accreditation award from the Metropolitan Police.

#### Reason:

In pursuance of the Local Planning Authority's duty under section 17 of the Crime and Disorder Act 1998 to consider crime and disorder implications in exercising its planning functions and to improve community safety and crime prevention, in accordance with: The National Planning Policy Framework 2019; Strategic Policy 12 (Design and Conservation) of the Core Strategy 2011, and; Saved Policy 3.14 (Designing Out Crime) of the Southwark Plan 2007.

#### 7 BREEAM CERTIFICATION

Before commencement of any above ground work relating to the three-storey Class D1 building within the rear yard, an independently verified BREEAM report to achieve a minimum BREEAM 'Excellent' rating in accordance with the requirements of the BREEAM Guide (or such national measure of sustainability that replaces that scheme) shall be submitted to and approved in writing by the Local Planning Authority and the development shall not be carried out otherwise than in accordance with any such approval given.

Before the first occupation of the development hereby permitted, a certified Post Construction Review (or other verification process agreed with the local planning authority) shall be submitted to and approved in writing by the Local Planning Authority, confirming that the agreed standards (i.e. those referred to in the preceding paragraph of this condition) have been met.

#### Reason:

To ensure the proposal complies with: The National Planning Policy Framework 2019; Strategic Policy 13 (High Environmental Standards) of The Core Strategy 2011, and; Saved Policies 3.3 (Sustainability) and 3.4 (Energy Efficiency) of the Southwark Plan 2007.

## 8 GRADUATED OBSCURING TREATMENT

Before any above grade works take place, a glazing sample (measuring at least 0.75 metres wide and 2.00 metres high) containing the graduated obscuring treatment shall be submitted to and approved by the Local Planning Authority. The obscuring treatment shall faithfully respect the specification set out in the document named 'Design and Access Statement Addendum - Part 2' [Produced by Jestico and Whiles, and dated January 2019], in that it:

- shall be an integral and irremovable component of the glazing, not simply a film/layer applied to one or both of its external faces;
- shall provide 100% obscuring from the base of the glazing to a height of 1.2 metres above the base of the glazing, and;
- shall, from 1.2 metres above the base of the glazing to 2.0 metres above the base of the glazing, be based on a 'polar array' design whereby obscure circles [all spaced at 10mm centres, measured horizontally and diagonally] decrease in diameter at a broadly consistent rate in a vertical direction such that the degree to which the glazing is obscured is 100% at the 1.2 metre mark and 0% at the 2.0 metre mark.

No part of the three-storey Class D1 building in the rear yard shall be occupied unless and until all the glazing to contain the approved graduated obscuring treatment [i.e. all the glazed apertures at first- and second-floor level on the northeast and southwest elevations] has been installed. The glazing shall be retained throughout the life of the development, and shall not be removed or replaced other than with glazing designed to the specification described in the first paragraph of this condition.

Should, for whatever reason, the base of any of the glazed apertures be lower than the Finished Floor Level of the floor of the building served by the glazing, the 'base of the glazing' as referred to in the first paragraph of this condition should be taken to mean the Finished Floor Level of the floor of the building served by the glazing.

Reason:

In order to be satisfied that the obscuring treatment will adequately protect the occupiers and users of the Harmsworth Mews and Brook Drive dwellings which back on to the application site from undue overlooking and associated privacy infringement, in accordance with: the National Planning Policy Framework 2019; Strategic Policy 13 (High environmental standards) of the Core Strategy 2011, and; Saved Policy 3.2 (Protection of Amenity) of the Southwark Plan 2007.

**Pre-occupation condition(s)** - the details required to be submitted for approval by the condition(s) listed below must be submitted to and approved by the council before the building(s) hereby permitted are occupied or the use hereby permitted is commenced.

## 9 HARD AND SOFT LANDSCAPING

Prior to first occupation of the Class D1 building within the rear yard, the hard and soft landscaping scheme shall be provided as shown and described on the following drawings and documents:

- Landscaping Strategy' [dated May 2018, produced by Eden Development Consultants Ltd]
- EDC22-SP01 - Rev D - 'Outline Landscape Specification' [dated 21/09/2018, produced by Eden Development Consultants Ltd]
- 2740-JW-ZZ-03-DR-A-1003 - Rev P04 - 'Proposed Roof Plan'
- 2740-JW-00-ZZ-DR-A-3008 - Rev P02 - 'Boundary Wall and Gates Proposed and Existing'
- EDC22-GA-100 - Rev N - 'General Arrangement Plan'
- EDCC22-GA-101 - Rev D - 'Hardworks Plan'
- EDC22-GA-102 - Rev D - 'Softworks Plan'
- EDC22-GA-205 - Rev A - 'Biodiversity Green Roof Details'

Unless otherwise approved in writing by the Local Planning Authority, the landscaping shall not be carried out otherwise than in accordance with any such approval given and shall be retained for the duration of the use.

The planting, seeding and/or turfing shall be carried out in the first planting season following completion of building works and any trees or shrubs that is found to be dead, dying, severely damaged or diseased within five years of the completion of the building works OR five years of the carrying out of the landscaping scheme (whichever is later), shall be replaced in the next planting season by specimens of the same size and species in the first suitable planting season. Planting shall comply to BS: 4428 Code of practice for general landscaping operations, 'BS: 5837 (2012) Trees in relation to demolition, design and construction' and 'BS 7370-4:1993 Grounds maintenance Recommendations for maintenance of soft landscape (other than amenity turf)'.

Reason:

So that the Council may be satisfied with the details of the landscaping scheme in accordance with: The National Planning Policy Framework 2019; Strategic Policies 11 (Open spaces and wildlife), 12 (Design and conservation) and 13 (High environmental standards) of the Core Strategy 2011, and; Saved Policies 3.2 (Protection of amenity), 3.12 (Quality in Design), 3.13 (Urban Design) and 3.28 (Biodiversity) of the Southwark Plan 2007.

#### 10 ELECTRIC VEHICLE CHARGING POINT AND PARKING SCHEME DETAILS

Before the first occupation of the three-storey Class D1 building within the rear yard hereby approved, details of the installation (including location and type) of one electric vehicle charger point to serve the proposed disabled parking space adjacent to the Austral Street entrance to the rear yard, together with a parking scheme, shall be submitted to and approved in writing by the Local Planning Authority.

The electric vehicle charger point shall be installed and made available for use prior to occupation of the Class D1 building within the rear yard, and shall thereafter be maintained as such in perpetuity.

Reason:

To encourage more sustainable travel in accordance with: The National Planning Policy Framework 2019; Policy 6.13 (Parking) of the London Plan 2016; Strategic Policy 2 (Sustainable Transport) of The Core Strategy 2011, and; Saved Policies 3.1 (Environmental Effects) and 5.2 (Transport Impacts) of the Southwark Plan 2007.

**Compliance condition(s)** - the following condition(s) impose restrictions and/or other requirements that must be complied with at all times once the permission has been implemented.

#### 11 COMPLIANCE WITH DELIVERY AND SERVICING PLAN

All measures detailed in the Delivery and Servicing Plan [dated May 2018, produced by Local Transport Projects] submitted with the application, including all vehicle routing and refuse collection arrangements, shall be implemented at the relevant stage(s) of the development and, where applicable, shall be adhered to throughout the lifetime of the development unless otherwise approved in writing by the local planning authority.

Reason:

In order to minimise the impact on the local highway network in accordance with: The National Planning Policy Framework 2019; Strategic Policy 2 (Sustainable Transport) of The Core Strategy 2011, and; Saved Policy 5.2 (Transport Impacts) of the Southwark Plan 2007.

#### 12 COMPLIANCE WITH TRAVEL PLAN

All measures detailed in the Travel Plan [dated May 2018, produced by Local Transport Projects] submitted with the application, including the appointment of an appropriately experienced and qualified Travel Plan Coordinator (TPC), shall be implemented at the relevant stage(s) of the development and, where applicable, shall be upheld throughout the lifetime of the development unless otherwise approved in writing by the local planning authority.

Reason:

In order that the use of non-car based travel is encouraged in accordance with: The National Planning Policy Framework 2019; Strategic Policy 2 (Sustainable Transport) of The Core Strategy 2011, and; Saved Policies 5.2 (Transport Impacts), 5.3 (Walking and Cycling) and 5.6 (Car Parking) of the Southwark Plan 2007.

#### 13 RESTRICTION ON USE WITHIN D1 USE CLASS: THE ALL SAINTS ANNEXE

Notwithstanding the provisions of the Town and Country Planning (Use Classes) Order and any associated provisions of the Town and Country Planning General Permitted Development Order (including any future amendment or enactment of those Orders) the Class D1 element of the 'mixed' Class D1/B1 use hereby permitted in respect of the All Saints Annexe shall not include any Class D1 use other than ancillary-to-museum.

Reason:

In granting this permission the Local Planning Authority has had regard to the special circumstances of this case and wishes to have the opportunity of exercising control over any subsequent alternative use in accordance with: the National Planning Policy Framework 2019; Strategic Policy 13 (High Environmental Standards) of the Core Strategy 2011, and; Saved Policy 3.2 (Protection of Amenity) of the Southwark Plan 2007.

#### 14 RESTRICTION ON USE WITHIN D1 USE CLASS: THE BUILDING WITHIN THE REAR YARD

Notwithstanding the provisions of the Town and Country Planning (Use Classes) Order and any associated provisions of the Town and Country Planning General Permitted Development Order (including any future amendment or enactment of those Orders) the Class D1 use hereby permitted in respect of the three-storey building in the rear yard shall not include any Class D1 use other than ancillary-to-museum.

## Reason:

In granting this permission the Local Planning Authority has had regard to the special circumstances of this case and wishes to have the opportunity of exercising control over any subsequent alternative use in accordance with: the National Planning Policy Framework 2019; Strategic Policy 13 (High Environmental Standards) of the Core Strategy 2011, and; Saved Policy 3.2 (Protection of Amenity) of the Southwark Plan 2007.

15 COMPLIANCE WITH FOUNDATION DETAILS

The construction of the site foundations shall be carried out in accordance with details submitted to and approved in writing by the Local Planning Authority and as described on the following drawings:

- 17373-DID-ZZ-00-DR-S-201-S2.B - 'Structural Details'
- 17373-DID-ZZ-00-DR-101-S2.B - 'Foundation GA'

## Reason:

As to construct the foundations in any other manner or to any other design would have the potential to affect groundwater, root protection zones and/or ground gas, the effect of which would be a failure to comply with: the National Planning Policy Framework 2018; Strategic Policy 13 (High Environmental Standards) of the Core Strategy 2011, and; Saved Policy 3.2 (Protection of Amenity) of the Southwark Plan 2007.

16 COMPLIANCE WITH CONSTRUCTION DETAILS

Unless the prior written consent of the local planning authority has been obtained for any proposed change or variation, the development shall be constructed in accordance with the arrangements and construction details described on the following drawings:

- 2740-JW-00-ZZ-DR-A-3008 - Rev P02 - 'Boundary Wall and Gates Proposed and Existing'
- 2740-JW-00-ZZ-DR-A-3007 - Rev P02 - 'Proposed West Elevation Typical Bay'
- 2740-JW-00-ZZ-DR-A-3006 - Rev P03 - 'Proposed South Elevation Typical Bay'
- 2740-JW-00-ZZ-DR-A-3005 - Rev P04 - 'Proposed North Elevation Typical Bay'

## Reason:

To ensure that the new works achieve a suitably high quality of design in accordance with: the National Planning Policy Framework 2018; Strategic Policy 12 (Design and Conservation) of the Core Strategy 2011, and; Saved Policies 3.12 (Quality in Design) and 3.13 (Urban Design) of the Southwark Plan 2007.

17 COMPLIANCE WITH MATERIALS SPECIFICATION AND SAMPLES

Unless the prior written consent of the local planning authority has been obtained for any proposed change or variation, the materials to be used in the implementation of this permission shall not be otherwise than as described and specified in the application and on the drawings hereby approved. The materials are:

- Facing Brick Type 1: Marziale by Wienerberger
- Mortar: Eurobrick Light Grey.
- Powder coated aluminium: Syntha Pulvin Anodite Light Bronze
- Ceramic-backed glass: Traffic Grey ceramic coating to face 4 of double glazed units.
- Glass: Guardian Sunguard double-glazed units.
- Clay pavers: Atlas UWF Tumbler by Wienerberger.

## Reason:

To ensure that the new works achieve a suitably high quality of design in accordance with: the National Planning Policy Framework 2019; Strategic Policy 12 (Design and Conservation) of the Core Strategy 2011, and; Saved Policies 3.12 (Quality in Design) and 3.13 (Urban Design) of the Southwark Plan 2007.

18 AIR CONDITIONING SPECIFICATION

The air conditioning equipment to be installed shall, unless otherwise approved by the local planning authority, comply with the following specification:

- PURY-EP900YSLM-A1 - 'Heat Recovery Outdoor Unit' [Air Conditioning Specification by Mitsubishi Electric]

## Reason:

To ensure that occupiers of neighbouring premises do not suffer a loss of amenity by reason of noise nuisance or the local environment from noise creep due to plant and machinery in accordance with: the National Planning Policy Framework 2018; Strategic Policy 13 (High Environmental Standards) of the Core Strategy 2011, and; Saved Policy 3.2 (Protection of Amenity) of the Southwark Plan 2007.

19 RESTRICTION ON THE INSTALLATION OF ROOF PLANT AND OTHER ROOF STRUCTURES

No roof plant, equipment or other structures, other than as shown on the plans hereby approved or approved pursuant to a condition of this permission, shall be placed on the roof or be permitted to project above the roofline of the Class D1 building hereby approved as shown on elevational drawings or shall be permitted to extend outside of the roof plant enclosure[s] of said building.

Reason:

In order to ensure that no additional plant is placed on the roof of the building in the interest of the appearance and design of the building and the visual amenity of the area, in accordance with: The National Planning Policy Framework 2018; Strategic Policy 12 (Design and Conservation) of The Core Strategy 2011, and; Saved Policies 3.2 (Protection of Amenity) and 3.13 (Urban Design) of the Southwark Plan 2007.

## 20 RESTRICTION ON THE INSTATEMENT OF TELECOMMUNICATIONS EQUIPMENT

Notwithstanding the provisions of Parts 24 and 25 The Town & Country Planning [General Permitted Development] Order 1995 [as amended or re-enacted] no external telecommunications equipment or structures shall be placed on the roof or any other part of the three-storey Class D1 building hereby permitted.

Reason:

In order to ensure that no telecommunications plant or equipment which might be detrimental to the design and appearance of the building and visual amenity of the area is installed on the roof of the building in accordance with: The National Planning Policy Framework 2019; Strategic Policy 12 (Design and Conservation) of The Core Strategy 2011, and; Saved Policies 3.2 (Protection of Amenity) and 3.13 (Urban Design) of the Southwark Plan 2007.

## 21 RESTRICTION ON THE INSTALLATION OF APPURTENANCES

No meter boxes, flues, vents or pipes [other than rainwater pipes] or other appurtenances not shown on the approved drawings shall be fixed or installed on the elevations of the three-storey Class D1 building within the rear yard.

Reason:

To ensure such works do not detract from the appearance of the building in accordance with: The National Planning Policy Framework 2019; Strategic Policy 12 (Design and Conservation) of The Core Strategy 2011, and; Saved Policies 3.12 (Quality in Design) and 3.13 (Urban Design) of The Southwark Plan 2007.

## 22 HOURS OF USE OF THE OUTDOOR DINING / 'SPILL OUT' SPACE ASSOCIATED WITH THE ANCILLARY CANTEEN/CAFE

Any tables and chairs placed within any part of the external space shall be brought inside the premises (and/or the small ad-hoc store adjacent to the cycle store) or otherwise made unusable no later than 18:00hrs (6pm) each day, and shall be brought back outside or otherwise made usable no earlier than 08:00hrs (8am) the following day.

Reason:

In order to protect nearby residential occupiers from noise or disturbance from any activities associated with the use or mis-use of this furniture during the late evening and night-time in accordance with: the National Planning Policy Framework 2019; Policy 7.15 (Reducing and Managing Noise, etc) of the London Plan 2016; Strategic Policy 13 (High Environmental Standards) of the Southwark Core Strategy 2011, and; Saved Policy 3.2 (Protection of Amenity) of the Southwark Plan 2007.

## 23 PLANT NOISE COMPLIANCE

The Rated sound level from any plant, together with any associated ducting shall not exceed the Background sound level (LA90 15min) at the nearest noise sensitive premises. Furthermore, the plant Specific sound level shall be 10dB(A) or more below the background sound level in this location. For the purposes of this condition the Background, Rating and Specific sound levels shall be calculated in full accordance with the methodology of BS4142:2014 .

Reason:

To ensure that occupiers of neighbouring premises do not suffer a loss of amenity by reason of noise nuisance or the local environment from noise creep due to plant and machinery in accordance with: the National Planning Policy Framework 2019; Strategic Policy 13 (High Environmental Standards) of the Core Strategy 2011, and; Saved Policy 3.2 (Protection of Amenity) of the Southwark Plan 2007.

## 24 SERVICING HOURS

Any deliveries, unloading and loading to the three-storey Class D1 building within the rear yard shall only take



place between 08:00hrs (8am) and 18:00hrs (6pm) Monday to Friday. No deliveries, unloading or loading shall take place on Saturdays, Sundays and Bank Holidays.

Reason:

To ensure that and occupiers of the development and occupiers of neighbouring premises do not suffer a loss of amenity by reason of noise nuisance in accordance with: The National Planning Policy Framework 2019; Strategic Policy 13 (High Environmental Standards) of the Core Strategy 2011, and; Saved Policy 3.2 (Protection of Amenity) of The Southwark Plan 2007.

## 25 COMPLIANCE WITH ENERGY STATEMENT

The development hereby permitted shall be carried out in accordance with the 'Energy Statement' [dated May 2018, produced by Delap and Waller], unless otherwise agreed in writing by the Local Planning Authority.

Reason:

To reduce carbon dioxide emissions as required by: the National Planning Policy Framework 2019; Policy 5.15 (Minimising Carbon Dioxide Emissions) of the London Plan 2016; Strategic Policy 13 (High Environmental Standards) of the Core Strategy 2011, and; Saved Policy 3.3 (Sustainability and Energy Efficiency) of the Southwark Plan.

## 26 COMPLIANCE WITH CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN AND CONSTRUCTION TRAFFIC MANAGEMENT PLAN

The implementation of the developments hereby approved shall, unless otherwise approved in writing by the local planning authority, be carried out in strict accordance with the strategies, measures and relevant codes of practice detailed in the following documents:

- 'Imperial War Museum, Parkside, Construction Traffic Management Plan' [undated, produced by Local Transport Projects]
- 'Construction and Environmental Management Plan' - Rev D [dated 15/08/2018, produced by REDS10]

Reason:

To ensure that occupiers of neighbouring premises and the wider environment do not suffer a loss of amenity by reason of pollution and nuisance, to ensure minimised impact on the local highway network, and to ensure construction activities have a minimised impact on local air quality, all of which is in accordance with: the National Planning Policy Framework 2019; Policy 7.14 (Improving Air Quality) of the London Plan 2016; Strategic Policies 13 (High Environmental Standards) and 2 (Sustainable Transport) of The Core Strategy 2011, and; Saved Policies 3.2 (Protection of Amenity) and 5.2 (Transport Impacts) of the Southwark Plan 2007.

## 27 BIRD AND BAT SUPPORT FEATURES

Prior to first occupation of the three-storey Class D1 building within the rear yard, a total of no less than three bird boxes, one bird feeder, three bat boxes and one bird bath shall be provided in the the exact location and to the specification and design shown on the following drawings and documents:

- EDC22-GA-100 - Rev N - 'General Arrangement Plan'
- EDC22-SP01 - Rev D - 'Outline Landscape Specification' [dated 21/09/2018, produced by Eden Development Consultants Ltd]

The bird and bat support features shall be installed strictly in accordance with these details and shall be maintained as such thereafter.

Reason:

To ensure the development provides the maximum possible provision towards creation of habitats and valuable areas for biodiversity in accordance with: Policies 5.10 (Urban Greening) and 7.19 (Biodiversity and Access to Nature) of the London Plan 2016; Strategic Policy 11 (Open Spaces and Wildlife) of the Core Strategy 2011, and; Saved Policy 3.28 (Biodiversity) of the Southwark Plan 2007.

## 28 BIODIVERSE ROOF

Prior to first use of the three-storey Class D1 building within the rear yard, the biodiverse roof shall be constructed, laid out and planted/seeded strictly in accordance with the details set out in the following documents:

- EDC22-SP01 - Rev D - 'Outline Landscape Specification' [dated 21/09/2018, produced by Eden Development Consultants Ltd]
- EDC22-GA-205 - Rev A - 'Biodiversity Green Roof Details'
- 2740-JW-ZZ-03-DR-A-1003 - Rev P04 - 'Proposed Roof Plan'

The biodiverse roof shall be maintained as such thereafter.

The biodiverse roof shall not be used as an amenity or sitting out space of any kind whatsoever and shall only be used in the case of essential maintenance or repair, or escape in case of emergency.

Reason:

To ensure the development provides the maximum possible provision towards creation of habitats and valuable areas for biodiversity in accordance with: Policies 2.18 (Green Infrastructure), 5.3 (Sustainable Design and Construction), 5.10 (Urban Greening), and 5.11 (Green Roofs and Development Site Environs) of the London Plan 2016; Strategic Policy 11 (Open Spaces and Wildlife) of the Core Strategy 2011, and; Saved Policy 3.28 (Biodiversity) of the Southwark Plan 2007.

#### 29 PREVIOUSLY UNIDENTIFIED CONTAMINATION: VERIFICATION OF REMEDIATION

If during each phase of development being brought into use, previously unidentified contamination is encountered, a verification report demonstrating the completion of works dealing with any unexpected contamination and the effectiveness of the remediation of this, shall be submitted to, and approved in writing, by the local planning authority. The report shall include results of sampling and monitoring carried out in accordance with the approved verification plan to demonstrate that the remediation of unexpected contamination criteria have been met.

Reason:

To ensure that the site does not pose any further risk to human health or the water environment by demonstrating that the requirements of the approved verification plan have been met and that remediation of the site is complete, in line with paragraph 170 (from the Chapter 'Conserving and Enhancing the Natural Environment') and paragraphs 178 to 180 (From the Chapter 'Ground Conditions and Pollution') of the National Planning Policy Framework 2019.

#### 30 PREVIOUSLY UNIDENTIFIED CONTAMINATION: REMEDIATION

If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until a remediation strategy detailing how this contamination will be dealt with has been submitted to and approved in writing by the Local Planning Authority. The remediation strategy shall be implemented as approved.

Reason:

To ensure that the development does not contribute to, or is not put at unacceptable risk from or adversely affected by, unacceptable levels of water pollution from previously unidentified contamination sources at the development site in line with paragraph 170 (from the Chapter 'Conserving and Enhancing the Natural Environment') and paragraphs 178 to 180 (From the Chapter 'Ground Conditions and Pollution') of the National Planning Policy Framework 2019.

#### 31 COMPLIANCE WITH DRAINAGE STRATEGY

The development hereby approved shall be carried out in accordance with the 'Site Drainage Strategy' [dated May 2018, produced by Design ID].

Reason:

To ensure the development is designed safely in reference to flood risk and sustainable urban drainage in accordance with: The National Planning Policy Framework 2019; Strategic Policy 13 (High Environmental Standards) of the Core Strategy 2011, and; Saved Policy 3.9 (Water) of the Southwark Plan 2007.

#### 32 PROVISION OF CYCLE STORAGE FACILITIES

Before the first use of the three-storey Class D1 building within the rear yard hereby approved, the cycle storage facilities (comprising 20 sheffield stands) as shown on drawing:

- EDC22-GA-100 - Rev. N - 'General Arrangement Plan'

shall be provided, to the specification and in the locations shown on the drawings. Thereafter, the facilities shall be retained and the space used for no other purpose.

Reason:

To ensure that satisfactory safe and secure bicycle parking is provided and retained for the benefit of the users of the building in order to encourage the use of alternative means of transport and to reduce reliance on the use of the private car, in accordance with: the National Planning Policy Framework 2019; Strategic Policy 2 (Sustainable Transport) of The Core Strategy, and; Saved Policy 5.3 (Walking and Cycling) of the Southwark Plan 2007.

**Other condition(s)** - the following condition(s) are to be complied with and discharged in accordance with the individual requirements specified in the condition(s).

### 33 DETAILS OF EXTERNAL LIGHTING AND SECURITY SURVEILLANCE EQUIPMENT

Details of any external lighting [including design, power and position of luminaries] and security surveillance equipment on/of (whichever the case may be) the three-storey Class D1 building and external areas surrounding the building shall be submitted to and approved by the Local Planning Authority in writing before any such lighting or security equipment is installed. The development shall not be carried out otherwise in accordance with any such approval given.

Notwithstanding the indicative details provided within the application documentation, the details to be submitted and approved by the local planning authority shall propose a lighting scheme which provides low-level illumination only (i.e. of the exterior of the Class D1 building at ground floor level and of the external space surrounding the building). None of the proposed fixtures shall, either through their orientation/positioning or level of illuminance, illuminate the first and second floor levels of the exterior of the Class D1 building.

Reason:

In order that the Council may be satisfied as to the details of the development in the interest of the visual amenity of the area, the safety and security of persons using the area and the amenity and privacy of adjoining occupiers in accordance with: the National Planning Policy Framework 2019; Strategic Policy 12 (Design and Conservation) and Strategic Policy 13 (High Environmental Standards) of the Core Strategy 2011, and; Saved Policies 3.2 (Protection of Amenity) and 3.14 (Designing Out Crime) of the Southwark Plan 2007.

### 34 ARCHAEOLOGY REPORTING SITE WORK

Within six months of the completion of archaeological site works, an assessment report detailing the proposals for post-excavation works, publication of the site and preparation of the archive shall be submitted to and approved in writing by the Local Planning Authority and that the works detailed in this assessment report shall not be carried out otherwise than in accordance with any such approval given.

Reason:

In order that the details of the programme of works for the archaeological mitigation works are suitable with regard to the impacts of the proposed development and the nature and extent of archaeological remains on site in accordance with: the National Planning Policy Framework 2019; Strategic Policy 12 (Design and Conservation) of the Core Strategy 2011; Saved Policy 3.19 (Archaeology) of the Southwark Plan 2007.

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

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

The pre-application service was used for this application and the advice given was followed to a large extent.

The application was validated promptly.

The application was subject to an Extension of Time to account for the inability to determine it within the statutory 13-week time frame.

#### **Informatives**

- 1 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 or [Hernan.castano@southwark.gov.uk](mailto:Hernan.castano@southwark.gov.uk) to arrange.
- 2 The applicant will be expected to repair any damages to the highway within the vicinity of the development as a result of the construction works.

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## RECOMMENDATION

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

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<b>Applicant</b>	-	<b>Reg. Number</b>	18/AP/4084
	Imperial War Museums		
<b>Application Type</b>	Listed Building Consent	<b>Case</b>	TP/1357-A
<b>Recommendation</b>	Grant permission	<b>Number</b>	

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### Draft of Decision Notice

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**Listed Building CONSENT was given to carry out the following works:**

Listed Building Consent for the demolition of part of the existing boundary wall between the All Saints Annexe and Geraldine Mary Harmsworth Park and the construction of a new wall, incorporating gates and windows, in association with planning application 18/AP/1577

**At:** ALL SAINTS ANNEXE (IMPERIAL WAR MUSEUM) AND LAND TO THE REAR, AUSTRAL STREET, LONDON, SE11 4SJ

**In accordance with application received on 18/12/2018 08:00:59**

**and Applicant's Drawing Nos.**

- 'Assessment of the fabric and structural condition of the boundary wall' [dated January 2019, produced by Alan Baxter]
- 'Design and Access Statement Addendum - Part 1' [dated 13.12.2018, produced by Jestico and Whiles]
- All Saints Annex wall Heritage Statement [dated December 2018, produced by Alan Baxter]
- 2740-JW-00-00-DR-A-1005 - Rev P01 - 'Proposed Site Plan'
- 2740-JW-00-00-DR-A-1004 - Rev P01 - 'Existing Site Plan'
- 2740-JW-00-00-DR-A-3010 - Rev P01 - 'Boundary Wall and Gates Proposed and Existing'
- 2740-JW-00-ZZ-DR-A-3008 - Rev P02 - 'Boundary Wall and Gates Proposed and Existing'
- 2740-JW-00-ZZ-DR-A-0103 - Rev P01 - 'Boundary Wall Site Location Plan'

**Subject to the following four conditions:**

**Time limit for implementing this permission and the approved plans**

- 1 The development hereby permitted shall be begun before the end of three years from the date of this permission.

Reason:

As required under Section 18 of the Planning (Listed Buildings & Conservation Areas) Act 1990 as amended.

**Pre-occupation condition(s)** - the details required to be submitted for approval by the condition(s) listed below must be submitted to and approved by the council before the building(s) hereby permitted are occupied or the use hereby permitted is commenced.

- 2 DISMANTLING OF THE WALL AND RECONSTRUCTING A DISCRETE PART IN SALVAGED AND SECOND-HAND BRICK

a) A Method Statement and details shall be provided as to: the condition of the wall; the careful dismantling of the wall, and; the method of setting aside and storing of those bricks that can be reused.

b) Details of an extent of wall that could be constructed using the salvaged bricks (together with matching second-hand bricks as necessary) to construct a discrete part of the wall to its full height (onto the northwest elevation of which the plaque should be installed), shall be provided.

The details required by parts a) and b) shall be submitted to and approved in writing by the Local Planning Authority, and shall be implemented in full, before the first occupation of the three-storey Class D1 building to which the associated planning application (18/AP/1577) relates.

Reason:

In order to ensure that the proposed works are in the interest of the special architectural or historic qualities of the listed building/structure in accordance with: the National Planning Policy Framework 2019; Strategic Policy 12 (Design and Conservation) of the Core Strategy 2011, and; Saved Policies 3.15 (Conservation of the Historic Environment), 3.16 (Conservation Areas) and 3.17 Listed Buildings of the Southwark Plan 2007.

### 3 REINSTATING THE PLAQUE

The applicant shall submit and receive the Local Planning Authority's written approval of drawings (and any other documents deemed appropriate) showing to a suitable level of detail where exactly the plaque will be reinstated on the parkside (northwest elevation) of the replacement wall, and the plaque shall be installed within the agreed location no later than the first occupation of the three-storey Class D1 building which the replacement wall forms a part of (and which is the subject of the associated planning application, 18/AP/4084).

The plaque shall not be reinstated on the yard-facing (southeast elevation) of the replacement wall.

Reason:

In order to ensure that the proposed works are in the interest of the special architectural or historic qualities of the listed building/structure in accordance with: the National Planning Policy Framework 2019; Strategic Policy 12 (Design and Conservation) of the Core Strategy 2011, and; Saved Policies 3.15 (Conservation of the Historic Environment), 3.16 (Conservation Areas) and 3.17 Listed Buildings of the Southwark Plan 2007.

**Compliance condition(s)** - the following condition(s) impose restrictions and/or other requirements that must be complied with at all times once the permission has been implemented.

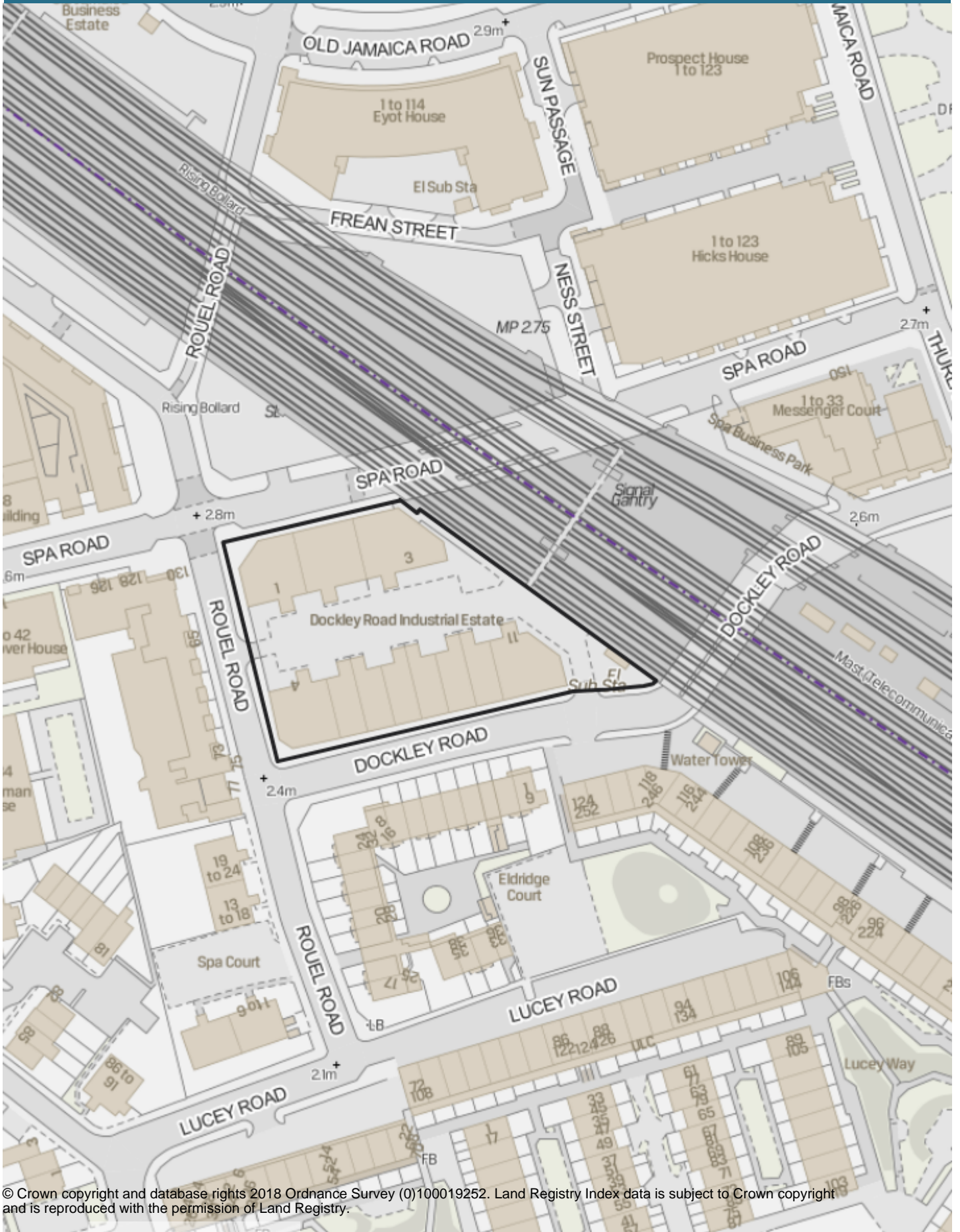
### 4 MATERIALS TO MATCH EXISTING, EXCEPT WHERE OTHERWISE STATED ON APPROVED PLANS

All new works and finishes, and any works of making good, shall match existing original work adjacent in respect of materials used, detailed execution and finished appearance, except where indicated otherwise on the drawings hereby approved or as required by any condition(s) attached to this consent.

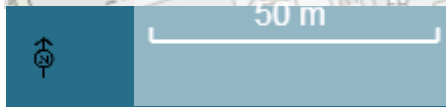
Reason:

In order to ensure that the design and details are in the interest of the special architectural or historic qualities of the listed building in accordance with: the National Planning Policy Framework 2019; Strategic Policy 12 (Design and Conservation) of the Core Strategy 2011, and; Saved Policies 3.15 (Conservation of the Historic Environment), 3.16 (Conservation Areas), 3.17 (Listed Buildings) of the Southwark Plan 2007.

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Scale = 1250

4-Jan-2019

<b>Item No.</b> 6.2	<b>Classification:</b> Open	<b>Date:</b> 2 April 2019	<b>Meeting Name:</b> Planning Committee
<b>Report title:</b>	<b>Development Management planning application:</b> Application 18/AP/0091 for: Full Planning Application  <b>Address:</b> DOCKLEY ROAD INDUSTRIAL ESTATE, 2 DOCKLEY ROAD, LONDON, SE16 3SF  <b>Proposal:</b> Demolition of the existing industrial units and redevelopment to provide a building ranging from one to nine storeys (32.55m AOD and 29.9m above ground) in height accommodating 1,093sqm of commercial floorspace at ground floor level incorporating industrial use (Use Class B8); retail uses (Use Class A1); and restaurants and cafe uses (Use Class A3) and 111 residential units (Class C3) at upper levels with associated works, including landscaping and 3 disabled car parking spaces.		
<b>Ward(s) or groups affected:</b>	South Bermondsey		
<b>From:</b>	Director of Planning		
<b>Application Start Date</b> 02/02/2018		<b>Application Expiry Date</b> 04/05/2018	
<b>Earliest Decision Date</b> 10/03/2018			

## RECOMMENDATION

1.
  - (a) That planning permission be granted, subject to conditions and the applicant entering into an appropriate legal agreement by no later than 31 August 2019.
  - (b) In the event that the requirements of (a) are not met by 31 August 2019, that the Director of Planning be authorised to refuse planning permission, if appropriate, for the reasons set out at paragraph 148 of this report.

## UPDATE ON ACTIONS SINCE DEFERRAL OF CONSIDERATION OF THE APPLICATION ON 15 JANUARY 2019

2. This application was originally referred to the Planning Committee on 15 January 2019. At that time there was some ambiguity around the height of the building above ground, particularly focussed on the impact of a lift over-run. The initial plans submitted with the application demonstrated that the building did not exceed 30 metres in height when measured from ground level. Revised plans submitted in advance of Committee appeared to show a small projection at roof level that would have taken the building beyond the 30 metres threshold. The applicant confirmed that this was an error on the drawings and the item was deferred in order to give the applicant time to review and correct the relevant drawings. This issue was important as the application would be referable to the Mayor of London if the height of the development above ground exceeded 30 metres.

3. Revised drawings were submitted by the applicant on 27 February 2019 alongside a revised Daylight and Sunlight Assessment. A re-consultation exercise commenced on 8 March 2019. The submitted drawings demonstrate that the building would not exceed 30 metres in height above ground level. For that reason the application is not referable to the Mayor of London, and would not be considered a 'tall building' under saved Southwark Plan policy 3.20.

### **EXECUTIVE SUMMARY**

4. In 2017 the Council granted planning consent for the redevelopment of the site at Dockley Road Industrial Estate. The consented scheme was designed as a podium building arranged in a horseshoe shape open to the railway viaduct. The consented scheme included Class A1 (retail) and B8 (storage/warehouse) floorspace as well as 59 apartments in a building rising to seven storeys. 25 car parking spaces were provided in the ground floor podium. This permission has not been implemented.
5. The proposed development maintains many aspects of the consented scheme, particularly with regards to the basic building form and range of uses. There would be a significant uplift in the number of residential units (from 59 to 111) as well as an increase in the level of affordable housing being provided (from 30% to 35.5%). The increased number of homes would be achieved through increasing the height from seven storeys to a maximum of nine storeys.
6. The proposed development would provide a policy compliant mix and type of housing as well as 35.5% on site affordable housing with an appropriate split between social rented and shared ownership (70:30). The new homes would offer an exemplary standard of accommodation for future occupiers as well as high quality communal amenity spaces and play spaces for children.
7. There is no policy requirement in this location to replace B Class floorspace when sites are redeveloped, so the reduction in employment floorspace is acceptable in this instance. The scheme does however include a range of units for retail and warehousing purposes which activate the ground floor frontages and some of these units face onto a 'Low Line' route alongside the viaduct which would be open to the public at weekends to complement the existing market trading in the area.
8. There would be noticeable impacts on some neighbouring residents in terms of daylight and sunlight however these are considered to be acceptable within the context of the BRE guidelines and the surrounding townscape.
9. Thirty nine objections have been received from neighbours raising concerns primarily relating to height, design, massing and density, sunlight and daylight impacts, parking provision, commercial uses and failure to provide a policy compliant level of affordable housing. A further seventy five objections have been received following re-consultation raising the same issues. Six letters of support have also been received.
10. The proposal would incorporate measures to reduce its carbon dioxide emissions, and a contribution to the Council's Carbon Off-set Green Fund would be secured through a s106 agreement. The proposal would be air quality neutral, and conditions are recommended to ensure that surface water drainage, archaeology and ecology would be adequately dealt with. A range of s106 obligations would be secured, including



employment and training during the course of construction. Overall, the benefits of the proposal are considered to outweigh the potential harm caused, and it is recommended that planning permission be granted, subject to conditions and the signing of a S106 agreement.

## **BACKGROUND INFORMATION**

### **Site location and description**

11. The application site is the 0.36 hectare Dockley Road Industrial Estate which is located between Spa Road, Dockley Road and Rouel Road in Bermondsey. The north eastern boundary of the site is bounded by the railway viaduct linking South Bermondsey to London Bridge Station.
12. The site is currently occupied by two rows of 1970s brick built industrial sheds comprising 11 Class B8 units with a total net internal floorspace of 1,850sqm. The two rows of buildings face inwards onto a central service yard with accesses onto Rouel Road and Dockley Road which are secured by metal palisade fencing.
13. The surrounding area is characterised by predominantly flatted residential accommodation with some commercial use in the railway arches to the north east. To the south east of the site lies Eldridge Court and the Lucey Way Estate comprising four to eight storeys of brick built flats. On Rouel Road to the west of the site is the recently completed Porters Building providing flats over four to seven storeys. The residential Bolonachi Building is located to the north west of the site and is part six/part eight storeys high.
14. The wider area has changed significantly over the past decade as a result of new housing schemes being delivered under the 'Bermondsey Spa' programme of redevelopment. This has increased the height and density of development in the area, and created a neighbourhood with a more distinctly residential character.
15. In terms of public transport the site lies approximately 450 metres to the south west of Bermondsey Underground Station and the nearest bus stops are located on Jamaica Road to the north (services 47, 188, 381, C10, N47 and N381) and Southwark Park Road to the south (services 1, N1, 381, N381, P12). The site has a PTAL of 3 which indicates a medium level of access to public transport.
16. The site is not within or close to any conservation areas although the adjacent Spa Road Railway Bridge is Grade II listed.

*Image – Site plan*



*Image – Aerial site plan*



### **Details of proposal**

17. Planning consent is sought for a comprehensive mixed-use redevelopment of the site for Class A1 use (Retail); Class A3 use (café/restaurant); Class B8 use (warehouse and distribution); and 111 residential units (including 11 units suitable for wheelchair users), laid out in a perimeter block building ranging from 1-9 storeys in height.

The schedule of accommodation is set out below:

*Table 1 – Schedule of accommodation*

Unit Type	Private (units)	Affordable Housing (units)		Total
		Social Rent	Intermediate	
1 bed	36	5	3	44
2 bed	34	6	5	45
3 bed	11	9	2	22
<b>Total</b>	81	20	10	111

18. Building footprint largely follows the boundaries of the site in a horseshoe form with the open end (above a single storey commercial unit) towards the railway viaduct and a ground level courtyard amenity space located at the centre of the site.
19. The proposed building would be highly articulated in terms of height with the tallest elements located at the corner of Spa Road/Rouel Road and on Dockley Road where it meets the railway viaduct. Heights would gradually step down from these points to four storeys on Dockley Road and five storeys on Rouel Road with a further small rise to six storeys on the corner of Rouel Road and Dockley Road. At the railway end of the building the height would reduce to one storey.
20. The development would employ robust materials. The facades would be brick at ground floor level, changing to a metal frame on the upper levels marking the change from commercial to residential. The frame would wrap around all of the upper floors on the street facing facades and would support the triangulated residential balconies. Four residential cores would be provided with all flats accessed from decks facing inwards towards the central courtyard space.
21. The Class A1 and A3 units would be located at ground floor on Spa Road, Rouel Road and Dockley Road. The Class B8 unit would be located to the rear of the site immediately adjacent to the railway viaduct. The route alongside the viaduct would be open to pedestrians at the weekend as part of the wider 'Low Line' aspiration, with the commercial spaces on both sides open as market trading spaces.
22. The proposed development would be car free with the exception of three accessible car parking spaces. A servicing route would be provided at the railway end of the building with one way access from Dockley Road and egress onto Spa Road which is in line with the previously consented scheme.

### **Planning history**

#### 13/AP/2592

23. Planning consent was granted in May 2017 for the demolition of the existing industrial units and erection of buildings up to 7 storeys in height comprising 15 industrial units with B8 and ancillary A1 use at ground floor level and 59 residential units on upper

levels with associated landscaping, new access from Spa Road, car and cycle parking.

24. The form of this approved development is similar to that of the proposed scheme in that it is a highly articulated single building in a horseshoe shape, open towards the railway albeit with a podium garden as opposed to a central courtyard and a larger amount of car parking.

17/EQ/0134

25. A pre-application enquiry was received in 2017 from the same applicant, seeking to increase the number of homes and proportion of affordable homes on the site. This pre-application enquiry was the precursor to the current application and the advice given to the applicant by the Council can be summarised as follows:

*The redevelopment of the site to provide new homes, improved commercial space and the ability to realise the aspirations for the low line is supported and the development is acceptable in land use terms. The provision of on-site affordable housing would be welcomed as part of the redevelopment of this site. The building heights and massing are considered to be acceptable in design terms although further information is required in order to determine if the height and massing would be acceptable in amenity terms. Further information is also required in terms of justifying the number of wheelchair parking spaces and information on the servicing strategy. However the broad approach to servicing the development, including the off-street provision, is supported in principle.*

**Planning history of adjoining sites**

26. The most relevant recent permissions are those pertaining to the Porters Building and Bolonachi Building which are located to the west and north west of the site respectively.
27. 05/AP/2617 - 89 Spa Road (Bolonachi Building) - Erection of building extending to between 4 and 8 storeys in height to provide 139 new dwellings (38 social rented units, 34 shared ownership units and 72 private units) and 317m<sup>2</sup> of commercial space (use classes A1, A2, and D1), together with the provision of associated car parking, landscaping, infrastructure works and improvements to the existing playground area. GRANTED with Legal Agreement - 13.09.2007.
28. 03/AP/2385 - 122-124 Spa Road (Porters Building) - Outline application for residential development (all matters reserved). The proposal considered was submitted in outline, with all matters reserved for residential development. The indicative plans submitted showed building heights ranging from 4 to 7 storeys and access from Spa Road comprising 115 flats and 11 houses. GRANTED with Legal Agreement - 17.08.2005.
29. 12/AP/0164 - Erection of a building ranging between 4 and 7 storeys in height, comprising 46 residential units, including a housing mix of 11 x 1-bed, 26 x 2-bed, 5 x 3-bed and 4 x 4-bed units, 12 car parking spaces, cycle parking for each unit and associated landscaping. (AMENDED SCHEME: alterations to housing tenure mix (8 affordable rent units proposed) and minor design amendments including timber privacy screening to balcony on south elevation).

GRANTED with Legal Agreement - 30.03.2012.

## **KEY ISSUES FOR CONSIDERATION**

### **Summary of main issues**

30. The main issues to be considered in respect of this application are:
- Principle of the proposed development in terms of land use and conformity with the development plan
  - Design, including building heights and impacts on townscape
  - Impact on heritage assets
  - Density
  - Affordable housing
  - Mix of dwellings
  - Wheelchair accessible housing
  - Quality of accommodation
  - Trees and landscaping
  - Impact of proposed development on amenity of adjoining occupiers and surrounding area
  - Transport
  - Flood risk
  - Sustainable development implications
  - Archaeology
  - Planning obligations (S.106 undertaking or agreement)
  - Mayoral and Borough community infrastructure levy (CIL)
  - All other relevant material planning considerations

### **Planning policy**

#### Site designations

31.
  - Air Quality Management Area (AQMA)
  - Archaeological Priority Zone (APZ)
  - PTAL 3
  - Urban Zone
32. The site does not fall within a conservation area and there are no listed buildings adjoining the site, although the central portion of the viaduct is Grade II listed.

#### National Planning Policy Framework (the Framework) 2019

33. Chapter 2 Achieving sustainable development  
 Chapter 5 Delivering a sufficient supply of homes  
 Chapter 6 Building a strong, competitive economy  
 Chapter 8 Promoting healthy and safe communities  
 Chapter 9 Promoting sustainable transport  
 Chapter 11 Making effective use of land  
 Chapter 12 Achieving well-designed places  
 Chapter 14 Meeting the challenge of climate change, flooding and coastal change  
 Chapter 15 Conserving and enhancing the natural environment

## Chapter 16 Conserving and enhancing the historic environment

The London Plan 2016

34. Policy 2.5 Sub-regions
- Policy 3.1 Ensuring equal life chances for all
  - Policy 3.3 Increasing housing supply
  - Policy 3.4 Optimising housing potential
  - Policy 3.5 Quality and design of housing developments
  - Policy 3.6 Children and young people's play and informal recreation facilities
  - Policy 3.7 Large residential developments
  - Policy 3.8 Housing choice
  - Policy 3.9 Mixed and balanced communities
  - Policy 3.13 Negotiating affordable housing on individual private residential and mixed use schemes
  - Policy 3.14 Affordable housing thresholds
  - Policy 4.4 – Managing industrial land and premises
  - Policy 4.12 Improving opportunities for all
  - Policy 5.1 Climate change mitigation
  - Policy 5.2 Minimising carbon dioxide emissions
  - Policy 5.3 Sustainable design and construction
  - Policy 5.5 Decentralised energy networks
  - Policy 5.6 Decentralised energy in development proposals
  - Policy 5.7 Renewable energy
  - Policy 5.9 Overheating and cooling
  - Policy 5.10 Urban greening
  - Policy 5.11 Green roofs and development site environs
  - Policy 5.12 Flood risk management
  - Policy 5.13 Sustainable drainage
  - Policy 5.15 Water use and supplies
  - Policy 5.21 Contaminated land
  - Policy 6.1 Strategic approach (Transport)
  - Policy 6.3 Assessing transport capacity
  - Policy 6.9 Cycling
  - Policy 6.10 Walking
  - Policy 6.12 Road network capacity
  - Policy 6.13 Parking
  - Policy 7.1 Building London's neighbourhoods and communities
  - Policy 7.2 An inclusive environment
  - Policy 7.3 Secured by design
  - Policy 7.4 Local character
  - Policy 7.5 Public realm
  - Policy 7.6 Architecture
  - Policy 7.8 Heritage assets and archaeology
  - Policy 7.14 Improving air quality
  - Policy 7.15 Reducing noise and enhancing soundscapes
  - Policy 7.21 Trees and woodlands
  - Policy 8.2 Planning obligations
  - Policy 8.3 Community infrastructure levy

Core Strategy 2011

35. Strategic Targets Policy 1 - Achieving growth  
 Strategic Targets Policy 2 - Improving places  
 Strategic Policy 1 - Sustainable development  
 Strategic Policy 2 - Sustainable transport  
 Strategic Policy 5 - Providing new homes  
 Strategic Policy 6 - Homes for people on different incomes  
 Strategic Policy 7 - Family homes  
 Strategic Policy 10 - Jobs and businesses  
 Strategic Policy 11 - Open spaces and wildlife  
 Strategic Policy 12 - Design and conservation  
 Strategic Policy 13 - High environmental standards  
 Strategic Policy 14 - Implementation and Delivery

Southwark Plan 2007 (July) - saved policies

36. The Council's cabinet on 19 March 2013, as required by para 215 of the NPPF, considered the issue of compliance of Southwark Planning Policy with the National Planning Policy Framework. All policies and proposals were reviewed and the Council satisfied itself that the policies and proposals in use were in conformity with the NPPF. The resolution was that with the exception of Policy 1.8 (location of retail outside town centres) in the Southwark Plan all Southwark Plan policies are saved. Therefore due weight should be given to relevant policies in existing plans in accordance to their degree of consistency with the NPPF.

Policy 1.1 Access to Employment Opportunities

Policy 1.4 Employment Sites

Policy 2.5 Planning Obligations

Policy 3.2 Protection of Amenity

Policy 3.3 Sustainability Assessment

Policy 3.4 Energy Efficiency

Policy 3.6 Air Quality

Policy 3.7 Waste Reduction

Policy 3.9 Water

Policy 3.11 Efficient Use of Land

Policy 3.12 Quality in Design

Policy 3.13 Urban Design

Policy 3.14 Designing Out Crime

Policy 3.15 - Conservation of the Historic Environment

Policy 3.18 Setting of Listed Buildings, Conservation Areas and World Heritage Sites

Policy 3.19 Archaeology

Policy 3.28 Biodiversity

Policy 3.31 Flood Defences

Policy 4.1 Density of Residential Development

Policy 4.2 Quality of Residential Development

Policy 4.3 Mix of Dwellings

Policy 4.4 Affordable Housing

Policy 4.5 Wheelchair Affordable Housing

Policy 5.1 Locating Developments

Policy 5.2 Transport Impacts

Policy 5.3 Walking and Cycling

Policy 5.6 Car Parking

Policy 5.7 Parking Standards for Disabled People and the Mobility Impaired

#### Supplementary Planning Documents

37. Affordable housing SPD (2008) and draft (2011)
- Sustainable design and construction SPD (2009)
- Sustainable transport SPD (2010)
- Residential Design Standards SPD (2011)
- Section 106 planning obligations and community infrastructure levy (CIL) SPD (2015)
- Technical update to the Residential Design Standards SPD (2015)

#### New Southwark Plan

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

#### Draft London Plan

39. The draft New London Plan was published on 30 November 2017 and the first and only stage of consultation closed on 2nd March 2018. Minor suggested changes to the plan were published on 13th August 2018 and an Examination in Public (EIP) began on 15th January 2019. The EIP will continue until May 2019 and until the London Plan reaches formal adoption it can only be attributed limited weight.

#### **Principle of development**

40. The proposed development would not re-provide the full amount of existing employment floorspace, however the existing employment floorspace is not protected by any of the criteria set out in saved policy 1.4 of the Southwark Plan or policy SP10 of the Core Strategy and as such the principle of releasing the land for alternative suitable uses such as new homes, including affordable homes, is supported in principle.
41. The National Planning Policy Framework (NPPF) was updated in 2019. At the heart of the NPPF is a presumption in favour of sustainable development. The framework sets out key principles, including a focus on driving and supporting sustainable economic development to deliver homes.
42. The NPPF promotes the delivery of a wide choice of high quality homes, seeks to widen opportunities for home ownership and create sustainable, inclusive and mixed communities. It encourages the effective use of land by reusing land that has been



previously developed and also promotes mixed use developments. The NPPF also states that permission should be granted for proposals unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework as a whole.

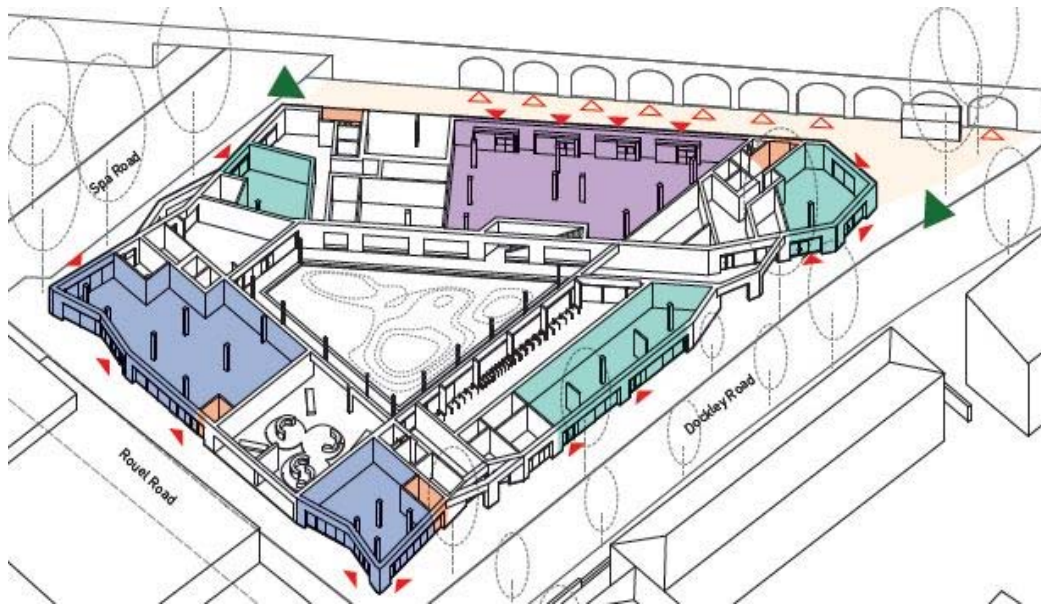
#### *Employment floorspace*

43. Saved Policy 1.4 'Employment sites outside the Preferred Office Locations and Preferred Industrial Locations' of the Southwark Plan sets out a series of criteria to identify sites where employment floorspace must be replaced in full if sites are redeveloped. These criteria include all sites in the CAZ or town centres, and sites which have direct access to a classified road. Where sites do not fall within any of these criteria, the site may be released for other appropriate uses, including housing. Core Strategy policy SP10 'Jobs and Business' continues the same approach. The application site does not fall within any of the locations where employment floorspace is protected by policy, and therefore it is appropriate to release the land for other priority uses. The proposed development would provide 1089sqm of Class B8 and Class A space alongside the housing. This mix is appropriate in terms of activating the street frontages, including the 'Low Line', whilst maximising the delivery of much needed new homes. The proposed employment floorspace would also generate up to 48 new jobs.

#### *Housing*

44. The development would provide 111 new homes, including 30 affordable homes, and 11 affordable homes suitable for wheelchair users.
45. There is a pressing need for housing across London and London Plan Policy 3.3 - Increasing Housing Supply sets a minimum target of 27,362 additional homes to be provided in Southwark over a period from 2015-2025. Strategic Policy 5 of the Core Strategy seeks high quality new homes in attractive environments. It states that development will provide as much housing as possible while also making sure that there is enough land for other types of development. The policy sets a target of 24,450 net new homes between 2011 and 2026. A key objective is to provide as much new housing as possible and create places where people would want to live. The proposal would deliver 111 new residential units including over 35% affordable housing, which is considered to be a positive aspect of the proposal and would make a significant contribution to the borough's housing target.

*Image – Arrangement of ground floor uses*



### *Retail*

46. The development would include five new retail units, three allocated to Class A1 use (retail) and two allocated to Class A3 use (restaurant/café). The retail units would help activate the ground floor of the development and would contribute to the vitality of the area as well as providing services for the increase in population. In its current form, the site has no active frontage and the proposal would create a much more attractive and vibrant street environment with retail opening out onto Dockley Road, Rouel Road and Spa Road. The amount and scale of provision is considered to be acceptable and would help to meet the needs of residents and visitors in the area.

### **Environmental impact assessment**

47. Applications where an Environmental Impact Assessment (EIA) is required will either be mandatory or discretionary depending on whether the proposal constitutes Schedule 1 (mandatory) or Schedule 2 (discretionary) development of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. The proposed development falls within Schedule 2, Category 10(b) 'Urban Development Project' of the EIA Regulations.
48. Whilst a formal Screening Opinion was not sought, the development is not considered to constitute EIA development, based on a review of the scheme against both the EIA Regulations 2017 and the European Commission guidance.

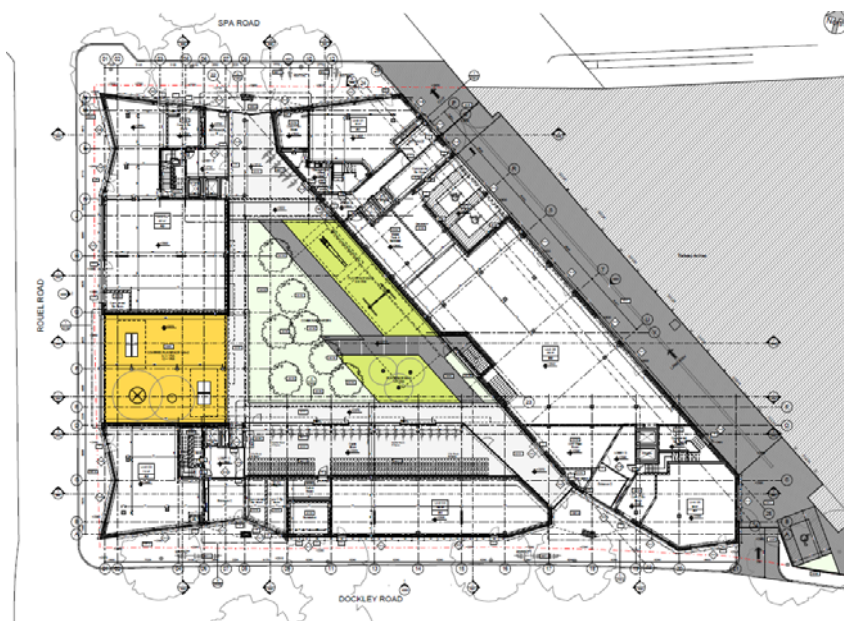
### **Design**

49. Section 12 of the NPPF 'Achieving well-designed places' advises that the creation of high quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development which creates better places in which to live and work. Policy 7.4 of the London Plan requires development to have regard to the form, function, and structure

of an area, place or street and the scale, mass and orientation of surrounding buildings. It should improve an area's visual or physical connection with natural features. In areas of poor or ill-defined character, development should build on the positive elements that can contribute to establishing an enhanced character for the future function of the area. Policies 7.4 and 7.5 are also relevant which require developments to provide high quality public realm and architecture.

50. Strategic policy 12 of the Southwark Core Strategy (2011) states that all development in the borough will be expected to *“achieve the highest possible standards of design for buildings and public spaces to help create attractive and distinctive places which are safe, easy to get around and a pleasure to be in.”* Saved policy 3.12 ‘Quality in design’ of the Southwark Plan asserts that developments should achieve a high quality of both architectural and urban design, enhancing the quality of the built environment in order to create attractive, high amenity environments people will choose to live in, work in and visit. When we consider the quality of a design we look broadly at the fabric, geometry and function of the proposal as they are bound together in the overall concept for the design. Saved policy 3.13 of the Southwark Plan asserts that the principles of good urban design must be taken into account in all developments. This includes height, scale and massing of buildings, consideration of the local context, its character and townscape as well as the local views and resultant streetscape. Saved policy 3.18 of the Southwark Plan requires to the setting of conservation areas, listed buildings and world heritage sites to be preserved.
51. The proposal is located on the southern flank of the railway viaduct and is bounded by Spa Road to the north and Dockley Road to the south. The main street frontage for the site is on Rouel Road to the west. The existing buildings are brick built industrial sheds in two rows that face inwards onto a central service yard with accesses onto Rouel Road and Dockley Road which are secured by metal palisade fencing. The surrounding streets are predominately residential in nature with heights up to seven and eight storeys.

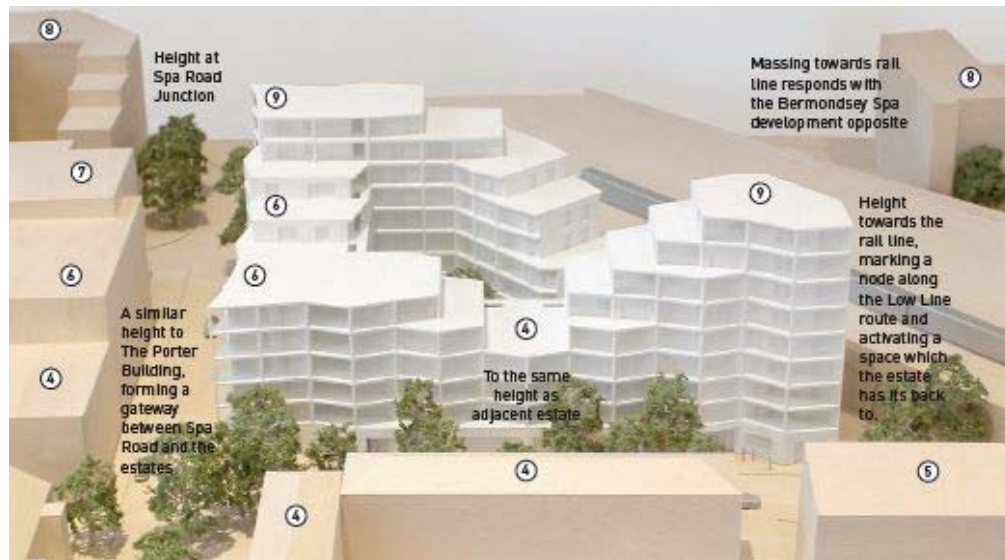
*Image – Proposed site plan*



### *Building form, height and massing*

52. The proposal takes on the form of the previously consented scheme and is arranged in a horseshoe form facing on to the main street frontages to the east, south and west. It is designed to have a robust base with a more lightweight design to the residential accommodation above. The base has retail units animating its edges, with residential entrances at key locations which residents can use to access their homes via the central garden.

### *Image – Building heights*



53. The height ranges from five storeys (19.23m AOD) on Rouel Road and four storeys facing the viaduct (16m AOD) and rises to its maximum height of nine storeys (32.55m AOD) at the opposing south-east and north-west corners. The massing is highly articulated with a stepped arrangement that rises incrementally in single-storey steps which means that above 4-5 storeys each successive floor plate is reduced so that when it reaches the top the scheme has just one or two flats clustered around the core.
54. The form is highly articulated and logical in that it reinforces the street frontages and is arranged around a secure communal garden. The massing mediates between the heights of the older buildings in the area such as Eldridge Court and the higher recent developments such as the Bolonachi Building. The tallest points are located at opposing corners - nearest the railway viaduct and at the corner of Rouel Road and Dockley Road - where the urban context and environmental conditions suggest height is appropriate. Whilst this building would be the tallest in its immediate context, its complex form, and the limited extent of these taller elements means that it will not feel over-bearing.

### *Architectural design*

55. The architectural language of this proposal is intricate and makes some reference to the industrial heritage of the area. The base is proposed to be in a dark masonry finish (black engineering brick), with angled elements lightened and animated by the glazed

openings of the commercial units and residential cores. One opening, onto Rouel Road, is wider and contains the covered play area for older children. At the centre is a landscaped communal courtyard which will provide a communal and visual amenity for residents. Above the base is the highly articulated metal framed (and metal finished) residential block. The apartments are designed with a 'saw-tooth' profile with deep-set angled balconies and an exposed structural grid of steel. This architectural device articulates the block and brings depth and animation to the entire street-facing facade. Chamfered frontages also help to minimise overlooking and offer added privacy to the residents. The upper floors are clad in a profiled metal face which is robust and dynamic.

*Image – View from Rouel Road*



56. The composition is highly articulated within an ordered framework defined by the structural grid and saw-tooth facade. The stepped massing is logical and gives the design a sculptured profile, adjusting in response to its immediate context - lower on Rouel Road, and taller at the prominent corners. Lift overruns are minimised and accommodated within the building.

*Image – Balcony detail*



*Heritage assets*

57. The Council's 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. Where there is harm to a heritage asset the NPPF requires the Council to ascertain the scale and degree of the harm caused and to balance that against the public benefits arising as a consequence of the proposal.
58. The site is not located in a conservation area and the nearest heritage asset is the Grade II Listed Spa Road railway bridge. The historic railway bridge is set at the middle of the railway viaduct where it is flanked by modern viaduct widening schemes that have added three lines on either side of the historic railway bridge. This proposal is unlikely to have any impact on the setting of this heritage asset given how deep set it is within the viaduct and its limited visibility from within the viaduct itself. The proposal will have no impact on the setting of any other designated heritage asset. The viaduct itself has been considered as an undesignated heritage asset given its scale and elegant detailing. The proposal is separated from the currently occupied portion of the viaduct by the roadway that serves these premises. In this way it preserves the viaduct and its setting.

*Conclusions on design*

59. In conclusion, the proposal is appropriate in its urban form and architectural design. It has no impact on heritage assets and responds appropriately to local character and history. The high quality design will rely to a large degree on the architectural detailing and the choice of materials, in particular the profiled metal cladding and the detailing around window and door openings, parapets, jambs and cills. It is recommended that these details be secured by conditions, as set out in the draft decision notice.

60.

**Density**

61. Policy 3.4 Optimising Housing Potential of the London Plan states that development should optimise housing output for different types of location within the relevant density range shown in Table 3.2 of the Plan. Strategic Policy 5 – Providing new homes of the Core Strategy sets out the density ranges that residential and mixed use developments would be expected to meet. As the site is located within the Urban Zone, a density range of 200-700 habitable rooms per hectare would be sought. In order for a higher density to be acceptable, the development would need to meet the criteria for exceptional design as set out in section 2.2 of the Residential Design Standards SPD.
62. The development as a whole would have a density of 1,082 habitable rooms per hectare. Since the maximum upper limit would be significantly exceeded, the development would need to demonstrate that it would provide exemplary accommodation to the highest design standards. If it can be demonstrated that an excellent standard of accommodation would be provided, and the response to context and impact on local services and amenity to existing occupiers is acceptable, then it's considered that the high density would not in itself raise any issues to warrant withholding permission.
63. The Council's Residential Design Standards SPD requires accommodation to be of an exemplary standard where density ranges would be exceeded. The requirements to be considered exemplary are set out below:

<b>Exemplary residential design criteria from Southwark Residential Design Standards SPD</b>	<b>Commentary</b>
Provide for bulk storage	Each of the apartments proposed would have storage, broadly in compliance with the Residential Design Standards SPD. No bulk storage is provided as the development does not incorporate any basement space.
Exceed minimum privacy distances	Minimum privacy distances would be exceeded in relation to existing neighbours. Some limited instances of lesser distances across the courtyard are mitigated by design and internal layouts.
Good sunlight and daylight standards	Good sunlight and daylight standards would be achieved.
Exceed minimum ceiling heights of 2.3m	All residential ceiling heights would significantly exceed 2.3m.
Exceed amenity space standards (both private and communal)	The proposed amenity space is set out in detail further below. Whilst there would be a small shortfall on some private amenity spaces, this is restricted to the one and to bedroom units and would be compensated by the significant areas of communal amenity space that would be provided that significantly exceed the SPD requirements.

Secure by Design certification	The scheme should achieve Secure by Design accreditation. Conditions to require this are recommended.
No more than 5% studio flats	No studio apartments are being provided.
Maximise the potential of the site	The potential of the site would be maximised, providing mixed use development with new retail and affordable homes.
Include a minimum 10% of units that are suitable for wheelchair users	10% of the proposed units would be suitable for wheelchair users.
Have excellent accessibility within buildings	The accessibility within the buildings would be excellent.
Have exceptional environmental performance	The environmental performance would be fully policy compliant, taking into account a contribution to the Southwark Green Fund.
Minimise noise nuisance between flats by stacking floors so that bedrooms are above bedrooms, lounges above lounges	Accommodation is generally stacked to minimise disturbance and noise transfer will be further mitigated by condition.
Make a positive contribution to local context, character and communities	The proposed development would make a positive contribution to local context, character and communities in terms of its quality of design and regeneration benefits including affordable housing, retail and Class B8 space as well as opening up a new section of the low line at weekends.
Include a predominance of dual aspect units	Over 99% of the proposed units would be dual aspect (only 1 single aspect flat)
Have natural light and ventilation in all kitchens and bathrooms	The vast majority of kitchens would have access to natural light and ventilation.
At least 60% of units contain two or more bedrooms	60% of the total number of units across all tenures would have two or more bedrooms.
Significantly exceed the minimum floor space standards	All units would meet the space standards, and many would exceed them, some to a significant degree.
Minimise corridor lengths by having additional cores	This has been achieved through having four separate cores to serve the new homes.

64. In addition, officers have identified the following exceptional aspects of the residential design:

- Exceptional architectural design, with high quality materials proposed;
- Large, functional balconies and expansive communal amenity spaces;
- Tenure blind design;
- Choice of layouts, with some open plan and others with separate kitchen diners and living rooms;
- Full provision of on site play space.



65. Officers consider that the new homes would be of an exemplary standard despite not all of the requirements in the above table being met in their entirety. It is considered that the proposal would be of an appropriate height, scale and massing and the quantum of development would allow the provision of affordable housing to be maximised. Although there would be adverse impacts upon daylight and sunlight to neighbouring properties, this must be weighed in the balance with all of the benefits arising from the scheme. When all of the benefits and disbenefits are taken into account, it is not considered that exceeding the density threshold would warrant withholding permission in this instance.

### **Affordable housing**

66. The development would provide 35% affordable housing, equating to 30 flats, once the dispensation for wheelchair affordable housing has been taken into account.
67. Section 5 of the NPPF sets out the government's approach to the delivery of significant new housing including a plan-led approach based on a sound evidence base, and policy 3.3 of the London Plan supports the provision of a range of housing types. It sets the borough a minimum target of 27,362 new homes between 2015-2025. Strategic policy 5 of the Core Strategy reinforces the London Plan policy, and requires development to meet the housing needs of people who want to live in Southwark and London by providing high quality new homes in attractive areas, particularly growth areas. Core Strategy SP6 requires that developments with 10 or more units should provide a minimum of 35% affordable housing, subject to viability. Saved policy 4.4 of the Southwark Plan requires an affordable housing tenure split of 70% social rented and 30% intermediate units in this location.
68. The proposed development would provide a total of 369 habitable rooms. As such, the 35% affordable housing requirement for this site would be 129 habitable rooms. Saved Policy 4.5 'Wheelchair affordable housing' of the Southwark Plan allows for one less habitable room of affordable housing to be provided for every one affordable wheelchair unit provided in a development. In this case, as the developer is providing 11 affordable homes suitable for wheelchair users, the overall affordable habitable room requirement is reduced to 118.
69. The proposed development would deliver a policy compliant level of affordable housing comprising 120 affordable habitable rooms which equates to 35.5% with a tenure split of 70% social rented and 30% intermediate (shared ownership). The mix of affordable units would be as follows:

<b>Unit Type</b>	<b>Private Units</b>	<b>Affordable Housing Units</b>		<b>Total</b>
		<b>Social Rent</b>	<b>Shared Ownership</b>	
<b>1 Bed</b>	36	5	3	44
<b>2 Bed</b>	34	6	5	45
<b>3 Bed</b>	11	9	2	22
<b>Total Units</b>	81	20	10	111
<b>Total Hab Rooms</b>	249	84	36	369

70. It is noted that 37% of the affordable housing units would be three bedroom family units and overall, 74% of the affordable housing would have two or more bedrooms. This is welcomed and the scheme is considered to offer a wide choice of affordable

homes.

#### *Viability*

71. The application is accompanied by a viability appraisal which has been independently reviewed by GVA (now Avison Young) on behalf of the Council. The proposed affordable housing offer would be policy compliant and this is demonstrated as being viable in the Financial Viability Appraisal submitted with the application. The delivery of the affordable housing would be secured within the S106.

#### **Housing mix**

72. Strategic Policy 7 of the Core Strategy expects developments to provide at least 60% two or more bedrooms and in this at least 20% of units to have 3 or more bedrooms. At least 10% of the units should be suitable for wheelchair users. The proposed housing mix is detailed below.

<b>No of Bedrooms</b>	<b>Total Units (number)</b>	<b>Total Units (%)</b>
1 Bed	44	40%
2 Bed	45	40%
3 Bed	22	20%
Total	111	

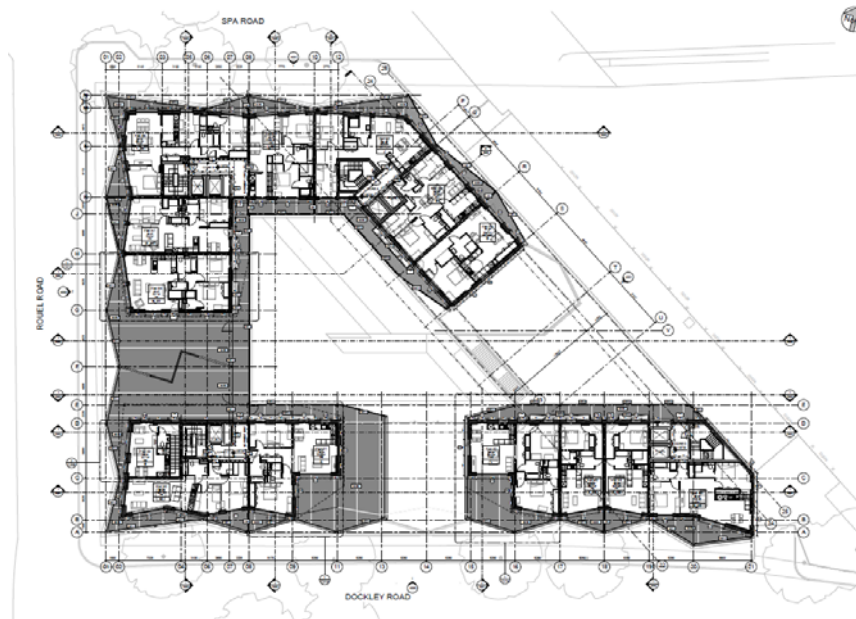
73. The proposed housing mix is fully compliant with policy and would offer a range of homes and unit sizes, including a policy compliant level of family sized housing which is fully supported.

#### **Wheelchair housing**

74. A total of 11 units would be provided that would be suitable for wheelchair users. All 11 of these would be affordable units. This meets the policy requirement of 10%. The exact units and level of fit out would be secured within the S106 agreement alongside a clawback mechanism to secure £100,000 for any affordable wheelchair unit that is not fully fitted out for occupation by a wheelchair user.

#### **Housing quality**

75. Policy 3.5 of the London Plan requires housing developments to be of the highest quality internally, externally, and in relation to their context and to the wider environment. They should enhance the quality of local places, incorporate requirements for accessibility and adaptability, and minimum space standards. In terms of Southwark policy, saved policy 4.2 of the Southwark Plan 'Quality of accommodation' requires developments to achieve good quality living conditions. 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.

*Image – Level 5**Unit size*

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

<b>Unit Type</b>	<b>SPD (sqm)</b>	<b>Size Range (sqm)</b>
1 Bed (flat)	50	50 – 66
2 Bed (flat)	61-70	70– 89
3 Bed (flat)	74-95	76 - 130

78. The proposed flat sizes meet and in many cases significantly exceed the minimum space standards as set out in the SPD which is welcomed and will provide an excellent standard of accommodation.

*Aspect*

79. 110 of the 111 units (over 99%) would be dual aspect and the one unit that would be single aspect would be orientated south/south east. This is an exemplary proportion of dual aspect units for a high density scheme.

*Overlooking*

80. Separation distances vary from between 17.5 metres and 26 metres across the courtyard however there is one instance of a separation distance of 11.5 metres at the inward facing units towards the railway end of the development. The closer distance of

11.5 metres only affects bedrooms and kitchens. Where other distances are less than the expected 21 metres, the splayed layout means that views are oblique which mitigates against intrusive overlooking. Overall, the separation distances are not considered to be significantly detrimental to amenity or the quality of the accommodation.

#### *Internal daylight*

81. A Daylight Assessment based on the Building Research Establishment (BRE) Guidance has been submitted which considers light to the proposed dwellings using the Average Daylight Factor (ADF). ADF determines the natural internal light or day lit appearance of a room and the BRE guidance recommends an ADF of 1% for bedrooms, 1.5% for living rooms and 2% for kitchens.
82. Of the 332 rooms tested 234 (70%) would fully comply with the BRE guidance in relation to ADF. Of the 98 rooms that fall short of this target, 76 would be bedrooms or dining rooms and 40 rooms would be within 0.3% of meeting the target. Officers consider the shortfalls to be minor and would generally affect rooms that are less sensitive to daylight. Overall the proposed units would be well lit by natural light.

#### *Amenity space*

83. All new residential development must provide an adequate amount of useable outdoor amenity space. The Residential Design Standards SPD sets out the required amenity space standards which can take the form of private gardens and balconies, shared terraces and roof gardens. Policy 3.6 of the London Plan requires new developments to make provision for play areas based on the expected child population of the development. Children's play areas should be provided at a rate of 10 sqm per child bed space (covering a range of age groups).
84. In terms of the overall amount of amenity space required, the following would need to be provided:
  - For units containing 3 or more bedrooms, 10sqm of private amenity space as required by the SPD;
  - For units containing 2 bedrooms or less, ideally 10sqm of private amenity space, with the balance added to the communal gardens;
  - 50sqm communal amenity space per block as required by the SPD; and
  - 10sqm of children's play space for every child space in the development as required by the London Plan.
85. All of the dwellings would have private amenity space with the three bedroom units either meeting or exceeding the minimum standards. 47 of the one and two bedroom units would fall below the 10sqm requirement but would still have in excess of 7sqm private amenity space. Overall the shortfalls on the one and two bedroom units is minor, equating to 96.5sqm overall which would be comfortably accommodated within the communal amenity space.

*Image – Internal courtyard*



86. Communal amenity space totalling 1018sqm would be provided in the form of a central courtyard and two roof terraces. This is more than enough to absorb the small private amenity shortfall of 96.5sqm and the large communal amenity spaces are a significant benefit of the scheme. The level of both private and communal amenity space is welcomed and is considered to be policy compliant.

*Children's play space*

87. In line with the Mayor's 'Providing for Children and Young People's Play and Informal Recreation' SPG the development would be required to provide 330sqm of children's play space broken down between the various age groups as detailed below.
88. The applicant has proposed 331sqm of child play space against the following child play space requirement:

<b>Age Group</b>	<b>Play Space Requirement</b>	<b>Play Space Provided</b>
Under 5	150	151
5 to 11	110	110
12+	70	70
<b>Total</b>	<b>330</b>	<b>331</b>

89. The play space will all be accommodated within the ground floor central courtyard which is well overlooked by the flats above ensuring that children can be supervised whilst playing outside. The 5-11 and 12+ play is located in the covered area between the courtyard and Rouel Road and a benefit of this is that it can be used in all weathers. The provision of equipment such as table tennis tables in this shaded area is a positive response to meeting the needs of older children. Officers welcome the fully compliant levels of play space being provided entirely on site. Play equipment in the form of swings, slides, roundabouts and table tennis tables will ensure that all age groups are catered for with final details of play equipment to be secured by condition.

Conclusions on housing quality

90. The proposed development would provide a policy compliant mix of homes all of which would meet or exceed the minimum space standards. All of the new homes would be well lit and ventilated with natural light and air and future occupiers would benefit from high quality private and communal amenity space alongside high quality and secure play spaces for children of all age groups. Officers consider the proposed accommodation to be of a high standard and a very positive aspect of the proposed development.

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

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

*Privacy and overlooking*

92. In order to prevent harmful overlooking, the Residential Design Standards SPD 2011 requires developments to achieve a distance of 12m at the front of the building and any elevation that fronts a highway and a minimum of 21m at the rear. All outward facing elevations of the proposed development would achieve at least 12 metres separation distance from adjacent buildings and in this respect it is not considered that there will be any adverse impact in terms of overlooking, loss of privacy or loss of outlook.

*Impact of proposed uses*

93. The proposed uses within the development would comprise Class A1, A3 and B8 as well as residential. Class B8 use is already in operation on the site and Class A1 and A3 uses generally sit comfortably near to residential properties, and the scale of the Class A (retail) uses would not result in any significant loss of amenity. It is recommended that the opening hours of the Class A1, A3 and B8 uses be limited to 7am to 11pm daily by way of a condition. Conditions are also recommended limiting servicing hours and plant noise from the development.

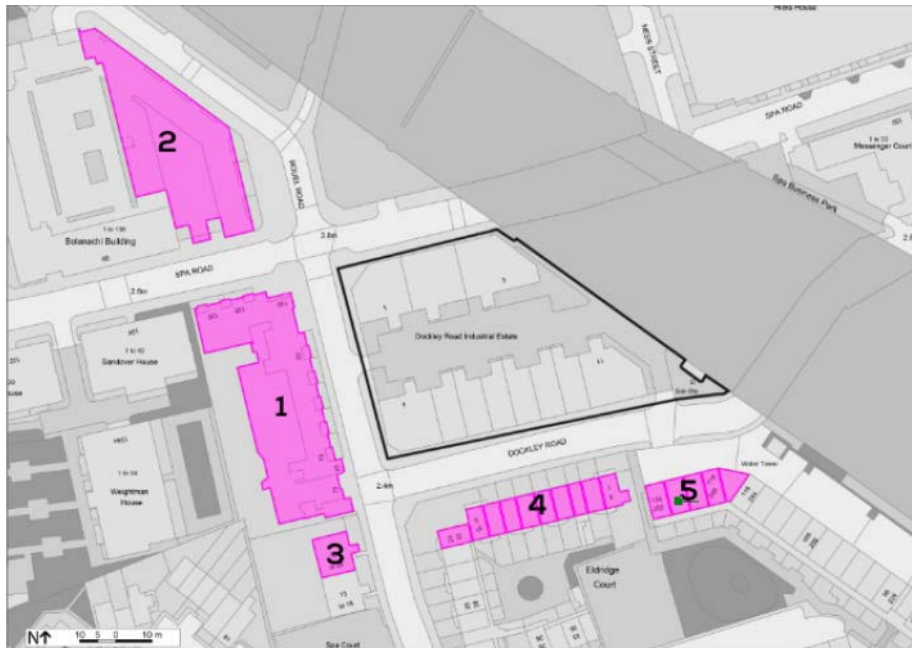
*Daylight and sunlight*

94. A daylight and sunlight report has been submitted that assesses the scheme based on the Building Research Establishments (BRE) guidelines on daylight and sunlight.
95. The existing buildings that surround the application site currently have unobstructed views across the application site due to the low rise nature of the existing buildings and as such receive unusually high levels of daylight and sunlight for an urban location. As such any redevelopment of the site would result in noticeable changes to

daylight to adjacent properties.

96. In this case there would be significant impacts to both the Porter Building and Eldridge Court. However, taking into account the existing context in the form of a 'mirror image' assessment for the Porter Building and a comparison of the impacts between the consented scheme and the proposed scheme for Eldridge Court, Officers are of the view that whilst the impacts would be significant, they would not be inappropriate. The Council have had the applicant's Daylight and Sunlight assessment independently reviewed and the Council's consultants (GVA) agreed with the conclusions of the applicant's report. It is noted that an updated Daylight and Sunlight Assessment has been submitted and as this updated assessment shows improved results it was not considered necessary to have the document reviewed externally.
97. The BRE Guidance provides a technical reference for the assessment of amenity relating to daylight, sunlight and overshadowing. The guidance within it is not mandatory and the advice within the guide should not be seen as an instrument of planning policy. The guidance notes that within an area of modern high rise buildings, a higher degree of obstruction may be unavoidable if new buildings are to match the height and proportion of existing buildings.
98. The BRE sets out two detailed daylight 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 residential buildings which look towards the site. The target figure for VSC recommended by the BRE is 27% which is considered to be a good level of daylight and the level recommended for habitable rooms with windows on principal elevations. The BRE have determined that the daylight can be reduced by about 20% of the original value before the loss is noticeable.
99. The second method is the No Sky Line (NSL) or Daylight Distribution (DD) method which assesses the proportion of the room where the sky is visible at the working plane, and plots the change in the No Sky Line between the existing and proposed situation. It advises that if there is a reduction of more than 20% in the area of sky visibility, daylight may be affected.
100. The daylight and sunlight assessment submitted by the applicant considers the impact of the development against the following buildings in residential use:
  - Porter Building
  - Bolonachi Building
  - 19-24 Spa Court (79 Rouel Road)
  - 1-16 Eldridge Court
  - 118-124 and 246-252 Lucey Way

Image – Site (outlined in black) and surrounding properties



1. 126 Spa Road (Porter Building)
2. Bolanachi Road
3. 19-24 Spa Court (79 Rouel Road)
4. 1-16 Eldridge Court
5. 118-124 & 246-252 Lucey Way

101. The daylight and sunlight assessment demonstrates that there would be no adverse impacts beyond the BRE guidance on either the Bolonachi Building or Spa Court. The remaining buildings will be taken in turn.

#### *Porter Building*

102. The Porter building sits directly opposite the application site on Rouel Road and rises to seven storeys (with the top floor slightly set back). The flats on the Rouel Road frontage are served by deep inset balconies. Three tests have been undertaken to gauge the impact of the development on the Vertical Sky Component (VSC) levels that would be achieved at the flats in the Porter building including :

- Existing V. Proposed
- Porter Building with balconies removed V. Proposed
- Mirror image massing of Porter Building V. proposed.

103. The results of the various tests on the Porter Building are set out in the following table:

	No. of windows assessed	* BRE Compliant	20.01% - 30% loss	30.01% - 40% loss	40.01% - 50% loss	50.01% - 60 % loss	> 60.01% loss
Existing V. Proposed	103	41 (39.8%)	13	12	15	12	16
Balconies removed	103	51	18	14	18	15	0



V. Proposed		(49.5%)					
Mirror massing V. Proposed	103	94 (91.2%)	8	1	0	0	0

\* less than 20% reduction in VSC or retains at least 27% VSC

*Existing V. Proposed*

104. The daylight assessment has assessed 103 windows serving 69 rooms. The Porter Building would experience substantial impacts as a result of the proposed development with 62 of 103 windows (60%) experiencing a loss of VSC beyond the 20% threshold and a reduction to below 27% VSC as set out in the BRE. There are instance where these changes would be significant when considering the percentage change however this is largely a result of low existing VSC levels which can result in a disproportionate percentage change.
105. In terms of NSL, 25 of the 69 rooms (36%) would see reductions in sky visibility beyond the 20% threshold.

*Balconies removed V. Proposed*

106. As set out above, the flats in the Porter Building which face Rouel Road frontage are served by deep inset balconies. This style of balcony is more enclosed than a projecting balcony and this in turn can restrict the ability of windows within this space to receive natural light, particularly light from above. As set out in the BRE guide, it is reasonable to undertake an assessment without the balconies in place. In the case of a projecting balcony, the simplest form of the test would be to remove the balcony from the daylight model. However, as the balconies at the Porter Building are inset, the point of calculation has been moved to the façade of the building, thereby removing the overhead and side obstructions of the inset balconies.
107. The VSC results demonstrate that the windows located within the inset balconies would receive low levels of VSC with the proposed development in place and in many cases this would be less than 10% VSC. In the scenario where the inset balconies are removed, the same windows would retain VSC levels of at least 15%. Overall, 49.5% of windows would remain BRE compliant in this scenario.

*Mirror image V. Proposed*

108. In situations where the existing buildings on site do not align with the surrounding context in terms of scale, massing and position then disproportionate reductions in daylight and sunlight can occur. This is because the neighbouring building would have high levels of daylight and sunlight that are not typical of the existing townscape and context. In these situations the BRE provide for an alternative assessment and this is known as a mirror image test.
109. The Dockley Road application site is untypical of the surrounding context and townscape in that it is occupied by low rise buildings, whilst neighbouring blocks reach up to seven or eight storeys in height. This results in a higher than typical level of daylight and sunlight to the neighbouring blocks when taking into account the general

scale and massing of the surrounding townscape.

110. The BRE advocates an approach, in such instances, that sets an alternative baseline target of VSC for the proposed development to meet. This baseline target is set by mirroring the neighbouring properties on the application site. A more accurate way of understanding the equivalent VSC value for each individual window is to undertake a quantitative daylight and sunlight analysis with the mirror image of the opposite building in the existing baseline condition.

*Image – Mirror massing of Porter Building*



111. The Porter Building sits very close to the boundary on Rouel Road and as set out in the BRE it is reasonable to conduct a 'mirror image' assessment which is used to understand the levels of daylight (VSC) that would be experienced by an existing neighbouring property if there were a building of the same height, massing and positioning opposite.

112. A 'mirror image' assessment has therefore been completed that quantifies the impact on the Porter Building using a mirror image of the Porter Building on the application site to set the alternative baseline condition. If the existing baseline for the Porter Building is set by the mirror image of the Porter Building on the application site, then the proposed development would result in only 9 of the 103 windows (8.7%) experiencing a loss of VSC beyond the BRE guidance and in many cases, the VSC results would improve under the proposed development as compared to the baseline 'mirror image'. Similar results are seen under NSL whereby only 4 of the 69 rooms that have been assessed (3.8%) would experience a 20% reduction under the proposed development using the mirror image as the baseline.
113. The results of the daylight and sunlight assessment demonstrate that there would be a significant impact on the Porter Building in terms of a loss of daylight. When giving consideration to the tests removing the obstructive balconies and the mirror image as set out under the BRE guidance, the VSC and NSL impacts on the Porter Building are considered acceptable on balance, taking into account the significant benefits of the scheme in terms of affordable housing provision, quality of accommodation, quality of play space and exceptional design.
114. In terms of sunlight, all but three rooms would remain BRE compliant and the three rooms that would be affected are bedrooms which are less sensitive to sunlight loss given their use. The retained total values for these rooms are between 24% and 25% which is only marginally short of the BRE target of 25%.

#### *Eldridge Court*

115. A total of 66 windows and rooms at Eldridge Court have been assessed for both VSC and NSL. When comparing the existing baseline versus the proposed development there would be 58 windows (88%) that would experience losses of more than 20% VSC and 33 rooms (50%) that would see at least a 20% reduction in NSL (area of the room where the sky is visible).
116. Of the 58 windows that would see reductions of more than 20% VSC, a total of 22 would retain VSC levels of between 20% and 25%; 23 would retain VSC levels of between 15% and 20% and 16 would retain VSC levels of between 10% and 15%. There would be a total of 5 windows with VSC levels below 10%. All of the windows that retain less than 15% VSC are compromised by obstructions that are part of the existing Eldridge Court building, including the significantly projecting eaves and the two projecting bays on the Dockley Road frontage. The majority of windows (79%) would continue to receive VSC levels in excess of 15% which is not untypical of urban areas.

#### *118-124 and 246-252 Lucey Way*

117. A total of 12 windows and rooms have been assessed for both VSC and NSL and whilst 50% of the windows and 25% of the rooms would experience reductions in VSC and NSL beyond the BRE guidance it should be noted that all windows would retain VSC levels of at least 22% and in many cases would exceed 24% which is very positive for a site in an urban area.

#### *Conclusions on daylight and sunlight*

118. The proposed development would have a significant impact on the Porter Building and Eldridge Court. In the case of the Porter Building, if the mirror image was adopted as an alternative target value, as allowed for in the BRE, then the proposed development can be shown to have an acceptable alteration in daylight. When considering Eldridge Court, the residual VSC levels are not untypical of urban areas and the proposed development would not be significantly different to the consented scheme in terms of the level of impact. So whilst there will be significant impacts beyond the 20% advocated in the BRE Guidelines and some of these are likely to be noticeable, the extent of change is not unusual in dense urban locations particularly where the height of the existing buildings on the site is so modest. The impacts identified in the Daylight and Sunlight report should be considered against wider policy context which encourages the more intensive use of brown field sites and the overall benefits of the proposal including the provision of high quality affordable housing, affordable family units within a well-designed building

### **Transport issues**

119. The NPPF states that planning decisions should ensure developments that generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised.
120. Core Strategy Strategic Policy 2 encourages walking, cycling and the use of public transport rather than travel by car. Saved Policy 5.1 of the Southwark Plan states that major developments generating a significant number of trips should be located near transport nodes. Saved Policy 5.2 advises that planning permission will be granted for development unless there is an adverse impact on transport networks; and/or adequate provision has not been made for servicing, circulation and access; and /or consideration has not been given to impacts of the development on the bus priority network and the Transport for London (TfL) road network.

### *Site context*

121. Pedestrian routes around this site connect easterly to Bermondsey Underground Station (Jubilee line) and the bus routes on Jamaica Road and southerly to the buses and shops on Southwark Park Road. In the northbound direction, these routes also join with the "Thames Path" riverside walkway. In the Eastbound direction the site is connected with Southwark Park. The existing Cycle Route Quietway 1 (Greenwich to Waterloo) on Willow Walk can easily be reached via Spa Road/Bacon Grove. A quietway (Abbey Street Quietway -Tower Bridge to Lower Road) is proposed (but not yet committed) through Dockley Road. There are pedestrian crossing facilities along the route to Bermondsey Underground Station in the form of a raised zebra crossing on St James's Road and signalized crossings at the St James's Road/Jamaica Road junction.

### *Site layout*

122. In site layout terms, the proposed building is similar to the consented scheme. The proposed development is set back slightly from Dockley Road and Spa Road to improve the current narrow footways on these roads. It is also proposed to open the Low Line pedestrian route (which is currently a closed service yard) along the adjacent railway line for weekend retail operation of the railway arches businesses.

The redundant vehicle crossover on Rouel Road will be removed and the pavement reinstated. The existing vehicle crossover on Dockley Road will be retained as the vehicle entrance to the proposed development with a new egress gate and crossover on Spa Road to create a one-way servicing route along the railway arches. To incorporate the new crossover and ensure that adequate visibility is provided, a 20m length of resident permit holder / pay and display parking bays on the southern side of Spa Road will be removed and relocated to the northern end of Rouel Road. One additional bay will be provided on the southern side of Spa Road, to the west of the new vehicle crossover.

#### *Car parking*

123. The site is located on the edge of but not within the GR Controlled Parking Zone (CPZ) with parking permitted for Resident Permit Holders (RPH) only from Monday to Friday between 08:00hrs and– 18:30hrs. The applicant proposes three disabled car parking spaces and no general needs parking.
124. Although the applicant has not proposed any car parking provision, the parking stress surveys that were undertaken on Wednesday 8 November and Thursday 9 November 2017 along the immediate road sections within 200metres walking distance of the Site between 00:30hrs and 05:30hrs have shown an average parking stress in the CPZ area of 74% while outside the CPZ area the parking stress is 98%.
125. A new CPZ proposal in the eastern side of the site (Thorburn Square CPZ) was supported by 53% of residents and subsequently recommended by the council. The introduction of the new CPZ will help to control overspill parking and occupiers of the development will not be eligible for any parking permits in either existing or future CPZs.
126. The number of disabled parking spaces is less than that recommended by the London Plan. However, due to site constraints it has been agreed that the proportion would be reduced from 10% to 3%. Nevertheless at least one car club bay will be required and this will be secured as part of the S106 Agreement.

#### *Cycle parking*

127. The applicant has proposed a residential cycle storage containing 176 cycle parking spaces, which is enclosed, secure and weatherproof and located in an accessible area at ground floor next to the central courtyard and is therefore compliant the adopted 2016 London Plan/NSP. However further detail is required on the type, number and location of the long stay cycle parking for the commercial units and this will be secured by condition.

#### *Servicing*

128. The applicant proposes that all residential and commercial waste will be collected on-street or along the service road. The bin stores have all been located within 10m of the proposed collection point. This is considered acceptable however a condition will be required to ensure that no doors open out over the highway as is standard.
129. Servicing of the development will occur via the existing service road which runs between the proposed development and the railway viaduct. A servicing bay would be

provided on the western side of the service road, designed to accommodate a 10m rigid vehicle. It is proposed that the commercial aspect of this development will be serviced via this route, which will be kept free from obstructions to ensure that loading can occur whilst vehicle circulation along the route is maintained. Residential servicing will also take place along this service route, which will be linked to the residential courtyard via two cores at either end of the route. In addition to the service road within the development, some on-street servicing and refuse collection activity is likely on Dockley Road and Spa Road adjacent to each of the small commercial units proposed. All tenants will be expected to manage their servicing requirements and to co-ordinate with the on-site management team to ensure that demand for the loading bay is managed efficiently. The on-site management team will seek to ensure that no more than one delivery is scheduled for the loading bay at any one time. A Service Management Plan will be required by condition and this will secure all details of servicing and set out the times within which servicing can take place.

#### *Traffic*

130. Officers consider that vehicle trips would increase as a result of the proposed development. Overall, the Transport Team have estimated that this development proposal would produce 22 and 49 vehicle movements in the morning and evening peak hours respectively. It is also forecast that the existing light industrial use of this site would have generated 16 and 11 vehicle movements in the morning and evening peak hours respectively meaning that the actual net additional vehicle movements resulting from this development would be 6 and 38 vehicle movements in the morning and evening peak hours respectively. Although these predicted vehicular trips are higher than those of the applicant's consultants, the Transport Team consider that these levels of vehicular traffic would not have any significant adverse impact on the prevailing vehicle movements or traffic at this location.

#### **Impact on trees**

131. The site is bordered by large street trees. The trees presently overhang the existing buildings to a significant degree and have resulted in parts of the highway buckling due to surfacing roots. It is acknowledged that the trees will likely need to be pruned however this is not considered to be a negative impact in and of itself. Tree protection measures will be required to demonstrate how the existing trees will be protected, how their root systems can be managed and the extent of any pruning work that may be required. This will be secured as a pre-commencement condition to ensure that the trees would not be put at risk as a result of the development. Further conditions will be imposed to secure high quality hard and soft landscaping for the communal amenity spaces as well as conditions to secure green roofs and some planting within the service route/low line.

#### **Archaeology**

132. Policy 7.8 of the London Plan advises that new development should make provision for the protection of archaeological resources, landscapes and significant memorials. The physical assets should, where possible, be made available to the public on-site. Where the archaeological asset or memorial cannot be preserved or managed on-site, provision must be made for the investigation, understanding, recording, dissemination and archiving of that asset. Saved policy 3.19 of the Southwark Plan is also relevant, which sets out the Council's approach to protecting and preserving archaeology within

the borough.

133. The application site is not located within a designated Archaeological Priority Zone (APZ), however, it is close to two existing APZs. Significant multi-phase archaeological remains have been discovered in the general area from a number of sites. For example, ditches dating to the late Iron Age and early Roman periods were found during an evaluation by Museum of London Archaeology at 150 Spa Road between June and July 2010, just the other side of the railway. Roman ditches were also found during an excavation by AOC Archaeology at Spa Road between November 2007 and August 2008 just to the west of the site, and post medieval features and the remains of a 19th century tannery were also found.
134. Evaluation trenches excavated by the Museum of London Archaeology Service during September 2008 just to the north of the site revealed a range of Post Medieval cut features sealed beneath later levels of material. These features included shallow gullies and a substantial (possible field drainage or a boundary) ditch. This feature may potentially relate to English Civil War defences dating from 1642-3, and mapped by Smith and Kelsey.
135. The applicants have submitted an archaeological Desk Based Assessment (DBA) by AOC and dated December 2017 in support of this planning application. The assessment notes that the site has been truncated by previous development impacts. The Council's archaeologist agrees with the findings of this report and there is sufficient information to establish that the development is not likely to cause such harm as to justify refusal of planning permission provided that appropriate conditions regarding archaeological investigation, recording and mitigation are applied to any consent issued.

### **Ecology**

136. Policy 7.19 of the London Plan 'Biodiversity and access to nature' requires development proposals to make a positive contribution to the protection, enhancement, creation and management of biodiversity wherever possible. Saved policy 3.28 of the Southwark Plan states that the Local Planning Authority will take biodiversity into account in its determination of all planning applications and will encourage the inclusion in developments of features which enhance biodiversity, and will require an ecological assessment where relevant. A preliminary ecological appraisal (PEA) has been submitted in support of the application.
137. The preliminary ecological assessment makes recommendations which are supported by the Council's Ecology officer and which will be secured by way of condition, including:
  - A soft landscaping scheme that includes native species and non-native species that are known to benefit wildlife; and
  - The installation of 40mm entrance hole wall-integrated bird boxes on the new buildings, specifically for use by black redstart (*Phoenicurus ochruros*), which is a species of conservation concern known to be present in the SE London area.
138. The PEA also recommended that green walls be incorporated into the private outdoor amenity spaces however the provision of green walls within these locations is not

feasible and instead focus will be on green roofs and planting.

### **Air Quality**

139. The site sits within an air quality management area. Policy 7.14 of the London Plan 'Improving Air Quality' seeks to minimise the impact of development on air quality, and sets requirements including minimising exposure to existing poor air quality, reducing emissions from the demolition and construction of buildings, being at least 'air quality neutral', and not leading to a deterioration in air quality. The Council's Environmental Protection Team have reviewed the applicant's Air Quality Impact assessment produced by AECOM and agree with the reports findings and the development would achieve Air Quality Neutral standard for both vehicle and building emissions. Mitigation measures will be required during construction and this will be secured as part of a Construction Environmental Management Plan.

### **Noise**

140. The Environmental Protection Team have reviewed the applicant's Environmental Noise Survey and Noise Impact Assessment Report. In order to meet the council's noise criteria for internal and external spaces, several mitigating conditions will be required as is standard. These conditions will relate to internal and external noise levels as well as noise transfer and noise from plant.

### **Land contamination**

141. Policy 5.21 of the London Plan advises that appropriate measures should be taken to ensure that development on previously contaminated land does not activate or spread contamination. The Council's Environmental Protection Team have reviewed the Desk Study and Ground investigation report which did not find any elevated substances that required remediation. As such no further land contamination conditions are required.

### **Flood risk**

142. The application site is located within Flood Zone 3, which is considered to be 'High Risk' but does benefit from the Thames tidal defences. The Environment Agency has reviewed the applicant's Flood Risk Assessment and considers it to be acceptable. The Environment Agency would also support the recommendation noted within the Flood Risk Assessment subject to conditions and these would be included as a condition on any consent issued.

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

143. 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

144. 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.

*S106 obligations*

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

Planning Obligation	Mitigation	Applicant Position
Car Club	Three years membership for all eligible residents.	Agreed
Carbon Offset – Green Fund	£145,215	Agreed
Employment During Construction	17 sustained jobs to unemployed Southwark residents 17 residents trained in pre/post employment short courses. 4 new apprenticeships. Or a payment of £81,650	Agreed
Trees	Not specifically required unless unforeseen issues prevent trees from being planted or they die within five years of planting in which case a contribution will be sought - £6,000 per tree.	Agreed
Admin Charge (2%)	£4,537.	Agreed

146. The S106 Agreement will also secure the following obligations:

- Employment during construction provisions;
- Employment, skills and business support ;
- Delivery of the commercial space before a proportion of the residential space can be occupied;
- Commercial units management plan;
- Provision of affordable housing including a clawback mechanism for any wheelchair units that are not fully fitted out for occupation by wheelchair users;
- Parking permit exemption;
- Affordable housing monitoring fee;
- District heating future proofing provisions;
- Secure opening of low line at weekends;
- Provision of a car club bay and relocation of displaced street permit parking
- Tree contribution of £6K per tree for any proposed tree which cannot be planted on the site or dies within 5 years of the completion of the development;
- Post-construction review of carbon dioxide savings.

147. Highway works which would be delivered through a s278 agreement comprising:

- Provision of a raised table on Dockley Road at the south-eastern end of the site next to the railway underpass to slow vehicles approaching the proposed pedestrian/vehicular access;
- A raised pedestrian crossing at the western side of the retained delivery access on Dockley Road;
- Removal of the bollards currently cluttering the footway on Rouel Road;
- Repaving of the footway around the development on Rouel Road, Dockley Road, and Spa Road using materials in accordance with Southwark's Streetscape Design Manual (concrete paving slabs and granite kerbs);
- Provision of vehicle crossovers on Spa Road and Dockley Road to be constructed/upgraded to the relevant SSDM standards;
- Redundant crossover on Rouel Road to be reinstated as footway;
- Upgrade the crossing point on the northern side of Rouel Road where it meets Spa Road to current SSDM standards including tactile paving on the full width of the crossing;
- Dropped kerb provisions around the development to be provided to SSDM standards;
- Promote a TRO to amend parking arrangements on Spa Road;
- Relocate the existing lamp columns on Rouel and Dockley Road to the back of footway;
- Replace any gully covers and paving blocks damaged during construction works;
- The Highway Authority wishes to adopt the strip of land (between the public highway and the proposed building line around the development) which currently does not form part of the public highway as publicly maintained. Footway width of at least 1.5m will then be achieved behind the bases of the existing mature trees especially on Dockley Road.

148. In the event that a satisfactory legal agreement has not been entered into by 31 August 2019 it is recommended that the Director of Planning be authorised to refuse planning permission, if appropriate, for the following reason:

The proposal, by failing to provide for appropriate planning obligations secured through the completion of a S106 agreement, fails to ensure adequate provision of affordable housing and mitigation against the adverse impacts of the development through projects or contributions in accordance with saved policy 2.5 'Planning Obligations' of the Southwark Plan (2007), strategic policy 14 'Delivery and Implementation' of the Core Strategy (2011), policy 8.2 'Planning obligations' of the London Plan (2016) and the Planning Obligations and Community Infrastructure Levy SPD (2015).

### **Community Infrastructure Levy (CIL)**

149. 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. While Southwark's CIL will provide for infrastructure that supports growth in Southwark. In this instance an estimated

Mayoral CIL payment of £304,360 and an estimated Southwark CIL payment of £2,061,626 are payable.

### **Sustainable development implications**

150. The London Plan Policy 5.2 sets out that development proposals should make the fullest contribution to minimising carbon dioxide emissions in accordance with the energy hierarchy Be lean: use less energy; Be clean: supply energy efficiently; Be green: use renewable energy. This policy requires development to have a carbon dioxide improvement of 35% beyond Building Regulations Part L 2013 as specified in Mayor's Sustainable Design and Construction SPG.
151. Policy 5.3 states that developments should demonstrate that sustainable design standards are integral to the proposal, including its construction and operation, and ensure that they are considered at the beginning of the design process. Within the framework of the energy hierarchy major development proposals should provide a reduction in expected carbon dioxide emissions through the use of on-site renewable energy generation, where feasible.
152. Strategic Policy 13 of Core Strategy states that development will help us live and work in a way that respects the limits of the planet's natural resources, reduces pollution and damage to the environment and helps us adapt to climate change.
153. The applicants have submitted a Sustainability Statement and Energy Assessment which seeks to demonstrate compliance with the above policy.

#### *Energy*

154. An energy statement has been submitted which provides an initial assessment of the energy demand and carbon dioxide (CO<sub>2</sub>) emissions and savings associated with the proposed development. The applicant proposes to use a range of 'be lean, be clean and be green' measures in order to achieve the required carbon reduction as set out below:

#### *Be Lean*

155. The relevant Be lean measures would generate a CO<sub>2</sub> saving of 9.82%:
- The specification of high performance building fabric, airtightness and thermal bridging to reduce winter heat loss will reduce the scheme's required heating energy.
  - Mechanical ventilation with heat recovery to each flat to reduce the heating energy demand.

#### *Be Clean*

156. The relevant Be clean measures would generate a CO<sub>2</sub> saving of 23.86%:
- In accordance with the London Plan and Southwark local planning policy, the new buildings connected to a site wide district heating network and central heat generating energy centre.

- A central CHP unit sized to provide around 20% of the housing's space heating and domestic hot water requirements.
- Hot water to the commercial units will be provided by the centralised LTHW system that serves the residential scheme.
- Tenant fit out heating and cooling to the commercial units will be provided by a variable volume DX system.

#### *Be Green*

157. The relevant Be Green measures would generate a CO2 saving of 6.62%:

- The Developer and Project Team propose to reduce carbon dioxide emissions through the use of energy efficiency, CHP and building mounted PV panels.
- A 5.8% reduction in carbon emissions has been provided through the specification of an 80m2 rooftop PV array.

158. The Be lean/Be clean/Be green measures set out above would generate a 40.3% improvement beyond Buildings Regulations Part L 2013 and as such is policy compliant.

#### *Carbon Zero*

159. A contribution of £145,215 towards the Council's Carbon Off-set Green Fund will be secured in order to make the residential part of the development Carbon Zero in line with the requirements of the London Plan. It is recommended that the carbon savings be reviewed post-construction, which may require an adjustment to the S106 contribution amount.

#### *BREEAM*

160. The BREEAM pre-assessment demonstrates that the commercial spaces can achieve BREEAM Excellent which is supported. This will be secured by condition.

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

161. The proposed development would result in the beneficial redevelopment of an industrial estate that fails to make the most efficient use of the site. There is a pressing need for housing in the borough and the scheme would deliver 111 new homes, including a policy compliant amount of family housing and 30 affordable housing units; this would equate to over 35% affordable housing by habitable room, with a policy compliant tenure split of social rented and shared ownership housing.

162. The proposed housing is considered to be of the highest standard as are the communal amenity spaces and play spaces which are positive aspects of the proposed development.

163. The provision of housing, retail and Class B8 use is supported by current development plan policies and will ensure that the scheme provides a range of uses to serve existing and future residents whilst activating what are currently dead frontages.

164. The architectural design would be of the highest quality and the proposal is appropriate in its urban form, scale and massing. It has no impact on heritage assets

and responds appropriately to local character and history.

165. Amenity impacts for some neighbouring buildings would be noticeable, however a detailed assessment has been carried out including a 'mirror image' assessment for the Porter Building and a comparison of the impacts between the consented scheme and the proposed scheme for Eldridge Court. On this basis, it is concluded that whilst the impacts would be significant, they would not be so harmful as to warrant the refusal of planning permission.
166. Officers have assessed the scheme against the relevant development plan policies, including all statutory guidance and subject to the completion of a S106 agreement and appropriate conditions, it is recommended that planning permission be granted.

Updated drawings confirm that no part of the building extends above 30 metres above ground level, and therefore the application is not referable to the Mayor for London.

### **Consultations**

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

### **Consultation replies**

168. Details of consultation responses received are set out in Appendix 2.
169. The following comments have been received from Statutory Consultees in response to the proposed development:
170. Environment Agency – No objections subject to conditions  
**Response** – Noted and agreed, the relevant conditions will be attached to any consent issued.
171. Historic England – No objections, the application should be determined in accordance with national and local policy guidance and on the basis of the Borough's specialist conservation advice.  
**Response** – Noted and agreed, the Council's Design and Conservation Team have been consulted on the proposed development and consider it to be a high quality design and appropriate to the local context.
172. London Fire and Emergency Planning Authority – An undertaking is required that access for fire appliances as required by part B5 of the Building Regulations will be provided.  
**Response** – This will be added as an informative as the development will be required to comply with the building regulations, including Part B5.
173. London Underground – No objections.  
**Response** – Noted.
174. Metropolitan Police Service - The development is suitable to achieve Secured by Design accreditation. The Metropolitan Police seek to have a 'Secured by Design' condition attached to any permission that may be granted in connection with this application.

**Response** – Noted and agreed, the relevant condition will be attached to any consent issued.

175. Natural England – No objections.

**Response** – Noted.

176. Thames Water – No objections subject to conditions and informatives.

**Response** – Noted and agreed, the relevant conditions and informatives will be added to any consent issued.

#### Summary of neighbour consultation responses

177. Following neighbour consultation, 39 objections and two letters of comment were received in response to the proposed development. Following consultation, a further 75 letters of objection have been received. Six letters of support have been received.

178. The letters of comment asked if future residents would be allowed to apply for parking permits with a further comment stating that they should be unable to apply for permits. Further comments were made stating that the scheme should reach BREEAM outstanding to improve environmental performance and affordability in the long run. As set out in the main body of the report, future residents would be exempt from being able to obtain parking permits and a condition will be imposed to ensure that the scheme meets BREEAM 'Excellent'

179. The letters of support expressed backing for the benefits that the scheme would bring to the area and local businesses and the positive impact this would have on residents and visitors. Support was expressed for the regeneration of the area as well as the provision of affordable housing. New pedestrian routes (low line) as well as investment in the local area was considered to be positive.

The main points of objection have been summarised and addressed below:

180. Objection - The proposed development is excessive in scale, massing and height.  
**Response** – Officers consider that the proposed development would be a suitable addition to the area taking into account the local context and existing building heights which reach seven and eight storeys. Building form is similar to the consented scheme with the main change being the design of the facades and an increase in maximum height from seven to nine storeys.

181. Objection - The proposed development is excessive in density.  
**Response** - The development as a whole would have a density of 1,082 habitable rooms per hectare. Since the maximum upper limit would be significantly exceeded, the development would need to demonstrate that it would provide exemplary accommodation to the highest design standards. Officers consider that the new homes would be of an exemplary standard despite not all of the requirements in the above table being met in their entirety. It is considered that the proposal would be of an appropriate height, scale and massing and the quantum of development would allow the provision of affordable housing to be maximised. Although there would be adverse impacts upon daylight and sunlight to some neighbouring properties, this must be weighed in the balance with all of the benefits arising from the scheme. When all of the benefits and disbenefits are taken into account, it is not considered that exceeding the density threshold would warrant withholding permission in this instance.

182. **Objection** - The development will over dominate the street and reduce natural light at street level. The proposed building should be no taller than 7 storeys including the ground floor in order to prevent overwhelming existing housing.  
**Response** – The development is considered to be appropriate to the local context in terms of height, scale and massing and the stepped massing is not considered to over dominate the street or surroundings.
183. **Objection** - The proposed central courtyard should be a public space.  
**Response** – The central courtyard is a communal amenity space provided for occupiers of the proposed development. Public access will be granted along the Low Line at weekends.
184. **Objection** - Neighbouring residents will experience a detrimental impact on their amenity.  
**Response** – The proposed development would have no adverse impact on neighbouring residents in terms of a loss of privacy, loss of outlook, or noise from the commercial uses (which can be mitigated by way of condition). It is accepted that there would be impacts on daylight and sunlight and these are discussed in more detail below.
185. **Objection** - The development does not include off-street parking and this will impact on the local area and residents.  
**Response** – The Council support the principle of car free development in order to reduce reliance on cars and promote more sustainable forms of transport. The site lies on the edge of a Controlled Parking Zone (CPZ) and it is likely that a new CPZ will be implemented that will encompass the application site. As such, all future residents and business owners will be made exempt from obtaining parking permits for any existing or future CPZ's within the borough.
186. **Objection** - There will be a significant impact on existing residents on Rouel Road and Dockley Road in terms of a loss of daylight and sunlight.  
**Response** - The proposed development would have a significant impact on the Porter Building and Eldridge Court. In the case of the Porter Building, if the mirror image of the Porter building was adopted as an alternative target value, as allowed for in the BRE, then the proposed development would not give rise to a significantly worsened impact on daylight. When considering Eldridge Court, the residual VSC levels are not untypical of urban areas and the proposed development is not significantly different to the consented scheme in terms of the level of impact on Eldridge Court. Overall there will be significant breaches of the BRE Guidelines and some of these are likely to be noticeable. However, such alterations are not always unusual in dense urban locations and the impacts identified in the Daylight and Sunlight report should be considered against wider policy context, local townscape and the overall benefits of the proposal including the policy compliant level of affordable housing and the provision of housing of an exemplary standard.
187. **Objection** - The proposed commercial uses within the scheme will create noise and disturb residents, or may end up vacant. A café and/or restaurants facing Rouel Road open late into the evening will no doubt generate significant noise and disturb residents on Rouel Road.  
**Response** - The proposed uses within the development would comprise Class A1, A3 and B8 as well as residential. Class B8 use is already in operation on the site and

Class A1 and A3 uses generally sit comfortably near to residential properties, and the scale of the Class A (retail) uses would not result in any significant loss of amenity. It is recommended that the opening hours of the Class A1, A3 and B8 uses be limited to 7am to 11pm daily by way of a condition. Conditions are also recommended limiting servicing hours and plant noise from the development.

188. **Objection** - There are concerns about the level of noise and traffic to/from the commercial properties at the proposed ground floor, specifically due to delivery lorries parking & loading supplies. This is a residential neighbourhood and the proximity of such increased road traffic could have a very negative impact on the area.  
**Response** – Servicing will only take place within agreed hours in line with a Service Management Plan which has been secured by condition.
189. **Objection** - The development will put pressure on public transport.  
**Response** – The development will result in an increase in public transport usage however given the range of public transport options it is not anticipated to result in overcrowding.
190. **Objection** - The development will over dominate the historic Bermondsey Spa railway Bridge.  
**Response** - The historic railway bridge is set at the middle of the railway viaduct where it is flanked by modern viaduct widening schemes that have added three lines on either side of the historic railway bridge. This proposal is unlikely to have any impact on the setting of this heritage asset given how deep set it is within the viaduct and its limited visibility from within the viaduct itself. The proposal will have no impact on the setting of any other designated heritage asset. The viaduct itself has been considered as an undesignated heritage asset given its scale and elegant detailing. The proposal is separated from the currently occupied portion of the viaduct by the roadway that serves these premises. In this way it preserves the viaduct and its setting.
191. **Objection** - There is a concern that the proposed ground floor use of the development will end up vacant.  
**Response** – It is expected the developer, who has considerable experience of managing and renting commercial space in the surrounding area, will conduct a marketing and advertising campaign that will result in the units being occupied.
192. **Objection** - The new proposed scheme has deviated from the consent in the sense that the ground floor units will now just be retail as opposed to the previously consented scheme whereby retail was ancillary to employment.  
**Response** – Noted, with the exception of the large B8 unit, the commercial space would be occupied by Class A1 and A3 use. This does not conflict with policy as employment use is not protected in this location.
193. **Objection** - Although most of the elevations use beige-coloured panels, the other dominant colour (of grilles, railings, gates etc.) is black. Many recent developments in the area (along Spa Rd and Grange Walk for example) have used very dark brickwork and/or metalwork creating an unnecessarily gloomy environment.  
**Response** – Final materials, type and tone will be secured and agreed by condition.
194. **Objection** - The original plan should be adhered to as industrial space is being seriously reduced locally and is part of a healthy mix of business and leisure use.



**Response** – The range of uses being proposed are compliant with saved Policy 1.4 of the Southwark Plan. The application site is not located on or have direct access to a classified road; is not located in a public transport accessibility zone; and is not located within either the Central Activities Zone or a Strategic Cultural Area and as such the loss of B Class floorspace is acceptable in line with saved policy 1.4.

195. Objection - Three accessible parking spaces is insufficient.

**Response** – The Council's Transport Team have agreed that three spaces would be acceptable given site constraints.

196. Objection - The proposal is an overdevelopment of the application site.

**Response** – The scale, height and massing of the buildings are considered to be appropriate to the local context and inner London location. It is acknowledged that the scheme exceeds the upper density limit however the new homes are considered to be of an exemplary standard. It is considered that the proposal would be of an appropriate height, scale and massing and the quantum of development would allow the provision of affordable housing to be maximised.

197. Objection - The building is poorly designed and out of character with the surrounding area.

**Response** – The proposed building is considered to be of a very high architectural standard and exemplifies good design which responds appropriately to the local character.

198. Objection - The building has been reduced in height to ensure it doesn't need to be referred to the GLA.

**Response** – The applicant has reviewed and revised the drawings to address the previous error on the drawings. The initial plans submitted with the application demonstrated that the building did not exceed 30 metres in height when measured from ground level. Revised plans submitted in advance of Committee appeared to show a small projection at roof level that would have taken the building beyond the 30 metres threshold. The applicant confirmed that this was an error on the drawings and the item was deferred in order to give the applicant time to review and correct the relevant drawings.

199. Objection - The development would result in more traffic which could compromise child safety and reduce air quality.

**Response** – Although the Councils Transport Team consider that the predicted vehicular trips would be higher than those of the applicant's consultants, the Transport Team consider that these levels of vehicular traffic would not have any significant adverse impact on the prevailing vehicle movements or traffic at this location. The Councils Environmental Protection Team have reviewed the applicants Air Quality Impact assessment produced by AECOM and agree with the reports findings and the development would achieve Air Quality Neutral standard for both vehicle and building emissions.

200. Objection - The proposed building will ruin the community feeling in the area.

**Response** – The proposed building is not considered to be a threat to the sense of community in the area, despite being higher than the immediately surrounding buildings.

201. Objection - The development will impact on views from surrounding flats and balconies.  
**Response** – The site is occupied by low rise industrial buildings. The development of the site will restrict some views over what is a low rise and open site but there is no right to a view over a third parties land.
202. Objection - There will adverse impacts on local infrastructure, services and transport.  
**Response** – The provision of 111 new homes is not considered to be detrimental to local services. The proposed development would be required to make a financial contribution to the Community Infrastructure Levy in order to mitigate impacts on infrastructure and fund improvements.
203. Objection - The development does not meet Council policy on affordable housing.  
**Response** – The development would provide 35.5% affordable housing which exceeds the 35% minimum set out in policy.
204. Objection - The proposal will result in overlooking to surrounding properties, most notably the Porter Building.  
**Response** – In order to prevent harmful overlooking, the Residential Design Standards SPD 2011 requires developments to achieve a distance of 12m at the front of the building and any elevation that fronts a highway and a minimum of 21m at the rear. All outward facing elevations of the proposed development would achieve at least 12 metres separation distance from adjacent buildings and in this respect it is not considered that there will be any adverse impact in terms of overlooking, loss of privacy or loss of outlook.
205. Objection - The development will have an adverse impact on the food market and local businesses.  
**Response** – Officers consider that the proposed commercial uses plus the opening of the low line passage at weekends would complement the food market and local businesses rather than harm them.
206. Objection - The proposed development is overpowering and would not be in keeping with improving quality of life, community, mental health, carbon neutral development or green spaces.  
**Response** – The proposed development would create well design, high quality new homes for families, including affordable homes. It would be an energy efficient development that would be air quality neutral with a suitable carbon reduction. The development is not considered to be overpowering nor is it considered to have an injurious impact on quality of life, mental health or sense of community.
207. Objection - The pre-app response on application 12/EQ/0038 stated that the height and overall quantum of development was considered to be excessive. The same planning officer's support for the present proposals is therefore a complete change of position.  
**Response** – The pre-application enquiry was undertaken by a different planning officer to that dealing with the current application. The proposed scheme is an entirely different design and whilst heights of nine storeys are being proposed, the massing and position of tall elements is different to the pre-application referred to dating back to 2012.

208. **Objection** - Southwark is set to exceed its housing target and as such there is no requirement for such a large scheme.  
**Response** – There is a shortage of affordable homes in Southwark and across London. Providing new affordable homes suitable for a range of affordable housing need is our main priority. This includes social rent and intermediate tenure homes. Our evidence shows that Southwark has a net additional housing requirement for 1,472 to 1,824 homes per year (2013-2031).
209. **Objection** - The Viability Assessment is insufficient in detail and evidence, some of the values are optimistic and there is no confirmation from senior lenders that they consider the scheme to be viable.  
**Response** – The application is accompanied by a viability appraisal which has been independently reviewed by GVA (now Avison Young) on behalf of the Council. The proposed affordable housing offer would be policy compliant and this is demonstrated as being viable in the Financial Viability Appraisal submitted with the application.
210. **Objection** - The public consultation exercise that was undertaken by the applicant was insufficient.  
**Response** – The applicant has submitted a Statement of Community Involvement detailing the consultation that took place in advance of the application submission. This included a public exhibition, engagement with Ward Councillors, distribution of flyers and direct mailing to residents of buildings immediately surrounding the site and advertisement in Southwark Life. In addition to this the Council has undertaken two rounds of statutory consultation involving advertisement in the Southwark News
211. **Objection** - The proposed scheme compares very poorly with the consented scheme.  
**Response** – The proposed development maintains many aspects of the consented scheme, particularly with regards to the basic building form and range of uses. The detailed design and architecture are completely different and the scheme has been assessed on its own merits.
212. A letter of objection has been received from Southwark Law Centre. The letter states that a decision cannot be taken on the application as, contrary to Article 4 of The Mayor of London Order (2008), Southwark Council did not notify the Greater London Authority of the application given the fact that the proposed building exceeds 30 metres in height.
213. The current application was received by Southwark Council on 9 January 2018 and made valid on 2 February 2018. The Greater London Authority were notified of the application on 8 February 2018. Whilst the development description sets out the maximum height of the proposed development as AOD, the height of the building for the purposes of GLA referral is taken from ground level. After confirming with the GLA on 22 February 2018 that the height of the building was 29.8m above ground level, the GLA confirmed that the application was not be referable.
214. However, following some minor plan revisions received on 3 December 2018, the elevations showed a lift over run which would push the building above 30m from ground level (approximately 30.71 metres). On this basis the application was deferred from the committee on 15 January 2019 in order to allow the applicant's architects to confirm the accurate height of the building. The letter from Southwark Law Centre goes on to raise further points regarding non-compliance with some policies of the Draft New Southwark Plan and the Draft London Plan however, these policy

documents have not been adopted and are attributed limited weight at this stage. The application complies with the Core Strategy and saved policies of the Southwark Plan in terms of replacement industrial land.

215.

The Southwark Law Centre letter states that the scheme is not compliant with the land use policy on the basis that the site is located within an Action Area core and as such the employment land is protected. This criterion is included in the Core Strategy, but this document, at Figure 31, is clear that the site is not in an Action Area. As such the employment floorspace is not protected. This letter raises further points related to density of development, quality of accommodation and daylight/sunlight impacts, all of which are addressed in the committee report.

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

216. 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:

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

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

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

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

### **Human rights implications**

220. 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.

221. This application has the legitimate aim of providing new homes and commercial space. The rights potentially engaged by this application, including the right to a fair trial and the right to respect for private and family life are not considered to be unlawfully interfered with by this proposal.

## BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
Site history file: TP/361-128 Application file: 18/AP/0091 Southwark Local Development Framework and Development Plan Documents	Place and Wellbeing Department 160 Tooley Street London SE1 2QH	Planning enquiries telephone: 020 7525 5403 Planning enquiries email: planning.enquiries@southwark.gov.uk Case officer telephone: 020 7525 5365 Council website: www.southwark.gov.uk

## APPENDICES

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

## AUDIT TRAIL

<b>Lead Officer</b>	Simon Bevan, Director of Planning	
<b>Report Author</b>	Terence McLellan, Team Leader	
<b>Version</b>	Final	
<b>Dated</b>	20 March 2019	
<b>Key Decision</b>	No	
<b>CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER</b>		
<b>Officer Title</b>	<b>Comments Sought</b>	<b>Comments included</b>
Strategic Director of Finance & Governance	No	No
Strategic Director, Environment and Social Regeneration	No	No
Strategic Director of Housing and Modernisation	No	No
Director of Regeneration	No	No
<b>Date final report sent to Constitutional Team</b>	22 March 2019	

**APPENDIX 1****Consultation undertaken**

**Site notice date:** 07/02/2018

**Press notice date:** 15/02/2018

**Case officer site visit date:** 16/05/2018

**Neighbour consultation letters sent:** 08/02/2018

**Internal services consulted:**

Ecology Officer  
Economic Development Team  
Environmental Protection Team Formal Consultation [Noise / Air Quality / Land Contamination / Ventilation]  
Flood and Drainage Team  
HIGHWAY LICENSING  
Highway Development Management  
Housing Regeneration Initiatives  
Waste Management

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

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

**Neighbour and local groups consulted:**

Flat 23 130 Spa Road SE16 3FL  
 Flat 22 130 Spa Road SE16 3FL  
 Flat 25 130 Spa Road SE16 3FL  
 Flat 24 130 Spa Road SE16 3FL  
 Flat 21 130 Spa Road SE16 3FL  
 Flat 18 130 Spa Road SE16 3FL  
 Flat 17 130 Spa Road SE16 3FL  
 Flat 20 130 Spa Road SE16 3FL  
 Flat 19 130 Spa Road SE16 3FL  
 Flat 32 130 Spa Road SE16 3FL  
 Flat 31 130 Spa Road SE16 3FL  
 Flat 34 130 Spa Road SE16 3FL  
 Flat 33 130 Spa Road SE16 3FL  
 Flat 30 130 Spa Road SE16 3FL  
 Flat 27 130 Spa Road SE16 3FL  
 Flat 26 130 Spa Road SE16 3FL  
 Flat 29 130 Spa Road SE16 3FL  
 Flat 28 130 Spa Road SE16 3FL  
 Flat 5 130 Spa Road SE16 3FL  
 Flat 4 130 Spa Road SE16 3FL  
 Flat 7 130 Spa Road SE16 3FL  
 Flat 6 130 Spa Road SE16 3FL  
 Flat 3 130 Spa Road SE16 3FL  
 128 Spa Road London SE16 3FL  
 Flat 2 130 Spa Road SE16 3FL  
 Flat 1 130 Spa Road SE16 3FL  
 Flat 14 130 Spa Road SE16 3FL  
 Flat 13 130 Spa Road SE16 3FL  
 Flat 16 130 Spa Road SE16 3FL  
 Flat 15 130 Spa Road SE16 3FL  
 Flat 12 130 Spa Road SE16 3FL  
 Flat 9 130 Spa Road SE16 3FL  
 Flat 8 Porter Building 130 Spa Road SE16 3FL  
 Flat 11 130 Spa Road SE16 3FL  
 Flat 10 130 Spa Road SE16 3FL  
 114 Lucey Way London SE16 3UF  
 112 Lucey Way London SE16 3UF  
 118 Lucey Way London SE16 3UF  
 116 Lucey Way London SE16 3UF  
 110 Lucey Way London SE16 3UF  
 104 Lucey Way London SE16 3UF  
 102 Lucey Way London SE16 3UF  
 108 Lucey Way London SE16 3UF  
 106 Lucey Way London SE16 3UF  
 230 Lucey Way London SE16 3UG  
 228 Lucey Way London SE16 3UG  
 234 Lucey Way London SE16 3UG  
 232 Lucey Way London SE16 3UG  
 226 Lucey Way London SE16 3UG  
 122 Lucey Way London SE16 3UF  
 120 Lucey Way London SE16 3UF  
 98 Lucey Way London SE16 3UF  
 124 Lucey Way London SE16 3UF  
 Porter Building 60 Rouel Road SE16 3FL  
 Arch 4 To 6 Spa Business Park SE16 3FJ  
 Flat 36 130 Spa Road SE16 3FL  
 Flat 35 130 Spa Road SE16 3FL  
 89 Spa Road London SE16 3SG  
 Unit 4 Voyager Business Estate SE16 4RP  
 100 Lucey Way London SE16 3UF  
 Flat 2 75 Rouel Road SE16 3SL  
 Flat 16 Messenger Court SE16 4AU  
 Flat 15 Messenger Court SE16 4AU  
 Flat 18 Messenger Court SE16 4AU  
 Flat 17 Messenger Court SE16 4AU  
 Flat 14 Messenger Court SE16 4AU  
 Flat 11 Messenger Court SE16 4AU  
 Flat 10 Messenger Court SE16 4AU  
 Flat 13 Messenger Court SE16 4AU  
 Flat 12 Messenger Court SE16 4AU  
 Flat 126 Bolanchi Building SE16 3EX  
 Flat 129 Bolanchi Building SE16 3EX  
 Flat 128 Bolanchi Building SE16 3EX  
 Flat 125 Bolanchi Building SE16 3EX  
 Flat 122 Bolanchi Building SE16 3EX  
 Flat 121 Bolanchi Building SE16 3EX  
 Flat 124 Bolanchi Building SE16 3EX  
 Flat 123 Bolanchi Building SE16 3EX  
 Flat 136 Bolanchi Building SE16 3EX  
 Flat 135 Bolanchi Building SE16 3EX  
 Flat 138 Bolanchi Building SE16 3EX  
 Flat 137 Bolanchi Building SE16 3EX  
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 Flat 130 Bolanchi Building SE16 3EX  
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 Flat 109 Bolanchi Building SE16 3EX  
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 Flat 107 Bolanchi Building SE16 3EX  
 Flat 104 Bolanchi Building SE16 3EX  
 Flat 103 Bolanchi Building SE16 3EX  
 Flat 106 Bolanchi Building SE16 3EX  
 Flat 105 Bolanchi Building SE16 3EX  
 Flat 118 Bolanchi Building SE16 3EX  
 Flat 117 Bolanchi Building SE16 3EX  
 Flat 120 Bolanchi Building SE16 3EX  
 Flat 119 Bolanchi Building SE16 3EX  
 Flat 116 Bolanchi Building SE16 3EX  
 Flat 113 Bolanchi Building SE16 3EX  
 Flat 112 Bolanchi Building SE16 3EX  
 Flat 115 Bolanchi Building SE16 3EX  
 Flat 114 Bolanchi Building SE16 3EX  
 23 Sandover House 124 Spa Road SE16 3FD  
 22 Sandover House 124 Spa Road SE16 3FD  
 25 Sandover House 124 Spa Road SE16 3FD  
 24 Sandover House 124 Spa Road SE16 3FD  
 21 Sandover House 124 Spa Road SE16 3FD  
 18 Sandover House 124 Spa Road SE16 3FD  
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 12 Sandover House 124 Spa Road SE16 3FD  
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 8 Sandover House 124 Spa Road SE16 3FD  
 11 Sandover House 124 Spa Road SE16 3FD  
 10 Sandover House 124 Spa Road SE16 3FD  
 Flat 102 Bolanchi Building SE16 3EX

Flat 25 Messenger Court SE16 4AU  
 Flat 24 Messenger Court SE16 4AU  
 Flat 27 Messenger Court SE16 4AU  
 Flat 26 Messenger Court SE16 4AU  
 Flat 23 Messenger Court SE16 4AU  
 Flat 20 Messenger Court SE16 4AU  
 Flat 19 Messenger Court SE16 4AU  
 Flat 22 Messenger Court SE16 4AU  
 Flat 21 Messenger Court SE16 4AU  
 42 Sandover House 124 Spa Road SE16 3FD  
 41 Sandover House 124 Spa Road SE16 3FD  
 Sales Office The Keyse Development Spa Road SE16 3QT  
 40 Sandover House 124 Spa Road SE16 3FD  
 37 Sandover House 124 Spa Road SE16 3FD  
 36 Sandover House 124 Spa Road SE16 3FD  
 39 Sandover House 124 Spa Road SE16 3FD  
 38 Sandover House 124 Spa Road SE16 3FD  
 Flat 7 Messenger Court SE16 4AU  
 Flat 6 Messenger Court SE16 4AU  
 Flat 9 Messenger Court SE16 4AU  
 Flat 8 Messenger Court SE16 4AU  
 Flat 5 Messenger Court SE16 4AU  
 Flat 2 Messenger Court SE16 4AU  
 Flat 1 Messenger Court SE16 4AU  
 Flat 4 Messenger Court SE16 4AU  
 Flat 3 Messenger Court SE16 4AU  
 Unit 3 Spa Business Park SE16 4EJ  
 Unit 1 11 And 12 Spa Business Park SE16 4QT  
 Arch 2 148 Spa Road SE16 3QT  
 Unit 2 Spa Business Park SE16 4EJ  
 First Floor Unit 10 Dockley Road Industrial Estate SE16 3SF  
 Ground Floor Unit 10 Dockley Road Industrial Estate SE16 3SF  
 Unit 1 Spa Business Park SE16 4EJ  
 67 Rouel Road London SE16 3SL  
 65 Rouel Road London SE16 3SL  
 Flat 1 75 Rouel Road SE16 3SL  
 69 Rouel Road London SE16 3SL  
 126 Spa Road London SE16 3FF  
 73 Rouel Road London SE16 3SL  
 71 Rouel Road London SE16 3SL  
 77 Rouel Road London SE16 3SL  
 Unit 3 Atlantic Business Estate SE16 3SU  
 Flat 33 Messenger Court SE16 4AU  
 Unit 4 Spa Business Park SE16 3FJ  
 Flat 32 Messenger Court SE16 4AU  
 Flat 29 Messenger Court SE16 4AU  
 Flat 28 Messenger Court SE16 4AU  
 Flat 31 Messenger Court SE16 4AU  
 Flat 30 Messenger Court SE16 4AU  
 Unit 11 Spa Business Park SE16 3FJ  
 Unit 10 Spa Business Park SE16 3FJ  
 Unit 13 Spa Business Park SE16 3FJ  
 Unit 12 Spa Business Park SE16 3FJ  
 Unit 9 Spa Business Park SE16 3FJ  
 Unit 6 Spa Business Park SE16 3FJ  
 Unit 5 Spa Business Park SE16 3FJ  
 Unit 8 Spa Business Park SE16 3FJ  
 Unit 7 Spa Business Park SE16 3FJ  
 236 Lucey Way London SE16 3UG  
 81 Goodwin Close London SE16 3TL  
 80 Goodwin Close London SE16 3TL  
 Unit 10 Dockley Road Industrial Estate SE16 3SF  
 Unit 3 Dockley Road Industrial Estate SE16 3SF  
 79 Goodwin Close London SE16 3TL  
 76 Goodwin Close London SE16 3TL  
 75 Goodwin Close London SE16 3TL  
 78 Goodwin Close London SE16 3TL  
 77 Goodwin Close London SE16 3TL  
 Unit 7 Voyager Business Estate SE16 4RP  
 Unit 6 Voyager Business Estate SE16 4RP  
 Unit 1 Voyager Business Estate SE16 4RP  
 Unit 8 Voyager Business Estate SE16 4RP  
 Flat 55 Bolanachi Building SE16 3SG  
 Flat 54 Bolanachi Building SE16 3SG  
 Flat 57 Bolanachi Building SE16 3SG  
 Flat 56 Bolanachi Building SE16 3SG  
 Flat 53 Bolanachi Building SE16 3SG  
 Flat 50 Bolanachi Building SE16 3SG  
 Flat 49 Bolanachi Building SE16 3SG  
 Flat 52 Bolanachi Building SE16 3SG  
 Flat 51 Bolanachi Building SE16 3SG  
 Flat 64 Bolanachi Building SE16 3SG  
 Flat 63 Bolanachi Building SE16 3SG  
 Flat 66 Bolanachi Building SE16 3SG  
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 Flat 62 Bolanachi Building SE16 3SG  
 Flat 59 Bolanachi Building SE16 3SG  
 Flat 58 Bolanachi Building SE16 3SG  
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 Flat 60 Bolanachi Building SE16 3SG  
 Flat 37 Bolanachi Building SE16 3SG  
 Flat 36 Bolanachi Building SE16 3SG  
 Flat 39 Bolanachi Building SE16 3SG  
 Flat 38 Bolanachi Building SE16 3SG  
 Flat 35 Bolanachi Building SE16 3SG  
 Flat 32 Bolanachi Building SE16 3SG  
 Flat 31 Bolanachi Building SE16 3SG  
 Flat 34 Bolanachi Building SE16 3SG  
 Flat 33 Bolanachi Building SE16 3SG  
 Flat 46 Bolanachi Building SE16 3SG  
 Flat 45 Bolanachi Building SE16 3SG  
 Flat 48 Bolanachi Building SE16 3SG  
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 Flat 44 Bolanachi Building SE16 3SG  
 Flat 41 Bolanachi Building SE16 3SG  
 Flat 40 Bolanachi Building SE16 3SG  
 Flat 43 Bolanachi Building SE16 3SG  
 Flat 42 Bolanachi Building SE16 3SG  
 Flat 90 Bolanachi Building SE16 3EX  
 Flat 89 Bolanachi Building SE16 3EX  
 Flat 92 Bolanachi Building SE16 3EX  
 Flat 91 Bolanachi Building SE16 3EX  
 Flat 88 Bolanachi Building SE16 3EX  
 Flat 85 Bolanachi Building SE16 3EX  
 Flat 84 Bolanachi Building SE16 3EX  
 Flat 87 Bolanachi Building SE16 3EX  
 Flat 86 Bolanachi Building SE16 3EX  
 Flat 99 Bolanachi Building SE16 3EX  
 Flat 98 Bolanachi Building SE16 3EX  
 Flat 101 Bolanachi Building SE16 3EX  
 Flat 100 Bolanachi Building SE16 3EX  
 Flat 97 Bolanachi Building SE16 3EX  
 Flat 94 Bolanachi Building SE16 3EX  
 Flat 93 Bolanachi Building SE16 3EX  
 Flat 96 Bolanachi Building SE16 3EX  
 Flat 95 Bolanachi Building SE16 3EX  
 Flat 73 Bolanachi Building SE16 3SG  
 Flat 72 Bolanachi Building SE16 3SG  
 Flat 75 Bolanachi Building SE16 3SG  
 Flat 74 Bolanachi Building SE16 3SG  
 Flat 71 Bolanachi Building SE16 3SG  
 Flat 68 Bolanachi Building SE16 3SG  
 Flat 67 Bolanachi Building SE16 3SG  
 Flat 70 Bolanachi Building SE16 3SG  
 Flat 69 Bolanachi Building SE16 3SG  
 Flat 81 Bolanachi Building SE16 3EX  
 Flat 83 Bolanachi Building SE16 3EX  
 Flat 82 Bolanachi Building SE16 3EX  
 Flat 80 Bolanachi Building SE16 3SG  
 Flat 77 Bolanachi Building SE16 3SG  
 Flat 76 Bolanachi Building SE16 3SG  
 Flat 79 Bolanachi Building SE16 3SG  
 Flat 78 Bolanachi Building SE16 3SG  
 Flat 53 Eyot House SE16 4BP



Unit 2 Voyager Business Estate SE16 4RP  
 Unit 7 Dockley Road Industrial Estate SE16 3SF  
 Unit 11 Dockley Road Industrial Estate SE16 3SF  
 Unit 6 Dockley Road Industrial Estate SE16 3SF  
 Flat 6 Eldridge Court SE16 3SN  
 Flat 5 Eldridge Court SE16 3SN  
 Flat 8 Eldridge Court SE16 3SN  
 Flat 7 Eldridge Court SE16 3SN  
 Flat 4 Eldridge Court SE16 3SN  
 Flat 36 Eldridge Court SE16 3SN  
 Flat 35 Eldridge Court SE16 3SN  
 Flat 38 Eldridge Court SE16 3SN  
 Flat 37 Eldridge Court SE16 3SN  
 Unit 9 Dockley Road Industrial Estate SE16 3SF  
 Unit 8 Dockley Road Industrial Estate SE16 3SF  
 74 Goodwin Close London SE16 3TL  
 73 Goodwin Close London SE16 3TL  
 Unit 5 Dockley Road Industrial Estate SE16 3SF  
 Unit 1 Dockley Road Industrial Estate SE16 3SF  
 Flat 9 Eldridge Court SE16 3SN  
 Unit 4 Dockley Road Industrial Estate SE16 3SF  
 Unit 2 Dockley Road Industrial Estate SE16 3SF  
 Flat 24 Spa Court SE16 3SL  
 Flat 23 Spa Court SE16 3SL  
 Unit 1 Atlantic Business Estate SE16 3SU  
 Railway Arch 700w Dockley Road SE16 4QT  
 Flat 22 Spa Court SE16 3SL  
 Flat 19 Spa Court SE16 3SL  
 Flat 18 Spa Court SE16 3SL  
 Flat 21 Spa Court SE16 3SL  
 Flat 20 Spa Court SE16 3SL  
 Unit 4 Atlantic Business Estate SE16 3SU  
 Unit 2 Atlantic Business Estate SE16 3SU  
 Unit 5b Voyager Business Centre SE16 4RP  
 Unit 5a Voyager Business Centre SE16 4RP  
 Flat 6 Spa Court SE16 3SL  
 Flat 5 Spa Court SE16 3SL  
 Flat 8 Spa Court SE16 3SL  
 Flat 7 Spa Court SE16 3SL  
 Flat 4 Spa Court SE16 3SL  
 Flat 1 Spa Court SE16 3SL  
 Unit 3 Voyager Business Estate SE16 4RP  
 Flat 3 Spa Court SE16 3SL  
 Flat 2 Spa Court SE16 3SL  
 Flat 15 Spa Court SE16 3SL  
 Flat 14 Spa Court SE16 3SL  
 Flat 17 Spa Court SE16 3SL  
 Flat 16 Spa Court SE16 3SL  
 Flat 13 Spa Court SE16 3SL  
 Flat 10 Spa Court SE16 3SL  
 Flat 9 Spa Court SE16 3SL  
 Flat 12 Spa Court SE16 3SL  
 Flat 11 Spa Court SE16 3SL  
 Flat 34 Eldridge Court SE16 3SN  
 132 Amina Way London SE16 3UW  
 130 Amina Way London SE16 3UW  
 136 Amina Way London SE16 3UW  
 134 Amina Way London SE16 3UW  
 128 Amina Way London SE16 3UW  
 122 Amina Way London SE16 3UW  
 120 Amina Way London SE16 3UW  
 126 Amina Way London SE16 3UW  
 124 Amina Way London SE16 3UW  
  
 76 Amina Way London SE16 3UW  
 74 Amina Way London SE16 3UW  
 80 Amina Way London SE16 3UW  
 78 Amina Way London SE16 3UW  
 72 Amina Way London SE16 3UW  
 140 Amina Way London SE16 3UW  
 138 Amina Way London SE16 3UW  
 144 Amina Way London SE16 3UW  
  
 Flat 52 Eyot House SE16 4BN  
 Flat 54 Eyot House SE16 4BP  
 Flat 57 Eyot House SE16 4BP  
 Flat 56 Eyot House SE16 4BP  
 Flat 55 Eyot House SE16 4BP  
 Flat 51 Eyot House SE16 4BN  
 Flat 46 Eyot House SE16 4BN  
 Flat 45 Eyot House SE16 4BN  
 Flat 44 Eyot House SE16 4BN  
 Flat 47 Eyot House SE16 4BN  
 Flat 50 Eyot House SE16 4BN  
 Flat 49 Eyot House SE16 4BN  
 Flat 48 Eyot House SE16 4BN  
 Flat 58 Eyot House SE16 4BP  
 Flat 69 Eyot House SE16 4BP  
 Flat 68 Eyot House SE16 4BP  
 Flat 67 Eyot House SE16 4BP  
 Flat 70 Eyot House SE16 4BP  
 Flat 73 Eyot House SE16 4BP  
 Flat 72 Eyot House SE16 4BP  
 Flat 71 Eyot House SE16 4BP  
 Flat 66 Eyot House SE16 4BP  
 Flat 61 Eyot House SE16 4BP  
 Flat 60 Eyot House SE16 4BP  
 Flat 59 Eyot House SE16 4BP  
 Flat 62 Eyot House SE16 4BP  
 Flat 65 Eyot House SE16 4BP  
 Flat 64 Eyot House SE16 4BP  
 Flat 63 Eyot House SE16 4BP  
 Flat 23 Eyot House SE16 4BN  
 Flat 22 Eyot House SE16 4BN  
 Flat 21 Eyot House SE16 4BN  
 Flat 24 Eyot House SE16 4BN  
 Flat 27 Eyot House SE16 4BN  
 Flat 26 Eyot House SE16 4BN  
 Flat 25 Eyot House SE16 4BN  
 Flat 20 Eyot House SE16 4BN  
 Flat 15 Eyot House SE16 4BN  
 Flat 14 Eyot House SE16 4BN  
 Flat 13 Eyot House SE16 4BN  
 Flat 16 Eyot House SE16 4BN  
 Flat 19 Eyot House SE16 4BN  
 Flat 18 Eyot House SE16 4BN  
 Flat 17 Eyot House SE16 4BN  
 Flat 28 Eyot House SE16 4BN  
 Flat 39 Eyot House SE16 4BN  
 Flat 38 Eyot House SE16 4BN  
 Flat 37 Eyot House SE16 4BN  
 Flat 40 Eyot House SE16 4BN  
 Flat 43 Eyot House SE16 4BN  
 Flat 42 Eyot House SE16 4BN  
 Flat 41 Eyot House SE16 4BN  
 Flat 36 Eyot House SE16 4BN  
 Flat 31 Eyot House SE16 4BN  
 Flat 30 Eyot House SE16 4BN  
 Flat 29 Eyot House SE16 4BN  
 Flat 32 Eyot House SE16 4BN  
 Flat 35 Eyot House SE16 4BN  
 Flat 34 Eyot House SE16 4BN  
 Flat 33 Eyot House SE16 4BN  
 Flat 114 Eyot House SE16 4BP  
 Flat 113 Eyot House SE16 4BP  
 Bermondsey Spa Medical Practice Eyot House SE16 4BL  
 Flat 2 Dickens Whinney House SE16 4AA  
 Flat 1 Dickens Whinney House SE16 4AA  
 Flat 112 Eyot House SE16 4BP  
 Flat 107 Eyot House SE16 4BP  
 Flat 106 Eyot House SE16 4BP  
 Flat 105 Eyot House SE16 4BP  
 Flat 108 Eyot House SE16 4BP  
 Flat 111 Eyot House SE16 4BP

142 Amina Way London SE16 3UW  
 250 Lucey Way London SE16 3UG  
 248 Lucey Way London SE16 3UG  
 100 Amina Way London SE16 3UW  
 252 Lucey Way London SE16 3UG  
 246 Lucey Way London SE16 3UG  
 240 Lucey Way London SE16 3UG  
 238 Lucey Way London SE16 3UG  
 244 Lucey Way London SE16 3UG  
 242 Lucey Way London SE16 3UG  
 114 Amina Way London SE16 3UW  
 112 Amina Way London SE16 3UW  
 118 Amina Way London SE16 3UW  
 116 Amina Way London SE16 3UW  
 110 Amina Way London SE16 3UW  
 104 Amina Way London SE16 3UW  
 102 Amina Way London SE16 3UW  
 108 Amina Way London SE16 3UW  
 106 Amina Way London SE16 3UW  
 Flat 23 Eldridge Court SE16 3SN  
 Flat 22 Eldridge Court SE16 3SN  
 Flat 25 Eldridge Court SE16 3SN  
 Flat 24 Eldridge Court SE16 3SN  
 Flat 21 Eldridge Court SE16 3SN  
 Flat 19 Eldridge Court SE16 3SN  
 Flat 18 Eldridge Court SE16 3SN  
 Flat 20 Eldridge Court SE16 3SN  
 Flat 2 Eldridge Court SE16 3SN  
 Flat 31 Eldridge Court SE16 3SN  
 Flat 30 Eldridge Court SE16 3SN  
 Flat 33 Eldridge Court SE16 3SN  
 Flat 32 Eldridge Court SE16 3SN  
 Flat 3 Eldridge Court SE16 3SN  
 Flat 27 Eldridge Court SE16 3SN  
 Flat 26 Eldridge Court SE16 3SN  
 Flat 29 Eldridge Court SE16 3SN  
 Flat 28 Eldridge Court SE16 3SN  
 94 Amina Way London SE16 3UW  
 92 Amina Way London SE16 3UW  
 98 Amina Way London SE16 3UW  
 96 Amina Way London SE16 3UW  
 90 Amina Way London SE16 3UW  
 84 Amina Way London SE16 3UW  
 82 Amina Way London SE16 3UW  
 88 Amina Way London SE16 3UW  
 86 Amina Way London SE16 3UW  
 Flat 15 Eldridge Court SE16 3SN  
 Flat 14 Eldridge Court SE16 3SN  
 Flat 17 Eldridge Court SE16 3SN  
 Flat 16 Eldridge Court SE16 3SN  
 Flat 13 Eldridge Court SE16 3SN  
 Flat 10 Eldridge Court SE16 3SN  
 Flat 1 Eldridge Court SE16 3SN  
 Flat 12 Eldridge Court SE16 3SN  
 Flat 11 Eldridge Court SE16 3SN  
 35 Sandover House 124 Spa Road SE16 3FD  
 Flat 87 Hicks House SE16 4AS  
 Flat 86 Hicks House SE16 4AS  
 Flat 89 Hicks House SE16 4AS  
 Flat 88 Hicks House SE16 4AS  
 Flat 85 Hicks House SE16 4AS  
 Flat 82 Hicks House SE16 4AS  
 Flat 81 Hicks House SE16 4AS  
 Flat 84 Hicks House SE16 4AS  
 Flat 83 Hicks House SE16 4AS  
 Flat 96 Hicks House SE16 4AS  
 Flat 95 Hicks House SE16 4AS  
 Flat 98 Hicks House SE16 4AS  
 Flat 97 Hicks House SE16 4AS  
 Flat 94 Hicks House SE16 4AS  
 Flat 91 Hicks House SE16 4AS  
 Flat 90 Hicks House SE16 4AS

Flat 110 Eyot House SE16 4BP  
 Flat 109 Eyot House SE16 4BP  
 Flat 3 Dickens Whinney House SE16 4AA  
 Flat 57b Eyot House SE16 4BP  
 Flat 57a Eyot House SE16 4BP  
 Flat 1c Eyot House SE16 4BN  
 Flat 57c Eyot House SE16 4BP  
 Surgery Thurland Road SE16 4AA  
 Dickens Whinney House 2 Thurland Road SE16 4AA  
 Shop Eyot House SE16 4TE  
 Flat 1b Eyot House SE16 4BN  
 Flat 6 Dickens Whinney House SE16 4AA  
 Flat 5 Dickens Whinney House SE16 4AA  
 Flat 4 Dickens Whinney House SE16 4AA  
 Flat 7 Dickens Whinney House SE16 4AA  
 Flat 1a Eyot House SE16 4BN  
 St James Vicarage 4 Thurland Road SE16 4AA  
 Flat 8 Dickens Whinney House SE16 4AA  
 Flat 84 Eyot House SE16 4BP  
 Flat 83 Eyot House SE16 4BP  
 Flat 82 Eyot House SE16 4BP  
 Flat 85 Eyot House SE16 4BP  
 Flat 88 Eyot House SE16 4BP  
 Flat 87 Eyot House SE16 4BP  
 Flat 86 Eyot House SE16 4BP  
 Flat 81 Eyot House SE16 4BP  
 Flat 76 Eyot House SE16 4BP  
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 Flat 91 Eyot House SE16 4BP  
 Flat 90 Eyot House SE16 4BP  
 Flat 93 Eyot House SE16 4BP  
 Flat 96 Eyot House SE16 4BP  
 Flat 95 Eyot House SE16 4BP  
 Flat 94 Eyot House SE16 4BP  
 Flat 40 Prospect House SE16 4AE  
 Flat 39 Prospect House SE16 4AE  
 Flat 38 Prospect House SE16 4AE  
 Flat 41 Prospect House SE16 4AE  
 Flat 44 Prospect House SE16 4AE  
 Flat 43 Prospect House SE16 4AE  
 Flat 42 Prospect House SE16 4AE  
 Flat 37 Prospect House SE16 4AE  
 Flat 32 Prospect House SE16 4AE  
 Flat 31 Prospect House SE16 4AE  
 Flat 30 Prospect House SE16 4AE  
 Flat 33 Prospect House SE16 4AE  
 Flat 36 Prospect House SE16 4AE  
 Flat 35 Prospect House SE16 4AE  
 Flat 34 Prospect House SE16 4AE  
 Flat 45 Prospect House SE16 4AE  
 Flat 55 Prospect House SE16 4AE  
 Flat 54 Prospect House SE16 4AE  
 Flat 56 Prospect House SE16 4AF  
 Flat 59 Prospect House SE16 4AF  
 Flat 58 Prospect House SE16 4AF  
 Flat 57 Prospect House SE16 4AF  
 Flat 53 Prospect House SE16 4AE



Flat 20 Hicks House SE16 4AH  
 Flat 19 Hicks House SE16 4AH  
 Railway Arches 111 To 116 And 704 To 708 And 704w And 705w And  
 706w Spa Road SE16 4QT  
 Flat 5 Hicks House SE16 4AH  
 Flat 4 Hicks House SE16 4AH  
 Flat 7 Hicks House SE16 4AH  
 Flat 6 Hicks House SE16 4AH  
 Flat 3 Hicks House SE16 4AH  
 Flat 37 Hicks House SE16 4AQ  
 Flat 2 Hicks House SE16 4AH  
 Flat 1 Hicks House SE16 4AH  
 Flat 50 Hicks House SE16 4AS  
 Flat 49 Hicks House SE16 4AR  
 Flat 52 Hicks House SE16 4AS  
 Flat 51 Hicks House SE16 4AS  
 Flat 48 Hicks House SE16 4AQ  
 Flat 45 Hicks House SE16 4AQ  
 Flat 44 Hicks House SE16 4AQ  
 Flat 47 Hicks House SE16 4AQ  
 Flat 46 Hicks House SE16 4AQ  
 Flat 59 Hicks House SE16 4AS  
 Flat 58 Hicks House SE16 4AS  
 Flat 61 Hicks House SE16 4AS  
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 Flat 57 Hicks House SE16 4AS  
 Flat 54 Hicks House SE16 4AS  
 Flat 53 Hicks House SE16 4AS  
 Flat 56 Hicks House SE16 4AS  
 Flat 55 Hicks House SE16 4AS  
 Flat 32 Hicks House SE16 4AH  
 Flat 31 Hicks House SE16 4AH  
 Flat 34 Hicks House SE16 4AH  
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 Flat 30 Hicks House SE16 4AH  
 Flat 27 Hicks House SE16 4AH  
 Flat 26 Hicks House SE16 4AH  
 Flat 29 Hicks House SE16 4AH  
 Flat 28 Hicks House SE16 4AH  
 Flat 41 Hicks House SE16 4AQ  
 Flat 40 Hicks House SE16 4AQ  
 Flat 43 Hicks House SE16 4AQ  
 Flat 42 Hicks House SE16 4AQ  
 Flat 39 Hicks House SE16 4AQ  
 Flat 36 Hicks House SE16 4AH  
 Flat 35 Hicks House SE16 4AH  
 Flat 38 Hicks House SE16 4AQ  
 Flat 30 Bolanachi Building SE16 3SG  
 Flat 127 Bolanachi Building SE16 3EX

Flat 67 Prospect House SE16 4AF  
 Flat 62 Prospect House SE16 4AF  
 Flat 61 Prospect House SE16 4AF  
 Flat 60 Prospect House SE16 4AF  
 Flat 63 Prospect House SE16 4AF  
 Flat 66 Prospect House SE16 4AF  
 Flat 65 Prospect House SE16 4AF  
 Flat 64 Prospect House SE16 4AF  
 Flat 75 Prospect House SE16 4AF  
 Flat 86 Prospect House SE16 4AF  
 Flat 85 Prospect House SE16 4AF  
 Flat 84 Prospect House SE16 4AF  
 Flat 87 Prospect House SE16 4AF  
 Flat 90 Prospect House SE16 4AF  
 Flat 89 Prospect House SE16 4AF  
 Flat 88 Prospect House SE16 4AF  
 Flat 83 Prospect House SE16 4AF  
 Flat 78 Prospect House SE16 4AF  
 Flat 77 Prospect House SE16 4AF  
 Flat 76 Prospect House SE16 4AF  
 Flat 79 Prospect House SE16 4AF  
 Flat 82 Prospect House SE16 4AF  
 Flat 81 Prospect House SE16 4AF  
 Flat 80 Prospect House SE16 4AF  
 7 Auley House Spa Road SE16 3FE  
 Navron House Horns Ln OX29 8NH  
 20 Fleming House George Row SE16 4UL  
 Bermondsey London SE16 4AE  
 Flat 9 130 Spa Road SE16 3FL  
 Porter Building London SE16 3FL  
 Flat 33 130 Spa Road SE16 3FL  
 Flat 122 Bolanachi Building SE16 3EX  
 Flat 20 The Porter Building 130 Spa Road SE16 3FL  
 Apt 8 The Porter Building Bermondsey SE16 3FL  
 312 Southwark Park Road London SE16 2HA  
 65 Rouel Road Bermondsey SE16 3SL  
 Flat 31 130 Spa Road SE16 3FL  
 2 Eldridge Court Dockley Road SE16 3SN  
 130 The Porter Building Spa Road SE16 3FL  
 87 Oxley Close London SE1 5HF  
 3 Eldridge Court Dockley Rd SE16 3SN  
 54 Sherwood Gardens London SE16 3jb  
 38 Royal Victoria Gardens London SE16 7EN  
 Flat 27 130 Spa Road SE16 3FL  
 128 Spa Road London SE16 3FL  
 56 Southwark Park Road London SE16 3RS  
 128 Spa Road London SE16 3FL  
 Irving House 161 Jerningham Road SE14 5NJ  
 Irving House 161 Jerningham Road SE14 5NJ

**Re-consultation:** n/a

**APPENDIX 2****Consultation responses received****Internal services**

Economic Development Team

**Statutory and non-statutory organisations**

Historic England  
 London Fire & Emergency Planning Authority  
 London Underground Limited  
 Metropolitan Police Service (Designing out Crime)  
 Natural England - London Region & South East Region  
 Thames Water - Development Planning

**Neighbours and local groups**

Apt 8 The Porter Building Bermondsey SE16 3FL  
 Bermondsey London SE16 4AE  
 Flat 122 Bolanachi Building SE16 3EX  
 Flat 18 130 Spa Road SE16 3FL  
 Flat 20 The Porter Building 130 Spa Road SE16 3FL  
 Flat 27 130 Spa Road SE16 3FL  
 Flat 29 130 Spa Road SE16 3FL  
 Flat 31 130 Spa Road SE16 3FL  
 Flat 31 130 Spa Road SE16 3FL  
 Flat 31 130 Spa Road SE16 3FL  
 Flat 31 130 Spa Road SE16 3FL  
 Flat 32 130 Spa Road SE16 3FL  
 Flat 32 130 Spa Road SE16 3FL  
 Flat 33 130 Spa Road SE16 3FL  
 Flat 8 Porter Building 130 Spa Road SE16 3FL  
 Flat 9 130 Spa Road SE16 3FL  
 Irving House 161 Jerningham Road SE14 5NJ  
 Irving House 161 Jerningham Road SE14 5NJ  
 Navron House Horns Ln OX29 8NH  
 Porter Building London SE16 3FL  
 Unit 5a Voyager Business Centre SE16 4RP  
 128 Spa Road London SE16 3FL  
 130 The Porter Building Spa Road SE16 3FL  
 2 Eldridge Court Dockley Road SE16 3SN  
 20 Fleming House George Row SE16 4UL  
 312 Southwark Park Road London SE16 2HA  
 38 Royal Victoria Gardens London SE16 7EN  
 54 Sherwood Gardens London Se16 3jb  
 56 Southwark Park Road London SE16 3RS  
 65 Rouel Road Bermondsey SE16 3SL  
 65 Rouel Road London SE16 3SL  
 65 Rouel Road London SE16 3SL  
 7 Auley House Spa Road SE16 3FE  
 87 Oxley Close London SE1 5HF

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## RECOMMENDATION

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

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<b>Applicant</b>	Dockley Limited	<b>Reg. Number</b>	18/AP/0091
<b>Application Type</b>	Full Planning Application	<b>Case Number</b>	TP/361-128
<b>Recommendation</b>	Grant subject to Legal Agreement		

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### Draft of Decision Notice

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**Planning Permission was GRANTED for the following development:**

Demolition of the existing industrial units and redevelopment to provide a building ranging from one to nine storeys (32.55m AOD and 29.9m above ground) in height accommodating 1,093sqm of commercial floorspace at ground floor level incorporating industrial use (Use Class B8); retail uses (Use Class A1); and restaurants and cafe uses (Use Class A3) and 111 residential units (Class C3) at upper levels with associated works, including landscaping and 3 disabled car parking spaces.

**At:** DOCKLEY ROAD INDUSTRIAL ESTATE, 2 DOCKLEY ROAD, LONDON, LONDON SE16 3SF

**In accordance with application received on 09/01/2018**

**and Applicant's Drawing Nos.**

Existing Plans

1706 1000 Site Plan; 1706 1001 Existing Site Plan; 4000; 4001.

Proposed Drawings

1706-S333-XX-00-DR-A-2000 Rev 2; 1706-S333-XX-01-DR-A-2001 Rev 5; 1706-S333-XX-02-DR-A-2002 Rev 5; 1706-S333-XX-03-DR-A-2003 Rev 5; 1706-S333-XX-04-DR-A-2004 Rev 4; 1706-S333-XX-05-DR-A-2005 Rev 4; 1706-S333-XX-06-DR-A-2006 Rev 4; 1706-S333-XX-07-DR-A-2007 Rev 2; 1706-S333-XX-07-DR-A-2008 Rev 2; 1706-S333-XX-09-DR-A-2009 Rev 1; 1706-S333-XX-ZZ-DR-A-4000 Rev 3; 1706-S333-XX-ZZ-DR-A-4001 Rev 3; 4030 Rev 1; 4031 Rev 1; 1706-S333-XX-ZZ-DR-A-5000 Rev 4; 1706-S333-XX-ZZ-DR-A-5001 Rev 4; 1706-S333-XX-ZZ-DR-A-5002 Rev 4; 1706-S333-XX-ZZ-DR-A-5003 Rev 4; 1706-S333-XX-ZZ-DR-A-5004 Rev 4; 1706-S333-XX-ZZ-DR-A-5005 Rev 1.

Planning Documents

Air Quality Assessment; Archaeological Desk Based Assessment; Accommodation Schedule; Construction Environmental Management Plan; Daylight and Sunlight Assessment (2019); Daylight and Sunlight Assessment (Internal) (2019); Delivery and Servicing Plan; Design and Access Statement; Desk Study and Ground Investigation Report; Drainage Strategy; Flood Risk Assessment; Lighting Assessment; Noise Impact Assessment; Planning Statement; Preliminary Ecological Appraisal; Statement of Community Involvement; SUDS and Utilities Assessment; Sustainability Statement and Energy Assessment; Transport Statement (including addendum); Tree Survey.

**Subject to the following thirty-two conditions:**

**Time limit for implementing this permission and the approved plans**

- 1 Time limit  
The development hereby permitted shall be begun before the end of three years from the date of this permission.  
  
Reason  
As required by Section 91 of the Town and Country Planning Act 1990 as amended.
  
- 2 Approved plans  
The development hereby permitted shall not be carried out otherwise than in accordance with the following approved plans:  
  
1706-S333-XX-00-DR-A-2000 Rev 1; 1706-S333-XX-01-DR-A-2001 Rev 3; 1706-S333-XX-02-DR-A-2002 Rev 3; 1706-S333-XX-03-DR-A-2003 Rev3; 1706-S333-XX-04-DR-A-2004 Rev 3; 1706-S333-XX-05-DR-A-2005 Rev 3; 1706-S333-XX-06-DR-A-2006 Rev 3; 1706-S333-XX-07-DR-A-2007 Rev 1; 1706-S333-XX-07-DR-A-2008 Rev 1;

1706-S333-XX-09-DR-A-2009 Rev 1; 1706-S333-XX-ZZ-DR-A-4000 Rev 1; 1706-S333-XX-ZZ-DR-A-4001 Rev 1; 1706-S333-XX-ZZ-DR-A-4010P Rev A; 1706-S333-XX-XX-DR-A-4011P Rev A; 4030; 4031; 1706-S333-XX-ZZ-DR-A-5000 Rev 1; 1706-S333-XX-ZZ-DR-A-5001 Rev 1; 1706-S333-XX-ZZ-DR-A-5002 Rev 1; 1706-S333-XX-ZZ-DR-A-5003 Rev 1; 1706-S333-XX-ZZ-DR-A-5004 Rev 1; 1706-S333-XX-XX-DR-A-5000P Rev A; 1706-S333-XX-XX-DR-A-5001P Rev A; 1706-S333-XX-XX-DR-A-5002P Rev A; 1706-S333-XX-XX-DR-A-5003P Rev A; 5004; 5005.

Reason:

For the avoidance of doubt and in the interests of proper planning.

**Pre-commencement condition(s)** - the details required to be submitted for approval by the condition(s) listed below must be submitted to and approved by the council before any work in connection with implementing this permission is commenced.

- 3 Archaeology  
Before any work hereby authorised begins, the applicant shall secure the implementation of a programme of archaeological evaluation works in accordance with a written scheme of investigation shall be submitted to and approved in writing by the Local Planning Authority.  
  
Reason  
In order that the applicants supply the necessary archaeological information to ensure suitable mitigation measures and/or foundation design proposals be presented in accordance with Strategic Policy 12 - Design and Conservation of The Core Strategy 2011, Saved Policy 3.19 Archaeology of the Southwark Plan 2007 and the National Planning Policy Framework 2018.
- 4 Archaeology  
Before any work hereby authorised begins, the applicant shall secure the implementation of a programme of archaeological mitigation works in accordance with a written scheme of investigation, which shall be submitted to and approved in writing by the Local Planning Authority.  
  
Reason  
In order that the details of the programme of works for the archaeological mitigation are suitable with regard to the impacts of the proposed development and the nature and extent of archaeological remains on site in accordance with Strategic Policy 12 - Design and Conservation of The Core Strategy 2011, Saved Policy 3.19 Archaeology of the Southwark Plan 2007 and the National Planning Policy Framework 2018.
- 5 Archaeology  
Before any work hereby authorised begins, a detailed scheme showing the complete scope and arrangement of the foundation design and all ground works shall be submitted to and approved in writing by the Local Planning Authority and the development shall not be carried out otherwise than in accordance with any such approval given.  
  
Reason  
In order that details of the foundations, ground works and all below ground impacts of the proposed development are detailed and accord with the programme of archaeological mitigation works to ensure the preservation of archaeological remains by record and in situ in accordance with Strategic Policy 12 - Design and Conservation of The Core Strategy 2011, Saved Policy 3.19 Archaeology of the Southwark Plan 2007 and the National Planning Policy Framework 2018.
- 6 PV Panels  
Before any above ground work hereby authorised begins (excluding demolition), detailed drawings showing the number, location and size of the proposed photovoltaic panels shall be submitted to and approved in writing by the Council as Local Planning Authority. The submission shall include a roof plan and elevations as well as access and servicing information.  
  
Reason  
In the interests of amenity and to retain effective planning control in accordance with Strategic Policy 12 - Design and Conservation of The Core Strategy 2011, Saved Policy 3.13 Urban Design of the Southwark Plan 2007 and the National Planning Policy Framework 2018.
- 7 Thames Water - Piling  
No impact piling shall take place until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and

minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement.

Reason: The proposed works will be in close proximity to underground sewerage utility infrastructure. Piling has the potential to impact on local underground sewerage utility infrastructure. The applicant is advised to contact Thames Water Developer Services on 0800 009 3921 to discuss the details of the piling method statement.

#### 8 Surface Water Drainage

Construction works for the proposed development permitted by this planning permission shall not commence until a surface water drainage scheme for the site is submitted to, and approved in writing by the Local Planning Authority. The drainage strategy should assess the extent of surface water run-off and potential surface water flooding as a consequence of the development, both on and off site, for a 1 in 100 year rainstorm event, including an allowance for climate change (30%). The drainage scheme should be designed to reduce discharge rates to the greenfield run-off rate, typically eight litres per second per hectare (l/s/ha), and attenuate surface water run-off as close to its source as possible. The nature of the underlying geology and the potential for high groundwater levels must be determined in order to ensure that drainage at the site will not be affected, and possible impacts of the proposals on groundwater should be assessed and taken in to account in the design of the scheme.

#### Reason

To reduce the impact of flooding on occupants of the development and to ensure that the development does not increase the risk of surface water flooding in accordance with The National Planning Policy Framework 2012, Strategic Policy 13 High Environmental Standards of the Core Strategy 2011 and Saved Policy Saved Policy 3.9 Water of the Southwark Plan 2007.

#### 9 Demolition/Construction Logistics and Environmental Management Plan

Prior to commencement of the development, a Demolition/Construction Logistics Environmental Management Plan shall be submitted to and approved in writing by the Local Authority and shall oblige the applicant, or developer and its contractor to use all best endeavours to minimise disturbances including but not limited to noise, vibration, dust, smoke and plant emissions emanating from the site during demolition and construction. The plan shall include but not exclusively, the following information:

A detailed specification of demolition and construction works including loading, unloading and storage of plant and materials and consideration of environmental impacts and the required remedial measures;

Details of the routing for all construction vehicles;

Details of the method of piling;

Details of security hoarding including decorative displays;

Wheel washing facilities;

Measures to control the emission of dust and dirt during construction;

A scheme for recycling / disposing of waste resulting from demolition and construction works;

Engineering measures, acoustic screening and the provision of sound insulation required to mitigate or eliminate specific environmental impacts;

Arrangements for publicity and promotion of the scheme during construction;

A commitment to adopt and implement of the ICE Demolition Protocol and Considerate Contractor Scheme registration;

Road safety measures, including measures for entering and leaving the site and a delivery and servicing plan;

Details of contractor parking and parking for vehicles associated with the works during construction;

Details of cycle awareness training to be undertaken by drivers of lorries in line with Crossrail Standards and shall include the use of skirts on all HGV's servicing the site.

All demolition and construction work shall be undertaken in strict accordance with the approved management scheme and code of practice, unless otherwise agreed in writing by the Local Planning Authority.

#### Reason:

To ensure that occupiers of neighbouring premises do not suffer a loss of amenity by reason of pollution and nuisance, in accordance with strategic policy 13 'High environmental standards' of the Core Strategy (2011) saved policy 3.2 'Protection of amenity' of the Southwark Plan (2007), and the National Planning Policy Framework 2012.

#### 10 Tree survey

Prior to works commencing, including any demolition, an Arboricultural Method Statement shall be submitted to and approved in writing by the Local Planning Authority.

a) A pre-commencement meeting shall be arranged, the details of which shall be notified to the Local Planning Authority for agreement in writing prior to the meeting and prior to works commencing on site, including any



demolition, changes to ground levels, pruning or tree removal.

b) A detailed Arboricultural Method Statement showing the means by which any retained trees on or directly adjacent to the site are to be protected from damage by demolition works, excavation, vehicles, stored or stacked building supplies, waste or other materials, and building plant, scaffolding or other equipment, shall then be submitted to and approved in writing by the Local Planning Authority. The method statements shall include details of facilitative pruning specifications and a supervision schedule overseen by an accredited arboricultural consultant.

c) Cross sections shall be provided to show surface and other changes to levels, special engineering or construction details and any proposed activity within root protection areas required in order to facilitate demolition, construction and excavation.

The existing trees on or adjoining the site which are to be retained shall be protected and both the site and trees managed in accordance with the recommendations contained in the method statement. Following the pre-commencement meeting all tree protection measures shall be installed, carried out and retained throughout the period of the works, unless otherwise agreed in writing by the Local Planning Authority. In any case, all works must adhere to BS5837: (2012) Trees in relation to demolition, design and construction and BS3998: (2010) Tree work - recommendations.

If within the expiration of 5 years from the date of the occupation of the building for its permitted use any retained tree is removed, uprooted is destroyed or dies, another tree shall be planted at the same place and that tree shall be of such size and species, and shall be planted at such time, as may be specified in writing by the Local Planning Authority.

#### Reason

To avoid damage to the existing trees which represent an important visual amenity in the area, in accordance with The National Planning Policy Framework 2018 and policies of The Core Strategy 2011: SP11 Open spaces and wildlife; SP12 Design and conservation; SP13 High environmental standards, and Saved Policies of The Southwark Plan 2007: Policy 3.2 Protection of amenity; Policy 3.12 Quality in Design; Policy 3.13 Urban Design and Policy 3.28 Biodiversity.

**Commencement of works above grade** - the details required to be submitted for approval by the condition(s) listed below must be submitted to and approved by the council before any work above grade is commenced. The term 'above grade' here means any works above ground level.

#### 11 Bird boxes

Details of the installation of four 40mm entrance hole wall-integrated bird boxes on the new buildings, specifically for use by black redstart (*Phoenicurus ochruros*), shall be submitted to the Council prior to any works taking place above grade (excluding demolition). The bird boxes shall be installed strictly in accordance with the details so approved, shall be maintained as such thereafter. Discharge of this condition will be granted on receiving the details of the nest/roost features and mapped locations and Southwark Council agreeing the submitted plans, and once the nest/roost features are installed in full in accordance to the agreed plans. A post completion assessment will be required to confirm the nest/roost features have been installed to the agreed specification.

Reason: To ensure the development provides the maximum possible provision towards creation of habitats and valuable areas for biodiversity in accordance with policies: 5.10 and 7.19 of the London Plan 2016, Policy 3.28 of the Southwark Plan and Strategic Policy 11 of the Southwark Core Strategy.

#### 12 Green Walls

Before any above grade work hereby authorised begins (excluding demolition), details of the green walls shall be submitted to and approved in writing by the Local Planning Authority prior to any superstructure works commencing on site.

The wall shall not be used as an amenity or sitting out space of any kind whatsoever and shall only be used in the case of essential maintenance or repair, or escape in case of emergency.

The green wall shall be carried out strictly in accordance with the details so approved and shall be maintained as such thereafter.

Discharge of this condition will be granted on receiving the details of the Walls and Southwark Council agreeing in writing the submitted plans.

Reason: To ensure the development provides the maximum possible provision towards creation of habitats and valuable areas for biodiversity in accordance with the NPPF 2018, the London Plan 2016, saved policy 3.28 of the

## Southwark Plan and Strategic Policy 11 of the Southwark Core strategy

- 13 Lighting  
Details of any external lighting [including design, power and position of luminaries] and security surveillance equipment of external areas surrounding the building shall be submitted to and approved by the Local Planning Authority in writing before any above grade works take place (excluding demolition). The development shall not be carried out otherwise in accordance with any such approval given.
- Reason  
In order that the Council may be satisfied as to the details of the development in the interest of the visual amenity of the area, the safety and security of persons using the area and the amenity and privacy of adjoining occupiers in accordance with The National Planning Policy Framework 2018, Strategic Policy 12 Design and Conservation and Strategic Policy 13 High environmental standards of The Core Strategy 2011 and Saved Policies 3.2 Protection of Amenity and 3.14 Designing out crime of the Southwark Plan 2007.
- 14 Green roofs  
Before any above grade work hereby authorised begins(excluding demolition), details of biodiversity green roofs and living walls shall be submitted to and approved in writing by the Local Planning Authority. The biodiversity green roofs shall be:  
biodiversity based with extensive substrate base (depth 80-150mm);  
laid out in accordance with agreed plans; and  
planted/seeded with an agreed mix of species within the first planting season following the practical completion of the building works (focused on wildflower planting, and no more than a maximum of 25% sedum coverage).
- The biodiversity green roofs shall not be used as an amenity or sitting out space of any kind whatsoever and shall only be used in the case of essential maintenance or repair, or escape in case of emergency.
- The biodiversity roofs shall be carried out strictly in accordance with the details so approved and shall be maintained as such thereafter.
- Discharge of this condition will be granted on receiving the details of the green roofs and Southwark Council agreeing the submitted plans, and once the green/brown roofs are completed in full in accordance to the agreed plans. A post completion assessment will be required to confirm the roof has been constructed to the agreed specification.
- Reason: To ensure the development provides the maximum possible provision towards creation of habitats and valuable areas for biodiversity in accordance with the NPPF 2018, the London Plan 2016, saved policy 3.28 of the Southwark Plan and Strategic Policy 11 of the Southwark Core strategy.
- 15 Detailed drawings  
1:5/10 section detail-drawings through:  
the facades;  
parapets;  
roof edges;  
junctions with the existing building; and  
heads, cills and jambs of all openings,  
to be used in the carrying out of this permission shall be submitted to and approved by the Local Planning Authority before any work in connection with this permission is carried out above grade (excluding demolition); the development shall not be carried out otherwise than in accordance with any such approval given.
- Reason:  
In order that the Local Planning Authority may be satisfied as to the design and details in the interest of the special architectural or historic qualities of the listed building in accordance with the NPPF (2018), policy SP12 - Design and Conservation - of the Core Strategy (2011) and saved policies 3.12 Quality in Design; 3.13 Urban Design; of The Southwark Plan (2007)
- 16 BREEAM  
Before any fit out works to the commercial premises hereby authorised begins, an independently verified BREEAM report (detailing performance in each category, overall score, BREEAM rating and a BREEAM certificate of building performance) to achieve a minimum 'excellent' rating shall be submitted to and approved in writing by the Local Planning Authority and the development shall not be carried out otherwise than in accordance with any such approval given;  
Before the first occupation of the building hereby permitted, a certified Post Construction Review (or other verification process agreed with the local planning authority) shall be submitted to and approved in writing by the

Local Planning Authority, confirming that the agreed standards at (a) have been met.

Reason

To ensure the proposal complies with The National Planning Policy Framework 2018, Strategic Policy 13 - High Environmental Standards of The Core Strategy 2011 and Saved Policies 3.3 Sustainability and 3.4 Energy Efficiency of the Southwark Plan 2007.

17 Sample materials

Sample panels of all and external facing materials, and surface finishes at the ground floor to be used in the carrying out of this permission shall be presented on site and approved by the Local Planning Authority before any work in connection with this permission is carried out; the development shall not be carried out otherwise than in accordance with any such approval given. These samples must demonstrate how the proposal makes a contextual response in terms of materials to be used.

Reason:

In order that the Local Planning Authority may be satisfied as to the design and details in accordance with the NPPF (2018), policy SP12 - Design and Conservation - of the Core Strategy (2011) and saved policies 3.12 Quality in Design; 3.13 Urban Design; of The Southwark Plan (2007).

18 Designing out crime

Before any above grade work hereby authorised begins (excluding demolition), details of security measures shall be submitted and approved in writing by the Local Planning Authority and any such security measures shall be implemented prior to occupation in accordance with the approved details which shall seek to achieve the 'Secured by Design' accreditation award from the Metropolitan Police.

Reason

In pursuance of the Local Planning Authority's duty under section 17 of the Crime and Disorder Act 1998 to consider crime and disorder implications in exercising its planning functions and to improve community safety and crime prevention in accordance with The National Planning Policy Framework 2018, Strategic Policy 12 - Design and conservation of The Core Strategy 2011 and Saved Policy 3.14 Designing out crime of the Southwark plan 2007.

19 Cycle storage

Before any above grade work hereby authorised begins (excluding demolition) details (1:50 scale drawings) of the facilities to be provided for the secure and covered storage of cycles (both residential and commercial) shall be submitted to and approved in writing by the Local Planning Authority. Thereafter the cycle parking facilities provided shall be retained and the space used for no other purpose and the development shall not be carried out otherwise in accordance with any such approval given.

Reason

In order to ensure that satisfactory safe and secure cycle parking facilities are provided and retained in order to encourage the use of cycling as an alternative means of transport to the development and to reduce reliance on the use of the private car in accordance with The National Planning Policy Framework 2018, Strategic Policy 2 - Sustainable Transport of The Core Strategy and Saved Policy 5.3 Walking and Cycling of the Southwark Plan 2007.

20 Hard and soft landscaping

Before any above grade work hereby authorised begins (excluding demolition), detailed drawings of a hard and soft landscaping scheme, including suitable greening along the Low Line lane, showing the treatment of all parts of the site not covered by buildings (including cross sections, surfacing materials of any parking, access, or pathways layouts, materials and edge details), shall be submitted to and approved in writing by the Local Planning Authority. The landscaping shall not be carried out otherwise than in accordance with any such approval given and shall be retained for the duration of the use.

The planting, seeding and/or turfing shall be carried out in the first planting season following completion of building works and any trees or shrubs that is found to be dead, dying, severely damaged or diseased within five years of the completion of the building works OR five years of the carrying out of the landscaping scheme (whichever is later), shall be replaced in the next planting season by specimens of the same size and species in the first suitable planting season. Planting shall comply to BS: 4428 Code of practice for general landscaping operations, BS: 5837 (2012) Trees in relation to demolition, design and construction and BS 7370-4:1993 Grounds maintenance Recommendations for maintenance of soft landscape (other than amenity turf).

Reason

So that the Council may be satisfied with the details of the landscaping scheme in accordance with The National Planning Policy Framework 2018 and policies of The Core Strategy 2011: SP11 Open spaces and wildlife; SP12 Design and conservation; SP13 High environmental standards, and Saved Policies of The Southwark Plan 2007: Policy 3.2 Protection of amenity; Policy 3.12 Quality in Design; Policy 3.13 Urban Design and Policy 3.28 Biodiversity.

**Pre-occupation condition(s)** - the details required to be submitted for approval by the condition(s) listed below must be submitted to and approved by the council before the building(s) hereby permitted are occupied or the use hereby permitted is commenced.

21 Signage strategy

The commercial units hereby permitted shall not be occupied until a site wide signage strategy detailing the design code for the proposed frontage of the commercial units facing street and routes (including advertisement zones, awnings, and spill-out zones) shall be submitted to and approved in writing by the Local Planning Authority and thereafter implemented in accordance with the approved details.

Reason

In order to ensure that the quality of the design and details are in accordance with Strategic Policy 12 - Design and conservation of the Core Strategy 2011 and saved Policies 3.12 Quality in design and 3.13 Urban design of the Southwark Plan 2007.

22 Ventilation

Prior to the commencement of any Class B8 or Class A3 use full particulars and details of a scheme for the ventilation of the premises to an appropriate outlet level, including details of sound attenuation for any necessary plant and the standard of dilution expected, has been submitted to and approved by the Local Planning Authority and the development shall not be carried out otherwise than in accordance with any approval given.

Reason

In order to ensure that the ventilation ducting and ancillary equipment will not result in an odour, fume or noise nuisance and will not detract from the appearance of the building in the interests of amenity in accordance with The National Planning Policy Framework 2012, Strategic Policy 13 - High Environmental Standards of The Core Strategy 2011 and Saved Policy 3.2 Protection of Amenity of The Southwark Plan 2007.

23 Plant Noise

The Rated sound level from any plant, together with any associated ducting shall not exceed the Background sound level (LA90 15min) at the nearest noise sensitive premises. Furthermore, the Specific plant sound level shall be 10dB(A) or more below the background sound level in this location. For the purposes of this condition the Background, Rating and Specific Sound levels shall be calculated fully in accordance with the methodology of BS4142:2014. Prior to the plant being commissioned a validation test shall be carried out following completion of the development. The results shall be submitted to the LPA for approval in writing. The plant and equipment shall be installed and constructed in accordance with the approval given and shall be permanently maintained thereafter.

Reason

To ensure that occupiers of neighbouring premises do not suffer a loss of amenity by reason of noise nuisance or the local environment from noise creep due to plant and machinery in accordance with the National Planning Policy Framework 2012, Strategic Policy 13 High Environmental Standards of the Core Strategy 2011 and Saved Policy 3.2 Protection of Amenity of the Southwark Plan (2007).

24 External Noise Levels in Private Amenity Areas

Private and communal external amenity areas shall be designed to attain 50dB(A) LAeq, 16hr  $\bar{L}_{d}$ .  
 $\bar{L}_{d}$  Daytime - 16 hours between 07:00-23:00hrs

Prior to the commencement of use of the amenity area/s a proposed scheme of sound reduction shall be submitted to the local planning authority. The scheme of sound insulation shall be installed and constructed in accordance with any approval given and shall be permanently maintained thereafter. Following completion of the development but prior to the commencement of use of the amenity area/s a validation test shall be carried out on a relevant sample of premises. The results shall be submitted to the LPA for approval in writing.

Reason

To ensure that the occupiers of the proposed development do not suffer a loss of amenity by reason of excess environmental noise in accordance with strategic policy 13 'High environmental standards' of the Core Strategy (2011), saved Policy 3.2 Protection of Amenity of the Southwark Plan (2007) and the National Planning Policy Framework 2012.

- 25 Residential  $\zeta$  Vertical sound transmission between commercial and residential properties on new build  
The habitable rooms within the development sharing a party ceiling/floor element with commercial premises shall be designed and constructed to provide reasonable resistance to the transmission of sound sufficient to ensure that noise due to the commercial premises does not exceed NR20. A written report shall be submitted to and approved by the LPA. The development shall be carried out in accordance with the approval given. The approved scheme shall be implemented prior to the commencement of the use hereby permitted and shall be permanently maintained thereafter. Following completion of the development and prior to occupation a validation test shall be carried out (on a relevant sample of premises). The results shall be submitted to the LPA for approval in writing.

Reason

To ensure that the occupiers and users of the proposed development do not suffer a loss of amenity by reason of noise nuisance and other excess noise from activities within the commercial premises accordance with strategic policy 13 'High environmental standards' of the Core Strategy (2011), saved Policy 3.2 Protection of Amenity of the Southwark Plan (2007) and the National Planning Policy Framework 2012.

- 26 Residential - Internal noise levels  
The dwellings hereby permitted shall be designed to ensure that the following internal noise levels are not exceeded due to environmental noise:  
Bedrooms - 35dB LAeq T  $\zeta$ , 30 dB LAeq T\*, 45dB LAFmax T \*  
Living rooms- 35dB LAeq T  $\zeta$   
Dining room - 40 dB LAeq T  $\zeta$   
\* - Night-time - 8 hours between 23:00-07:00  
 $\zeta$  - Daytime - 16 hours between 07:00-23:00

A report shall be submitted in writing to and approved by the LPA. The approved scheme shall be implemented prior to the commencement of the use hereby permitted and shall be permanently maintained thereafter. The development shall be carried out in accordance with the approval given. Following completion of the development and prior to occupation, a validation test shall be carried out on a relevant sample (usual minimum of 10%) of premises. The results shall be submitted to the LPA for approval in writing.

Reason

To ensure that the occupiers and users of the development do not suffer a loss of amenity by reason of excess noise from environmental and transportation sources in accordance with strategic policy 13 'High environmental standards' of the Core Strategy (2011) saved policies 3.2 'Protection of amenity' and 4.2 'Quality of residential accommodation' of the Southwark Plan (2007), and the National Planning Policy Framework 2012.

- 27 Service Management Plan  
Before the first occupation of the building hereby permitted a Service Management Plan detailing how all elements of the site are to be serviced (including servicing hours, number of trips, vehicles used) has been submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the approval given and shall remain for as long as the development is occupied.

Reason

To ensure compliance with The National Planning Policy Framework 2018, Strategic Policy 2 Sustainable Transport of The Core Strategy 2011 and Saved Policy 5.2 Transport Impacts of the Southwark Plan 2007.

- 28 Refuse storage  
Before the (i) the first occupation of the new homes and (ii) the commencement of the A1, A3 or B8 use, details of the arrangements for the storing of domestic/commercial refuse (whichever the case shall be) shall be submitted to and approved in writing by the Local Planning Authority and the facilities approved shall be provided and made available for use by the occupiers of the dwellings and the facilities shall thereafter be retained and shall not be used or the space used for any other purpose.

Reason

To ensure that the refuse will be appropriately stored within the site thereby protecting the amenity of the site and the area in general from litter, odour and potential vermin/pest nuisance in accordance with The National Planning Policy Framework 2018, Strategic Policy 13 High Environmental Standards of the Core Strategy 201 and Saved Policies 3.2 Protection of Amenity and Policy 3.7 Waste Reduction of The Southwark Plan 2007

complied with at all times once the permission has been implemented.

29 Roof plant

No roof plant, equipment or other structures, other than as shown on the plans hereby approved or approved pursuant to a condition of this permission, shall be placed on the roof or be permitted to project above the roofline of any part of the building[s] as shown on elevational drawings or shall be permitted to extend outside of the roof plant enclosure[s] of any building[s] hereby permitted.

Reason

In order to ensure that no additional plant is placed on the roof of the building in the interest of the appearance and design of the building and the visual amenity of the area in accordance with The National Planning Policy Framework 2018, Strategic Policy 12 - Design and Conservation of The Core Strategy 2011 and Saved Policies 3.2 Protection of Amenity and 3.13 Urban Design of the Southwark Plan 2007.

30 Parking permit exemption

No developer, owner or occupier of any part of the development hereby permitted, with the exception of disabled persons, shall seek, or will be allowed, to obtain a parking permit within the controlled parking zone in Southwark in which the application site is situated.

Reason

To ensure compliance with Strategic Policy 2 - Sustainable Transport of the Core Strategy 2011 and saved policy 5.2 Transport Impacts of the Southwark Plan 2007.

31 Hours of use

The use hereby permitted for Class A1/A3 and Class B8 purposes shall not be carried on outside of the hours 07:00-23:00 on Monday to Saturday or 08:00-22:00 on Sundays.

Reason:

To safeguard the amenities of neighbouring residential properties in accordance with The National Planning Policy Framework 2018, Strategic Policy 13 High environmental standards of The Core Strategy 2011 and Saved Policy 3.2 Protection of Amenity of The Southwark Plan 2007.

**Other condition(s)** - the following condition(s) are to be complied with and discharged in accordance with the individual requirements specified in the condition(s).

32 Archaeology

Within six months of the completion of archaeological site works, an assessment report detailing the proposals for post-excavation works, publication of the site and preparation of the archive shall be submitted to and approved in writing by the Local Planning Authority and that the works detailed in this assessment report shall not be carried out otherwise than in accordance with any such approval given.

Reason

In order that the archaeological interests of the site are secured with regard to the details of the post-excavation works, publication and archiving to ensure the preservation of archaeological remains by record in accordance with Strategic Policy 12 - Design and Conservation of The Core Strategy 2011, Saved Policy 3.19 Archaeology of the Southwark Plan 2007 and the National Planning Policy Framework 2018.

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

The Council offers a pre-application advice service and this was used by the applicant prior to the submission of this application.

The application has been given the opportunity to amend their scheme in response to concerns raised by officers and other consultees, and this has enabled a positive recommendation to be made.

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