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| Item No. 5.1 | Classification: Open | Date: 12 July 2016 | Meeting Name: Planning Committee |
| Report title: | <p>Development Management planning application: Application 15/AP/5125 for: Full Planning Permission</p> <p>Address: SKIPTON HOUSE, 80 LONDON ROAD, PERRY LIBRARY, 250 SOUTHWARK BRIDGE ROAD; and KEYWORTH STREET HOSTEL, 10 KEYWORTH STREET, LONDON SE1</p> <p>Proposal: Demolition of the existing buildings and creation of 2 levels of basement (plus mezzanines) and the erection of buildings ranging from Ground Floor plus 7 to ground floor plus 39 stories (maximum building height of 146.3m AOD) comprising retail uses (Use Classes A1/A3/A4) at ground floor, multifunctional cultural space (Use Classes D1/D2/Sui Generis) and flexible retail/fitness space (Uses Classes A1/A3/A4 and D2) below ground, and office use (Use Class B1) and 421 residential units (Use Class C3) on upper levels, new landscaping and public realm, a publically accessible roof garden, ancillary servicing and plant, cycle parking and associated works.</p> <p>The application is accompanied by an Environmental Statement submitted pursuant to the Town and Country Planning (Environmental Impact Assessment) 2011.</p> | | |
| Ward(s) or groups affected: | Cathedrals | | |
| From: | Director of Planning | | |
| Application Start Date 14/01/2016 | | Application Expiry Date 05/05/2016 | |
| Earliest Decision Date 27/02/2016 | | | |

RECOMMENDATIONS

1.
 - a) That planning permission be granted, subject to conditions and referral to the Mayor of London, and the applicant entering into an appropriate legal agreement by no later than 16 December 2016.
 - b) That environmental information be taken into account as required by Regulation 3(4) of the Town and Country Planning (Environmental Impact Assessments) Regulations 2011.
 - c) That following issue of the decision, the Director of Planning place a statement on the Statutory Register pursuant to Regulation 24 of the Town and Country Planning (Environmental Impact Assessments) Regulations 2011 which contains the information required by Regulation 21, and that for the purposes of Regulation 24(1)(c) the main reasons and considerations on which the planning committee's decision is based are as set out as in the report.
 - d) In the event that the requirements of (a) are not met by 16 December 2016 the Director of Planning be authorised to refuse planning permission for the reasons set out under paragraph 271 of the report.

BACKGROUND INFORMATION

Site location and description

2. The site has an area of 0.87ha and forms the northern edge of the emerging Elephant Square, a busy trafficked area and the confluence of a number of main roads including Newington Butts, St Georges Road, London Road, Newington Causeway and the New Kent Road. The site is currently occupied by three buildings, a 6 - 8 storey office building situated behind the Bakerloo tube station with elevations fronting onto Newington Causeway, London Road and Ontario Street, and two neighbouring four storey buildings, the Perry Library for London South Bank University and adjoining Keyworth Street Hostel which front onto Southwark Bridge Road and Keyworth Street.
3. The office building is currently occupied by NHS administrative services and provides 20, 254sqm of office floor space. The Perry Library is the main university library for the London South Bank University. The Keyworth Street Hostel is a 35 bed hostel which provides temporary accommodation for single homeless men with a connection to London Borough of Southwark.
4. The area is characterised by a mix of uses and building types, including residential, education, office and retail uses. The surrounding existing building heights range from 3 to 18 Storeys. While the neighbouring development at Eileen House, which is currently under construction will have a maximum height of 40 storeys. To the north of Eileen House is the location of the Ministry of Sound venue and night club.
5. The site has the following designations:
 - Central Activity Zone (CAZ)
 - Air Quality Management Area
 - Elephant and Castle Major Town Centre
 - Elephant and Castle Opportunity Area.
6. There are no listed buildings or structures within the application site, however there are a number of heritage assets within the local area. The closest of these are:
 - Metro Central Heights, Newington Causeway (Grade II listed building)
 - Michael Faraday Memorial, Elephant and Castle (Grade II listed building).
7. While there are other heritage assets in the wider setting namely:
 - Inner London Crown Court, Newington Causeway (Grade II listed building)
 - Metropolitan Tabernacle, Newington Butts (Grade II listed building)
 - Elliot's Row; St George's Circus and West Square Conservation Areas.

Details of proposal

8. The proposed development involves the erection of two adjoining blocks (Blocks A and C) along Ontario Street and a further block (Block B) along Newington Causeway with the introduction of new pedestrian street running parallel to Ontario Street and Newington Causeway between the two sets of blocks. The proposed buildings are comprised of the following uses:

| Use | Area (GIA m²) |
|------------------------|---------------------------------|
| Residential (C3) | 43,547 |
| Office (B1) | 48,892 |
| Cultural (D1, D2) | 1794 |
| Gym (D2) | 800 |
| Retail (A1, A3 and A4) | 1533 |
| Back of House/Storage | 9975 |

Block A

9. A part 8/part 28/part 39 storey block with retail and performance venue on ground floor, office space floors 1 to 7 and residential above. The building steps up from 8 storeys to 28 to 39 on the junction of Ontario Street with Keyworth Street reaching a maximum height of 147m AOD (above ordnance datum). The roof space is utilised as amenity space for the prospective residents.

Block B

10. A part 15/part 21/part 28 storey block with retail and servicing on the ground floor. The upper floors have office and residential uses. The office use occurs on floors 1 - 14 on the southern end of the block and floors 1 - 7 in the northern end of the block. Residential is proposed from floors 7 to 28 and occurs in the northern end of the block. A public garden with retail is proposed on floor 15 at the southern end of the block this will be accessed from public lift on Skipton Gardens.

Block C

11. A 12 storey block fronting onto London Road and Ontario Street which adjoins Block A. This comprises a fitness use on the ground floor and office use above. The roof of this building is used for amenity space for office and plant.
12. A single level basement with a mezzanine level is proposed across the entire site. This provides space for waste storage, bike storage for both the residential and office uses and space for Combined Heat and Power Unit (CHP) and other plant storage.
13. The residential accommodation comprises 408 residential units with the following mix:

| Unit Type | Quantity | Percentage |
|------------------|-----------------|-------------------|
| Studio | 18 | 4 |
| 1-bed | 134 | 33 |
| 2-bed | 212 | 52 |
| 3-bed | 44 | 11 |
| Total | 408 | 100 |

14. The accommodation provided on site will be fully private but an off site contribution has been put forward which would equate to 20% affordable housing of all the habitable rooms delivered on and off the site.
15. **Planning history**

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| <p>09/AP/2333 Application type: Full Planning Permission (FUL) Installation on footway of cycle hire docking station measuring 17.8m long and 2m wide, for the Transport for London Cycle Hire Scheme containing a maximum of 16 docking points for scheme bicycles plus a terminal.</p> <p>Decision date 08/12/2009 Decision: Granted (GRA)</p> |
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| <p>15/AP/4257 Application type: Scoping Opinion (EIA) (SCP) Scoping opinion in respect of an environmental impact assessment</p> <p>Decision date 23/12/2015 Decision: Scoping Opinion - EIA Regs (SCP)</p> |
| <p>15/EQ/0364 Application type: Pre-Application Enquiry (ENQ) Mixed-use development with 431 new homes, offices, shopping, leisure facilities and cultural activities</p> <p>Decision date 28/01/2016 Decision: Pre-application enquiry closed (EQC)</p> |

Planning history of adjoining sites

Eileen House

16. 09/AP/0343 - demolition of existing building and erection of a 41 storey (128.7m AOD) building and separate 8 storey (35.60m AOD) building incorporating 270 private flats (16 x studio, 126 x 1-bed, 92 x 2-bed and 36 x 3-bed), 65 intermediate flats (17 x 1-bed, 44 x 2-bed and 4 x 3-bed), 4,785sq.m. of office (Use Class B1) and 287 sq.m. of retail (Use Class A1-A5), together with 34 disabled car parking spaces, 44 motorcycle spaces and 411 cycle spaces within 2 basement levels, plus associated servicing facilities (4,626sq.m.) and public realm improvements including creation of a residents' garden (458sq.m.) and University Square (2,768sq.m.). Granted 01/12/2011.
17. This site is currently under construction.

KEY ISSUES FOR CONSIDERATION

Summary of main issues

18. The main issues to be considered in respect of this application are:
 - a) Principle of the proposed development in terms of land use and conformity with strategic policies
 - b) Environmental impact assessment
 - c) Density
 - d) Dwelling mix
 - e) Affordable housing
 - f) Quality of residential accommodation
 - g) Design issues, including layout height and massing
 - h) Impact on strategic and local views and the setting of listed buildings and/or conservation areas
 - i) Neighbouring amenity
 - j) Impact of adjoining and nearby uses on occupiers of the proposed development
 - k) Transport

- l) Trees and landscaping
- m) Ecology and biodiversity
- n) Wind
- o) Archaeology
- p) Land contamination
- q) Water resources and flood risk
- r) Socio-economic implications
- s) Equalities
- t) Energy and sustainability
- u) Planning obligations.

Planning policy

19. National Planning Policy Framework (the Framework)

- Section 1 'Building a strong, competitive economy'
- Section 2 'Ensuring the vitality of town centres'
- Section 4 'Promoting sustainable transport'
- Section 6 'Delivering a wide choice of high quality homes'
- Section 7 'Requiring good design'
- Section 8 'Promoting healthy communities'
- Section 10 'Meeting the challenge of climate change, flooding and coastal change'
- Section 11 'Conserving and enhancing the natural environment'
- Section 12 'Conserving and enhancing the historic environment'

20. London Plan July 2015 consolidated with alterations since 2011

- Policy 2.13 – Opportunity areas and intensification areas
- Policy 2.14 – Areas for regeneration
- Policy 2.15 – Town centres
- Policy 3.2 – Improving health and addressing health inequalities
- 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 3.8 – Housing choice
- Policy 3.9 – Mixed and balanced communities
- Policy 3.12 – Negotiating affordable housing
- Policy 3.16 – Protection and enhancement of social infrastructure
- Policy 4.1 – Developing London's economy
- Policy 4.6 – Support for and enhancement of arts, culture, sport and entertainment
- Policy 4.7 – Retail and town centre development
- Policy 5.1 – Climate change mitigation
- Policy 5.2 – Minimising carbon dioxide emissions
- Policy 5.3 – Sustainable design and construction
- 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 6.2 – Providing public transport capacity and safeguarding land for transport
Policy 6.3 – Assessing effects of development on transport capacity
Policy 6.4 – Enhancing London’s transport connectivity
Policy 6.9 – Cycling
Policy 6.10 – Walking
Policy 6.13 – Parking
Policy 7.1 – Building London’s neighbourhoods and communities
Policy 7.2 – An inclusive environment
Policy 7.3 – Designing out crime
Policy 7.4 – Local character
Policy 7.5 – Public realm
Policy 7.6 – Architecture
Policy 7.7 – Location and design of tall and large buildings
Policy 7.8 – Heritage assets and archaeology
Policy 7.11 – London view management framework
Policy 7.14 – Improving air quality
Policy 7.18 – Protecting open space and addressing deficiency
Policy 7.19 - Biodiversity and access to nature
Policy 7.21 – Trees and woodlands
Policy 8.2 – Planning obligations

21. Core Strategy 2011

Strategic Policy 1 – Sustainable development
Strategic Policy 2 – Sustainable transport
Strategic Policy 3 – shopping, leisure and entertainment
Strategic Policy 4 – Places for learning, enjoyment and healthy lifestyles
Strategic Policy 5 – Providing new homes
Strategic Policy 6 – Homes for people on different incomes
Strategic Policy 7 – Family homes
Strategic Policy 10 – Jobs and businesses
Strategic Policy 11 – Open spaces and wildlife
Strategic Policy 12 – Design and conservation
Strategic Policy 13 – High environmental standards

Southwark Plan 2007 (July) - saved policies

22. 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 uses
Policy 2.2 – 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 3.12 – Quality in design
Policy 3.13 – Urban design
Policy 3.14 – Designing out crime
Policy 3.19 – Archaeology
Policy 3.20 – Tall buildings
Policy 3.28 – Biodiversity
Policy 4.1 – Density of residential development
Policy 4.2 – Quality of residential accommodation
Policy 4.4 – Affordable housing
Policy 5.2 – Transport impacts
Policy 5.3 – Walking and cycling
Policy 5.6 – Car parking

23. Southwark Supplementary Planning Documents (SPDs)

Residential Design Standards with Technical Update 2015
Draft Affordable Housing SPD 2011
Elephant and Castle SPD and Opportunity Area Planning Framework 2012
Development Viability SPD 2015

24. The site has a Public Transport Accessibility Level (PTAL) of 6b which is the highest accessibility level. Newington Causeway and London Road form part of the Transport For London (TfL) Road Network while Ontario Street and Keyworth Street form part of the Cycle Super Highway 7.

Principle of development

25. The NPPF promotes sustainable development which means improving the built and natural environment while creating jobs, improving the design and function of places and providing a wide choice of good quality homes. This site is within the Elephant and Castle Opportunity Area, a major town centre with excellent public transport accessibility where a mix of uses and intensification is encouraged. The vision for the Elephant and Castle Opportunity Area identifies the area as having the potential of redevelopment into an attractive central London destination that provides new homes and employment as well as excellent shopping and leisure facilities. There is also a desire to develop the evening economy and cultural activities.
26. The proposed development would provide a number of key benefits which would help meet the objectives of this vision and have the potential to contribute to the establishment of Elephant and Castle as a major town centre destination. The key benefits that the proposed development would deliver are:
- A new destination office building providing 48,892sqm of office floor space (28,638sqm uplift – more than double the existing) and potential for permanent jobs in a highly accessible location
 - 408 new homes
 - New cultural facility with ancillary retail
 - A new public pedestrian street improving connections between Elephant and

Castle town centre and sites to the north, including the London South Bank University campus

- A new publically accessible roof garden
- Contribution towards the delivery of affordable housing.

Business floorspace

27. The council's Core Strategy supports the provision of additional business floor space within major town centres and action area cores. The Elephant and Castle SPD sets an indicative target of 25000 - 30000sqm of business floor space while the more recent London Plan update sets a indicative employment capacity of 5000 jobs. The proposed development would result in the provision 46500sqm of office floorspace which would exceed the indicative capacity of the business floor space in the SPD and provide space for a significant increase in the number of jobs within the local area. This represents an increase of 23 000sqm in excess of the existing provision.

Housing

28. The Core Strategy and Opportunity Area SPD set a target for the provision of 4000 new homes. The proposed development would provide 408 new homes in a very well connected and sustainable location. This level of provision is welcomed. Further discussion of affordable housing provision and the mix is set out in the housing section below.

Cultural/leisure offer

29. The Elephant and Castle SPD 6 policy states 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.' The provision of a 350 seat auditorium and ancillary cultural space will be in accordance with the intentions of this policy and would help support the consolidation of the area as a major town centre. The proposed facility would be a new performance venue arranged over two levels (ground floor and basement) complement the existing and prospective cultural provision within the town centre. It would also increase footfall into the area particularly to support the night time economy while also raising the profile of the area as a destination.
30. It is recognised in the London Plan policy 4.6 that culture plays a valuable role in place shaping, especially by engaging younger people in wider community activity. In the absence of a community use strategy, the council would welcome additional information with regard to the preferred occupier of the cultural space and how their programme will provide engagement with young people and other groups within the area. This strategy would be secured through a legal agreement and would set out the strategy for how the occupier will work to engage, support, educate and provide training for young people and local residents wanting to get involved in the creative industries. This will be required to ensure that the local community benefits from securing this facility

Retail

31. The Opportunity Area SPD supports the provision of retail activities along the main roads leading into the main town centre. Newington Causeway and London Road are both identified as main routes into the town centre. The proposal includes the provision of retail space on the ground floor which will have frontages onto both main roads and onto Skipton Street. A total area of 1628sqm of retail space is proposed at

the ground floor level. This is arranged in 9 separate retail units ranging in size from the smallest at 20sqm to the largest at 368sqm. These would have a flexible use of A1 (retail)/A3 (restaurant/cafe)/A4 (drinking establishments) use classes. Another commercial unit is proposed at the 15th floor of building B adjacent to the public sky garden. This will have a gross internal area of 488sqm.

32. This level and arrangement of retail provision should complement the proposed cultural use and retail provision proposed for other sites within the Opportunity Area as well as strengthening links to town centre from surrounding areas.

Loss of community facilities

Keyworth Street hostel

33. The existing Keyworth Street Hostel is a 35-bed facility which provides bed spaces for homeless men over the age of 18 years with a connection to Southwark that is managed by Southwark Council Housing Services, and is currently fully occupied. The hostel use is classed *sui generis* and there is no current policy requirement to re-provide this use. However policy DM7 of the emerging Southwark Plan does not permit the loss of hostels where they meet an identified local housing need. The emerging Southwark Plan has been subject to two rounds of consultation and has some weight as a material consideration. The council have identified a site within the Opportunity Area that has the potential for use as a similar sized hostel albeit will have to be subject to planning.

Library education

34. The existing site also contains the Perry Library, which is the main library for the London South Bank University, which has an area 8107sqm (GEA). The library use will not be re-provided in the completed development. Policy 2.3 of saved Southwark Plan states that planning permission for a change of use from D class educational establishments will not be granted unless:

- Similar or enhanced provision within the catchment area is secured; and
- Opportunities are taken wherever possible to ensure that that provision is made to enable the facility to be used by all members of the community.

35. The applicants have advised that London South Bank University have plans to re-locate the library to another building within the campus. Council and GLA officers have sought assurances from the applicants to provide greater certainty with regard to the re-provision. No comment has been provided from London South Bank University. The GLA have confirmed that this has been discussed with London South Bank University who have advised that a more advanced library and electronic resource facility will be provided at another site within the campus. The proposed development is therefore considered to be in accordance with policy 2.3 Saved Southwark Plan and London Plan policy 3.15.

Conclusion on land use matters

36. The proposed development would provide a significant increase in the quantum of employment space on site, more than double the existing, which would go a significant way towards meeting the vision of providing 25000 - 30000sqm of business floor space within the Opportunity Area. The provision of a mixed use development including office, residential, cultural and ancillary retail is supported in policies set out in EACOA SPD.

Environmental impact assessment

37. Applications where an Environmental Impact Assessment (EIA) is required will either be mandatory or discretionary depending on whether the proposal constitutes Schedule 1 (mandatory) or Schedule 2 (discretionary) development of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 (the 'EIA Regulations' – as amended in 2015). The proposed development falls within Schedule 2, Category 10(b) 'Urban Development Project' of the EIA Regulations and constitutes EIA development having regard to its potential for likely significant environmental effects.
38. Prior to the submission of the planning application, a formal scoping pinion (reference 15/AP/4257) was submitted to the council under Regulation 13 of the EIA Regulations to ascertain what information the local planning authority considered should be included within an environmental statement (ES).
39. The EIA Regulations preclude the granting of planning permission unless the council has first taken the 'environmental information' into consideration. The 'environmental information' means an environmental statement, including any further information, any representations made by consultation bodies and any other person, about the environmental effects of the development. The ES should identify and assess the likely magnitude and significance of environmental impacts at each stage of the development programme, including impacts arising from the demolition and construction phases as well as those arising from the completed and operational development.
40. It is not necessarily the case that planning permission should be refused if a development has the potential to have significant adverse effects. It has to be decided whether any of the identified adverse impacts are capable of being mitigated, or at least reduced, to a level where the residual impact would not be so significant or adverse as to warrant a refusal of permission, or else would be outweighed by other factors.
41. In accordance with the EIA Regulations, an ES accompanies the planning application. It comprises:
 - Volume 1 – Main text and figures
 - Volume 2 – Townscape, built heritage and Visual Impact Assessment
 - Volume 3 – Transport assessment
 - Volume 4 – Technical appendices
 - Non-technical summary – A summary of the information contained with volumes 1-4 of the ES.
42. Additional environmental information or 'further information' to support the ES was submitted in March 2016 following revisions made to the proposed development. A further round of consultation was undertaken on the ES addendum in accordance with Regulation 22 of the EIA Regulations. Information on the potential environmental impacts of the scheme and mitigation (where required) is included in the various sections of this report.

Alternatives

43. The EIA Regulations requires the ES to provide information on the alternative options considered by the applicant. The 'do nothing' alternative would leave the application site in its current state (i.e. the existing buildings in active economic use). This scenario is considered in the ES to have no environmental benefits compared with the proposed redevelopment of the site.

44. The ES also describes the design evolution of the scheme which has been influenced by environmental factors, particularly the acoustic environment, daylight and sunlight and wind microclimate. Other key factors that have informed the design rationale and land use distribution includes the protected London View Management Framework (LVMF) view 23A.1 from the Serpentine Bridge on the building heights and massing across the site, as well as how the proposal responds to 'Elephant Square' or newly reconfigured gyratory, and inclusion of a pedestrian link through the site. As such, the final iteration of the scheme is the culmination of a series of design options which has taken account of the constraints and opportunities presented by the site as well as issues raised by key stakeholders during the process.
45. Officers are satisfied that the ES adequately demonstrates that other alternatives would not be viable or supported in planning terms. While the existing buildings are in active use, they occupy a prominent position at the heart of the Elephant and Castle Opportunity Area where such sites are fundamental to achieving the overall regeneration of the area in line with Southwark's vision for the Elephant and Castle. To not develop the site in the manner proposed would lead to a missed opportunity to secure a high density, mixed use scheme delivering new jobs, homes and cultural facilities in addition to significant improvements to public realm and north-south permeability in the borough.

Cumulative impacts

46. The ES takes into account the cumulative effects of the scheme and considers the following types of impact:
- the combined effects of individual impacts, such as the interaction between noise and dust exposure during construction; and
 - the combined effects from several development schemes.
47. In terms of the combined effect of individual impacts from the proposed development on nearby receptors, the cumulative impacts arising during the demolition and construction phases and the magnitude of the impacts would vary depending on the different stages of the works. Such impacts are likely to arise from construction traffic, dust/air quality, noise and vibration, and visual amenity. However, the combined impacts would be temporary and transient in nature and, while adverse, mitigation measures would be in place through a Construction Environmental Management Plan (CEMP) to minimise the impacts and ensure there would be no significant residual cumulative effects upon people or the environment that would warrant planning permission being refused.
48. The combined impacts of the proposal alongside other committed developments have also been considered. During demolition and construction, the localised construction cumulative impacts caused by works on other nearby development sites, the closest of which is Eileen House to the north, would be temporary in nature and can be minimised through the implementation of a CEMP. Once operational, the cumulative effects of the development with other schemes were found to be negligible, but predicted to be of significant benefit in terms of housing and employment generation at a local and borough-wide level.
49. Officers acknowledge that there will be adverse impacts resulting from the demolition and construction of the proposed scheme and this also needs to be considered alongside the construction of other schemes in the area. However, such impacts will be reduced as far as possible and any short-term or temporary nuisance arising has to be balanced with the long-term significant regenerative benefits that the scheme

would deliver to the site and the wider Elephant and Castle.

Conclusion on environmental impact assessment

50. A detailed assessment of the likely potential and residual impacts of the scheme is provided in the relevant sections of this report, taking into account the ES and the material planning policy considerations. In summary, officers are satisfied that the ES is adequate to enable a fully informed assessment of the environmental effects of the proposal.

Density

51. London Plan policy 3.4 states that taking into account local context and character, the design principles of chapter 7 and public transport capacity, development should optimise housing output for different types of location. With central areas located within a major town centre identified as the most appropriate for highest density development. Core Strategy policy 5 states that developments above the density range for Central Activities Zone will be permitted where the development has an exemplary standard of design.
52. The Mayor's Housing SPD provides guidance where density ranges may be exceeded in justified exceptional circumstances. It states that development at densities outside these ranges will require particularly clear demonstration of exceptional circumstances. The key considerations when assessing appropriate levels of density include 'liveability', relating to proposed dwelling mix, design and quality, physical access to services, long term management of communal areas and the wider context of the proposal including its contribution to local 'place shaping' as well as concerns over 'place shielding. It is important to take account of the developments impact in terms of massing, scale and character in relation to nearby uses.
53. The proposed development is situated in the core of the Elephant and Castle Opportunity Area. The character of this area is defined by the scale and massing of recently approved developments (both completed and under construction) such as Eileen House (251 The Elephant), Elephant One, Strata and the emerging proposals for the Shopping Centre as well as existing tall buildings such as those at Perronet House, Metro Central Heights and London Communications College. The scale and massing of the proposed development should therefore be viewed in the context of this existing and emerging character. The quality of accommodation/'liveability' of the proposed development is demonstrated by the quality of public realm around the development with specific contribution from Skipton Street and improvements to public realm on Ontario Street and on Southwark Bridge Road and the high quality amenity space provision and large unit sizes of the proposed development. It is in an area which has been identified as appropriate for tall buildings. The site also has 'excellent' public transport accessibility.
54. The density of the development is clearly above Southwark and London Plan density ranges but there are exceptional circumstances relating to the character of the area, quality of accommodation and excellent public transport accessibility which would permit a development that exceeds the relevant density ranges. The development would be significantly above London Plan maximum density of 1150 habitable rooms per hectare. However this is considered acceptable as the development provides an exceptional quality of accommodation, is situated within a major town centre and adjacent to a public transport hub with excellent accessibility to public transport and local services and facilities. The site is also within an area where tall buildings are considered to be appropriate.

Dwelling mix

55. Strategic policy 7 'Family Homes' of the Core Strategy 2011 prioritises the development of family homes. The policy sets out differing requirements for provision of family sized units depending upon the geographical area in which developments of 10 or more units are located. Developments of 10 or more units in the CAZ must provide at least 60% of units with 2 or more bedrooms. The Elephant and Castle Opportunity Area SPD requires that at least 10% of units have 3, 4 or 5 bedrooms. Policy SP7 does not permit anymore than 5% studio provision.

| Unit Type | Quantity | Percentage |
|--------------|------------|------------|
| Studio | 18 | 4.4 |
| 1-bed | 134 | 32.8 |
| 2-bed | 212 | 52 |
| 3-bed | 44 | 10.8 |
| Total | 408 | 100 |

56. This table demonstrates that the proposed development provides a policy compliant mix of dwellings with appropriate provision of family units and the number of studios below 5%. The development is considered to provide a good mix of accommodation and complies with Core Strategy SP7.

Wheelchair accommodation

57. The London Plan policy sets out that in major residential developments, 10% of new homes should be accessible for wheelchair users. The wheelchair units and communal areas should be designed to comply with the relevant building regulations and the guidelines set out in the technical update to Southwark's Residential Design Standards. The applicants have confirmed that all units will comply with building regulations M4(2) while the proposed wheelchair accommodation will comply with building regulations M4(3).

Affordable housing

Policy context

58. The NPPF requires local planning authorities to plan for a mix of housing based on the different groups in the community and that the size, type and tenure reflect local demand. Where affordable housing is required this should be provided on-site unless off-site provision or a financial contribution of broadly equivalent value can be robustly justified and the agreed approach contributes to the objective of creating mixed and balanced communities.
59. London Plan policy requires that the maximum reasonable amount of affordable housing should be sought having regard to a range of matters including the need to encourage rather than restrain residential development, the need to promote mixed and balanced communities, the specific circumstances of individual sites and the resources available to fund affordable housing to maximise affordable housing output. Development viability should be taken into account together with provisions for re-appraising the viability of schemes prior to implementation. The London Plan also specifies the need for on-site provision other than in exceptional circumstances where it can be provided off-site. In lieu payments should only be accepted where this would have demonstrable benefits in furthering the affordable housing and other policies. Such contributions should be ring-fenced to secure additional housing either on identified sites or as part of an agreed programme for provision of affordable housing.

60. Strategic Policy 6 of the Core Strategy 'Homes for people on different incomes' requires, in the Elephant and Castle Opportunity Area, a minimum of 35% of the residential units to be affordable and a minimum of 35% to be private. With regard to tenure, saved policy 4.4 of the Southwark Plan requires a split of 70% social rented: 30% intermediate. All of the affordable units should be provided on site and a mix of housing types and sizes for the affordable units would be required; saved policy 4.3 of the Southwark Plan advises that studio flats are not suitable for meeting affordable housing need.
61. The council's adopted Affordable Housing SPD 2008 (section 3.6) together with the draft Affordable Housing SPD 2011 (section 6.3) clarifies the Southwark Plan and Core Strategy policy framework. They set out the sequential tests for the delivery of affordable housing which can be summarised as follows:
- **On site provision** – All housing, including affordable housing should be located on the development site
 - **Off site provision** – in exceptional circumstances, where affordable housing cannot be provided on site or where it can be demonstrated that significant benefits will be gained by providing units in a different location in the local area, the affordable housing can be provided on another site
 - **In lieu payment** – In very exceptional circumstances where it is accepted that affordable housing cannot be provided on-site or off-site, a delivery towards the delivery of affordable housing will be required.

Development Viability SPD

62. The council has recently adopted a Development Viability SPD which sets out the requirements for Viability Appraisals (VA) that are submitted with applications where affordable housing is required by policy. The SPD was formally adopted on 15 March 2016 and apart from stipulating the information required with such appraisals the SPD also secures transparency of this process whereby the VA is published prior to consideration by the planning committee. An executive summary is required at the outset before an application can be validated and registered.
63. The application under consideration was submitted in December 2015 prior to the adoption of the SPD hence none of the viability information was published at that stage. However in June the applicants provided an executive summary in line with what is now required in line with the SPD. A full VA will be published in advance of the committee meeting.

Affordable housing proposal

64. As submitted, all the residential units (408) on site would be for market sale and the proposal does not include any on-site affordable housing. The reasons for this, as submitted by the applicant, are set out below and in addition a VA has been provided in further support of this position.

Consideration of on-site provision

65. In considering on-site provision the applicant points to difficulties in providing separate cores, within the residential towers, that would be required for social rented accommodation on site. While this would be physically possible it would be costly in terms of reduced floor areas at every level, reducing the viability further. There would be a reduction in the overall value of the scheme reducing the affordable provision further. On-going service charges associated with the residential terraces would also

militate against on-site provision. Off-site provision can be demonstrated to deliver a greater quantum of affordable housing than would be the case on-site. A higher level of provision would be feasible.

66. Consideration was also given to providing affordable housing on-site in a separate building. At pre-application stage the provision of affordable housing in 'building C', the 13 storey office building which fronts London Road. Ultimately this was considered inappropriate as it would have failed to maximise the commercial (office) content of the scheme on a prime office site within the Opportunity Area where there is an aspiration to generate significant employment. The provision of a stand-alone office building which could be attractive to a single anchor tenant would help meet the objectives of the Opportunity Area in becoming an established office location. Its proximity to major transport facilities underlines its role in meeting this objective. The estimated number of jobs that could be provided is in the order of 1,363.
67. In addition the location of this building on the busy London Road and Elephant and Castle peninsula coupled with the potential provision of residential uses on lower floors would have been problematic. Exemplary standards of residential design in this context would have been difficult to achieve. The balance between securing affordable housing on site and the delivery of employment on a key site in the centre core of the Opportunity Area was considered to be in favour of office provision.
68. On that basis it is considered that there are exceptional circumstances which indicate off-site provision as being appropriate in line with policy. It is concluded that the provision of off-site affordable housing will maximise the number of units that can be delivered.

Off-site affordable housing

69. To this end the applicant has been involved in a site search both with registered providers and the council. Opportunities to provide off-site affordable housing on a number of council sites, part of the SRPP and direct delivery programmes have been identified. Within the Elephant and Castle Opportunity Area sites at Salisbury Close (Chatham Street), Manor Place and Braganza Street are being explored. The estimated capacity on the identified sites:
 - Salisbury Close - 193 habitable rooms - 49 units
 - Manor Place - 111 habitable rooms - 30 units
 - Braganza Street - 37 habitable rooms - 10 units.
70. The combined capacity therefore is 341 habitable rooms equating to 89 units. To secure this a s106 obligation would require the applicant/developer to construct and/or fund these developments transferring the completed units back to the council as appropriate and depending on the applicant's ability to secure the construction contract.
71. The Salisbury Close development will be entirely affordable and likely to be social rent (notwithstanding a Core Strategy requirement for 35% private with emerging policy in the New Southwark Plan removing this requirement). A preliminary scheme for Manor Place includes both affordable and private. The applicant's off-site proposal would be to provide the affordable housing within this scheme which would be a minimum of 111 affordable habitable rooms. At Braganza Street a further 37 affordable habitable rooms would be provided.
72. The identified sites are within a programme which targets application submissions

over the next few months. However in the event that one or any of these sites, or both, failed to come forward there are numerous sites within the Council's programme which could be substituted on the same basis. Obligations in the s106 would be phrased to allow for alternative equivalent sites to be developed for this purpose but the affordable housing requirement will be expressed in terms of the number of habitable rooms to be provided.

Level of affordable housing to be provided off-site

73. Combining the 1,366 habitable rooms provided on site at Skipton House, with the 341 habitable rooms as off-site provision, the affordable housing provision would equate to 19.97% (341/1707). The policy requirement is for 35% or the maximum reasonable level, so the proposal is below this level.

Viability justification

74. Policy requires as much affordable housing as is reasonably possible and financially viable. The applicant has provided a viability appraisal which demonstrates that where they apply the most optimistic conditions the scheme cannot viably support the policy required level of affordable housing i.e. 35%. Their best case scenario produces a profit surplus of £16m which could deliver in the region of 20% affordable housing depending on the method of delivery.
75. The applicant has provided a VA which has been assessed by consultants on behalf of the council. Although there is broad agreement on the assessment and most variables within the assessment are considered to be acceptable, on one significant matter – build costs – there is a difference of opinion. The applicants estimate is higher by about 14%. That is not to say either of these views is right or wrong – simply the parties have different estimates and either could be proved correct, or more accurate, once actual costs are known. A viability review can verify the real position.
76. A number of different scenarios have been looked at based on different profit levels and different office yields. The latter is quite significant as the value of the offices is considerable so small differences in estimated yields result in big differences in profit surpluses available to support the provision of affordable housing.
77. Put simply the view the applicant takes, depending of which profit level and office yield is set, ranges from a deficit of £52.3m to a profit surplus of £16m.
78. By contrast, the council's consultants conclude that the profit surplus will range from a deficit of £1.2m to a profit surplus of £67.1m. This latter sum is based on a low profit level and very optimistic (but not necessarily unrealistic) view of office yields.
79. The difference in outcomes between the two parties is consistent and is attributable to the different view as to build costs.
80. A further significant factor in the viability of the scheme relates to the very high existing use value (EUV) of the site of which the largest part is an office building. This has been let to the NHS for a considerable time. In valuation terms a fully let office building with a government tenant commands a very high EUV. The profit/value arising from any new development in such circumstances will therefore be less than a comparable development where a lower EUV applies. This is a key factor in limiting the viability of the scheme so that it can support a level of affordable housing.
81. Notwithstanding this situation where the applicant argues that the scheme cannot viably support affordable housing the applicant proposes off-site provision to the value of £16.88m. In effect this offer assumes a low level of profit at 10% where the industry

norm, arguably, is in the region of 17.5%. Initial costings have been calculated in relation to the sites mentioned above to demonstrate that the level of affordable housing that can be delivered in this way equates to 20% (rounded up).

82. The applicant has made the affordable housing offer based on what the applicant believes to be an achievable future office rent taking into account the regenerative effect, critical mass, current market conditions and wider improvements in the area. Normally these factors are not taken into account until a review stage but the approach being taken here by the applicant is to take that risk up front. The applicant's most optimistic conclusion on the viability of the scheme based on the VA, as outlined above, supports this position.
83. Advice from the council's consultants suggests that the estimated construction costs are high and that the lower construction costs they have suggested would add support to the argument that the development could support the level of affordable housing being proposed by the applicant at 20%.

Viability review

84. Given that the affordable housing proposal falls below 35%, the applicant accepts the requirement for a Viability review, as set out in the recently adopted SPD and this will be secured in the s106 legal agreement. The SPD requires this to occur following 'substantial implementation' of the scheme.
85. The review will establish whether there is any improvement in the scheme's viability at this point relative to the date of consent so that any uplift can secure further financial contributions towards increasing the affordable housing provision. This would be capped to a maximum of 35% - the policy compliant level. The SPD includes a formula which effectively splits the uplift at 50% to the developer and 50% to the council. While it is recognised that the off-site affordable housing can be viewed as un-viable nevertheless it is being provided and this needs to be factored into any review.
86. A baseline level, to include a number of variables such as sales values etc. will need to be agreed which accounts for this together with an appropriate basis for apportioning any uplift between the developer and the council for the purposes of providing additional affordable housing. Any funds secured in this way would be similarly tied to funding council schemes or those by registered housing providers within the opportunity area or adjacent. This allows for the habitable rooms to be valued in relation to real costs. Regardless of the outcome of any review the 20% off-site provision will not be reduced.
87. It should be noted that a fall-back position for an in-lieu payment is not being proposed in this case.
88. The provision of off-site affordable housing is considered acceptable in this case for the reasons set out above and that the proposal satisfies the sequential test. Officers consider that the level proposed, at 20%, is supported by the submitted viability assessment notwithstanding the difference in opinion regarding construction costs. With a s106 obligation that secures a review on substantial implementation which will be based on actual costs and other variables, it is considered that the development will provide the maximum reasonable level of affordable housing and consequently the affordable housing proposed is considered acceptable.

Design and impact on townscape views and heritage assets

Policy context

89. The NPPF at paragraph 56 stresses the importance of good design, considering it to be a key aspect of sustainable development. Chapter 7 of the London Plan deals with design related matters. In particular, policy 7.1 sets out the design principles required for new development and policy 7.6 requires architecture to make a positive contribution to the public realm, streetscape and cityscape. Policy 7.8 asserts that development affecting heritage assets and their settings should conserve their significance by being sympathetic in their form, scale, materials and architectural detail.
90. The relevant Southwark design and conservation policies are strategic policy 12 of the Core Strategy and saved policies 3.12, 3.13, 3.18 and 3.20 of the Southwark Plan. These policies require the highest possible standards of design for buildings and public spaces. The principles of good urban design must be taken into account in all developments including height, scale and massing, consideration of local context including historic environment, its character, and townscape strategic and local views.

Site context

91. The proposal seeks to replace Skipton House, a 1980s office building, the London South Bank University Perry Library and London Borough of Southwark Hostel with a substantial mixed use development incorporating cultural, commercial and residential uses within two stepped blocks. A key aspect of the scheme is the inclusion of a new thoroughfare (the reinstated 'Skipton Street') at the centre of the Elephant and Castle. The site forms the northern edge of the new peninsula, a heavily trafficked area being at the confluence of a number of main roads.
92. The site does not include any listed buildings and is not located within a conservation area. There are, however, a number of designated heritage sites in the vicinity including (but not limited to) the Grade II listed Metro Central Heights (former Alexander Fleming House) and Michael Faraday Memorial as well as Elliot's Row and West Square Conservation Areas.
93. The Bakerloo line underground station building abuts the site to the south. This is a modest building constructed in 1906 which formed the original entrance to the Elephant and Castle underground station. Although an undesignated heritage asset, it is considered to be an important building of townscape merit. Other nearby undesignated heritage assets the railway viaducts that bisect the area. The spaces either side of the railway routes, described in the draft Southwark Plan as the 'Low line', are key walking routes which will facilitate economic growth and improve permeability along the viaducts.

Urban structure, space and movement

94. The proposed site layout responds positively to the specific opportunities and constraints presented by the urban grain and development patterns in this area. In particular, officers welcome the proposal to reinstate the historic Skipton Street to provide a north-south pedestrian route through the centre of the site thereby creating a visual and physical link from the peninsula to Keyworth Street and Southwark Bridge Road beyond. The increased permeability offered would be in marked contrast to the publically impermeable blocks existing on the site.
95. The proposed development is divided into two parts or linear blocks arranged either side of the new public route. The two separate elements would be unified in the

basement where the required plant and service areas would be located in order to ensure that the development can optimise the amount of active street frontage, including along the new Skipton Street. The blocks would be arranged on a north-south alignment with key frontages onto Newington Causeway (east) and Ontario Street (west). The narrow ends of the two parts face onto Keyworth Street (north) while the main frontage is onto the peninsula. This is an important civic space from where the two separate parts of the development would be most prominent.

96. Each block is then sub-divided into triangular-shaped extrusions (four on Ontario Street and three on Newington Causeway) which rise to varying heights. The lowest parts of the development are generally located on the peninsula with each extrusion stepping up, the tallest being located on the Keyworth/Ontario Street junction (north-west). On Newington Causeway, the extrusions step up naturally while on Ontario Street the pattern is interrupted by a gap at the second extrusion, set deliberately lower than the frontage building and dedicated to the cultural venue. In this way, the Ontario Street building has been carefully designed to reduce the bulk and mass of the development on this prominent flank which would be highly visible from London Road.

Tall buildings

97. The development rises up to 40-storeys (146.3m AOD) and as such must be assessed against a number of design-led criteria set out in saved policy 3.20 as well as other environmental considerations, such as overshadowing and impact on the micro-climate. An assessment of the proposal against saved policy 3.20 design criteria is set out below. Environmental implications of the development are dealt with elsewhere in the relevant sections of the report.

Criterion (i): Makes a positive contribution to the landscape

98. The landscape and public realm are important elements of any tall building proposal. They not only create a setting for the tower, allowing it to 'land' appropriately, but also provide an opportunity to exploit the benefits that arise from expanding vertically in this way, by freeing up more public space at grade in dense urban locations such as the Elephant and Castle.
99. The landscape proposal has been developed in tandem with the architecture and is an integral aspect of the scheme. From the outset, the focus on landscape has been to maximise the public realm on the street as well as create new landscaped open spaces (both public and private) on the various rooftops. The key features of the landscape proposal are described below.

The new Skipton Street

100. This is an essential feature of the development which offers the opportunity to create a generous (circa 19m wide) pedestrianized thoroughfare through the site. The new street opens up the heart of the site, aligning with Southwark Bridge Road to the north, and offers direct public access to and from the peninsula at the heart of the Opportunity Area.
101. The street has been carefully designed to ensure it is a genuinely open and inviting public space. It would be lined by active uses either side, including the new cultural auditorium and access point to the roof-top public garden. The street would be carefully landscaped to encourage pedestrians to filter across and dwell within the new route as well as facilitate a new event space. A lightweight structure is proposed at fourth floor level to span the street to provide protection from the weather. It is not designed as a continuous element so as not to detract from the generosity or sense of

openness of the street. Wind and micro-climate will be key considerations for the success of this space and this is discussed paragraph 242 of this report.

Elephant Square

102. The site fronts onto the peninsula which is a focus of the area, including two underground stations. This is not only a busy trafficked area but also a destination for residents and visitors alike. The key frontage onto the square defined by Perronet House and Metro Central Heights is also the main façade onto the peninsula and has an axial relationship with Newington Butts to the south.
103. The proposed landscape has been designed to reinforce the concept of Elephant Square as well as to complement the surviving buildings in it. The entrance to Skipton Street from the south is an important gateway to the site. This is signalled by mature landscaping, including trees, to act as visual clues and encourage permeability.

Relationship with Eileen House Square

104. This is an important aspect of the design. The re-introduction of Skipton Street would link the peninsula with the new public space at the foot of the Eileen House scheme (known as Two Five One), at the entrance to Keyworth Street. This key focal point will be defined by landscaping and mature planting to ensure the sequence of new public open spaces are generous and open, to encourage permeability, and enhance the public realm network of the area.

Elevated public garden and communal terraces

105. The public garden is an exciting element of the landscape proposal which will offer the unique opportunity in the Elephant and Castle for a new public 620 sqm roof-top garden and viewing terrace with fantastic views across London. Access to the garden, located at level 15 (building B), would be via two glazed scenic lifts. The operational requirements of the public garden, including opening hours, will be secured by legal agreement to ensure it remains publically accessible at all times and at no cost to the general public. The proposed design of the garden has risen to the challenge of creating a viable landscape on the 15th floor, the details of which will be reserved by appropriate landscape condition.
106. In addition to the public garden, a series of residential terraces at varying heights across the development would provide high quality residential communal and private amenity, including play space, for future occupiers of the development. A separate roof terrace (circa 408 sqm) for the office element will be provided at level 12 of building C.
107. SPD 15 of the Elephant and Castle SPD sets out design guidance in respect of new public realm. New developments are required to help transform the public realm by, among other things, contributing towards the delivery of a hierarchy of different types of streets and spaces and create high quality places where people will want to linger, and which feel safe at all times. The proposal seeks to deliver this and is entirely consistent with the approach to public realm advocated in the SPD. In particular, the re-introduction of Skipton House and the manner in which circa. 60% of the application site (including rooftop public garden) would be devoted to public realm are important, highly desirable features of the scheme.

Criterion (ii): Is located at a point of landmark significance

108. For the purposes of saved policy 3.20, the Southwark Plan defines a 'point of landmark significance' as '*where a number of important routes converge, where there*

is a concentration of activity and which is or will be the focus of views from several directions. Furthermore, SPD 17 of the Elephant and Castle SPD details the key locational criteria for building heights within the Opportunity Area. Tall buildings will help signal the regeneration of the area where tall buildings should act as focal points in views along main roads to strengthen gateways into the central area. At the confluence of a number of important routes at the centre of the Elephant and Castle as well as the focus of many views, the application site fully complies with the locational criteria set out in the SPD and saved policy 3.20. As such, it is a highly appropriate location for tall buildings.

109. In determining height, an important consideration is the LVMF view 23A.1 from the Serpentine Bridge in Hyde Park to the Palace of Westminster. The southern part of the site is within the geometrically defined backdrop of this view which should be protected. This necessitates that buildings on the site within the protected vista have to stay below the threshold of around 65m. The tallest element of the proposal has therefore been sited on the north-western corner which is outside the backdrop of the protected vista. The impact of the development on townscape and protected views is discussed in detail elsewhere in this report.

Criterion (iii): Is of the highest architectural standard

110. Buildings of the height and scale proposed must demonstrate their contribution towards the appearance of the wider area. The highest architectural standard is needed, requiring an elegance of proportion, innovation in design, and a demonstrable exemplary standard of accommodation.
111. The main challenge for the proposal has been to break down the bulk of the development into a series of buildings. This has been done successfully with the use of a confident triangulated geometry and variety in the height to each triangular extrusion. This has transformed the design from what could have been a large monolithic mass into a highly articulated block that will be experienced differently as one travels around it in the area.

Active base of the buildings

112. The base of the buildings will interact directly with the street and hence it is important that the buildings are designed to ensure that active uses predominate. The base is also an important element of the composition of any tall building and plays a key role in 'grounding' the building. It is important that the base is appropriately proportioned, active all round, and legible with clear addresses for each of its distinctive land use functions.
113. A number of revisions to the scheme have been made which include relocating the cultural space and fitness use to the ground floor which gives greater visibility and prominence to these uses and helps better activate the frontages on all sides of the development. The detailed design of the scheme has also developed to make the active base an integral part of the buildings while ensuring it is well defined through large double height glazed retail spaces.

Materiality

114. Two different finishes are proposed for the façade of each triangular extrusion. In the main, the buildings are clad in a stone-like vertical ribbed design with the ribs angled and sculpted into fins as they rise to accommodate the range of uses including balconies, windows and rooftop gardens. Such a design gives the extrusions an elegant soaring verticality as well as a complex texture and articulation that will reveal itself as one gets closer to the buildings. On the exposed 'prow-like' edges of the

triangular extrusions, the façade opens up to become a frameless glazed slot that not only breaks up the form, but also creates special spaces (i.e. winter gardens and spectacular angled views). Subtle variations in the colour of the ribs gives each building its distinctive character and ranges from darker hues to the lower commercial blocks lighter hues in the residential towers.

115. The proposed façade design uses a reconstituted stone vertical ribbed design with glass infill to form the main cladding of the towers. Within the simple palette, the design of the façade is proposed to be highly articulated with ribs that turn into vertical fins which begin as perpendicular to the façade at the base, then twist through 90 degrees at the offices and again through 90 degrees at the residential upper floors. This subtle twist in the ribbed design has been used by designers to accommodate features such as balconies and rooftop gardens which give the buildings an elegant crown-like finish. The subtle change in the colouration of the reconstituted stone fins distinguishes each extruded tower from the other and reflects their function. Darker tones are proposed for the commercial buildings facing onto the peninsula and lighter tones for the residential towers behind. In this way, the buildings won't be dominated by glass facades but rather have a strong textural character that reflects their urban setting.

Tower top

116. The top of the tower is an important feature of a building. This is not simply to give it a distinctive capping but also to demonstrate how it would appear in the views. Similar to The Shard, this proposal attempts to mark the top of the tower with a crown of angled glass planes between vertical fins.
117. In summary, officers are satisfied that the proposal is of the highest architectural standard and fully complies with this aspect of the policy. Ultimately, the quality will however rely heavily on the choice of cladding materials and the architectural detailing which must demonstrate how the sculpted residential fins, the public roof-top garden and other amenity outdoor terraces and winter gardens, the cultural venue, the active edges, including the double height shops and entrance lobbies will be constructed. Officers therefore recommend that these details are reserved by condition requiring: full scale mock-ups of typical bays within the commercial and residential towers; samples of all cladding materials presented on site; and 1:5/1:10 and 1:20 scale architectural details of the construction drawings.

Criterion (iv): Relates well to its surroundings, particularly at street level

118. In terms of its contribution to the street scene, the proposal considers all four flanks and seeks to activate all its street frontages as well as activate the re-instated Skipton Street. This would significantly enhance the degree of pedestrian activity and natural surveillance to the surrounding public realm.
119. When the Design Review Panel (DRP) reviewed earlier iterations of the scheme, the panel raised concerns about the depth of the ribbed glazed design which could obscure oblique views of the development at its base. The panel asked for the design to be amended to ensure that the lower two or even three floors be considered as an active frontage avoiding obstructions to clear views of the glazed frontages. In addition, questions were raised about the then proposed deep recesses at the re-entrant corners of the scheme, particularly at ground level where these deep recesses could potentially feel unsafe and/or prove difficult to keep clean.
120. These matters have been addressed in the current proposal. The deep rib design has been changed at the lower two floors of the buildings to ensure clear views of the shop fronts and the recessed areas activated to ensure these benefit from natural

surveillance.

Criterion (v): Contributes positively to the London skyline as a whole consolidating a cluster within the skyline or providing a key focus within views

121. Part of the site is located in the background wider setting consultation area of the protected vista of the Palace of Westminster World Heritage Site (WHS) in Townscape View 23A.1 from the Serpentine Bridge in Hyde Park, as identified in the LVMF SPG 2012 which relates to the management of important London views. The proposed development would also be potentially visible in a number of London panoramas.
122. In respect of LVMF View 23A.1, the LVMF SPG states: *Development in the background of the view should not undermine the relationship between the predominantly parkland landscape composition in the foreground and the landmark buildings at the focus of the view in the middle ground (including the Palace of Westminster and Westminster Abbey). New buildings in the background of the view must be subordinate to the World Heritage Site.' Further, 'Buildings that exceed the threshold plane of the Wider Setting Consultation Area in the background should preserve or enhance the viewer's ability to recognise and appreciate the Palace of Westminster.'*
123. The potential impact on townscape and views has been considered in a Townscape, Built Heritage and Visual Impact Assessment which forms volume 2 of the ES. This details the long-term impact of the proposal on 32 viewing locations (agreed with the local planning authority). The proposal has also been considered in relation to its cumulative impact along with other tall buildings, including other significant committed developments, on the London skyline. A further three unverified views were also tested (from the Millennium Bridge and Camberwell Road) to ensure that where it was predicted that the impacts of the proposal would be negligible, this was indeed the case.
124. The ES demonstrates that the proposed development would not intrude into the strategic vista and would not exceed the threshold plane of the Wider Setting Consultation Area in the background. The detailed visualisations submitted chart the dynamic view of the World Heritage Site from the northern end of the Serpentine Bridge to the south. These have been provided in addition to the strategic view which is at the centre of the bridge. These additional dynamic views demonstrate that the proposal will be visible at certain locations on the bridge over the canopy of the trees surrounding the lake but always remains outside the defined strategic vista.
125. In this location, the viewer would be able to see the angled 'crown' of the top-most 4/5 storeys of the development over the trees and may be able to discern the simple ribbed design and glazed filigree of the roof-top gardens. While this would be the closest incursion into the view from this northern edge, it is considered that this would not affect the viewer's ability to recognise and appreciate the Outstanding Universal Value (OUV) of the Westminster WHS which remains separated from the proposed tower by the existing tree canopy. The height of the proposal has been carefully designed to ensure it does not exceed the visual height of the Victoria Tower from this location. The design of the crown would be angled to echo the form of the tree canopy to ensure it remains subservient to the Westminster WHS. In addition, from this location, a number of modern buildings are visible over the tree canopy in the near, middle and distant backdrop. However, they do not detract from the parkland enclosure and Serpentine Lake which dominate the setting and this proposal, being nearly 5 km away from this view, is unlikely to affect that experience.
126. Officers consider that the views of city-wide importance in the ES, including those

from the LVMF, show the proposal to have a minimal impact and one that is very much subordinate to heritage assets including Hyde Park, the Serpentine, and the Palace of Westminster World Heritage Site.

127. Historic England have however raised an objection to the impact of the proposal on the LVMF view from the Serpentine Bridge stating that in their opinion the proposed tower would harm the significance of the listed buildings within the Westminster WHS by reducing their visual primacy. Furthermore, they suggest that the tower would have a harmful impact upon the setting of the nearby heritage assets, particularly from West Square and Trinity Church Square Conservation Areas. As such, they consider the cumulative impact of the proposal on the historic environment causes harm that has not been justified.
128. The Twentieth Century Society has also objected to the proposal, raising concerns about the impact on Metro Central Heights (Grade II listed). The society consider that the proposal would cause significant harm to the architectural significance of Metro Central Heights due to its height, design and massing. In particular, the long distant views show the proposed development to appear as an extension to Metro Central Heights, thereby diminishing its landmark status and visually competing and overwhelming the building.
129. For the reasons mentioned above, officers are satisfied that the proposal does not affect the viewer's ability to recognise and appreciate the Westminster WHS or its OUV. The tallest element of the development is located well outside the strategic vista of the protected view and is set at a height that ensures it would remain subservient to the Westminster WHS. Its angled silhouette and distance (some 5 km or 3 miles when viewed from the Serpentine Bridge) would further ensure it would be deferential to the WHS.
130. The long distance view of Metro Central Heights raised by the Twentieth Century Society is from within the Rockingham Estate. This is not a special or protected view, rather it is an incidental view and shown in a worst case scenario (i.e. only part of Metro Central Heights is visible). In this view, the proposed new development clearly distinguishes itself from Metro Central Heights. Its glassy character, different geometry and articulation serve to contrast with the listed building and therefore officers consider there is no harmful impact to Metro Central Heights.
131. With regard to the impact on the nearby conservation areas and other listed buildings, officers acknowledge that the top of the tower would be prominent in some local views from nearby conservation areas and the curtilage of listed buildings. However, where it is visible, the development is always in the distant backdrop and generally seen in conjunction with other significant buildings (including views of other committed developments) which cumulatively contribute positively to the urban setting of these important heritage assets. As such, officers consider that the effect on local views would range from negligible and, in some instances, would be beneficial.
132. In relation to any possible perceived harm to heritage assets, consideration must be given to the substantial public benefits that the proposal would deliver, including the creation of the new public route and enhancement of the surrounding public realm, the provision of a public roof-top garden and new cultural venue for the Elephant and Castle together with the new office space, employment opportunities and new housing. Taken together, these public benefits mean that, notwithstanding, the special regard which must be given to any perceived harm to the OUV of the WHS and other heritage assets due to the modest incursions into the wider view from the Serpentine Bridge or views out of nearby conservation areas, officers consider that the public interests of the development would significantly outweigh any perceived harm.

133. Historic England also requested that the council notify the Department of Culture, Media and Sport (DCMS) and referred to the World Heritage Sites Committee under section 172 of the UNESCO guidelines. Accordingly, the DCMS has been notified of the application but to date no response has been received. Westminster City Council has also not submitted comments on the application proposal.
134. The GLA confirmed that in response to the historic environment, the proposal provides an appropriate response to context and would not harm the character or setting of the conservation areas or listed buildings identified in the ES. Furthermore, they are satisfied that the proposal would not harm the OUV of the Westminster WHS when viewed from the Serpentine Bridge.
135. Royal Parks also raised objections to the scheme but in relation to its impact on St. James's Park. Firstly, that the new development would sit within the corridor of the protected vista at the Blue Bridge, St James's Park (view 26 of the London Plan). Secondly, the proposed height of the tallest element (146.30m AOD) would be 71.30m over the 75m AOD they accept as a maximum height for new developments at the distance from the park interiors. As such, Royal Parks deem the impact of the development to be unacceptable and an invasion of the protected vista and sky space of St. James's Park.
136. The applicant will be providing a view to demonstrate that the scheme will not be visible from the Blue Bridge within St. James's Park and this will be included in an addendum for planning committee. The LVMF SPG defines view 26 from St. James's Park to Horse Guards Road as a townscape view and does not include a protected vista. The SPG doesn't therefore define a protected height but the guidance does highlight that the view is sensitive to buildings that may appear in the backdrop. The view submitted will show that the proposal will not be visible in this important townscape view.

Relationship with adjacent Bakerloo line building

137. The configuration of the proposed development would allow pedestrian movement all the way around the station building with new public realm improvements proposed to the rear to encourage permeability through to the new Skipton Street. The GLA, while satisfied that the alignment of the proposed scheme responds well to the orientation of the existing station building, felt it raised some challenges in terms of delivering a coherent and activated piece of townscape in this location. In particular, the station building has a blank flank wall and poor quality rear elevation which could detract from the quality and function of this space.
138. The applicant is proposing to screen the blank façade of the station building in some way and this is being discussed with TfL. Such screening could be in the form of lighting or public art/living wall strategy. The GLA have agreed that this is an acceptable approach in principle and recommend that the details of the strategy are reserved by condition.

Comments of the Design Review Panel

139. Southwark's Design Review Panel reviewed earlier iterations of the scheme on two occasions (6 July and 16 November 2015). The Panel raised concerns about the significant bulk of the proposal, the singular architectural approach taken to the development and the detailed design of the ground floor. These concerns have been addressed in the application scheme with darker tones proposed for the commercial buildings fronting the peninsular and lighter shades proposed to the residential towers behind. More emphasis has been made of the active frontages that encircle the building with double-height shop fronts and entrance lobbies proposed at street level.

Finally, the proposed public access to the public roof top garden has been integrated into the design of the new Skipton Street frontage.

Impacts from demolition and construction

140. The likely significant impacts on townscape character and visual amenity would vary over time depending on the nature of the demolition and construction works. Such activities would have the greatest visual impact in the areas adjoining the site, including the setting of built heritage assets, and would reduce further away from the site. The impacts would however be short to medium term and temporary in nature.
141. Visual adverse impacts of short to medium term duration during the demolition and construction phases are inevitable on a scheme of this size and scale. It is however considered that given their nature and duration the adverse impacts are acceptable in order to secure the comprehensive redevelopment of this prominent site, thus contributing towards the regeneration of the Elephant and Castle.

Trees and landscaping

142. Saved policy 3.13 of the Southwark Plan requires a high quality streetscape and landscaping to be delivered. A detailed landscaping strategy has been submitted which proposes a significant amount of new public realm as well as residential amenity space.

Public realm

143. At ground floor level, a key feature of the proposal is the new public thoroughfare 'Skipton Street'. The street would be designed to cater for a range of activities with café terraces, informal seating areas, as well as a new cultural event space. The surrounding public realm on all the frontages would be enhanced through high quality paving and setts, new street lighting, street trees and planting, seating, and signage at key nodes around the site.
144. 12 existing trees would be removed to facilitate the development (2 x category B; 9 x category C; and 1 x category U) with 25 new trees proposed along the new Skipton Street as well as Ontario Street, Keyworth Street and Newington Causeway. Details of the tree planting on TfL and Southwark routes will need to be submitted for approval in consultation with the relevant highway authority. Should it not be technically feasible to provide the proposed new trees in the locations shown on the submitted landscaping plan, then the trees will be required to be provided elsewhere on the highway. Tree planting and other public realm improvements will be secured through s278 and s106 Agreements.
145. A further area of new public amenity would be the proposed roof-top public garden and viewing terrace created at Levels 14 and 15 of building B. The garden would be laid out with a variety of trees, planting and level changes and would offer the opportunity for panoramic views of London to the west. The garden would be accessed via two dedicated scenic lifts from Skipton Street with a platform lift connecting the main garden and lower viewing terrace. The roof-top garden would be a public facility with no admission fee or requirement to book in advance. The management arrangements for this space will be secured in the s106 legal agreement.

Amenity space

146. A series of roof-top landscaped amenity spaces would be provided across the development for future occupiers of the building. The terraces will include a variety of

multi-functional spaces which allow for areas of doorstep and incidental play opportunities as well as open and private terraced space. A dedicated landscaped amenity terrace (408 sqm) would be available for users of the office space.

Conclusion

147. Officers are satisfied that the details show a high quality landscape strategy but appropriate detailed design details for hard and soft landscaping, including the new areas of public realm, will be required in order to ensure the quality of the landscape aspired to. In particular, it will need to be demonstrated that sufficient soil volumes to sustain the proposed planting are provided.

Quality of residential accommodation

148. Saved policy 4.2 of the Southwark Plan asserts that planning permission will be granted provided the proposal achieves good quality living conditions, and includes high standards of accessibility, privacy and outlook, natural light, ventilation, space, safety and security, and protection from pollution. This policy is reinforced by the Residential Design Standards with Technical Update SPD (RDS 2015). Section 2.2 of the SPD sets out the criteria required to be met for high density schemes which include:

- Significantly exceed minimum floorspace standards (both flats and rooms)
- Provide for bulk storage
- Include a predominance of dual aspect units in the development
- Exceed the minimum ceiling height of 2.3 metres required by the building regulations
- Have natural light and ventilation in kitchens and bathrooms
- Exceed amenity space standards
- Meet good sunlight and daylight standards
- Have excellent accessibility within dwellings including meeting approved document M of the building regulations (M4(2) standard for all non wheelchair homes
- Minimise corridor lengths by having increased number of cores.

149. Internal unit sizes

| Unit | Overall unit sizes proposed (sqm) | SPD minimum sqm | Amenity space proposed sqm | SPD minimum sqm |
|-------------|--|--------------------------|-----------------------------------|------------------------|
| 1-bed | 50-70 | 50 | 3-10 | 10 |
| 2-bed | 64-99 | 61 (3p)/71 (4p) | 3-10 | 10 |
| 3-bed | 93-195 | 74 (4p)/ 85 (5p)/95 (6p) | 3-10 | 10 |

150. The proposed residential units would all equal or exceed minimum requirements set out in the council's RDS. The design of the proposed building results in many of the

residential units with irregularly shaped room layouts. However there will be an acceptable impact as a large proportion of these would significantly exceed the minimum floor space by over 10sqm.

Aspect and outlook

151. The applicants have suggested that the proposed development would provide 71% dual aspect units as this proportion of units will have windows facing in different directions. However this would not comply with the council's definition of dual aspect windows as it would include windows with the wedge shaped recess with windows inverted towards each other. Using the council's approach which would exclude these units the proposed development would provide 63% dual/triple aspect units and 37% single aspect units. There will be no single aspect north facing units. This would deliver a predominance of dual aspect units which is a key requirement of exemplary residential quality.

Privacy and overlooking

152. The RDS states that there should be a minimum distance of 12m at the front of the building and any elevation that fronts onto a highway and 21m between developments at the rear. The proposed buildings, in total, have five frontages. The frontages onto existing streets Ontario Street, Keyworth/Southwark Bridge Road, Newington Causeway and towards Elephant and Castle major junction all have sufficient distances away from neighbouring buildings to maintain privacy levels and ensure not significant levels of overlooking. Within Skipton Street there is a minimum distance of 19.2m between facing habitable rooms and 18m from the closest projecting balcony on block B to nearest habitable room in block A. The RDS states that there should be a minimum of 21m between developments at the rear. This distance is considered to be sufficient as the Skipton Street is effectively a frontage elevation for the units concerned. Therefore the 21m distance between rear habitable room windows does not apply.
153. The proposed building layout includes some wedge shaped recesses and projecting elements. Within building B on floors 8 - 13 there are office windows on facing residential windows across the wedge. To ensure that adequate levels of privacy are retained for prospective residents the office glazing in these areas will be translucent.

Internal daylight, sunlight and overshadowing

154. A daylight and sunlight report based on the Building Research Establishment (BRE) Guidance has been submitted which considers light to the proposed dwellings using the Average Daylight Factor (ADF). ADF determines the natural internal light or 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. This also adopts an ADF of 2% for shared open plan living room/kitchens/dining. The report has been updated to take into account the replacement of residential units on the seventh floor with office floor space.
155. The report advises that 93.9% of all habitable rooms will meet or exceed the levels of ADF recommended by the BRE. Of those that fail 55 are within building A (taller western block fronting Ontario Street) and 12 are within building B (lower eastern block fronting Newington Causeway). Of those which would not meet the requirement, they would achieve levels ranging from 0.5% to 1.6% for LKDs, 0.61% to 1.45% for living rooms, 1.31% to 1.53% for kitchens and 0.71% to 0.93% for bedrooms. The worst affected units are those in block A facing east towards block B.
156. The least well lit units within the development are three 1 bed units located on floors 8

- 10 of block A where the lowest ADF value of 0.5% for open plan living space occurs. These units have projecting balconies. The affected living rooms will have very low daylight distribution figures and a proposed VSC of 5.05. The shortfall occurs due to their situation facing east towards Skipton Street and block B, and the proposed inset balcony provided on the floor above. While the living rooms within the three affected units would not comply with the BRE guidelines the bedrooms do. In the context of the development as a whole and the quality of accommodation and daylight levels to almost all the units within the scheme this shortfall is considered acceptable.

157. There are no single aspect north facing residential units where sunlight levels would be a concern. The Daylight and Sunlight Report includes a section on Annual Probable Sunlight Hours (APSH) and concludes that 65 living rooms within block A and 6 within block B would fail recommended APSH. In most cases where the worst values are found this is as a result of units on lower floors facing into Skipton Street with living room windows situated below the inset balcony of the unit above. It is considered that the requirement to provide some outdoor amenity space for each unit and the benefits that this provides for prospective residents offsets the lower levels of sunlight to a small number of rooms within the development. The report concludes that in all other respects the proposed development performs very well on sunlight.

Amenity space

158. Section 3 of the Residential Design Standards SPD sets out the council's amenity space requirements for residential developments and states that all flat developments must meet the following minimum standards and seek to exceed these where possible:
- 50 sqm communal amenity space per development
 - For units containing three or more bedrooms, 10 sqm of private amenity space
 - For units containing two or less bedrooms, 10 sqm of private amenity space should ideally be provided. Where it is not possible to provide 10 sqm of private amenity space, as much space as possible should be provided as private amenity space, with the remaining amount added towards the communal amenity space requirement
 - Balconies, terraces and roof gardens must be a minimum of 3 sqm to count towards private amenity space.
159. The proposed development would provide 408 residential units. The development should therefore provide a minimum of 4130sqm of amenity space. All of the residential units have private amenity space in the form of balconies or roof terraces ranging in size from 3sqm to 112sqm. The total shortfall of amenity space is calculated by the total amount of amenity space by which each unit falls short of 10sqm. This calculation gives a shortfall of 660.3sqm within block A and 280.5sqm within block B. This shortfall and the requirement for a minimum of 50sqm of amenity space would be offset by the provision of 989.33sqm of communal roof terraces in block A 711.98sqm of communal roof terraces within block B. The level of amenity space provision represents a provision well in excess of the minimum amenity requirement.
160. The communal roof terraces are spaces available for all residents and will be appropriately landscape as set out in the landscape section below. Access arrangements will be secured through the legal agreement with residents of each block being able to access all communal terraces within their respective residential blocks.

Child play space

161. The proposed development has a child yield of 38 children and child play space requirement of 380sqm. 230sqm of this is required for under-5s and 90sqm for 5 - 11 age groups. This will be provided on site. The communal gardens will provide a total of 590sqm of dedicated play space. A financial contribution has been agreed with regard to the provision of play space for over 12s which cannot be accommodated on site.

Conclusion on residential quality

162. The proposed development provides accommodation that in the majority is considered to be of an exemplary standard. Of particular note is:
- The proportion of over-sized units
 - The quality and size of private and communal amenity space which is south facing and would receive good levels of daylight and sunlight
 - The predominance of dual aspect units with no single aspect north facing units
 - The limited number of units access from each core.

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

163. 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.
164. A development of the size and scale proposed will clearly have potential significant impacts on the amenities and quality of life of occupiers of properties both adjoining and in the vicinity of the site. The proposal has required an EIA in order to ascertain the likely associated environmental impacts and how these impacts can be mitigated. The accompanying ES and ES addendum deals with the substantive issues raised by local residents. An assessment then needs to be made as to whether the residual impacts, following mitigation, would amount to such significant harm as to justify the refusal of planning permission.

Outlook and privacy of neighbouring properties

165. Paragraph 2.8 of the residential design standards SPD states that a minimum separation distance of 12m should be secured at the front of the building and any elevation which fronts onto a highway, to ensure that there will be no detrimental impact in terms of loss of privacy and outlook. The SPD states that where the minimum distances cannot be met, the applicants must provide justification through the design and access statement.
166. The site is bounded by roads on all elevations. The nearest residential uses will be those situated within the Eileen House development currently under construction to the north on the opposite side of Southwark Bridge Road. The proposed development

would be 25m at its closest point to the Eileen House development. The other neighbouring residential developments at Metro Central Heights are situated over 40m away while Perronet House on the opposite side of London Road is 48m from the nearest windows of the proposed development. The proposed elevations are situated closer to neighbouring buildings to the north west on Ontario Street and north east on Keyworth Street. At the closest point they are 12.17m and 11.8m apart respectively. However as these neighbouring buildings are not in residential use the issue of harm to residential amenity does not arise.

167. The proposed development exceeds all the minimum distances set out in the council's Residential Design Standards. The development is considered to be appropriately situated away from neighbouring residential windows so as to maintain acceptable levels of outlook and privacy for neighbouring residents.

Impact on daylight received by neighbours

168. An assessment of the likely significant impacts of the development on daylight and sunlight is contained in the ES. Local residents have expressed concern that the proposed development will have a negative impact in terms of daylight and sunlight to neighbouring properties. The impacts on levels of daylight received by neighbouring properties have been assessed in line with best practice guidance produced by the Building Research Establishment (BRE). The report prepared by Delva Patman Redler, which forms part of the ES, uses three methods to assess the impact of the proposed development on neighbours: the Vertical Sky Component (VSC) test and the No Sky Line (NSL) or Daylight Distribution analysis and Average Daylight Factor (ADF).
169. The BRE Guidance (2011) 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 to match the height and proportion of existing buildings. Elephant and Castle town centre has been identified as an area where tall buildings are appropriate and there are existing buildings or those under construction with heights of 18 storeys (Metro Central Heights), 22 storeys (Signal Building) and 42 storeys (Eileen House), within close proximity to the site.
170. The VSC test considers the angle of visible sky that falls on a window taking account of local obstructions. The BRE sets out that a 27% VSC indicates a good level of daylight. Further, the guidance advises that if a proposed development results in the VSC of neighbouring buildings falling by more than 20% this would result in a noticeable impact, with a breakdown as follows:

| | |
|-------------|------------|
| 0 - 20% | Negligible |
| 20 - 29.99% | Minor |
| 30 - 39.99% | Moderate |
| 40% + | Major |

171. This is supplemented by the NSL or Daylight Distribution method, a simple test that considers the proportion of a room from which the sky is visible. Again, if a 20% reduction occurs then this would indicate a noticeable impact as a result of the development.
172. The ADF test is a measure of the actual likely natural diffuse daylight in a room taking account of various matters influencing this such as the reflectivity of surfaces and the glazing in the window. This can only be used to assess the impact on daylight to neighbouring windows where the layouts and windows sizes of neighbouring

properties are known. In this case it is possible to use this to assess the impact on the residential units of Eileen House as the building is currently under construction and there are detailed plans showing the layout of each floor. A room may be adversely affected if the ADF is less than 1% for a bedroom, 1.5% for a living room or 2% for a kitchen. The daylight and sunlight analysis also includes ADF results for all neighbouring buildings. These results are based assumptions of neighbouring layouts made from sales particulars for units based within those buildings. As these do not provide accurate layouts for every unit within these buildings there could be some variation as to the room the window serves and the assumptions of the ADF results.

173. In considering the impact upon sunlight, the test is based upon a calculation of annual probable sunlight hours (APSH) for all window faces within 90 degree of due south. BRE guidelines require that a window should receive a minimum of 25% of the annual probable sunlight hours, of which, 5% should be received in winter months. Where window sunlight levels fall below this recommendation, the window should not lose more than a 20% loss of its former value.

174. The report considers the impact on the following neighbours:

- Eileen House development (consented scheme)
- Metro Central Heights north building
- Metro Central Heights south building
- Metro Central Heights west building
- Metro Central Heights east building
- Metro Central Heights vantage building
- Elephant and Castle public house
- Perronet House
- 1 - 19 Princess Street (odds)
- 8 - 22- Gaywood Street (evens)
- Gaywood housing estate
- Laurie House.

Vertical sky component

175. Number of rooms experiencing daylight impacts as a result of the development (VSC method) per property

| Property | No. of windows tested | No. retaining at least 80% of their baseline value | No. with minor adverse impact of up to 29.99% reduction in VSC | No. with moderate adverse impact of between 30% - 39.99% reduction in VSC | No. with major adverse impact of over 40% reduction in VSC |
|----------|-----------------------|--|--|---|--|
| | | | | | |

| | | | | | |
|-----------------------------|-----|-----|----|----|-----------|
| Eileen House | 410 | 259 | 46 | 30 | 75 |
| MCH north | 136 | 6 | 41 | 31 | 58 |
| MCH south | 159 | 156 | 3 | 0 | 0 |
| MCH west | 154 | 60 | 43 | 33 | 18 |
| MCH east | 77 | 77 | 0 | 0 | 0 |
| MCH Vantage House | 113 | 113 | 0 | 0 | 0 |
| Elephant and Castel PH | 31 | 29 | 2 | 0 | 0 |
| Perronet House | 177 | 127 | 37 | 9 | 4 |
| 11-19 Princess Street (odd) | 21 | 16 | 5 | 0 | 0 |
| 8-22 Gaywood Street (even) | 48 | 45 | 3 | 0 | 0 |
| Gaywood Housing Estate | 76 | 35 | 33 | 7 | 1 |
| Laurie House | 35 | 35 | 0 | 0 | 0 |

176. Number of rooms experiencing daylight impacts as a result of the development (NSL method) per property

| Property | No. of windows tested | No. retaining at least 80% of their baseline value | No. with minor adverse impact of up to 29.99% | No. with moderate adverse impact of between 30% - 39.99% | No. with major adverse impact of over 40% reduction |
|--------------|-----------------------|--|---|--|---|
| Eileen House | 410 | 379 | 3 | 2 | 26 |

| | | | | | |
|-----------------------------|-----|-----|---|---|----------|
| MCH north | 136 | 116 | 7 | 5 | 8 |
| MCH south | 159 | 159 | 0 | 0 | 0 |
| MCH west | 154 | 154 | 0 | 0 | 0 |
| MCH east | 77 | 77 | 0 | 0 | 0 |
| MCH Vantage House | 113 | 113 | 0 | 0 | 0 |
| Elephant and Castle PH | 31 | 29 | 1 | 0 | 1 |
| Perronet House | 177 | 177 | 0 | 0 | 0 |
| 11-19 Princess Street (odd) | 21 | 19 | 1 | 0 | 1 |
| 8-22 Gaywood Street (even) | 48 | 46 | 2 | 0 | 0 |
| Gaywood Housing Estate | 76 | 71 | 0 | 0 | 5 |
| Laurie House | 35 | 35 | 0 | 0 | 0 |

Eileen House

177. This building is situated directly north of the site with windows facing directly towards the proposed development. As can be seen from the tables above there will be a considerable number of rooms on the south side of the development which will be affected by loss of daylight. The layout of this development is such that there is a single aspect south facing 1-bed unit on each floor from 3rd floor to the 30th floor. Each of these units has an inset balcony which is situated directly above the windows of the same unit below. This unit is referred to as Unit 2 within the daylight and sunlight report. This level of loss of daylight is regrettable but it is partly a result of the layout of the Eileen House development which includes 26 single aspect south facing one bedroom units with splayed projecting balconies.
178. On VSC 151 rooms out of 410 tested will experience reductions of more than 20% above baseline. Of these 31 would experience a loss of daylight over 20% below the baseline in terms of NSL. The Daylight and Sunlight analysis identifies the rooms with a major adverse impact as those experiencing over 40% reduction below baseline. These rooms are all bedrooms within the single aspect, south facing, one bedroom

units.

179. The rooms have also been tested for impact on ADF using the approved unit layouts from the consented scheme (09/AP/0343). From the three tests there are 28 rooms out of 410 that fall short of BRE criteria for each of the three tests. 23 of these are bedrooms in flat 2 on floors 3 to 26 and a bedroom in unit 6 on floors 3 to 5. These failures are due to the presence of splayed balcony situated directly above the windows of flat 2 and the small size of window and existing low levels of light through to the bedroom window of flat 6. Therefore the scale of the impact on these windows while regrettable is not sufficient to outweigh the positive aspects that the proposed development would provide.

Metro Central Heights North

180. Within Metro Central Heights north block 136 rooms were assessed. A total of 20 rooms would fail the criteria for acceptable impact on both VSC and NSL. Of these 10 are identified as kitchens, 5 are identified as bedrooms and 5 as living rooms. The rooms which fail are predominantly located below existing projecting balconies or are situated in south east corner where daylight levels are already low so that even a small reduction results in large percentage fall. Each of these units has been assessed in relation to ADF based on internal layouts received from sales particulars. This analysis shows that only three of these rooms would fail ADF test (1 bedroom, 1 kitchen and 1 living room). This level of impact is not to the same extent as that at Eileen House and while there will be some moderate loss of light to these units it will not outweigh the benefits of the proposed development.

Metro Central Heights south

181. There is negligible impact on daylight levels to MCH south block. 3 rooms out of 159 tested would experience reductions of more than 20% above baseline for VSC while none of the rooms would experience NSL reductions within 20% of baseline.

Metro Central Heights west

182. 154 rooms were assessed for impacts on daylight levels. 60 of these would experience reductions of more than 20% above baseline in terms of VSC while none of the rooms would experience NSL reductions within 20% of baseline. There will be a negligible impact in terms of daylight on rooms within this block.

Metro Central Heights east block and Vantage building

183. 190 rooms have been tested in these two blocks and it is found to be fully compliant with BRE guidelines with no detrimental impact in terms of VSC and NSL.

Elephant and Castle public house

184. 31 rooms were tested. One room situated on the first floor would experience more than 20% reduction in VSC and NSL. In this instance the room is a bedroom and experiences an existing VSC of 7.27 which would fall to 5.14 following the proposed development. This reduction would not result in a significant perceived reduction in daylight from the existing situation.

Gaywood Housing Estate London Road

185. This building is situated to the south west of the site on London Road. 76 rooms were tested and 5 of these would experience a 20% reduction from baseline in terms of VSC and NSL. Four of these are bedrooms located on ground to third floor directly

adjacent to a projecting four storey element on the same building while the other is a bedroom window at the third floor which is smaller than others on the floors below. The impact is not considered to be significant.

Perronet House

186. 177 rooms were tested. 50 rooms would experience a reduction of 20% VSC over baseline figures. However when these rooms were tested against NSL they would have an impact within 20% of baseline figure. The impact on these units is considered to be negligible. The proposed development is expected to have an acceptable impact on the residential units in Perronet House.

Princess Street

187. 3 rooms from 21 tested would experience a 20% reduction from baseline in terms of VSC and NSL. Two of these rooms are bedrooms and the other is a bedroom. It should be noted that all of these rooms are shown to retain acceptable ADF levels.

Gaywood Street and Gaywood Housing Estate

188. All the rooms tested on this street are considered to have acceptable daylight impacts.

Conclusion on daylight

189. The daylight analysis submitted within the Daylight and Sunlight Report demonstrates that the proposed development will have a noticeable impact on the daylight levels through to some rooms of neighbouring properties, predominantly within Eileen House development and to the lower levels of Metro Central Heights north block. Within Eileen House it is the same one bed unit affected on floors 3 to 26 with the bedroom worst affected. This situation arises as the units are single aspect south facing directly opposite the Skipton House Site and they also have projecting balconies situated directly above the bedroom windows. To ensure a fully compliant level of light for all these windows would significantly limit the development potential on the Skipton House site and would not allow a building of any significant height. The rooms affected on Metro Central Heights which have a noticeable impact on both VSC and NSL include 10 kitchens, 5 bedrooms and 5 living rooms. The impact is particularly bad to these rooms as a result of existing overhanging balconies or return elevations restricting the sky visibility.

Impact on sunlight received by neighbours

190. The impact of the scheme on sunlight to neighbouring properties has been assessed using the Annual Probable Sunlight Hours (APSH) test. The test follows the same methodology that is outlined above for VSC, with guidance advising that if a reduction in sunlight is 20% or less of its original value then the retained sunlight received is adequate. Only rooms with windows facing within 90 degrees of due south are assessed.
191. 433 neighbouring rooms are served by windows which have been identified as sensitive receptors and habitable rooms that have a southern orientation and qualify for sunlight analysis. The results of this are summarised below.

192. Number of rooms experiencing sunlight impacts as a result of the development (APSH method) per property

| Property | No. of windows tested | No. retaining at least 80% of their baseline value | No. with minor adverse impact of up to 29.99% | No. with moderate adverse impact of between 30% - 39.99% | No. with major adverse impact of over 40% reduction |
|-----------------------------|-----------------------|--|---|--|---|
| Eileen House | 84 | 34 | 0 | 0 | 50 |
| MCH north | 69 | 30 | 7 | 12 | 20 |
| MCH south | 66 | 66 | 0 | 0 | 0 |
| MCH west | 47 | 45 | 2 | 0 | 0 |
| MCH east | 44 | 44 | 0 | 0 | 0 |
| MCH Vantage House | 62 | 62 | 0 | 0 | 0 |
| Elephant and Castle PH | 22 | 22 | 0 | 0 | 0 |
| 11-19 Princess Street (odd) | 15 | 14 | 1 | 0 | 0 |
| Gaywood Housing Estate | 4 | 4 | 0 | 0 | 0 |
| Laurie House | 20 | 20 | 0 | 0 | 0 |

193. The above table demonstrates that there will be a total 92 rooms that will experience a reduction of over 20% above baseline in terms of Annual Probable Sunlight Hours. 70 of these will experience a major adverse impact (a reduction of 40%+ below baseline) and these are situated in Eileen House (50) and Metro Central Heights north block (20), There are a further 12 rooms with moderate impacts in MCH north block and 10 rooms with minor adverse impact within MCH north block (7), MCH west block (2) and at 19 Princess Street (1).

194. The windows principally affected on Eileen House are south facing windows which serve the living rooms of just two flats out of nine on each floor. These rooms are largely affected by being situated below a deep projecting balcony on the floor above. The windows principally affected in Metro Central Heights are those that open out onto an inset balcony or are situated below or beside a projecting element of the existing building. In addition to this the windows on MCH north block have an orientation just below the east west line which results in the having very low baseline

APSH figures.

195. Therefore while these units will experience a decline in annual probable sunlight hours it should be noted that these are predominantly as a result of the design of their respective buildings and when considered in the context of the wider benefits of the development and the location within Central Activities Zone (where development should be optimised), it is recommended that the impacts be noted but that on balance permission should be granted.

Noise and vibration (construction/operational impacts)

196. The noise and vibration impacts from the site would be highest during the demolition of the existing buildings and substructure works (which would include excavation and piling works) and lowest during the internal fit out and landscaping. Traffic noise from construction would increase noise levels, particularly along Southwark Bridge Road and Newington Causeway. A Construction Environmental Management Plan (CEMP) would be prepared to reduce excessive noise as far as is possible. The noise impacts from demolition and construction would be temporary in nature and it is not envisaged that any long term disturbance would be caused.
197. There would be an increase in the number of residents, visitors and workers as a result of the new homes, retail and cultural attractions and new offices. However, it is unlikely that there would be any demonstrable harm caused to residential amenities from their comings and goings. The site is located within a busy major town centre environment and adjacent to a busy transport hub where some noise should be expected.

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

Noise

198. The NPPF states that planning decisions should avoid noise from giving rise to significant adverse impacts on health and quality of life as a result of new development. It also states that planning decisions should recognise that development will often create some noise and existing business wanting to develop in continuance of their business should not have unreasonable restrictions put on them because of changes in nearby land uses since they were established.
199. The nearest noise generating neighbour is the Ministry of Sound nightclub situated on Gaunt Street. The Ministry of Sound (MoS) have raised objection to the proposed development on the grounds that the proposed glazing system would be inadequate as it would fail to sufficiently attenuate low frequency sound within the proposed residential rooms. A report prepared by acoustic consultants, Vanguardia Consulting, on behalf of MoS, has been submitted to support the objection. This report suggests that the applicants have failed to consider the impact of noise and disturbance as a result of the Garden Party events that take place in the courtyard area during the summer months and that as a result the window specifications would not be sufficient to protect prospective residents from noise disturbance from the operation of the night club.
200. In order to respond to the issues raised by MoS, the applicant's acoustic consultants (ARUP) prepared a summary document which provides summary results of further analysis they have undertaken, compares the results to those of MoS's consultants, and details of how the designs have considered the Garden Party operations.
201. The noise survey submitted by the applicant with the planning application provides

guidance on the sound insulation measures that would be required for the facades such that appropriate internal noise levels can be met. This is not however an unusual scenario for a city location and while sound levels on balconies may cause annoyance to some residents, this must be balanced against the substantial benefit of private outdoor space and openable windows.

202. The council's Environmental Protection Officers have reviewed the relevant chapter of the Environmental Statement and both noise reports. They recommend that any residential rooms that could be affected by entertainment noise from the existing MoS be required to meet the same internal noise conditions that are required of neighbouring development as Eileen House. Accordingly appropriately worded conditions will be attached to ensure that the proposed development would be appropriately sound proofed to ensure that there will be no disturbance to prospective residents.

Transport issues

203. 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 (paragraph 34).
204. 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.
205. EACAAP SPD 14 states that a transport assessment is required for all major applications. This should detail the likely impact on all the transport networks, including walking, and demonstrate how development can mitigate those impacts.
206. An assessment of the likely significant environmental impacts of the development on transport is included within the ES. A framework Travel Plan and Service Management Plan have also been submitted. A technical transport note addendum was submitted during the course of the application to address comments raised by the GLA in the stage I report and from Southwark's Transport Planning Team.
207. The application site has excellent levels of public transport accessibility which is reflected in the PTAL rating of 6b which is the highest possible level. London Road, Elephant peninsula and a part of Newington Causeway all form part of the Transport for London Road Network (TLRN) where Transport for London is the Highway Authority. There is also a Cycle Super Highway (CS7) which crosses London Road and runs along Ontario Street onto Keyworth Street.

Vehicle trip movements

208. The existing building is currently fully occupied and in use and includes predominantly office floor space as well as London South Bank University Library and Keyworth Street Hostel. The current service vehicle demand is estimated at 46 vehicle two way trips. As the proposed development is car free the principal generators of traffic movement for the proposed development would be service vehicle traffic. The submitted transport assessment estimates that the site will generate around 137 two-way trips for deliveries and servicing.

209. The proposed development includes a servicing point accessed from Southwark Bridge Road within building block B. The servicing yard will contain 4 loading bays and a turntable to allow servicing vehicles to enter and exit the site in forward gear. Servicing vehicle movements have the potential to cause significant problems on the local road network particularly if this is not managed appropriately and vehicles back up onto surrounding road network. In order to avoid this issue occurring the applicants are proposing a servicing management plan that will involve a pre-booking system for the loading bays during the proposed servicing hours of 07:00 - 22:00 each day. This will limit servicing vehicle movements to and from the site to a maximum of 16 per hour and a level which will have an acceptable impact on local highway network. Further discussion on the servicing and access arrangements is set out in the relevant sections below.
210. Officers are satisfied that, subject to a comprehensive and robust delivery and servicing plan being secured, vehicular trip generation from the proposed development would not have a negative impact on traffic movements in the opportunity area.

Impacts on the public transport

211. The development site is located within immediate proximity to Elephant and Castle underground station and in close proximity to Elephant and Castle Network Rail system. The proposed development would result in an increase in the resident and working population in the local area leading to an increase in the number of journeys undertaken on the public transport network. The Transport Assessment concludes that there would be no adverse impact on public transport capacity.
212. TFL have noted that the proposed development would change the street presence of the Bakerloo line ticket hall and could have an impact on the operation of the current Bakerloo line ticket hall. The applicants have entered into dialogue with TFL to respond to this and have agreed to a section 106 obligation requiring the submission of a planning application for details of the Bakerloo line entrance façade works. TFL have also London Underground (LU) advice that the site is situated close to underground tunnels and infrastructure and therefore a condition is recommended to secure further details of foundations and basements to ensure there will be no impact on existing LU infrastructure.

Pedestrian and cycle movements

213. Elephant and Castle SPD policy 11 relates to walking and cycling within the action area. This states that among other matters proposed development should:
- Make pedestrian and cycle connections in the surrounding area
 - Link new and existing public and open spaces creating a network of space that act as a focus for activity and draw people through the area
 - Use existing and new landmarks and views to help direct pedestrians to key locations such as transport interchanges, public spaces and major roads, as well as provided good quality way finding signs that follow the principles of Legible London.
214. The proposed development would provide a new 24 hour accessible street in the form of 'Skipton Street' which would provide a pedestrian connection between the Elephant and Castle public transport interchange and the London South Bank University buildings to the north. The introduction of this new pedestrian route will significantly improve permeability through the area while the proposed active uses at the ground

floor level will provide increased informal surveillance for pedestrians using the area. The applicants have also agreed to a s106 contribution towards 'Legible London' signage.

215. Cycle Super Highway 7 (CS7) runs immediately west and north of the site along Ontario Street and Keyworth Street onto Southwark Bridge Road. This route provides a link from Merton to the City via Clapham Road, Kennington Park Road and across Southwark Bridge. There is also a London Cycle Hire docking station on Ontario Street which currently provides 15 docking stations.
216. The proposed development would result in an increase in cycle movements to and from the site particularly within peak hours. The increase in movements is predominantly associated with the increase in office space within the new development. The applicants have agreed to a s106 contribution of £200,000 towards the construction of a new cycle hire docking system with approximately 34 docking points as well as providing sufficient cycle storage and changing facilities.
217. It is considered that the proposed development will result in significant improvements for pedestrian movements around the and through the site and into the wider Elephant and Castle Opportunity Area. In addition to this the removal of vehicular and servicing traffic from Ontario Street and Keyworth Street should improve cycle movements around the site while the contribution towards extension of cycle hire docking station will help mitigate any increased demand for public transport while improving cycle facilities within the opportunity area.

Access

218. A new vehicular access will be provided from Southwark Bridge Road adjacent to the junction with Newington Causeway. This is recognised as the least problematic location for an access point to the site given that both London Road and Newington Causeway form part of the TLRN and Ontario Street and Keyworth Street contain important cycle infrastructure. The existing site access from Ontario Street will be removed and Ontario Street will effectively become closed to vehicular traffic.
219. This allows for servicing vehicles to access the site from a left turn from Newington Causeway. Servicing vehicles leaving the site would have to turn right onto Southwark Bridge Road and then onto Newington Causeway. The existing traffic signals at the junction of Southwark Bridge Road will have to be altered to allow access onto Newington Causeway from the site. Whether this is in the form of a left turn or right turn onto Newington Causeway will require further work to assess the impact on signal timings and the potential impact of northbound trips on existing road network around Elephant and Castle. Details of this will be secured through an appropriately worded condition/section 278 clause.

Car parking

220. The proposed development would be a car free development with no parking provision. This is considered suitable given the very high level of public transport accessibility in the local area as well as the mixed use nature of the development in proximity to services and amenities within Elephant and Castle town centre.
221. The proposed development would also not provide any disabled parking on site. TFL have noted the lack of disabled parking is contrary to London Plan requirements. However it is considered that this is appropriate given the excellent public transport accessibility in the surrounding area (PTAL 6b) and the improvements, already delivered and further proposed, to pedestrian routes to public transport nodes and other amenities in the Opportunity Area. In addition to this the only appropriate on site

location for additional parking would be at the basement level which would have subsequent implications in terms of viability and design at the ground floor level.

Cycle parking

222. Given the car-free aspect of the development and its location on the apex of existing and planned strategic cycle routes, officers have asked that the cycle parking facilities should be an exemplar for development in London. The development proposes 1221 long stay spaces and 52 short stay spaces which are calculated according to London Plan standards. The 1273 spaces proposed are to be accommodated within the basement accessed via a ramp from Ontario Street which will be largely restricted to pedestrians and cyclists.
223. The proposed development would provide dedicated shower and changing facilities, with lockers for officer workers arriving by cycle. A dedicated lift to bring cyclists to Skipton Street is proposed although its location adjacent to a refuse area for office waste is not ideal.
224. Officers have sought further clarity on the submitted information on cycle parking included a scaled plan showing the proposed cycle parking locations, the type of stands proposed to be used and the spaces between the stands. The applicants have provided this and the details are considered to be sufficient.

Refuse and servicing

225. As noted above the limited space and complex location within the immediate proximity of the site to the busy Elephant and Castle roundabout and underground station, a busy bus corridor on Newington Causeway and CS7 on Ontario Street the only feasible location for the delivery and servicing access point is on the north-east corner of the site. The size of this is limited to four loading bays with access to these from a turntable. The mixed-use nature of the development, high pedestrian and cycle activity, and the site's obvious constraints means that a high level of service and waste management is needed and scheduling of slots needs to be robust to ensure that there will be servicing vehicles backing up onto Newington Causeway.
226. The scale of the uses proposed will require daily refuse and recycling collection. The location of the proposed bin stores adjacent to the cores in each building is appropriate and would provide sufficient space for the Eurobins required. However considerable manoeuvring will be necessitated to execute all refuse collection. The logistics for managing the waste collection are complex and would require a high degree of co-ordination and robust management.
227. As other loading bays will be required for storage of bins ahead of collection the servicing area will be closed to all other deliveries and servicing during waste collection. The applicants have assessed similar operations and are confident that such an operation could be carried out within one hour but have confirmed that 90 minutes will be allocated each day to ensure that there is sufficient resilience within the daily schedule.
228. The turntable provided to turn vehicles so that they can safely enter and exit the site in forward gear will require a high level of continuous maintenance as breakdowns are possible. Consequently the on-going maintenance of the turntable will need to be addressed within the detailed servicing plan.
229. The transport assessment identifies a total of 23 residential deliveries a day which is considered to be an under-estimate. Such deliveries are to be centralised into the loading area and transferred to the relevant residential core by the service yard

manager. This is acceptable although there is some concern that this may conflict with the delivery arrangements for the other uses. In addition there is concern that home deliveries may be less certain to follow the booking system.

230. The transport assessment does not detail how this will be managed and what measures will be in place to ensure there is no on street impact should one or two home deliveries arrive at the same time as the loading area is busy. This is particularly pertinent with stresses already in place at the junction with Newington Causeway and CSH 7.
231. It is recommended that any approval will be conditional on the submission and approval of a detailed Delivery and Servicing Plan (DSP) to include an annual review mechanism. The first review should take place 6 months after occupation of the development and be reviewed thereafter on an annual basis. All costs associated with the DSP formation, review and any remedial or reconfiguration works to the site or highway (if needed) will be borne by the developer.
232. To reduce the risk of vehicles waiting and potentially blocking the footway and highway space on Southwark Bridge Road, it is recommended that a planning condition or s106 legal agreement to prevent vehicles parking, loading or waiting on the adjoining streets to the development is required.
233. There is a concern that vehicles could back up and be waiting across the junction with Southwark Bridge Road and Newington Causeway. This would have significant impacts on bus journey times and the safety of cyclists using Newington Causeway. It is therefore advised that this junction should be marked with a yellow hashed box that prevents any vehicle waiting in the junction and this should be an obligation within the legal agreement.
234. The Transport Assessment and DSP suggest that the site will be serviced by 10m trucks and smaller vans. The proposed turntable has a diameter of 9m and can support a vehicle of maximum of 10m in length with overhang. A condition to restrict the size of the vehicles servicing the development to 10m is considered appropriate.

Travel plan

235. A framework travel plan has been submitted by the applicants. The design, nature location and layout of the development generally favours sustainable travel by occupants, workers and visitors to the site. A more detailed and robust Travel Plan (incorporating deliveries and servicing) will be required and secured by s106 agreement.
236. Most of the vehicle movements will be associated with deliveries and servicing of the development. The Travel Plan must be delivered in conjunction with delivery, servicing and waste management arrangements. The plan should look to reduce vehicular movements to the site e.g. methods and incentives to reduce the overall trips to the site, use of cargo bikes to replace smaller motorised transport trips. Reviews will be required after the initial 6 months of occupation and on an annual basis thereafter. Other measures for the occupants of the development will include 3 years membership of a council approved.

Demolition and construction traffic impacts

237. The applicants have submitted a Construction and Development Programme within the Environmental Statement and a draft Construction Logistics Plan (CLP) in the Transport Assessment. The applicants envisage that construction will take place in a single phase over 45 months encompassing demolition and construction to

completion. The demolition is scheduled to run for 8 to 9 months and construction is anticipated to be approximately 36 months. The access to the site would be from Southwark Bridge Road at the junction of Keyworth Street, with vehicles accessing the site from Newington Causeway. In order to secure this access it will be necessary to re-locate the existing bus stop.

238. There are no detailed figures of vehicular movements during construction, as these will not be finalised until the appointment of the principal contractor. A draft Construction Logistics Plan has been provided and this anticipates that approximately 18 - 30 two-way vehicle movements per day during demolition, 40 - 60 during construction of sub and superstructure and 15 - 25 during fit out. More robust information will be provided following appointment of the principal contractor and will be presented in the Construction Environment Management Plan and CLP prepared prior to construction.

Conclusion on transport matters

239. The proposed development provides a level of development that would generate significant movement and therefore is located in an area where the need to travel will be minimised and the use of sustainable transport modes can be maximised. The development will also improve pedestrian and to a lesser extent cycle routes in the opportunity area with the provision of a fully pedestrianized Skipton Street and the removal of service vehicles from Ontario Street. There are issues with regard to the logistics of delivery and servicing particularly in relation to the collection of refuse and recycling which require a comprehensive and robust delivery and servicing plan to be secured as part of s106 with built in review. The cycle parking facilities meet the current London Plan standards.

Ecology and biodiversity

240. Saved policy 3.28 of the Southwark Plan requires that biodiversity is taken into account in all planning applications and encourages the inclusion of features which enhance biodiversity. It also states that developments will not be permitted which would damage the nature conservation value of sites of importance for nature conservation and local nature reserves and/or damage habitats or priority species. The proposal has no such effect. Strategic Policy 11 concerning open spaces and wildlife requires new development to avoid harming protected and priority plants and animals to help improve and create habitat. Section 40(1) of the Natural Environment and Rural Communities Act 2006 provides that: '(1) Every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity.'
241. The council's Ecology Officer has reviewed the ecology chapter within the ES and considers the assessment to be acceptable. The site currently has a low ecological value when considering the footprint of the existing buildings, the extent of hard-standing and intensively managed amenity landscape being present on the site. The proposed development has the potential to enhance biodiversity with the inclusion of features such as bio-diverse living roofs and green walls which are beneficial for wildlife. The retention of street trees is particularly welcome. Natural England declined to comment on the proposals.

Wind (microclimate)

242. The ES has assessed the implications of the proposal on wind conditions within and immediately surrounding the site, and the suitability of these in relation to pedestrian comfort and safety. For the completed development, all tested locations on the ground and elevated levels are predicted to be suitable for their intended use (i.e. sitting,

standing, and walking) with the exception of one ground floor entrance which would be marginally too windy. This could be improved if the entrance were recessed. With hard and soft landscaping in place, the rooftop amenity areas, including public garden, are predicted to be suitable for general recreational use. Overall, the results of the assessment demonstrate that the residual impact on wind conditions around the site would be negligible.

Air quality

243. The majority of the borough, including the application site, is within an Air Quality Management Zone due the significant presence of traffic generated pollutants. As a result, developments are required to take account of any impacts upon air pollution as a result of, and during construction of, a proposed development. An Air Quality Assessment has been prepared and submitted as part of the ES.
244. There are potential adverse impacts upon local air quality during the construction phase, particularly from dust generation and additional construction traffic vehicle movements. However, these would be temporary in nature and can be mitigated as far as possible through measures secured as part of the Construction Environmental Management Plan. During this phase it is not expected that that the volume of construction traffic from this development, or combined with other construction sites, would have a significant adverse impact upon local air quality when compared with existing traffic flows in the area. The mitigation measures proposed to offset the generation of dust include procedures such as vehicle wheel washing, screens, water spraying and regular monitoring. These measures would be implemented as part of the Construction Environmental Management Plan (CEMP).
245. Local air quality could be affected by the service traffic generated by the development and the assessment has also considered the effect of the proposed combined heat and power (CHP) and centralised boiler plant on air quality. Extremely small changes to air quality are predicted along streets around the development due to service traffic and the emissions from CHP and boiler plant associated with the development. But these emissions are considered to have a negligible of very minor impact on local air quality. The AQMA has also demonstrated that the air quality for prospective residents is considered to be acceptable.

Electronic interference

246. Developments which include tall buildings have the potential to disrupt local radio and TV reception (digital terrestrial and satellite format) as the buildings can block the signals. The ES includes an assessment of the proposed development upon potential impacts to radio and TV reception.
247. During demolition and construction, the use of equipment such as cranes and scaffolding could affect radio and TV reception but signal disruption would be temporary and intermittent depending on the type of plant in use and stage of construction. As such, the resultant magnitude of impact would be minimal and of negligible significance.
248. There is the potential for the completed development to interfere with TV reception as a result of terrestrial TV transmission shadowing to the north and is predicted to be of minor significance without mitigation in place. However, this is worst case and subject to uncertainty as to the actual degree of interference that may be experienced. The ES therefore recommends appropriate surveys to be carried out before and after the development to assess the likely impacts. If any interference is shown to be caused by the development, then appropriate mitigation measures can be put in place on completion. With mitigation in place, the long-term residual impacts to radio and TV

reception are predicted to be negligible. Such mitigation can be appropriately secured through conditions.

249. Heathrow Airport and NATS Safeguarding Office have raised concerns about the potential impact of the proposal on the radar located at Heathrow Airport. This radar (known as Heathrow H10 PSR/SSR) provides data to the NATS London Terminal Control Centre as well as to a number of other users, including Heathrow and City Airport. They are concerned that false radar targets could be generated due to reflections of the radar signal from the tall building. This can however be mitigated through modifications to the radar system. Heathrow Airport and NATS have therefore advised that an aviation condition should be imposed on any grant of planning permission to secure details of a Radar Mitigation Scheme (RMS).

Archaeology

250. Policy 3.19 of the Southwark Plan requires an archaeological assessment and evaluation to be submitted for planning applications affecting sites within the Archaeological Priority Zones (APZ). The eastern half of the application site lies within the Kennington Road and Elephant and Castle APZ and, accordingly, a desk-based archaeological assessment of the site has been undertaken. This provides the baseline data for the archaeological chapter within the ES.
251. The ES demonstrates that the site has a low to moderate potential to contain localised archaeological remains, particularly at the edges of the site which are unaffected by the existing basements associated with the current buildings. Officers are satisfied that appropriate archaeological mitigation measures can be secured by conditions. With such measures in place, the residual impacts of the proposed development both during demolition, construction and when operational are considered to have a negligible impact on archaeological remains.

Ground conditions and contamination

252. An assessment of soil and ground conditions has been undertaken in order to establish the potential for significant ground contamination to exist at the site and the likely risk to a range of sensitive receptors, including humans, aquifers and flora. The ES advises that there is little evidence of potentially contaminative uses on the site in the past. Moreover, the redevelopment of the site for the current buildings involved extensive basement excavation which is likely to have removed potential contamination.
253. Measures would be secured as part of the Construction Environmental Management Plan to prevent spillage of construction materials, oils or chemicals to groundwater and soil. The completed development is predicted to have negligible impacts for future occupiers on the site as well as for groundwater and soil quality.
254. The Environment Agency and the council's Environmental Protection Team are satisfied with the submitted details but consider that further investigations are required to fully assess the sub-surface conditions. Officers therefore recommend that further details of potential site contamination and remediation are secured by condition.

Water resources and flood risk

255. Strategic policy 13 of the Core Strategy allows development to occur in the protected Thames flood zone as long as it is designed to be safe and resilient to flooding. The policy further requires major development to reduce surface water run-off by at least 50%.

256. The ES and accompanying Flood Risk Assessment (FRA) considers the likely impacts of the development on water resources and flood risk. The site is located within Flood Zone 3 which is defined as having a high probability of tidal and fluvial flooding with a greater than 0.5% chance of flooding in any given year due to the proximity of the River Thames. However, the site is in an area which benefits from Thames tidal flood defences.
257. During construction, there is the potential for impacts to ground and surface water resources but such impacts would be short-term and protective measures would be incorporated into the Construction Environmental Management Plan to minimise the impacts. Once operational, measures to reduce water runoff from the site and control the rate of discharge of this water to the local sewer network, including a sustainable urban drainage scheme (SUDs), would allow for future increases in rainfall arising from climate change.
258. The residential accommodation would be located above ground level (floor 8 upwards) and will be protected from flooding in the unlikely event of the river defences being breached. Floor resilience measures to protect the cultural uses in the basement are also proposed. The ES concludes that the development would not result in an increased risk of flooding either on site or beyond the site boundary.
259. The Environment Agency, Thames Water and the council's Flood and Drainage Team have raised no objections to the proposal subject to the imposition of appropriate conditions. The residual impacts of the development are therefore considered to be negligible.

Equalities

260. The Equality Act 2010 provides protection from discrimination in respect of certain protected characteristics namely; age, disability, gender reassignment, pregnancy and maternity, race, religion or beliefs, and sex and sexual orientation. It places the local planning authority under a legal duty to have due regard to the advancement of equality in the exercise of its powers including planning powers. Officers have taken this into account in the assessment of the application and members must be mindful of this duty, inter alia, when determining all planning applications. In particular, members must pay due regard to the need to:
- Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act
 - Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it
 - Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
261. An Equalities Impact Assessment has been submitted which in particular draws on information presented in various chapters of the ES. The assessment concludes that the development would make a significant contribution towards the regeneration of the Elephant and Castle and, as such, it would have a positive impact on the local area and would not have a negative impact on equalities.
262. During the demolition and construction phase there are no specific equalities impacts in that all potentially adverse construction impacts would be evenly distributed and as such do not disadvantage any particular group. It is acknowledged that there will be some disruption during construction but this would be temporary and the impacts minimised through a CEMP.

263. The current uses on the site support up to 1,700 FTE jobs but the completed development would create 3,375 FTE jobs resulting in a net gain of 1,675 FTE jobs. Furthermore, about 63 FTE jobs would be created during construction. The proposed new housing would be built to a Lifetime Homes standard and 10% of the units would be designed to be easily adaptable for a wheelchair user. The improved physical environment, including areas of new public realm and publically accessible roof garden, will ensure greater accessibility and movement through the site. Officers consider that these are positive aspects of the scheme which people within all the protected characteristic groups could benefit from.
264. The completed development would increase the demand on local infrastructure such as health and education provision. However, monies would be secured through the payment of the Southwark Community Infrastructure Levy (CIL) which would mitigate the impacts of this increased demand. The provision of new areas of open amenity space, including play space, and landscaped public realm would provide recreational opportunities for existing and future local residents which in turn would generate associated health benefits for all the target groups.
265. Officers therefore consider that the proposed scheme and the wider regeneration of the area brought about by the development, which aims to deliver a mixed and balanced community, is compatible with its equalities duties and will have some beneficial impact on protected groups, the advancement of equality of opportunity and the fostering of good relations between persons who share a relevant protected characteristic and persons who do not share it.

Planning obligations (s106 undertaking or agreement)

266. Saved policy 2.5 'Planning Obligations' 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. Core Strategy 14 and saved policy 2.5 of the Southwark Plan state that planning obligations will be sought to reduce or mitigate the impacts of the development. These local policies are reinforced by the council's s106 Planning Obligations/Community Infrastructure Levy SPD.

267. The following financial contributions will be secured in the legal agreement:

- Cycle hire scheme contribution: £200,000
- Archaeology contribution: £11,171
- Legible London contribution: £10,000
- Contribution towards children's play space (12+): £9060

Total: £230,231

Admin charge (2% of total) £4604

Overall Total: £ 234,835

268. In addition, the following non-financial contributions would be secured within the s106 agreement:

- Off-site affordable housing contribution
- Review mechanism for affordable housing contribution

- Employment in construction/completed development provisions including fall-back contribution if targets not met
- Submission of an application for works to Bakerloo line entrance façade
- Provision of affordable retail space
- Car free development
- Marketing strategy for the wheelchair adaptable units funding and 3 years free car club membership
- 3 year membership of London Cycle Hire Scheme
- Submission of dynamic Event Management Plan for the proposed cultural space
- Travel Plan
- Demolition and Construction Environmental Management Plans
- Delivery and Servicing Management Plan
- Public garden access
- Future Connection to District CHP
- Compliance with Energy Strategy public realm improvements
- Provision of new public street (Skipton Street)
- Skipton Street Event Strategy
- Tree Planting Strategy to secure provision of new trees in and around the new site.

269. S278 agreement to secure (but not limited to) the following:

- Footways fronting the development on London Road, Ontario Street, Keyworth Street and Newington Causeway with a minimum 2.4m passing width
- Footways must be repaved using Yorkstone on London Road to match the TfL surface and silver grey granite stone paving slabs and kerbs on other streets as per SSDM 'town centre' palette
- All pedestrian and vehicular crossovers to be constructed to the relevant SSDM standards
- All external doors opening inwards or sliding doors used
- Adoption of strips of land on London Road, Ontario Street, Keyworth Street, Southwark Bridge Road and Newington Causeway
- Re-location of existing bus stands on Southwark Bridge Road
- Junction/Signal works to Newington Causeway/Southwark Park Road Junction

- Cycle Super Highway alterations.
270. Any damage caused to the highway during construction works would need to be repaired by the developer.
271. In the event that the legal agreement has not been signed by 16 December 2016, it is recommended that the Director of Planning be authorised to refuse planning permission, if appropriate, for the following reason:

In the absence of a signed s106 legal agreement there is no mechanism in place to secure adequate provision of affordable housing and mitigation against the adverse impacts of the development through contributions and it would therefore be contrary to saved policy 2.5 planning obligations of the Southwark Plan 2007, strategic policy 14 Delivery and Implementation of the Core Strategy (2011) policy 8.2 planning obligations of the London Plan (2015) and the Southwark section 106 planning obligations and Community Infrastructure Levy SPD (2015).

Southwark CIL and Mayoral CIL

272. 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 a Mayoral CIL payment of £3,328,092 and a Southwark CIL payment of £7,355,679 are due.

Sustainable development policy context

273. This section concerns the environmental role of planning in ensuring sustainable development. The NPPF defines this role as contribution to protecting and enhancing our natural, built and historic environment; and as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.
274. 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 the Mayor's Sustainable Design and Construction SPG.
275. 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. LP5.7 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.
276. 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.
277. The applicants have submitted an energy statement and a sustainability statement for the proposed development which seek to demonstrate compliance with the above

policy.

Energy

278. An energy statement has been submitted which provides an initial assessment of the energy demand and carbon dioxide (CO₂) emissions from a baseline building and estimates the expected energy and CO₂ emissions savings associated with the proposed development. This sets out that the proposed development will have total CO₂ emissions of 1105 tonnes per annum and a 35% improvement beyond Buildings Regulations Part L 2013.

The 'be clean' (use less energy)

279. The measures proposed include:

- Low fabric u-values and air permeability rates to reduce heat loss
- User friendly thermal, time and zone controls
- Mechanical ventilation with heat recovery
- High efficiency boilers
- Solar shading from balconies with low G-values to reduce overheating and reduce excessive solar gain and overheating
- Low energy lighting and low water use fittings.

280. These measures would reduce carbon dioxide emissions by 23% (398 tonnes) when compared to a scheme compliant with building regulations.

The 'be clean' measures (supply energy efficiently)

281. Policy 5.5 states that LPAs should require developers to prioritise connection to existing or planned decentralised energy networks where feasible. LP5.6 states that development proposals should evaluate the feasibility of CHP systems and where a new CHP system is appropriate also examine opportunities to extend the system beyond the boundary to adjacent sites.

282. Major development proposals should select energy systems in accordance with the following hierarchy:

1. Connection to existing heating or cooling networks
2. Site wide CHP network
3. Communal heating and cooling.

283. The applicants have held initial discussions with Lend Lease and EON about opportunities for connection to a district heating network served by the forthcoming Energy Centre at Elephant Park. The outcome of these discussions suggest that it would be more practical and viable to connect to other developments closer to Elephant Park prior to connecting to Skipton House, but that there is still an option to connect to Skipton. An appropriately worded s106 clause will be used to secure a future connection to the District Wide Heating Network should it arise.

284. In the absence of secure connection it is proposed that low temperature hot water

boilers are installed within the development in conjunction with a Combined Heat and Power (CHP) unit with suitably sized thermal stores to provide primary heating to the Development. The CHP unit would be sized to for 75% of annual residential heating requirements plus 100% of commercial buildings domestic hot water requirements and would be situated at the basement level in the south west corner of the site. The onsite CHP would result in 6% (97 tonnes of CO₂ per annum) reduction in CO₂ emissions over Part L 2013 emissions.

The 'be green' measures (use renewable energy)

285. A renewable energy assessment has been submitted with the application information. This identified photovoltaic (PV) and ground source cooling as the most feasible technologies. Provision of 300sqm of PV panels is proposed on the roof of the office building fronting onto London Road and on the roof of the tower elements. The ground source cooling would provide chilled water at a temperature suitable for chilled beam or chilled ceiling applications and is proposed for base load cooling of office space. The applicants have show that this would result in 6% (100 tonnes of CO₂ per annum) reduction in CO₂ emissions over part L 2013 emissions. This would be short of the 20% target but this would be difficult to achieve given the measures proposed for the 'be clean' and 'be lean' measures referred to above. The applicants have explored providing additional panels on the roof however this is the maximum extent considered possible without result in loss of communal amenity space or shared public garden.

Other sustainability matters

286. A BREEAM pre-assessment has been submitted for the non-residential elements of the proposed development. This demonstrates how the proposed office space, retail space and cultural space will meet the BREEAM 'excellent' standard, in accordance with Core Strategy policy 13 and incorporates a range of sustainable measures as set out in the applicant sustainability strategy. This will be secured by condition.
287. Policy 5.9 of London Plan states that major development proposals should reduce potential overheating and reliance on air conditioning systems and demonstrate this in accordance with the cooling hierarchy:
1. Minimise internal heat generation through energy efficient design
 2. Reduce the amount of heat entering a building in summer through orientation, shading, albedo, fenestration, insulation and green roofs and walls
 3. Manage the heat within the building through exposed internal thermal mass and high ceilings
 4. Passive ventilation
 5. Mechanical ventilation
 6. Active cooling systems (ensuring they are the lowest carbon options).
288. The applicants have stated that they have undertaken design development in accordance with the cooling hierarchy for each of the separate uses on site. This states that acceptable overheating control will be achievable without the need for cooling. However the thermal modelling has not been undertaken in accordance with the GLA guidance and data sets using 1976, 1989 and 2003 design weather years and the London Weather Dataset. Therefore does not demonstrate that the building will not overheat. This is a matter which has been raised by GLA and council policy

officers. To address this, the applicants have agreed to a condition requiring the submission of revised thermal modelling in accordance with the GLA guidelines.

Conclusion on planning issues

289. The proposed redevelopment of the site would provide a high density, mixed use development with commercial, residential, cultural and retail uses, and would support the council's objective of consolidating the Elephant and Castle as a major town centre. In particular, the proposed significant increase in the quantum of employment space on site, more than double the existing, which would go a significant way towards meeting the vision of providing 25000 - 30000sqm of business floor space within the Opportunity Area. In addition the proposed development, with the introduction of 'Skipton Street' and improvements to surrounding streets, would result in improved connectivity and a significant enhancement to public realm within the Opportunity Area. The provision of a new publicly accessible roof garden is a particularly positive benefit of the scheme for existing and future residents.
290. The principle of providing an off-site affordable housing solution is acceptable in the specific circumstances of this case and satisfies the sequential test. Officers consider that the level proposed, at 20%, is supported by the submitted Viability Assessment notwithstanding the difference in opinion regarding construction costs. With a s106 obligation that secures a review on substantial implementation which will be based on actual costs and other variables, it is considered that the development will provide the maximum reasonable level of affordable housing and consequently the affordable housing proposed is considered acceptable.
291. The development is in a highly appropriate location for a tall building being centrally located at the heart of Elephant and Castle Opportunity Area. Officers are satisfied that the proposal is of the highest architectural standard and will provide exemplary form of residential accommodation including outdoor amenity space. The proposal provides an appropriate response to context and would not harm the character or setting of the nearby conservation areas or listed buildings. Furthermore careful consideration has been given to the impact of the proposal on townscape views including the Westminster World Heritage Site. Although the proposal would be visible from a number of vantage points, this does not cause harm.
292. It is recognised that the development of this size and scale, including its demolition and construction, has the potential for significant environmental impacts and therefore an Environmental Statement has been submitted. In arriving at their recommendation, officers had full regard to the Environmental Statement, further information and other information and all submissions relating to considerations contained in this statement. This includes an assessment of possible alternative options and why these were not feasible as well as an assessment of the cumulative impacts of this and other nearby developments. Following mitigation measures, there are likely to be some adverse impacts association with the demolition and construction phases but these impacts would be short term. The development would however result in some adverse impacts to the daylight and sunlight of a number of windows of properties closest to the site. Whilst any resultant adverse impact to neighbouring properties is regrettable, the impacts would not amount to such significant harm that would justify the refusal of planning permission on those grounds.
293. Other policies have also been considered but, as set out in the report, no impacts and/or conflicts with planning policy have been identified that couldn't adequately be dealt with by planning obligation or condition. Having regard to all the policies considered and any other material planning considerations it is recommended that planning permission is granted subject to conditions and the completion of a legal agreement.

Community impact statement

294. In line with the council's Community Impact Statement the impact of this application has been assessed as part of the application process with regard to local people in respect of their age, disability, faith/religion, gender, race and ethnicity and sexual orientation. Consultation with the community has been undertaken as part of the application process. The impact on local people is set out above.
295. A Statement of Community Involvement has been submitted which details the public consultation and engagement process undertaken by the applicant prior to submission of the planning application. Public engagement included a series of meetings with key stakeholders, a three day public consultation exhibition (held on 8 - 10 October 2015), and set up of a dedicated project website.
296. The proposal was presented to the Design Review Panel (DRP) on 6 July and 16 November 2016. A summary of the panel's comments are provided at paragraph 139 of this report.

Consultations

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

Consultation replies

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

Summary of consultation responses

299. Please see Appendix 2 attached below.

BACKGROUND DOCUMENTS

| Background Papers | Held At | Contact |
|---|--|--|
| Site history file: TP/1399-80 Application file: 15/AP/5125 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 3920 Council website: www.southwark.gov.uk |

APPENDICES

| No. | Title |
|------------|---------------------------------|
| Appendix 1 | Consultation undertaken |
| Appendix 2 | Consultation responses received |
| Appendix 3 | Human rights |
| Appendix 4 | Computer generated images |

Note: Recommendation document will be supplied at the meeting in the addendum.

AUDIT TRAIL

| | | |
|---|---|--------------------------|
| Lead Officer | Simon Bevan, Director of Planning | |
| Report Author | Robin Sedgwick, Senior Planning Officer | |
| Version | Final | |
| Dated | 30 June 2016 | |
| Key Decision? | No | |
| CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER | | |
| Officer Title | Comments sought | Comments included |
| Strategic Director of Finance and Governance | No | No |
| Strategic Director, Environment and Leisure | No | No |
| Strategic Director of Housing and Modernisation | No | No |
| Director of Regeneration | No | No |
| Date final report sent to Constitutional Team | | 30 June 2016 |

Consultation undertaken

Site notice date: 28/01/2016

Press notice date: 28/01/2016

Case officer site visit date: n/a

Neighbour consultation letters sent: 28/01/2016

Internal services consulted:

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

Statutory and non-statutory organisations consulted:

Arqiva - digital communications
BAA - Safeguarding
City Of London
City of Westminster
EDF Energy
Environment Agency
Greater London Authority
Historic England
Historic Royal Palaces (Tower of London)
London Borough of Haringey
London Borough of Islington
London Borough of Lambeth
London City Airport
London Fire and Emergency Planning Authority
London Underground Limited
Metropolitan Police Service (Designing out Crime)
National Planning Casework Unit
Natural England - London Region and South East Region
Network Rail (Planning)
Thames Water - Development Planning
The Royal Parks
The Theatres Trust
Transport for London (referable and non-referable app notifications and pre-apps)

Neighbour and local groups consulted:

Po Box 36614
91 Peronnett House Princess Street SE1 6JS
6 Cartwright House County Street SE1
7 Orient Street London SE11 4SR
Unit 233 Elephant and Castle Shopping Centre SE1 6TE
28 Sutherland Square London
Via Email x

191 Metro Central Heights 119 Newington Causeway SE1 6BW
192 Metro Central Heights 119 Newington Causeway SE1 6BW
189 Metro Central Heights 119 Newington Causeway SE1 6BW
190 Metro Central Heights 119 Newington Causeway SE1 6BW
196 Metro Central Heights 119 Newington Causeway SE1 6BW
197 Metro Central Heights 119 Newington Causeway SE1 6BW
194 Metro Central Heights 119 Newington Causeway SE1 6BW
195 Metro Central Heights 119 Newington Causeway SE1 6BW
182 Metro Central Heights 119 Newington Causeway SE1 6BT
183 Metro Central Heights 119 Newington Causeway SE1 6BT
180 Metro Central Heights 119 Newington Causeway SE1 6BT
181 Metro Central Heights 119 Newington Causeway SE1 6BT
187 Metro Central Heights 119 Newington Causeway SE1 6BT
188 Metro Central Heights 119 Newington Causeway SE1 6BT
184 Metro Central Heights 119 Newington Causeway SE1 6BT
185 Metro Central Heights 119 Newington Causeway SE1 6BT
209 Metro Central Heights 119 Newington Causeway SE1 6BW
210 Metro Central Heights 119 Newington Causeway SE1 6BW
207 Metro Central Heights 119 Newington Causeway SE1 6BW
208 Metro Central Heights 119 Newington Causeway SE1 6BW
213 Metro Central Heights 119 Newington Causeway SE1 6BW
214 Metro Central Heights 119 Newington Causeway SE1 6BW
211 Metro Central Heights 119 Newington Causeway SE1 6BW
212 Metro Central Heights 119 Newington Causeway SE1 6BW
201 Metro Central Heights 119 Newington Causeway SE1 6BW
202 Metro Central Heights 119 Newington Causeway SE1 6BW
198 Metro Central Heights 119 Newington Causeway SE1 6BW
199 Metro Central Heights 119 Newington Causeway SE1 6BW
205 Metro Central Heights 119 Newington Causeway SE1 6BW
206 Metro Central Heights 119 Newington Causeway SE1 6BW
203 Metro Central Heights 119 Newington Causeway SE1 6BW
204 Metro Central Heights 119 Newington Causeway SE1 6BW
156 Metro Central Heights 119 Newington Causeway SE1

378 Metro Central Heights 119 Newington Causeway SE1 6DX
375 Metro Central Heights 119 Newington Causeway SE1 6DX
376 Metro Central Heights 119 Newington Causeway SE1 6DX
381 Metro Central Heights 119 Newington Causeway SE1 6DX
382 Metro Central Heights 119 Newington Causeway SE1 6DX
379 Metro Central Heights 119 Newington Causeway SE1 6DX
380 Metro Central Heights 119 Newington Causeway SE1 6DX
Flat 5 Metro Central Heights SE1 6BA
Flat 12 Wardroper House SE1 6ET
Flat 13 Wardroper House SE1 6ET
Flat 10 Wardroper House SE1 6ET
Flat 11 Wardroper House SE1 6ET

Unit 2a06 South Bank Technopark SE1 3UZ
Flat 14 Wardroper House SE1 6ET
Flat 15 Wardroper House SE1 6ET
Flat 4 Wardroper House SE1 6ET
Flat 5 Wardroper House SE1 6ET
Flat 2 Wardroper House SE1 6ET
Flat 3 Wardroper House SE1 6ET
Flat 8 Wardroper House SE1 6ET
Flat 9 Wardroper House SE1 6ET
Flat 6 Wardroper House SE1 6ET
Flat 7 Wardroper House SE1 6ET
Unit 2a22 South Bank Technopark SE1 6LN
Unit 2b22 South Bank Technopark SE1 6LN
Unit 2a07 South Bank Technopark SE1 6LN
Unit 2a13 South Bank Technopark SE1 6LN
Unit 2b06 South Bank Technopark SE1 6LN
Unit 2b08 South Bank Technopark SE1 6LN
Unit 2d21 South Bank Technopark SE1 6LN
Unit 2b01 South Bank Technopark SE1 6LN
Unit 2b03 South Bank Technopark SE1 3UZ
Unit 2b04 South Bank Technopark SE1 3UZ
Unit 2a31 South Bank Technopark SE1 3UZ
Unit 2a35 South Bank Technopark SE1 3UZ
Unit 2c09 South Bank Technopark SE1 3UZ
Unit 2d27 South Bank Technopark SE1 3UZ
Unit 2b07 South Bank Technopark SE1 3UZ
Unit 2c07 South Bank Technopark SE1 3UZ
Flat 8 West Combe Apartments SE1 6BN
10a Gaywood Street London SE1 6HG
Flat 6 West Combe Apartments SE1 6BN
Flat 7 West Combe Apartments SE1 6BN
Unit 2 5-9 Rockingham Street SE1 6PD

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| 6BT | | |
| 157 | Metro Central Heights 119 Newington Causeway SE1 | 10b Gaywood Street London SE1 6HG |
| 6BT | | |
| 154 | Metro Central Heights 119 Newington Causeway SE1 | Unit 1 5-9 Rockingham Street SE1 6PD |
| 6BT | | |
| 155 | Metro Central Heights 119 Newington Causeway SE1 | Unit 6d 10 Keyworth Street SE1 6NG |
| 6BT | | |
| 160 | Metro Central Heights 119 Newington Causeway SE1 | Unit 6e 10 Keyworth Street SE1 6NG |
| 6BT | | |
| 161 | Metro Central Heights 119 Newington Causeway SE1 | Unit 6b 10 Keyworth Street SE1 6NG |
| 6BT | | |
| 158 | Metro Central Heights 119 Newington Causeway SE1 | Unit 6c 10 Keyworth Street SE1 6NG |
| 6BT | | |
| 159 | Metro Central Heights 119 Newington Causeway SE1 | Flat 3 West Combe Apartments SE1 6BN |
| 6BT | | |
| 148 | Metro Central Heights 119 Newington Causeway SE1 | Flat 5 West Combe Apartments SE1 6BN |
| 6BT | | |
| 149 | Metro Central Heights 119 Newington Causeway SE1 | Unit 6f 10 Keyworth Street SE1 6NG |
| 6BT | | |
| 145 | Metro Central Heights 119 Newington Causeway SE1 | Flat 4 West Combe Apartments SE1 6BN |
| 6BT | | |
| 146 | Metro Central Heights 119 Newington Causeway SE1 | Unit 2d06 South Bank Technopark SE1 3UZ |
| 6BT | | |
| 152 | Metro Central Heights 119 Newington Causeway SE1 | Unit 2d07 South Bank Technopark SE1 3UZ |
| 6BT | | |
| 153 | Metro Central Heights 119 Newington Causeway SE1 | Unit 2d02 South Bank Technopark SE1 3UZ |
| 6BT | | |
| 150 | Metro Central Heights 119 Newington Causeway SE1 | Unit 2d03 South Bank Technopark SE1 3UZ |
| 6BT | | |
| 151 | Metro Central Heights 119 Newington Causeway SE1 | Flat 1 Wardroper House SE1 6ET |
| 6BT | | |
| 173 | Metro Central Heights 119 Newington Causeway SE1 | Unit 2d41 South Bank Technopark SE1 3UZ |
| 6BT | | |
| 174 | Metro Central Heights 119 Newington Causeway SE1 | Unit 1a03 South Bank Technopark SE1 6LN |
| 6BT | | |
| 170 | Metro Central Heights 119 Newington Causeway SE1 | Office 10 Keyworth Street SE1 6NG |
| 6BT | | |
| 172 | Metro Central Heights 119 Newington Causeway SE1 | Unit 2a24 South Bank Technopark SE1 3UZ |
| 6BT | | |
| 177 | Metro Central Heights 119 Newington Causeway SE1 | Unit 2d01 South Bank Technopark SE1 3UZ |
| 6BT | | |
| 179 | Metro Central Heights 119 Newington Causeway SE1 | Unit 1a04 South Bank Technopark SE1 3UZ |
| 6BT | | |
| 175 | Metro Central Heights 119 Newington Causeway SE1 | Unit 1d06 South Bank Technopark SE1 3UZ |
| 6BT | | |
| 176 | Metro Central Heights 119 Newington Causeway SE1 | Flat 16 Pioneer Building SE1 6BN |
| 6BT | | |
| 164 | Metro Central Heights 119 Newington Causeway SE1 | Flat 17 Pioneer Building SE1 6BN |
| 6BT | | |
| 165 | Metro Central Heights 119 Newington Causeway SE1 | Flat 14 Pioneer Building SE1 6BN |
| 6BT | | |
| 162 | Metro Central Heights 119 Newington Causeway SE1 | Flat 15 Pioneer Building SE1 6BN |
| 6BT | | |
| 163 | Metro Central Heights 119 Newington Causeway SE1 | Flat 20 Pioneer Building SE1 6BN |
| 6BT | | |
| 168 | Metro Central Heights 119 Newington Causeway SE1 | Flat 21 Pioneer Building SE1 6BN |
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| 169 | Metro Central Heights 119 Newington Causeway SE1 | Flat 18 Pioneer Building SE1 6BN |
| 6BT | | |
| 166 | Metro Central Heights 119 Newington Causeway SE1 | Flat 19 Pioneer Building SE1 6BN |
| 6BT | | |
| 167 | Metro Central Heights 119 Newington Causeway SE1 | Flat 8 Pioneer Building SE1 6BN |
| 6BT | | |
| 262 | Metro Central Heights 119 Newington Causeway SE1 | Flat 9 Pioneer Building SE1 6BN |
| 6BX | | |
| 263 | Metro Central Heights 119 Newington Causeway SE1 | Flat 6 Pioneer Building SE1 6BN |
| 6BX | | |
| 260 | Metro Central Heights 119 Newington Causeway SE1 | Flat 7 Pioneer Building SE1 6BN |
| 6BX | | |
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| 6BX | | |
| 266 | Metro Central Heights 119 Newington Causeway SE1 | Flat 13 Pioneer Building SE1 6BN |
| 6BX | | |
| 267 | Metro Central Heights 119 Newington Causeway SE1 | Flat 10 Pioneer Building SE1 6BN |
| 6BX | | |
| 264 | Metro Central Heights 119 Newington Causeway SE1 | Flat 11 Pioneer Building SE1 6BN |
| 6BX | | |
| 265 | Metro Central Heights 119 Newington Causeway SE1 | Flat 32 Pioneer Building SE1 6BN |
| 6BX | | |

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| 254 Metro Central Heights 119 Newington Causeway SE1 6BX | Flat 33 Pioneer Building SE1 6BN |
| 255 Metro Central Heights 119 Newington Causeway SE1 6BX | Flat 30 Pioneer Building SE1 6BN |
| 251 Metro Central Heights 119 Newington Causeway SE1 6BX | Flat 31 Pioneer Building SE1 6BN |
| 252 Metro Central Heights 119 Newington Causeway SE1 6BX | Flat 36 Pioneer Building SE1 6BN |
| 258 Metro Central Heights 119 Newington Causeway SE1 6BX | Flat 37 Pioneer Building SE1 6BN |
| 259 Metro Central Heights 119 Newington Causeway SE1 6BX | Flat 34 Pioneer Building SE1 6BN |
| 256 Metro Central Heights 119 Newington Causeway SE1 6BX | Flat 35 Pioneer Building SE1 6BN |
| 257 Metro Central Heights 119 Newington Causeway SE1 6BX | Flat 24 Pioneer Building SE1 6BN |
| 279 Metro Central Heights 119 Newington Causeway SE1 6BX | Flat 25 Pioneer Building SE1 6BN |
| 280 Metro Central Heights 119 Newington Causeway SE1 6BX | Flat 22 Pioneer Building SE1 6BN |
| 276 Metro Central Heights 119 Newington Causeway SE1 6BX | Flat 23 Pioneer Building SE1 6BN |
| 278 Metro Central Heights 119 Newington Causeway SE1 6BX | Flat 28 Pioneer Building SE1 6BN |
| 283 Metro Central Heights 119 Newington Causeway SE1 6BX | Flat 29 Pioneer Building SE1 6BN |
| 285 Metro Central Heights 119 Newington Causeway SE1 6DB | Flat 26 Pioneer Building SE1 6BN |
| 281 Metro Central Heights 119 Newington Causeway SE1 6BX | Flat 27 Pioneer Building SE1 6BN |
| 282 Metro Central Heights 119 Newington Causeway SE1 6BX | Fourth Floor Lancaster House SE1 6DG |
| 270 Metro Central Heights 119 Newington Causeway SE1 6BX | Unit 2b25 South Bank Technopark SE1 6LN |
| 271 Metro Central Heights 119 Newington Causeway SE1 6BX | Kiosk Outside 21 St Georges Road SE1 6ES |
| 268 Metro Central Heights 119 Newington Causeway SE1 6BX | Second Floor Lancaster House SE1 6DG |
| 269 Metro Central Heights 119 Newington Causeway SE1 6BX | Unit 2b11 Unit 2b15 And Unit 2b21 South Bank Technopark SE1 6LN |
| 274 Metro Central Heights 119 Newington Causeway SE1 6BX | Unit 2b12 South Bank Technopark SE1 6LN |
| 275 Metro Central Heights 119 Newington Causeway SE1 6BX | Unit 2b09 South Bank Technopark SE1 6LN |
| 272 Metro Central Heights 119 Newington Causeway SE1 6BX | Unit 2b10 South Bank Technopark SE1 6LN |
| 273 Metro Central Heights 119 Newington Causeway SE1 6BX | Unit 2b18 South Bank Technopark SE1 6LN |
| 226 Metro Central Heights 119 Newington Causeway SE1 6BW | Unit 2b20 South Bank Technopark SE1 6LN |
| 227 Metro Central Heights 119 Newington Causeway SE1 6BX | Unit 2b14 South Bank Technopark SE1 6LN |
| 223 Metro Central Heights 119 Newington Causeway SE1 6BW | Unit 2b16 South Bank Technopark SE1 6LN |
| 225 Metro Central Heights 119 Newington Causeway SE1 6BW | Flat 1 Pioneer Building SE1 6BN |
| 230 Metro Central Heights 119 Newington Causeway SE1 6BX | Fifth Floor Lancaster House SE1 6DF |
| 232 Metro Central Heights 119 Newington Causeway SE1 6BX | Third Floor Lancaster House SE1 6DF |
| 228 Metro Central Heights 119 Newington Causeway SE1 6BX | Flat 4 Pioneer Building SE1 6BN |
| 229 Metro Central Heights 119 Newington Causeway SE1 6BX | Flat 5 Pioneer Building SE1 6BN |
| 217 Metro Central Heights 119 Newington Causeway SE1 6BW | Flat 2 Pioneer Building SE1 6BN |
| 218 Metro Central Heights 119 Newington Causeway SE1 6BW | Flat 3 Pioneer Building SE1 6BN |
| 215 Metro Central Heights 119 Newington Causeway SE1 6BW | Excluding Second Fourth And Sixth Floor Lancaster House SE1 6DF |
| 216 Metro Central Heights 119 Newington Causeway SE1 6BW | Sixth Floor Lancaster House SE1 6DF |
| 221 Metro Central Heights 119 Newington Causeway SE1 6BW | Unit 2d35 South Bank Technopark SE1 6LN |
| 222 Metro Central Heights 119 Newington Causeway SE1 6BW | Book And Latte 100-116 London Road SE1 6LN |
| 219 Metro Central Heights 119 Newington Causeway SE1 6BW | Unit 1 Metro Central Heights SE1 6BN |
| 220 Metro Central Heights 119 Newington Causeway SE1 | First Floor Lancaster House SE1 6DF |

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| 6BW | |
| 244 Metro Central Heights 119 Newington Causeway SE1 6BX | 430 Metro Central Heights 119 Newington Causeway SE1 6DT |
| 245 Metro Central Heights 119 Newington Causeway SE1 6BX | 431 Metro Central Heights 119 Newington Causeway SE1 6DT |
| 242 Metro Central Heights 119 Newington Causeway SE1 6BX | 428 Metro Central Heights 119 Newington Causeway SE1 6DT |
| 243 Metro Central Heights 119 Newington Causeway SE1 6BX | 429 Metro Central Heights 119 Newington Causeway SE1 6DT |
| 249 Metro Central Heights 119 Newington Causeway SE1 6BX | 434 Metro Central Heights 119 Newington Causeway SE1 6DT |
| 250 Metro Central Heights 119 Newington Causeway SE1 6BX | 435 Metro Central Heights 119 Newington Causeway SE1 6DT |
| 247 Metro Central Heights 119 Newington Causeway SE1 6BX | 432 Metro Central Heights 119 Newington Causeway SE1 6DT |
| 248 Metro Central Heights 119 Newington Causeway SE1 6BX | 433 Metro Central Heights 119 Newington Causeway SE1 6DT |
| 235 Metro Central Heights 119 Newington Causeway SE1 6BX | 422 Metro Central Heights 119 Newington Causeway SE1 6DT |
| 236 Metro Central Heights 119 Newington Causeway SE1 6BX | 423 Metro Central Heights 119 Newington Causeway SE1 6DT |
| 233 Metro Central Heights 119 Newington Causeway SE1 6BX | 420 Metro Central Heights 119 Newington Causeway SE1 6DT |
| 234 Metro Central Heights 119 Newington Causeway SE1 6BX | 421 Metro Central Heights 119 Newington Causeway SE1 6DT |
| 240 Metro Central Heights 119 Newington Causeway SE1 6BX | 426 Metro Central Heights 119 Newington Causeway SE1 6DT |
| 241 Metro Central Heights 119 Newington Causeway SE1 6BX | 427 Metro Central Heights 119 Newington Causeway SE1 6DT |
| 237 Metro Central Heights 119 Newington Causeway SE1 6BX | 424 Metro Central Heights 119 Newington Causeway SE1 6DT |
| 238 Metro Central Heights 119 Newington Causeway SE1 6BX | 425 Metro Central Heights 119 Newington Causeway SE1 6DT |
| 51 Metro Central Heights 119 Newington Causeway SE1 6BA | 446 Metro Central Heights 119 Newington Causeway SE1 6DT |
| 52 Metro Central Heights 119 Newington Causeway SE1 6BA | 447 Metro Central Heights 119 Newington Causeway SE1 6DT |
| 49 Metro Central Heights 119 Newington Causeway SE1 6BA | 444 Metro Central Heights 119 Newington Causeway SE1 6DT |
| 50 Metro Central Heights 119 Newington Causeway SE1 6BA | 445 Metro Central Heights 119 Newington Causeway SE1 6DT |
| 55 Metro Central Heights 119 Newington Causeway SE1 6BA | 450 Metro Central Heights 119 Newington Causeway SE1 6DT |
| 56 Metro Central Heights 119 Newington Causeway SE1 6BA | 451 Metro Central Heights 119 Newington Causeway SE1 6DT |
| 53 Metro Central Heights 119 Newington Causeway SE1 6BA | 448 Metro Central Heights 119 Newington Causeway SE1 6DT |
| 54 Metro Central Heights 119 Newington Causeway SE1 6BA | 449 Metro Central Heights 119 Newington Causeway SE1 6DT |
| 43 Metro Central Heights 119 Newington Causeway SE1 6BA | 438 Metro Central Heights 119 Newington Causeway SE1 6DT |
| 44 Metro Central Heights 119 Newington Causeway SE1 6BA | 439 Metro Central Heights 119 Newington Causeway SE1 6DT |
| 41 Metro Central Heights 119 Newington Causeway SE1 6BA | 436 Metro Central Heights 119 Newington Causeway SE1 6DT |
| 42 Metro Central Heights 119 Newington Causeway SE1 6BA | 437 Metro Central Heights 119 Newington Causeway SE1 6DT |
| 47 Metro Central Heights 119 Newington Causeway SE1 6BA | 442 Metro Central Heights 119 Newington Causeway SE1 6DT |
| 48 Metro Central Heights 119 Newington Causeway SE1 6BA | 443 Metro Central Heights 119 Newington Causeway SE1 6DT |
| 45 Metro Central Heights 119 Newington Causeway SE1 6BA | 440 Metro Central Heights 119 Newington Causeway SE1 6DT |
| 46 Metro Central Heights 119 Newington Causeway SE1 6BA | 441 Metro Central Heights 119 Newington Causeway SE1 6DT |
| 68 Metro Central Heights 119 Newington Causeway SE1 6BA | South Bank University 21 Keyworth Street SE1 6NG |
| 69 Metro Central Heights 119 Newington Causeway SE1 6BA | Elephant Kiosk Outside Underground Station Elephant And Castle SE1 6LW |
| 65 Metro Central Heights 119 Newington Causeway SE1 6BA | Adjacent 74 London Road London Road SE1 6LW |
| 66 Metro Central Heights 119 Newington Causeway SE1 6BA | Elephant And Castle Underground Station Elephant And Castle SE1 6LW |
| 72 Metro Central Heights 119 Newington Causeway SE1 6BA | London College Of Printing And Graphic Art Elephant And Castle SE1 6SB |
| 73 Metro Central Heights 119 Newington Causeway SE1 6BA | Second Floor Left 21 St Georges Road SE1 6ES |
| 70 Metro Central Heights 119 Newington Causeway SE1 6BA | Second Floor Right 21 St Georges Road SE1 6ES |

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| 71 Metro Central Heights 119 Newington Causeway SE1 6BA | Unit 3 Metro Central Heights SE1 6BN |
| 59 Metro Central Heights 119 Newington Causeway SE1 6BA | Unit 4 Metro Central Heights SE1 6BN |
| 60 Metro Central Heights 119 Newington Causeway SE1 6BA | 414 Metro Central Heights 119 Newington Causeway SE1 6DT |
| 57 Metro Central Heights 119 Newington Causeway SE1 6BA | 415 Metro Central Heights 119 Newington Causeway SE1 6DT |
| 58 Metro Central Heights 119 Newington Causeway SE1 6BA | Flat 1 West Combe Apartments SE1 6BN |
| 63 Metro Central Heights 119 Newington Causeway SE1 6BA | Flat 2 West Combe Apartments SE1 6BN |
| 64 Metro Central Heights 119 Newington Causeway SE1 6BA | 418 Metro Central Heights 119 Newington Causeway SE1 6DT |
| 61 Metro Central Heights 119 Newington Causeway SE1 6BA | 419 Metro Central Heights 119 Newington Causeway SE1 6DT |
| 62 Metro Central Heights 119 Newington Causeway SE1 6BA | 416 Metro Central Heights 119 Newington Causeway SE1 6DT |
| 16 Metro Central Heights 119 Newington Causeway SE1 6BA | 417 Metro Central Heights 119 Newington Causeway SE1 6DT |
| 17 Metro Central Heights 119 Newington Causeway SE1 6BA | 10 Keyworth Street London SE1 6NG |
| 14 Metro Central Heights 119 Newington Causeway SE1 6BA | Unit 2d 10 Keyworth Street SE1 6NG |
| 15 Metro Central Heights 119 Newington Causeway SE1 6BA | Unit 2e 10 Keyworth Street SE1 6NG |
| 20 Metro Central Heights 119 Newington Causeway SE1 6BA | Unit 2b 10 Keyworth Street SE1 6NG |
| 21 Metro Central Heights 119 Newington Causeway SE1 6BA | Unit 2c 10 Keyworth Street SE1 6NG |
| 18 Metro Central Heights 119 Newington Causeway SE1 6BA | Unit 3b 10 Keyworth Street SE1 6NG |
| 19 Metro Central Heights 119 Newington Causeway SE1 6BA | Unit 3c 10 Keyworth Street SE1 6NG |
| 8 Metro Central Heights 119 Newington Causeway SE1 6BA | Unit 2f 10 Keyworth Street SE1 6NG |
| 9 Metro Central Heights 119 Newington Causeway SE1 6BA | Unit 3a 10 Keyworth Street SE1 6NG |
| 6 Metro Central Heights 119 Newington Causeway SE1 6BA | Unit 1a 10 Keyworth Street SE1 6NG |
| 7 Metro Central Heights 119 Newington Causeway SE1 6BA | Unit 1b 10 Keyworth Street SE1 6NG |
| 12 Metro Central Heights 119 Newington Causeway SE1 6BA | Wetherspoons Metro Central Heights SE1 6DQ |
| 13 Metro Central Heights 119 Newington Causeway SE1 6BA | Flat 9 West Combe Apartments SE1 6BN |
| 10 Metro Central Heights 119 Newington Causeway SE1 6BA | Unit 1e 10 Keyworth Street SE1 6NG |
| 11 Metro Central Heights 119 Newington Causeway SE1 6BA | Unit 2a 10 Keyworth Street SE1 6NG |
| 34 Metro Central Heights 119 Newington Causeway SE1 6BA | Unit 1c 10 Keyworth Street SE1 6NG |
| 35 Metro Central Heights 119 Newington Causeway SE1 6BA | Unit 1d 10 Keyworth Street SE1 6NG |
| 32 Metro Central Heights 119 Newington Causeway SE1 6BA | Unit 5b 10 Keyworth Street SE1 6NG |
| 33 Metro Central Heights 119 Newington Causeway SE1 6BA | Unit 5c 10 Keyworth Street SE1 6NG |
| 39 Metro Central Heights 119 Newington Causeway SE1 6BA | Unit 4f 10 Keyworth Street SE1 6NG |
| 40 Metro Central Heights 119 Newington Causeway SE1 6BA | Unit 5a 10 Keyworth Street SE1 6NG |
| 36 Metro Central Heights 119 Newington Causeway SE1 6BA | Unit 5f 10 Keyworth Street SE1 6NG |
| 38 Metro Central Heights 119 Newington Causeway SE1 6BA | Unit 6a 10 Keyworth Street SE1 6NG |
| 25 Metro Central Heights 119 Newington Causeway SE1 6BA | Unit 5d 10 Keyworth Street SE1 6NG |
| 26 Metro Central Heights 119 Newington Causeway SE1 6BA | Unit 5e 10 Keyworth Street SE1 6NG |
| 22 Metro Central Heights 119 Newington Causeway SE1 6BA | Unit 3f 10 Keyworth Street SE1 6NG |
| 24 Metro Central Heights 119 Newington Causeway SE1 6BA | Unit 4a 10 Keyworth Street SE1 6NG |
| 29 Metro Central Heights 119 Newington Causeway SE1 6BA | Unit 3d 10 Keyworth Street SE1 6NG |
| 31 Metro Central Heights 119 Newington Causeway SE1 6BA | Unit 3e 10 Keyworth Street SE1 6NG |
| 27 Metro Central Heights 119 Newington Causeway SE1 6BA | Unit 4d 10 Keyworth Street SE1 6NG |
| 28 Metro Central Heights 119 Newington Causeway SE1 6BA | Unit 4e 10 Keyworth Street SE1 6NG |
| 120 Metro Central Heights 119 Newington Causeway SE1 | Unit 4b 10 Keyworth Street SE1 6NG |

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| Flat 10 22 London Road SE1 6JW | Flat 18 Perronet House Gaywood Estate SE1 6JR |
| Flat 7 22 London Road SE1 6JW | Flat 15 Perronet House Gaywood Estate SE1 6JR |
| Flat 8 22 London Road SE1 6JW | Flat 16 Perronet House Gaywood Estate SE1 6JR |
| 292 Metro Central Heights 119 Newington Causeway SE1 6DB | Flat D 60 St Georges Road SE1 6ET |
| 299 Metro Central Heights 119 Newington Causeway SE1 6DB | Elephant And Castle Public House 121 Newington Causeway SE1 6BN |
| 277 Metro Central Heights 119 Newington Causeway SE1 6BX | Flat C 60 St Georges Road SE1 6ET |
| 284 Metro Central Heights 119 Newington Causeway SE1 6DB | Flat D 58 St Georges Road SE1 6ET |
| 337 Metro Central Heights 119 Newington Causeway SE1 6DQ | Flat 85 Perronet House Gaywood Estate SE1 6JS |
| 345 Metro Central Heights 119 Newington Causeway SE1 6DQ | Flat 86 Perronet House Gaywood Estate SE1 6JS |
| 306 Metro Central Heights 119 Newington Causeway SE1 6DB | Flat 83 Perronet House Gaywood Estate SE1 6JS |
| 330 Metro Central Heights 119 Newington Causeway SE1 6DQ | Flat 84 Perronet House Gaywood Estate SE1 6JS |
| 200 Metro Central Heights 119 Newington Causeway SE1 6BW | 64-66 Newington Causeway London SE1 6DD |
| 224 Metro Central Heights 119 Newington Causeway SE1 6BW | Flat A 58 St Georges Road SE1 6ET |
| 186 Metro Central Heights 119 Newington Causeway SE1 6BT | 233 Southwark Bridge Road London SE1 6NP |
| 193 Metro Central Heights 119 Newington Causeway SE1 6BW | Flat B 60 St Georges Road SE1 6ET |
| 246 Metro Central Heights 119 Newington Causeway SE1 6BX | Flat C 58 St Georges Road SE1 6ET |
| 253 Metro Central Heights 119 Newington Causeway SE1 6BX | Flat A 60 St Georges Road SE1 6ET |
| 231 Metro Central Heights 119 Newington Causeway SE1 6BX | Flat B 58 St Georges Road SE1 6ET |
| 239 Metro Central Heights 119 Newington Causeway SE1 6BX | Students Union Building South Bank University SE1 6NG |
| 24 London Road London SE1 6JW | Flat 3 Metro Central Heights SE1 6BA |
| 25 London Road London SE1 6JW | Flat 4 Metro Central Heights SE1 6BA |
| 101 Newington Causeway London SE1 6BN | 1 Metro Central Heights 119 Newington Causeway SE1 6BA |
| 23 London Road London SE1 6JW | 2 Metro Central Heights 119 Newington Causeway SE1 6BA |
| 28 London Road London SE1 6JW | Flat 89 Perronet House Gaywood Estate SE1 6JS |
| 29 London Road London SE1 6JW | Flat 90 Perronet House Gaywood Estate SE1 6JS |
| 26 London Road London SE1 6JW | Flat 87 Perronet House Gaywood Estate SE1 6JS |
| 27 London Road London SE1 6JW | Flat 88 Perronet House Gaywood Estate SE1 6JS |
| 383 Metro Central Heights 119 Newington Causeway SE1 6DX | 237 Southwark Bridge Road London SE1 6NP |
| 390 Metro Central Heights 119 Newington Causeway SE1 6DX | 235 Southwark Bridge Road London SE1 6NP |
| 352 Metro Central Heights 119 Newington Causeway SE1 6DQ | 103 Gaunt Street London SE1 6DP |
| 359 Metro Central Heights 119 Newington Causeway SE1 6DQ | 250 Southwark Bridge Road London SE1 6NJ |
| 412 Metro Central Heights 119 Newington Causeway SE1 6DX | Flat 61 Perronet House Gaywood Estate SE1 6JS |
| Flat 56 Prospect House Gaywood Estate SE1 6HF | Flat 62 Perronet House Gaywood Estate SE1 6JS |
| 398 Metro Central Heights 119 Newington Causeway SE1 6DX | Flat 59 Perronet House Gaywood Estate SE1 6JS |
| 405 Metro Central Heights 119 Newington Causeway SE1 6DX | Flat 60 Perronet House Gaywood Estate SE1 6JS |
| First Floor 21 St Georges Road SE1 6ES | Flat 65 Perronet House Gaywood Estate SE1 6JS |
| Unit 5 Metro Central Heights SE1 6BN | Flat 66 Perronet House Gaywood Estate SE1 6JS |
| Basement To Seventh Floors Eileen House SE1 6EF | Flat 63 Perronet House Gaywood Estate SE1 6JS |
| Student Union Satellite Library Shop Southwark Bridge Road SE1 6NJ | Flat 64 Perronet House Gaywood Estate SE1 6JS |
| Basement And Part Ground Floor 21 St Georges Road SE1 6ES | Flat 53 Perronet House Gaywood Estate SE1 6JS |
| Unit 5 Perronet House Gaywood Estate SE1 6JR | Flat 54 Perronet House Gaywood Estate SE1 6JS |
| 9 Rockingham Street London SE1 6PD | Flat 51 Perronet House Gaywood Estate SE1 6JS |
| 409a Metro Central Heights 119 Newington Causeway SE1 6DX | Flat 52 Perronet House Gaywood Estate SE1 6JS |
| Unit 1 Newington Court Business Centre SE1 6DD | Flat 57 Perronet House Gaywood Estate SE1 6JS |
| 398a Metro Central Heights 119 Newington Causeway SE1 6DX | Flat 58 Perronet House Gaywood Estate SE1 6JS |
| 399a Metro Central Heights 119 Newington Causeway SE1 6DX | Flat 55 Perronet House Gaywood Estate SE1 6JS |
| Unit 5 Newington Court Business Centre SE1 6DD | Flat 56 Perronet House Gaywood Estate SE1 6JS |
| Unit 6 Newington Court Business Centre SE1 6DD | Flat 77 Perronet House Gaywood Estate SE1 6JS |
| Unit 2 To 3 Newington Court Business Centre SE1 6DD | Flat 78 Perronet House Gaywood Estate SE1 6JS |
| Unit 4 Newington Court Business Centre SE1 6DD | Flat 75 Perronet House Gaywood Estate SE1 6JS |
| 348a Metro Central Heights 119 Newington Causeway SE1 | Flat 76 Perronet House Gaywood Estate SE1 6JS |

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| 6DQ | 358a Metro Central Heights 119 Newington Causeway SE1 6DQ | Flat 81 Perronet House Gaywood Estate SE1 6JS |
| | Flat 7 44 London Road SE1 6JW | Flat 82 Perronet House Gaywood Estate SE1 6JS |
| | Flat 8 44 London Road SE1 6JW | Flat 79 Perronet House Gaywood Estate SE1 6JS |
| | 379a Metro Central Heights 119 Newington Causeway SE1 6DX | Flat 80 Perronet House Gaywood Estate SE1 6JS |
| | 389a Metro Central Heights 119 Newington Causeway SE1 6DX | Flat 69 Perronet House Gaywood Estate SE1 6JS |
| | 368a Metro Central Heights 119 Newington Causeway SE1 6DX | Flat 70 Perronet House Gaywood Estate SE1 6JS |
| | 378a Metro Central Heights 119 Newington Causeway SE1 6DX | Flat 67 Perronet House Gaywood Estate SE1 6JS |
| | First Floor And Second Floor Flat 25 Gaywood Street SE1 6HG | Flat 68 Perronet House Gaywood Estate SE1 6JS |
| | Fourth Floor Flat 100-116 London Road SE1 6NJ | Flat 73 Perronet House Gaywood Estate SE1 6JS |
| | First Floor Flat Southwark Citadel SE1 6HH | Flat 74 Perronet House Gaywood Estate SE1 6JS |
| | Basement And Ground Floor Flat 25 Gaywood Street SE1 6HG | Flat 71 Perronet House Gaywood Estate SE1 6JS |
| | 5 Gaunt Street London SE1 6DP | Flat 72 Perronet House Gaywood Estate SE1 6JS |
| | 74 London Road London SE1 6LW | Flat 17 Prospect House Gaywood Estate SE1 6HF |
| | Lancaster House 70 Newington Causeway SE1 6DF | Flat 18 Prospect House Gaywood Estate SE1 6HF |
| | Unit 7 Newington Court Business Centre SE1 6DD | Flat 15 Prospect House Gaywood Estate SE1 6HF |
| | Unit 8 Newington Court Business Centre SE1 6DD | Flat 16 Prospect House Gaywood Estate SE1 6HF |
| | Unit 9 Newington Court Business Centre SE1 6DD | Flat 20 Prospect House Gaywood Estate SE1 6HF |
| | Unit 10 Newington Court Business Centre SE1 6DD | Flat 21 Prospect House Gaywood Estate SE1 6HF |
| | Unit 3 Newington Court Business Centre SE1 6DD | Flat 19 Prospect House Gaywood Estate SE1 6HF |
| | 333 Metro Central Heights 119 Newington Causeway SE1 6DQ | Flat 2 Prospect House Gaywood Estate SE1 6HF |
| | 334 Metro Central Heights 119 Newington Causeway SE1 6DQ | Flat 1 Prospect House Gaywood Estate SE1 6HF |
| | 331 Metro Central Heights 119 Newington Causeway SE1 6DQ | Flat 10 Prospect House Gaywood Estate SE1 6HF |
| | 332 Metro Central Heights 119 Newington Causeway SE1 6DQ | 40 Princess Street London SE1 6HJ |
| | 338 Metro Central Heights 119 Newington Causeway SE1 6DQ | 42 Princess Street London SE1 6HJ |
| | 339 Metro Central Heights 119 Newington Causeway SE1 6DQ | Flat 13 Prospect House Gaywood Estate SE1 6HF |
| | 335 Metro Central Heights 119 Newington Causeway SE1 6DQ | Flat 14 Prospect House Gaywood Estate SE1 6HF |
| | 336 Metro Central Heights 119 Newington Causeway SE1 6DQ | Flat 11 Prospect House Gaywood Estate SE1 6HF |
| | 324 Metro Central Heights 119 Newington Causeway SE1 6DB | Flat 12 Prospect House Gaywood Estate SE1 6HF |
| | 325 Metro Central Heights 119 Newington Causeway SE1 6DB | Flat 31 Prospect House Gaywood Estate SE1 6HF |
| | 322 Metro Central Heights 119 Newington Causeway SE1 6DB | Flat 32 Prospect House Gaywood Estate SE1 6HF |
| | 323 Metro Central Heights 119 Newington Causeway SE1 6DB | Flat 3 Prospect House Gaywood Estate SE1 6HF |
| | 328 Metro Central Heights 119 Newington Causeway SE1 6DQ | Flat 30 Prospect House Gaywood Estate SE1 6HF |
| | 329 Metro Central Heights 119 Newington Causeway SE1 6DQ | Flat 35 Prospect House Gaywood Estate SE1 6HF |
| | 326 Metro Central Heights 119 Newington Causeway SE1 6DB | Flat 36 Prospect House Gaywood Estate SE1 6HF |
| | 327 Metro Central Heights 119 Newington Causeway SE1 6DQ | Flat 33 Prospect House Gaywood Estate SE1 6HF |
| | 351 Metro Central Heights 119 Newington Causeway SE1 6DQ | Flat 34 Prospect House Gaywood Estate SE1 6HF |
| | 353 Metro Central Heights 119 Newington Causeway SE1 6DQ | Flat 24 Prospect House Gaywood Estate SE1 6HF |
| | 349 Metro Central Heights 119 Newington Causeway SE1 6DQ | Flat 25 Prospect House Gaywood Estate SE1 6HF |
| | 350 Metro Central Heights 119 Newington Causeway SE1 6DQ | Flat 22 Prospect House Gaywood Estate SE1 6HF |
| | 356 Metro Central Heights 119 Newington Causeway SE1 6DQ | Flat 23 Prospect House Gaywood Estate SE1 6HF |
| | 357 Metro Central Heights 119 Newington Causeway SE1 6DQ | Flat 28 Prospect House Gaywood Estate SE1 6HF |
| | 354 Metro Central Heights 119 Newington Causeway SE1 6DQ | Flat 29 Prospect House Gaywood Estate SE1 6HF |
| | 355 Metro Central Heights 119 Newington Causeway SE1 6DQ | Flat 26 Prospect House Gaywood Estate SE1 6HF |
| | 342 Metro Central Heights 119 Newington Causeway SE1 6DQ | Flat 27 Prospect House Gaywood Estate SE1 6HF |
| | 343 Metro Central Heights 119 Newington Causeway SE1 6DQ | 17 Gaywood Street London SE1 6HG |

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| 340 Metro Central Heights 119 Newington Causeway SE1 6DQ | 19 Gaywood Street London SE1 6HG |
| 341 Metro Central Heights 119 Newington Causeway SE1 6DQ | 13 Gaywood Street London SE1 6HG |
| 347 Metro Central Heights 119 Newington Causeway SE1 6DQ | 15 Gaywood Street London SE1 6HG |
| 348 Metro Central Heights 119 Newington Causeway SE1 6DQ | 24 Gaywood Street London SE1 6HG |
| 344 Metro Central Heights 119 Newington Causeway SE1 6DQ | 21 Gaywood Street London SE1 6HG |
| 346 Metro Central Heights 119 Newington Causeway SE1 6DQ | 23 Gaywood Street London SE1 6HG |
| 298 Metro Central Heights 119 Newington Causeway SE1 6DB | London Underground Ltd Elephant And Castle Underground Station SE1 6TG |
| 300 Metro Central Heights 119 Newington Causeway SE1 6DB | 82 Newington Causeway London SE1 6DE |
| 296 Metro Central Heights 119 Newington Causeway SE1 6DB | 72 London Road London SE1 3PA |
| 297 Metro Central Heights 119 Newington Causeway SE1 6DB | Skipton House 80 London Road SE1 6LH |
| 303 Metro Central Heights 119 Newington Causeway SE1 6DB | 11 Gaywood Street London SE1 6HG |
| 304 Metro Central Heights 119 Newington Causeway SE1 6DB | 2 Princess Street London SE1 6JP |
| 301 Metro Central Heights 119 Newington Causeway SE1 6DB | 28 Princess Street London SE1 6HJ |
| 302 Metro Central Heights 119 Newington Causeway SE1 6DB | 30 Princess Street London SE1 6HJ |
| 289 Metro Central Heights 119 Newington Causeway SE1 6DB | 24 Princess Street London SE1 6HJ |
| 290 Metro Central Heights 119 Newington Causeway SE1 6DB | 26 Princess Street London SE1 6HJ |
| 287 Metro Central Heights 119 Newington Causeway SE1 6DB | 36 Princess Street London SE1 6HJ |
| 288 Metro Central Heights 119 Newington Causeway SE1 6DB | 38 Princess Street London SE1 6HJ |
| 294 Metro Central Heights 119 Newington Causeway SE1 6DB | 32 Princess Street London SE1 6HJ |
| 295 Metro Central Heights 119 Newington Causeway SE1 6DB | 34 Princess Street London SE1 6HJ |
| 291 Metro Central Heights 119 Newington Causeway SE1 6DB | 31 Gaywood Street London SE1 6HG |
| 293 Metro Central Heights 119 Newington Causeway SE1 6DB | 33 Gaywood Street London SE1 6HG |
| 316 Metro Central Heights 119 Newington Causeway SE1 6DB | 27 Gaywood Street London SE1 6HG |
| 317 Metro Central Heights 119 Newington Causeway SE1 6DB | 29 Gaywood Street London SE1 6HG |
| 314 Metro Central Heights 119 Newington Causeway SE1 6DB | 20 Princess Street London SE1 6HJ |
| 315 Metro Central Heights 119 Newington Causeway SE1 6DB | 22 Princess Street London SE1 6HJ |
| 320 Metro Central Heights 119 Newington Causeway SE1 6DB | 35 Gaywood Street London SE1 6HG |
| 321 Metro Central Heights 119 Newington Causeway SE1 6DB | Flat B 16 Gaywood Street SE1 6HG |
| 318 Metro Central Heights 119 Newington Causeway SE1 6DB | Flat B 18 Gaywood Street SE1 6HG |
| 319 Metro Central Heights 119 Newington Causeway SE1 6DB | Flat B 12 Gaywood Street SE1 6HG |
| 308 Metro Central Heights 119 Newington Causeway SE1 6DB | Flat B 14 Gaywood Street SE1 6HG |
| 309 Metro Central Heights 119 Newington Causeway SE1 6DB | Flat B 8 Gaywood Street SE1 6HG |
| 305 Metro Central Heights 119 Newington Causeway SE1 6DB | Flat A 11 Princess Street SE1 6HH |
| 307 Metro Central Heights 119 Newington Causeway SE1 6DB | Flat B 20 Gaywood Street SE1 6HG |
| 312 Metro Central Heights 119 Newington Causeway SE1 6DB | Flat B 22 Gaywood Street SE1 6HG |
| 313 Metro Central Heights 119 Newington Causeway SE1 6DB | Flat A 14 Gaywood Street SE1 6HG |
| 310 Metro Central Heights 119 Newington Causeway SE1 6DB | Flat A 16 Gaywood Street SE1 6HG |
| 311 Metro Central Heights 119 Newington Causeway SE1 6DB | Flat A 12 Gaywood Street SE1 6HG |
| 404 Metro Central Heights 119 Newington Causeway SE1 6DX | Flat A 22 Gaywood Street SE1 6HG |
| 406 Metro Central Heights 119 Newington Causeway SE1 | Flat A 8 Gaywood Street SE1 6HG |

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| 6DX | | |
| 402 Metro Central Heights 119 Newington Causeway SE1 | 6DX | Flat A 18 Gaywood Street SE1 6HG |
| 403 Metro Central Heights 119 Newington Causeway SE1 | 6DX | Flat A 20 Gaywood Street SE1 6HG |
| 409 Metro Central Heights 119 Newington Causeway SE1 | 6DX | Flat B 19 Princess Street SE1 6HH |
| 410 Metro Central Heights 119 Newington Causeway SE1 | 6DX | Flat B 7 Princess Street SE1 6HH |
| 407 Metro Central Heights 119 Newington Causeway SE1 | 6DX | Flat B 15 Princess Street SE1 6HH |
| 408 Metro Central Heights 119 Newington Causeway SE1 | 6DX | Flat B 17 Princess Street SE1 6HH |
| 395 Metro Central Heights 119 Newington Causeway SE1 | 6DX | Flat 10 Laurie House Gaywood Estate SE1 6HQ |
| 396 Metro Central Heights 119 Newington Causeway SE1 | 6DX | Flat 11 Laurie House Gaywood Estate SE1 6HQ |
| 393 Metro Central Heights 119 Newington Causeway SE1 | 6DX | Flat B 9 Princess Street SE1 6HH |
| 394 Metro Central Heights 119 Newington Causeway SE1 | 6DX | Flat 1 Laurie House Gaywood Estate SE1 6HQ |
| 400 Metro Central Heights 119 Newington Causeway SE1 | 6DX | Flat A 17 Princess Street SE1 6HH |
| 401 Metro Central Heights 119 Newington Causeway SE1 | 6DX | Flat A 19 Princess Street SE1 6HH |
| 397 Metro Central Heights 119 Newington Causeway SE1 | 6DX | Flat A 13 Princess Street SE1 6HH |
| 399 Metro Central Heights 119 Newington Causeway SE1 | 6DX | Flat A 15 Princess Street SE1 6HH |
| 125 Metro Central Heights 119 Newington Causeway SE1 | 6BB | Flat B 11 Princess Street SE1 6HH |
| 133 Metro Central Heights 119 Newington Causeway SE1 | 6BB | Flat B 13 Princess Street SE1 6HH |
| 89 Metro Central Heights 119 Newington Causeway SE1 | 6BB | Flat A 7 Princess Street SE1 6HH |
| 118 Metro Central Heights 119 Newington Causeway SE1 | 6BB | Flat A 9 Princess Street SE1 6HH |
| 171 Metro Central Heights 119 Newington Causeway SE1 | 6BT | Flat 46 Prospect House Gaywood Estate SE1 6HF |
| 178 Metro Central Heights 119 Newington Causeway SE1 | 6BT | Flat 47 Prospect House Gaywood Estate SE1 6HF |
| 140 Metro Central Heights 119 Newington Causeway SE1 | 6BT | Flat 44 Prospect House Gaywood Estate SE1 6HF |
| 147 Metro Central Heights 119 Newington Causeway SE1 | 6BT | Flat 45 Prospect House Gaywood Estate SE1 6HF |
| 23 Metro Central Heights 119 Newington Causeway SE1 | 6BA | Flat 5 Prospect House Gaywood Estate SE1 6HF |
| 30 Metro Central Heights 119 Newington Causeway SE1 | 6BA | Flat 50 Prospect House Gaywood Estate SE1 6HF |
| 411 Metro Central Heights 119 Newington Causeway SE1 | 6DX | Flat 48 Prospect House Gaywood Estate SE1 6HF |
| 413 Metro Central Heights 119 Newington Causeway SE1 | 6DX | Flat 49 Prospect House Gaywood Estate SE1 6HF |
| 75 Metro Central Heights 119 Newington Causeway SE1 | 6BB | Flat 39 Prospect House Gaywood Estate SE1 6HF |
| 82 Metro Central Heights 119 Newington Causeway SE1 | 6BB | Flat 4 Prospect House Gaywood Estate SE1 6HF |
| 37 Metro Central Heights 119 Newington Causeway SE1 | 6BA | Flat 37 Prospect House Gaywood Estate SE1 6HF |
| 67 Metro Central Heights 119 Newington Causeway SE1 | 6BA | Flat 38 Prospect House Gaywood Estate SE1 6HF |
| 369 Metro Central Heights 119 Newington Causeway SE1 | 6DX | Flat 42 Prospect House Gaywood Estate SE1 6HF |
| 370 Metro Central Heights 119 Newington Causeway SE1 | 6DX | Flat 43 Prospect House Gaywood Estate SE1 6HF |
| 367 Metro Central Heights 119 Newington Causeway SE1 | 6DX | Flat 40 Prospect House Gaywood Estate SE1 6HF |
| 368 Metro Central Heights 119 Newington Causeway SE1 | 6DX | Flat 41 Prospect House Gaywood Estate SE1 6HF |
| 373 Metro Central Heights 119 Newington Causeway SE1 | 6DX | Flat 61 Prospect House Gaywood Estate SE1 6HF |
| 374 Metro Central Heights 119 Newington Causeway SE1 | 6DX | Flat 62 Prospect House Gaywood Estate SE1 6HF |
| 371 Metro Central Heights 119 Newington Causeway SE1 | 6DX | Flat 6 Prospect House Gaywood Estate SE1 6HF |
| 372 Metro Central Heights 119 Newington Causeway SE1 | 6DX | Flat 60 Prospect House Gaywood Estate SE1 6HF |
| 361 Metro Central Heights 119 Newington Causeway SE1 | 6DQ | Flat 8 Prospect House Gaywood Estate SE1 6HF |

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| 362 Metro Central Heights 119 Newington Causeway SE1 6DQ | Flat 9 Prospect House Gaywood Estate SE1 6HF |
| 358 Metro Central Heights 119 Newington Causeway SE1 6DQ | Flat 63 Prospect House Gaywood Estate SE1 6HF |
| 360 Metro Central Heights 119 Newington Causeway SE1 6DQ | Flat 7 Prospect House Gaywood Estate SE1 6HF |
| 365 Metro Central Heights 119 Newington Causeway SE1 6DQ | Flat 53 Prospect House Gaywood Estate SE1 6HF |
| 366 Metro Central Heights 119 Newington Causeway SE1 6DX | Flat 54 Prospect House Gaywood Estate SE1 6HF |
| 363 Metro Central Heights 119 Newington Causeway SE1 6DQ | Flat 51 Prospect House Gaywood Estate SE1 6HF |
| 364 Metro Central Heights 119 Newington Causeway SE1 6DQ | Flat 52 Prospect House Gaywood Estate SE1 6HF |
| 386 Metro Central Heights 119 Newington Causeway SE1 6DX | Flat 58 Prospect House Gaywood Estate SE1 6HF |
| 387 Metro Central Heights 119 Newington Causeway SE1 6DX | Flat 59 Prospect House Gaywood Estate SE1 6HF |
| 384 Metro Central Heights 119 Newington Causeway SE1 6DX | Flat 55 Prospect House Gaywood Estate SE1 6HF |
| 385 Metro Central Heights 119 Newington Causeway SE1 6DX | Flat 57 Prospect House Gaywood Estate SE1 6HF |
| 391 Metro Central Heights 119 Newington Causeway SE1 6DX | |
| 392 Metro Central Heights 119 Newington Causeway SE1 6DX | |
| 388 Metro Central Heights 119 Newington Causeway SE1 6DX | |
| 389 Metro Central Heights 119 Newington Causeway SE1 6DX | |
| 377 Metro Central Heights 119 Newington Causeway SE1 6DX | |

Re-consultation: n/a

APPENDIX 2

Consultation responses received

Summary of consultation responses

Representations from the occupiers of 42 properties have been received objecting to the proposals, together with three general comments. This includes representations received following a 21 day re-consultation on the revisions to the application, with the responses advising that previous comments had not been addressed. Many objections cite support for the principle of redeveloping the site, but raise concerns regarding the specific nature of the proposals.

Letters of support

2 letters of support have been received from residents of the local area. They support the proposals on the following grounds:

- The proposed development will benefit community and improve the area
- Tall buildings in this central area are appropriate
- The proposal will improve facilities in the area.

Objections

Principle/land uses

- The proposed development would result in the loss of local library
- The loss of the hostel
- Proposed commercial space not sustainable
- Loss of existing office space will result in loss of jobs
- Affordable business opportunities should be given to local people
- Proposal does not provide adequate replacement for Coronet.

Design

- The mixed use of the scheme would harm the special historic and architectural character of Metro Central Heights
- Adverse impact on setting of the Bakerloo tube entrance building
- The proposed building will have an adverse impact on height, scale and massing of proposal/out of character with the area/harmful to conservation areas and listed buildings in the local area
- Over-development of site/proposal overly dense
- The proposed development will result in wind tunnelling
- The cumulative visual impact of this and neighbouring buildings would be

overbearing/too many tall buildings in this area

- The publically accessible park should be provided at the ground floor level.

Amenity

- Loss of daylight, sunlight and overshadowing to Metro Central Heights, Gaywood Street, Peronnet House and other buildings on London Road
- Noise and disturbance during construction
- Loss of privacy and overlooking towards Metro Central Heights
- Social upheaval due to additional residents and impact on local services such as public transport, doctors surgeries and parks
- Loss of view from Metro Central Heights and Gaywood Street (Officer response – this is not a material planning consideration and cannot be taken into account).

Transport

- Increased traffic and increased demand for parking
- The proposed development would adversely affect highway/pedestrian safety
- Construction traffic and junction capacity
- Proposal fails to resolve access and design issues faced by the transport network in the area surrounding the development.

Affordable housing

- Lack of affordable housing
- Lack of clarity over the affordable housing offer and the viability appraisal should be made public
- Housing will end up in overseas ownership with detrimental impact on area.

Sustainability

- Insufficient renewable energy
- Not sustainable development
- Insufficient ecological provision is made.

Telecommunications

- The proposed will result in telecommunication problems.

Consultation

- Consultation did not encompass a wide enough area.

Ministry of Sound

Objection on grounds that the noise impact assessment has not correctly modelled the impact from lower frequency dance music. A noise assessment accompanies the objection which states that the noise impact occurs from the use of the courtyard for events. This recommends that windows are non-opening with additional secondary glazing and that the scheme is re-orientated to place the residential in a part of the site such as London Road or Newington Causeway.

The following comments have been received from statutory consultees:

CAAG

The proposed development would fail to acknowledge the prevailing character of the area. Southwark should refuse if this is not going to be considered.

Ecology Officer

Have reviewed this application with regard to ecology. The ecological assessment is acceptable and its findings are agreed; no further surveys are required.

Environment Agency

No objections subject to conditions.

Environmental Protection Team

Approval with conditions.

Flood and Drainage Team

Further details should also be provided of the drainage strategy; this could be dealt with by condition once the discharge rates are agreed.

GLA

London Plan policies on CAZ, Opportunity Area, mix of uses, housing, urban design, strategic views, inclusion, sustainable development and transport are relevant to this application. Whilst the scheme is generally acceptable in strategic planning terms the application does not yet fully comply with the London Plan as set out below:

- Principle of development: The principle of the proposed mixed use redevelopment is strongly supported in accordance with London Plan Policies 2.11 and 2.13
- Mix of uses: The proposal includes an excellent mix of CAZ uses in accordance with London Plan policies 2.10, 2.11, 3.3, 4.2 and 4.3
- Housing: The proposal to provide a high quality high density residential component to this scheme would increase housing supply and is strongly supported in accordance with London Plan policy 3.3. However, the position on scheme viability must be independently verified so that the maximum reasonable amount of affordable housing may be secured in line with London Plan policy 3.12
- Urban design: The proposed design is well considered and would successfully accommodate the proposed uses within a scheme which would optimise development potential and deliver high quality public realm. Furthermore, GLA officers are of the view that the proposal would provide an appropriate response in

townscape terms, and would not cause harm to designated heritage assets. Notwithstanding this, GLA officers strongly encourage a revised approach to the interface between block B and the retained Bakerloo line

- Strategic views: The scheme would preserve the viewer's ability to recognise and appreciate the Palace of Westminster in views for Serpentine Bridge; and, would not compromise the Outstanding Universal Value of the World Heritage Site. The application therefore accords with London Plan policies 7.10 and 7.12
- Inclusion: The response to access and inclusion is broadly supported in line with London Plan policy 7.2. However, further discussion is sought with respect to the approach to disabled parking
- Sustainable development: The proposed energy strategy and climate change adaptation measures are broadly supported in strategic planning terms. Following the conclusion of discussions on the energy strategy, the Council is encouraged to secure associated energy and adaptation details by way of planning condition in accordance with London Plan policies 5.2, 5.10, 5.11, 5.13, 7.19 and 7.21
- Transport: The applicant should address the matters raised in the transport section of this report with respect to: access and car parking; public realm; walking and cycling; interaction with the Bakerloo line station; public transport capacity impacts; and travel plan, demolition/construction impacts, deliveries and service plan in line with London Plan policies. 6.3, 6.6, 6.9, 6.10 and 6.14.

Highways Development Management

If consent is granted the developer must enter into a s278 agreement to complete the following works:

1. The footways fronting the development on London Road, Ontario Street, Keyworth Street and Newington Causeway must have a minimum of 2.4m passing width
2. The footways must be repaved using Yorkstone on London Road to match the TfL surface and silver grey granite natural stone paving slabs and kerbs on the other streets as per SSDM 'Town Centre' palette
3. All pedestrian and vehicle crossings should be according to current SSDM details
4. There are external doors shown opening outwards on to footways, on London Road and Ontario Street; these should either open inwards or sliding doors used. Even if the footway area in those sections is 2.4m or more, there is need for a physical barrier to protect pedestrian
5. Further to item 4 above, an exception could be made if columns effectively prevent a continuous route such as the columns on Keyworth Street. However, some columns near the junction of Keyworth Street and Ontario Street are shown located within current highway land, these needs to be revised
6. To facilitate maintenance, London Borough of Southwark would like to adopt as highway the areas hatched green on the attached drawing.

Historic England

Objection. The proposed tower would harm the significance of the listed buildings within the Westminster World Heritage site by reducing the visual primacy of the historic buildings. This is particular evident in the LVMF view from the Serpentine Bridge.

In addition, we note that the proposed tower will have a harmful impact upon the settings of conservation areas and listed buildings in other views, particular from West Square and Trinity Church Square.

In our view, the cumulative impact of the proposals on the historic environment causes harm that has not been justified. In that regard, we do not believe the proposals represent sustainable development as required by the NPPF, and we therefore object to them.

We would also expect your council to notify the DCMS regarding the impact on the Westminster World Heritage site as set out under Section 172 of the UNESCO guidelines.

Local Economy Team

Welcomes the increase in employment space. Notes the office space is designated as high quality with emphasis on the corporate market. Flexible layouts. Supports draft employment land review to accommodate more CAZ type activities.

Development broadly complements current and planned retail activity. 1550sqm of retail triggers need for affordable business space. 97% increase in jobs 1700FTE to 3375FTE.

London Borough of Lambeth (no further comments following re-consultation)

No objection but have requested detailed views to assess the impact on Grade 1 listed Lambeth Palace.

London Fire and Emergency Planning Authority

The proposed development will need to comply with relevant building regulation standards regarding fire safety.

London Heathrow Airport Limited

The proposed development has been examined from an aerodrome safeguarding perspective and could conflict with safeguarding criteria unless any planning permission granted is subject to the conditions detailed below:

No Development can take place until mitigation has been agreed and put in place to ensure that the proposed development will have no impact on the H10 radar at Heathrow Airport.

Reason: To ensure the development does not endanger the safe movement of aircraft or the operation of Heathrow Airport through interference with communication, navigational aids and surveillance equipment.

We, therefore, have no aerodrome safeguarding objection to this proposal, provided that the above condition is applied to any planning permission.

London Underground

No objections subject to conditions requiring detailed design and method statements for all of the foundations, basement and ground floor structures and any other structures below ground level to ensure no detrimental impact on London Underground infrastructure.

National Air Traffic Services

NATS wishes to raise an objection due to the anticipated technical impact on its radar located at Heathrow Airport.

This radar, known as Heathrow H10 PSR/SSR, provides data to the NATS London Terminal Control Centre located in Swanwick, Hampshire as well as to a number of other users including Heathrow and London City airports.

The impact on the radar is anticipated to manifest itself in the form of the generation of false radar targets due to reflections of the radar signal from the building. This is due to the height of the building and the fact that this is significantly greater than that of surrounding buildings, together with a clear line of sight between the H10 radar and the proposed development.

Notwithstanding the above, the resultant effect of reflected energy, i.e. false aircraft targets appearing on air traffic radar displays, can normally be mitigated through a modification to the radar system.

As such, NATS requires mitigation measures to be implemented in order to address this impact. This mitigation solution, referred to as a 'radar mitigation scheme' or 'RMS' mitigates the impact of the development through a modification to the radar system to address the generation of false targets.

While the implementation of the mitigation solution is dependent on the applicant entering into an agreement with NATS, NATS is confident that the technical solution is a tangible and realistic one which can be delivered at this location within the lifetime of the planning consent (3 years).

Accordingly, NATS is satisfied that should the planning authority be minded to grant the application, it would be willing to withdraw its objection subject to the imposition of aviation conditions on the consent.

Natural England

Natural England has no comments to make on this application.

Network Rail

The developer/applicant must ensure that their proposal, both during construction and after completion of works on site, does not:

- encroach onto Network Rail land
- affect the safety, operation or integrity of the company's railway and its infrastructure
- undermine its support zone
- damage the company's infrastructure
- adversely affect any railway land or structure
- over-sail or encroach upon the air-space of any Network Rail land
- cause to obstruct or interfere with any works or proposed works or Network Rail development both now and in the future.

I give below my comments and requirements for the safe operation of the railway and the protection of Network Rail's adjoining land.

Plant and Materials

All operations, including the use of cranes or other mechanical plant working adjacent to Network Rail's property, must at all times be carried out in a 'fail safe' manner such that in the event of mishandling, collapse or failure, no plant or materials are capable of falling within 3.0m of the boundary with Network Rail.

Scaffolding

Any scaffold which is to be constructed within 10 metres of the railway boundary fence must be erected in such a manner that at no time will any poles over-sail the railway and protective netting around such scaffold must be installed. The applicant/applicant's contractor must consider if they can undertake the works and associated scaffold/access for working at height within the footprint of their property boundary.

Secure By Design

In a development this size which has a mix of office, residential and commercial spaces as well as community areas, in a busy London area which has in the past had above average crime rate I would expect continued consultation with the design out crime unit. Therefore if there is not already I would seek to have a secured by design condition for the commercial and office space to achieve SBD Commercial 2015.

The residential areas of the development for the residential now has building regulations ADQ but this does not prevent from the development from achieving Secured by Design design and lay out incorporating lighting, secure cycle storage, digital surveillance CCTV and the applicant actually achieving SBD accreditation if they wish to submit an application to my office. There is no reason why with the correct tested, accredited and third party certificated products and continued consultation that this development should not achieve SBD accreditation .

Thames Water

No objections subject to conditions in relation to waste water infrastructure, surface water drainage, piling and groundwater risk management.

Theatres Trust

The Trust welcomes the provision of a new cultural facility within this mixed use development, further enhancing the cultural provision within the Elephant and Castle Opportunity Area. Nevertheless, it is important that all operational issues are taken into consideration at this planning stage to ensure the venue is viable and will deliver the expected cultural benefits for the local community and to the development itself.

In the absence of a venue operator, what is unclear is the rationale in the revised plans which has led to the radical change in design and layout, and the reduction in capacity of the venue to 350-seats with no little income generating support space (as the 3-screen cinema venue and associated basement concessions no longer feature), and if these significant changes will still create a financially viable venue.

This radical change without the involvement of an end user suggests there needs to be a clear vision developed about the purpose of this cultural facility or how it will be used. Performance venues are technically complex facilities and if not designed correctly from

the outset, can be costly to retro fit. We strongly recommend a venue operator is involved in this design and planning phase to determine what the venue will be used for, and the appropriate layout, access and technical needs for that purpose. This needs to be incorporated in to the final permitted design to not compromise its viability.

In addition to the specific design needs of the venue operator, the Trust has raised some of the broader design issues with the applicant that need further consideration. These issues include:

- The provision of an appropriate and accessible retail unit at ground level to provide essential income generating bar/café functions for the venue
- ensuring there is sufficient column free space in the basement to provide a suitable and accessible layout for the dressing rooms and other back of house functions, and provision of necessary servicing
- Ensuring appropriate circulation for both audiences, and staff and performers, particularly the connections between the back of house areas and the stage; and
- Provision of suitable access/stage lift to allow sets, musical instruments, and technical equipment to be efficiently delivered to the stage.

If the application proceeds before a venue operator can be involved, there must be sufficient flexibility within the confines of the dedicated cultural space to allow for the detailed design and fit out of the venue to reflect the specific needs of the end user. The Trust recommends:

- Council and the applicant work together to develop a clear vision about the purpose of this cultural facility, what it is to be used for, and how it will be used. This should then inform the design and capacity of the space
- There is a planning condition/s106 requirement for the preparation of a Cultural Management Plan to detail the programme and minimum number of public facing performances, to ensure reasonable publically accessible cultural use
- There is a s106 requirement to tender for a suitable arts organization to operate the performance venue once permission is granted, and the obligations to manage the venue primarily for cultural purposes, in accordance with the Cultural Management Plan. This was the method adopted by Lambeth Council to ensure the viable operation of a new community theatre space currently under construction in Streatham Hill
- There is a planning condition/s106 requirement stating that prior to the commencement of the fit out of the ground and basement level layouts relating to the cultural space, a detailed schedule of works and specification for the performance venue (including back and front of house facilities as well as an ancillary areas) together with technical and electrical installations, fixtures, fittings and seating shall be prepared in conjunction with the selected venue operator and be approved in writing by the local authority and the Theatres Trust
- The s106 ensures provision of suitable funding by the developer for the fit-out of the venue including necessary technical facilities
- The s106 provides clarification on the provision of an appropriate retail unit at ground level to provide essential bar/café functions
- The s106 provides clarification of the type of lease to be offered to the venue

operator e.g. peppercorn or a genuinely affordable rent for both the cultural facility and the associated retail/bar space.

The Theatres Trust does welcome and support the development of this new cultural facility, and in the best interests of all parties, provides this advice to ensure the delivery of a genuinely viable cultural venue that supports the cultural needs of Southwark and the wider area.

Transport for London

TfL has a number of fundamental concerns with the development proposals, in particular the potential loss of bus standing on Southwark Bridge Road and the interaction with the Bakerloo line station, and potentially public transport capacity impacts. Until these issues, and others identified in the Stage 1 report are addressed, TfL cannot support the application. As such, we would welcome the opportunity to discuss further with the council and the applicant.

Twentieth Century Society

We have major concerns about the impact of the proposed development. In our view it will cause significant harm to the architectural significance of Metro Central Heights by virtue of its considerable height, design and massing. This is particularly relevant when seen in longer distant views which show the proposed development appear as an extension to Metro Heights, diminishing its current landmark status and visually competing with and overwhelming the existing building. We consider that this harm to the setting of Metro Central House has not been justified and we therefore recommend refusal to the proposals in their current form.

APPENDIX 3

Human Rights Considerations

This planning application engages certain human rights under the Human Rights Act 2008 (the HRA). The HRA prohibits unlawful interference by public bodies with conventions rights. The term 'engage' simply means that human rights may be affected or relevant.

This application has the legitimate aim of providing additional residential accommodation. 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.