

Item No.	Classification: OPEN	Date: 7 October 2014	Meeting Name: PLANNING COMMITTEE
Report title:	Development Management planning application: Application 14/AP/1872 for: Full Planning Permission Address: SITE OF THE FORMER TUKE SCHOOL, 2-4 WOODS ROAD, LONDON, SE15 2PX Proposal: Redevelopment of site to provide 122 residential units in a new building fronting Woods Road and Cossall Park ranging from 4-7 storeys high, a new 2-storey building at the rear of the site and provision of car parking, cycle parking and amenity space (Use Class C3).		
Ward(s) or groups affected:	Nunhead		
From:	Head of Development Management		
Application Start Date 20/06/2014		Application Expiry Date: 19/09/2014	
		Time extension Date: 07/11/2014	
Earliest Decision Date 07/08/2014			

RECOMMENDATION

- 1 That planning permission be granted, subject to conditions and completion of a legal agreement.
- 2 In the event that the legal agreement is not entered into by 7 November 2014, that the Head of Development Management is authorised to refuse planning permission, if appropriate, for the reasons set out in paragraph 151 of this report.

BACKGROUND INFORMATION

Site location and description

- 3 The application site is located on the western side of Woods Road, just south of Queens Road in Peckham. There is a hotel, dwellings, a doctors surgery and Peckham Methodist Chapel to the north, John Donne Primary School to the east, Cossall Park to the south, and the rear of houses on Consort Road to the west.
- 4 The eastern part of the site is owned by the Council and is the site of the former Tuke School. As part of the Building Schools for the Future programme Tuke School relocated to a new building in Daniel Gardens, SE15, which opened in 2010. The buildings on the site subsequently became vacant and were demolished, and the site has now been cleared. The western part of the site is in use as a scaffold yard and comprises a vehicular access from Woods Road, a number of open storage areas, a storage shed and the grade II listed Woods Road which is currently in use as offices for the scaffold yard; this part of the site is owned by the applicant. The site measures 0.6 hectares in total.

- 5 There are a number of listed buildings near to and adjoining the site at 2-10 and 32-40 Queens Road, and numbers 1, 5, 7, 9, 11, 13, 15 and 17 Consort Road.

Details of proposal

- 6 Kitewood Developments Ltd seek full planning permission to redevelop of the site to provide 122 residential units. The existing storage shed and other storage structures associated with the scaffold yard would be demolished and two new buildings would be erected. The first and largest of the buildings would essentially be a perimeter block running along the Woods Road and Cossall Park frontages. It would contain 118 dwellings and would range from 4-7 storeys high, starting at 4-storeys closest to 2 Woods Road, stepping up to 7-storeys (21.25m) on the southern corner with Cossall Park, and stepping back down to 4-storeys at its southern-most point adjoining the park. Although a single building, it is described in the submission as blocks A-D, with block A being closest to the listed building and block D being the southern-most part adjoining the park.
- 7 The second building would be located at the rear of 6-10 Queens Road on the north-western part of the site. It would be 2-storeys high with undercroft parking at ground level and four flats above. This building would measure 6m high with a flat roof and is described in the submission as block E or the Gate House block.
- 8 Both buildings would be constructed of brick, with a contrasting brick to the tallest part of the perimeter block. The top floors of the perimeter block would be glazed and both blocks would have brown roofs. Aluminium windows and doors are proposed; cedar timber panels would be incorporated into parts of the perimeter block and the balcony balustrades would be glazed.
- 9 The existing vehicular access would be retained and upgraded, leading to 25 parking spaces and a landscaped communal garden. Although it is currently the intention that 2 Woods Road would be refurbished and converted to a dwelling, this does not form part of the application. It has however, been included within the application site boundary because it is proposed to re-landscape the areas around the building.
- 10 The following mix of units is proposed:

Unit size	Amount	Percentage
1B2P	43	35.2%
2B3P	25	20.4%
2B4P	27	22.1%
3B4P	13	11% %
3B5P	10	8.1%
3B6P	4	3.2%
Total	122	100%

Amendments

- 11 The proposal as originally submitted was for 124 units, but owing to concerns regarding the quality of accommodation this has been reduced to 122. An additional balcony has been added to the proposed Gate House building, further balconies to the north-facing elevation of block C, and recessed brick panels to the northern-most elevation of the perimeter block have been changed to obscure-glazed windows. A tree on the site which was proposed to be removed would be retained (T10).

Relevant planning history

- 12 14-AP-2059 - Screening Opinion for Environmental Impact Assessment for a proposal to provide 124 apartments in mixed four to seven storey building. A negative screening opinion was issued on 04/07/2014, i.e. concluding that the proposed development would not require an Environmental Impact Assessment to be carried out.
- 13 14-AP-0614 - Screening opinion for: Redevelopment of land at Woods Road comprising a new building stepping in height from 4-8 storeys, a 2-storey block at the rear of 2-12 Queens Road and alterations and change of use of 2 Woods Road, to provide approximately 130 dwellings. A negative screening opinion was issued on 07/05/2014 concluding that the proposed development would not require an Environmental Impact Assessment to be carried out.
- 14 97-AP-0237 - Redevelopment of the site by the construction of 12 x 2-bed flats, 7 x 2-bed houses and 4 x 3-bed houses. Outline planning permission was GRANTED on 26/08/1997 and occupied the same site as the application site.
- 15 Pre-application advice was provided in advance of this application, the details of which are held electronically by the local authority. A number of meetings have been held with the applicant prior to the submission of this application. Discussions centred around the detailed design of the proposal, its height, scale and massing, the quality of accommodation to be provided and transport impacts.

Planning history of adjoining and neighbouring sites

John Donne Primary School

- 16 12-AP-1839 - Erection of a single storey modular building extension in northwest corner of site adjacent to the existing single storey modular building (to retain 2 new classroom units, common room, toilet facilities and canopied external decked access terraces) for a temporary period of 2 years. Planning permission was GRANTED for a limited period on 17/08/2012.
- 17 10-AP-0876 - Demolition and removal of existing single storey timber framed teaching support classroom unit and replacement with new single storey modular building to provide 2 new classroom units, common room, toilet facilities and canopied external decked access terraces. External hard and soft areas to be landscaped. Redundant raised brick flower beds to be removed and new canopied parents waiting shelter / buggy parking area to be provided adjacent entrance to playground spaces. Planning permission was GRANTED for a limited period on 02/07/2014.

Consort Club, 3 Consort Road

- 18 14-AP-1578 - Change of use to a 30 room hostel for temporary accommodation of up to six months. Application UNDER CONSIDERATION.
- 19 12-AP-3080 - Use of existing building as a hostel with enhanced living-benefits for temporary accommodation (3 months occupancy) and alteration to side [northern] elevation. An appeal was lodged against non-determination and was subsequently DISMISSED on 30/12/2013. This was on the grounds that the proposed use was for 31 self-contained flats, the units would be severely undersized, and the intensification of the use would give rise to an unacceptable impact on local amenity.
- 20 There have been a number of applications for changes of use and extensions to properties along Queens Road and Consort Road.

Wood Dene, site bounded by Queens Road, Meeting House Lane and Carlton Grove

- 21 13-AP-0876 - Demolition of remaining structures and erection of three buildings between two and nine storeys in height to provide 333 residential units and 450sqm (GIA) of flexible retail (Classes A1-A3) / office (Class B1) / non-residential institution (Class D1) space together with the provision of access, car and cycle parking, plant, landscaping and an energy centre. Planning permission was GRANTED on 29/07/2013 following the completion of a s106 agreement.

83-89 Queens Road and 2A-C Carlton Grove

- 22 13-AP-1738 - Demolition of 2A-C Carlton Grove. Erection of a part 4 part 6 storey building with a detached two / three storey building behind, providing 420sqm of ground floor retail space (Use Class A1) and 47 self-contained dwellings. Provision of 5 accessible parking spaces off street and associated communal amenity space. Planning permission was GRANTED on 14/02/2014 following the completion of a s106 agreement.

23 **KEY ISSUES FOR CONSIDERATION**

Summary of main issues

- 24 The main issues to be considered in respect of this application are:

- a) Principle of the proposed development in terms of land use
- b) Environmental impact assessment
- c) Density
- d) Affordable housing
- e) Housing mix
- f) Quality of accommodation
- g) Wheelchair accessible housing
- h) Impact of proposed development on amenity of existing occupiers
- i) Transport issues
- j) Design and setting of adjacent listed buildings
- k) Trees and landscaping
- l) Archaeology
- m) Planning obligations (S.106 undertaking or agreement)
- n) Mayoral Community Infrastructure levy
- o) Sustainable development implications
- p) Ecology
- q) Contaminated land
- r) Air quality
- s) Flooding
- t) Statement of community involvement

Planning policy

- 25 The site is subject to the following designations on the Proposals Map:
- Proposal site 70P (saved Southwark Plan)
 - Air Quality Management Area
 - Archaeological Priority Zone
 - Urban Density Zone
 - 35% private / 35% affordable housing area
 - Public Transport Accessibility Level (PTAL) 6a (high)
 - Action area core and proposals site 15 (draft Peckham and Nunhead Area Action Plan)

National Planning Policy Framework (NPPF)

- 26 Section 1 - Building a strong, competitive economy
Section 4 - Promoting sustainable transport
Section 6 - Delivering a wide choice of high quality homes
Section 7 - Requiring good design
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

London Plan July 2011 consolidated with revised early minor alterations October 2013

- 27 Policy 3.3 Increasing housing supply
Policy 3.5 Quality and design of housing developments
Policy 3.6 Children and young people's play and informal recreation facilities
Policy 3.8 Housing choice
Policy 3.9 Mixed and balanced communities
Policy 3.13 Affordable housing thresholds
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 5.8 Innovative energy technologies
Policy 5.11 Green roofs and development site environs
Policy 5.12 Flood risk management
Policy 5.15 Water use and supplies
Policy 6.9 Cycling
Policy 6.10 Walking
Policy 6.13 Parking
Policy 7.2 An inclusive environment
Policy 7.3 Designing out crime
Policy 7.4 Local character
Policy 7.5 Public realm
Policy 7.6 Architecture
Policy 7.8 Heritage Assets and Archaeology
Policy 7.18 Protecting local open space and addressing local deficiency
Policy 7.19 Biodiversity and access to nature
Policy 7.21 Trees and woodlands
Policy 8.2 Planning obligations
Policy 8.3 Community infrastructure levy

Core Strategy 2011

- 28 Strategic policy 1 - Sustainable development
Strategic policy 2 - Sustainable transport
Strategic policy 5 - Providing new homes
Strategic policy 6 - Homes for people on different incomes
Strategic policy 7 - Family homes
Strategic policy 11 - Open spaces and wildlife
Strategic policy 12 - Design and conservation
Strategic policy 13 - High environmental standards
Strategic policy 14 - Implementation and delivery

Southwark Plan 2007 (July) - saved policies

- 29 The Council's cabinet on 19 March 2013, as required by para 215 of the NPPF, considered the issue of compliance of Southwark Planning Policy with the National Planning Policy Framework. All policies and proposals were reviewed and the Council satisfied itself that the policies and proposals in use were in conformity with the NPPF. The resolution was that with the exception of Policy 1.8 (location of retail outside town centres) in the Southwark Plan all Southwark Plan policies are saved. Therefore due weight should be given to relevant policies in existing plans in accordance to their degree of consistency with the NPPF.
- 30 SP20 - Development site uses
- 2.5 - Planning obligations
 - 3.2 - Protection of amenity
 - 3.3 - Sustainability assessment
 - 3.4 - Energy efficiency
 - 3.6 - Air quality
 - 3.7 - Waste reduction
 - 3.9 - Water
 - 3.11 - Efficient use of land
 - 3.12 - Quality in design
 - 3.13 - Urban design
 - 3.14 - Designing out crime
 - 3.15 - Conservation of the historic environment
 - 3.18 - Setting of listed buildings, conservation areas and world heritage sites
 - 3.19 - Archaeology
 - 3.28 - Biodiversity
 - 4.2 - Quality of residential accommodation
 - 4.3 - Mix of dwellings
 - 4.4 - Affordable housing
 - 4.5 - Wheelchair affordable housing
 - 5.2 - Transport impacts
 - 5.3 - Walking and cycling
 - 5.6 - Car parking
 - 5.7 - Parking standards for disabled people and the mobility impaired
 - 7.1 - Peckham Action Area

Supplementary Planning Documents

- 31 Section 106 Planning Obligations (2007)
Sustainable design and construction SPD (2009)
Sustainability assessments SPD (2009)
Sustainable Transport SPD (2010)
Residential Design Standards SPD (2011)
Affordable housing SPD (2008 - Adopted and 2011 - Draft)
Peckham and Nunhead Area Action Plan (September 2012 - Draft)

Draft Peckham and Nunhead Area Action Plan (PNAAP 2012)

- 32 The site lies within the proposed action area core and is identified as proposals site 15 in the PNAAP, which designates the site for residential use with an indicative capacity of 115 units; the site specific guidance advises that development proposals should improve and maximise frontages to Cossall Park. There is a fenced off area immediately to the south of the site which was part of the park and was later annexed to the school, and the site designation advises that this will be returned to the park and designated as protected open space.
- 33 Following its publication in September 2012 the PNAAP has been to Examination in Public (EiP) and the final Inspector's report has been received. The PNAAP is now

being prepared for adoption in October this year and although in draft form, it holds considerable weight.

Principle of development in terms of land use

- 34 Policy 3.3 of the London Plan recognises the pressing need for more homes in London and sets housing targets for the boroughs, and strategic policy 5 of the Core Strategy requires 24,450 new homes to be provided between 2011-2016. The site is designated proposal site 70P in the saved Southwark Plan which allocates the site for housing, subject to the relocation of Tuke School, and an indicative capacity of 95-222 residential units is given. Saved policy SP20 of the Southwark Plan requires development on proposal sites to be carried out in accordance with the site designation, and states that planning permission may be granted for 'other acceptable uses' within the designation provided the 'required uses' would be secured. In this instance housing is the only required use and no other acceptable uses are given.
- 35 The PNAAP sets out the planning framework that will help to bring long lasting improvements to Peckham and Nunhead over the next 15 years, and it advises that the focus of development and physical change will take place in and around Peckham town centre which is defined as Peckham core action area. The PNAAP describes how the core area is considered suitable for change owing to its character which includes a mix of uses, high public transport accessibility levels and opportunities and capacity for growth. Policy 16 of the PNAAP advises that a minimum of 2,000 net new homes will be provided in Peckham and Nunhead between 2011 and 2026, with at least 1,500 of these to be located in the core action area; it states that the majority of the new homes will be delivered on proposal sites.
- 36 As stated, the site is located in the PNAAP core area and is identified as a proposal site allocated for housing. The majority of objections received in response to the application have raised the pressure on school places as a significant concern, including that John Donne school opposite is fully subscribed and having to accept bulge classes, and that providing flats on the site would prevent children currently living locally from being able to attend the school. The objectors question where children living in the development and recently consented developments in the vicinity would be schooled, and consider that the site would be better used either for a school or a school and housing. There are concerns that the cumulative impacts of new developments on infrastructure capacity have not been fully considered, and that the situation was different when the PNAAP was being prepared.
- 37 The PNAAP sets out the Council's approach to education provision in the area and policy 8 advises that the Council will deliver improvements to schools by working with partners to provide additional places at primary schools to meet anticipated demand. It advises that there is projected pressure for primary school places in Peckham, Nunhead and Peckham Rye and that this would be met by temporary expansion of classes, and permanent expansions at popular, good and outstanding schools. It goes on to state how secondary school places are planned on a borough-wide basis, and that pressure for additional places would be met through the provision of a new 5FE Aylesbury Academy in Walworth and another in Rotherhithe.
- 38 Tuke School, a special needs secondary school, relocated to a new, purpose built building in Daniel Gardens in 2010. The application site was subsequently found to be surplus to educational requirements and at its meeting on 16 July 2013 the Council's Cabinet agreed to its disposal for housing. The Cabinet report relating to the disposal advises that there would be no net loss of school places or facilities as a new, larger building had been provided for Tuke School, and provision of additional school places to meet demand would be met using other sites.

- 39 The infrastructure requirements for the area have been considered and planned for through the preparation of the PNAAP, section 7.5 of which sets out how over the next 15 years the Council expects over 2,000 new homes to be built in Nunhead and Peckham, along with increased amounts of retail, cultural and business space. It advises that in order to ensure that new development delivers sustainable communities, the facilities and services needs of these populations must be properly planned for, that existing infrastructure will need to be improved, and new infrastructure provided to cope with the additional population and visitors. The PNAAP advises that within the schedule of proposals sites indicative capacities for each of the main sites have been provided which has assisted in considering the possible future infrastructure needs for the area.
- 40 The PNAAP approach to both education and housing provision in the area were reviewed by the Inspector at the Examination in Public between 23 July and 2 August last year and were found to be sound. It is recognised that the development would generate demand for services such as education and health care, and a s106 agreement would be required to mitigate this which is the usual approach for developments with 10 more residential units. The PNAAP now holds considerable weight and it is intended that it will be adopted in October this year. The proposal would be in accordance with both the site designation in the saved Southwark Plan and the PNAAP and as such is considered to be acceptable in land use terms.

Environmental impact assessment (EIA)

- 41 Concerns have been raised by neighbouring residents that the size of the site and scale of the development is such that an EIA should have been required, that consultation on the screening opinions and notifying residents of the decision were not carried out properly, that the proposal would have significant environmental effects, and that the cumulative impact of the proposals when considered in light of recent consents at the Wood Dene site and Carlton Grove were not properly considered. The Wood Dene site on the northern side of Queens Road is approximately 80m from the application site and has consent for 333 new dwellings and flexible retail, office and community space (reference: 13-AP-0876); the Carlton Grove site is located to the east of Wood Dene and has consent for 47 residential units and commercial space (reference: 13-AP-1738).
- 42 Prior to the submission of this application two requests for screening opinions were submitted to the Council under the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 'the Regulations; this was to determine whether an EIA should be carried out to determine the impacts of the development. The first was for the provision of approximately 130 dwellings on the site (reference 14-AP-0614) and the second was for the provision of 124 flats (reference:14-AP-2059).
- 43 Development falling within Schedule 1 of the Regulations will always require an EIA to be undertaken; this includes development such as oil refineries, power stations and airports. Schedule 2 development is defined as development which is likely to have significant effects on the environment by virtue of factors such as its nature, size or location. If a development is listed in column 1 of schedule 2 and exceeds the relevant thresholds or criteria set out in column 2 (sometimes referred to as 'exclusion thresholds and criteria') the proposal needs to be screened by the Local Planning Authority to determine whether significant effects are likely. Developments listed in Schedule 2 which are located or partly located in a 'sensitive area' also need to be screened, even if they are below the relevant thresholds. The Regulations define sensitive areas as sites of special scientific interest, land within a national park, land within the Broads, world heritage sites, scheduled ancient monuments, areas of outstanding natural beauty and European sites relating to the conservation of habitat

and species. It is not the case that developments on all sites over 0.5ha automatically require an EIA.

- 44 The site is not located in a sensitive area as defined by the Regulations, but the proposal and those which were subject to the screening opinions could fall within column 1 of schedule 2 under the category of 'urban development project'. The Regulations advise that this includes the construction of shopping centres and car parks, sports stadiums, leisure centres and multiplex cinemas. The site also exceeds the 0.5ha exclusion threshold set out in column 2 of schedule 2 hence the need for the proposed developments to be screened. Guidance on determining whether schedule 2 development would require an EIA is set out at schedule 3 of the Regulations.
- 45 An assessment of the proposals based on a review of the schedule 3 screening criteria was undertaken to determine whether the developments would be likely to have significant effects upon the environment by virtue of their nature, size or location. It was concluded that although the developments would be of a substantial scale, they would not give rise to environmental effects of more than local significance and an EIA was not required. Given the similarities between the proposals subject to the screening opinions and that for which permission is now sought, it is considered that an EIA is not required for this proposal.
- 46 Although a development may be large, it does not necessarily follow that its environmental effects would be significant and far-reaching. It is considered that the impacts would be relatively localised and limited to Woods Road, Consort Road and a small part of Queens Road. It is recognised that it would increase demand for local services including education, but this would not in itself require an EIA to be undertaken as the infrastructure needs of the area have been considered through the AAP process and s106 contributions are the mechanism for mitigating this.
- 47 It is not considered that cumulatively the proposals on the application site, Wood Dene and Carlton Grove would have significant environmental effects that would require the submission of an EIA. The Wood Dene site, also a proposal site in the PNAAP, contained 323 dwellings before the buildings were demolished and the planning application for the redevelopment of that site similarly did not require an EIA. All of the sites are located in densely populated urban areas with excellent access to public transport and whilst it is recognised that the proposals would increase demand for services in the area, both the Wood Dene and Carlton Grove permissions were subject to s106 agreements which secured among other things, contributions towards health care and education.
- 48 Although the Regulations do not require any consultation to be carried out for screening opinions, a number of residents commented on the applications and were of the view that an EIA should be required. Concerns have been raised that there was a delay in notifying those residents of the outcomes of the screening opinions and that residents were sent letters stating 'do not send' and no information on the decision. This was due to a technical issue relating to the way in which screening opinions are recorded, and this is in the process of being rectified. It is noted that the first screening opinion was issued on 7 May 2014 and the decision was displayed on the Council's website on 13 May, and the second screening opinion was issued on 4 July 2014 and the decision was displayed on the website on 11 July 2014.

Density

- 49 Strategic policy 5 of the Core Strategy 'Providing new homes' permits a density range of between 200-700 habitable rooms per hectare (hrh) in the urban density zone and this is repeated through policy 16 of the PNAAP, which also notes that this may be

exceeded in the core area where developments are of an exemplary standard of design. Concerns have been raised that the proposal would represent an over-development of the site and would lead to significant overcrowding in what is already a densely populated area.

- 50 There would be 356 habitable rooms within the development equating to 532 habitable rooms per hectare, sitting comfortably within the permitted range. It is noted that the site specific guidance in the PNAAP provides an indicative capacity of 115 dwellings on the site which the proposal would exceed by seven units, but this is not considered to be significant, particularly as the density would sit within the permitted range. The proposed number of units would also sit comfortably within the indicative capacity given in the Southwark Plan proposal site designation which is for 95-222 dwellings.
- 51 A neighbouring resident has commented that 2 Woods Road is included within the application site but has not been factored into the density calculation; this building is currently in commercial use as offices for the scaffold yard. The Southwark Plan sets out the methodology for calculating the density of mixed use schemes and requires areas of non-residential space to be divided by 27.5 to create an equivalent in terms of habitable rooms. The listed building provides 309sqm of commercial floorspace and based on this methodology with the listed building included, the density of the proposed development would equate to 548 habitable rooms per hectare, remaining within the permitted range.

Affordable housing

- 52 Strategic policy 6 of the Core Strategy 'Homes for people on different incomes' requires at least 35% of the units to be affordable and at least 35% to be private, and this is repeated through policy 17 of the PNAAP. For developments of 15 or more units affordable housing is calculated as a percentage of the habitable rooms rather than total number of units, and further information can be found in the Council's draft Affordable Housing SPD (2011). In accordance with saved policy 4.5 of the Southwark Plan, for every affordable housing unit which complies with the wheelchair design standards one less affordable habitable room will be required.
- 53 With regard to tenure, saved policy 4.4 of the Southwark Plan requires a split of 30% social rented: 70% 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.
- 54 Concerns have been raised that the proposed development would not provide any affordable housing. However, 39 of the proposed flats would be affordable, located in blocks A and B of the perimeter block on the northern part of the site; this would equate to 32% in terms of units. In order to achieve 35% affordable habitable rooms, 134 habitable rooms would be required, although this could be reduced to 129 because five wheelchair accessible affordable units would be provided (3 x 2B3P, 1 x 2B4P and 1 x 3B4P flats). The proposal would provide 129 affordable habitable rooms and would therefore be policy compliant.
- 55 In terms of tenure mix the proposal would provide 15.4% social rented units (3-bed units), 10.3% affordable rented units (1 and 2-bed units) and 74.3% shared ownership which would broadly comply with the required tenure mix. The affordable rented units would be let at up to 70% of market value or below the local housing allowance, whichever is lowest. The proposed mix of affordable units is set out below.

	Social	Affordable	Intermediate	Total	Percentage by
--	---------------	-------------------	---------------------	--------------	----------------------

	rented	rented			mix
1 bedroom	0	1	10	11	28.3%
2 bedroom	0	3	19	22	56.4%
3 bedroom	6	0	0	6	15.3%
Total units	6	4	29	39	100%

- 56 The delivery of the affordable housing including the rent levels and a requirement for them to be completed before more than 50% of the private units can be occupied would be secured through the s106 agreement. As the site is located in a ward where 35% private housing is required, a clause must also be included to ensure that a minimum of 35% of the units within the development would remain private.

Housing mix

- 57 Strategic policy 7 of the Core Strategy 'Family homes' requires developments of 10 or more units to provide at least 60% 2+ bedroom units and 20% 3+ bedroom units. No more than 5% studio units can be provided and these can only be for the private housing.
- 58 Concerns have been raised that the proposal would fail to provide a policy compliant mix of housing. However, following revisions to the scheme resulting in two less units overall, the development would provide 65% 2+ bed units and 22% 3+ bed units which would be policy compliant.

Quality of accommodation

- 59 Saved policy 4.2 of the Southwark Plan 'Quality of accommodation' requires developments to achieve good quality living conditions. Further information is provided in the Residential Design Standards SPD which sets out minimum unit and room sizes, together with amenity space standards. Concerns have been raised by neighbouring residents regarding the quality of accommodation to be provided including whether the units would be large enough.
- 60 With regard to the proposed site layout, the Councils Parks and Open Spaces Service has commented that the proximity of the development to a ball park within Cossall Park could result in noise complaints from future occupiers. The development would be located a minimum of 20m from the ball court, which is currently accessible 24 hours a day and is unlit; the rooms facing the park would serve a mix of living spaces and bedrooms. Whilst this concern is noted, the separation distance is such that this should not be a significant issue. As the ball court is currently unlit people are only likely to be able to use it during daylight hours, and it is unlikely that it would be used beyond 10pm and only then during the summer months. Whilst lighting to the court could be provided in the future, this would require planning permission to enable a full assessment of the impacts to be made.
- 61 Some of the units located at the inward facing corners of the perimeter block would have a close relationship. However, the windows have been designed to incorporate timber panels which would prevent direct views into neighbouring accommodation, whilst still allowing for good levels of outlook. The relationship between the perimeter block and 2 Woods Road would be acceptable in ensuring that the listed building could be converted to good quality residential accommodation in the future.

- 62 In relation to privacy, the Residential Design Standards SPD recommends a minimum window-to-window separation distance of 12m at the front of the building and any elevation which fronts a highway, and 21m at the rear of a building. The separation distance between the Gate House block and the perimeter block would be approximately 26m which would ensure good levels of privacy between the units. There would be balconies to neighbouring units next to each other on the northern elevation of the perimeter block (block C) therefore a condition for screening is recommended.
- 63 The individual unit sizes within the development would be as follows:

Bedspaces	Overall unit size	SPD minimum	Amenity space	SPD Minimum
1-bed	50sqm-71sqm	50sqm	5sqm-55sqm	10sqm
2 bed	61sqm-96sqm	61sqm-70sqm	5sqm-92sqm	10sqm
3 bed	76sqm-121sqm	74sqm-95sqm	10sqm – 317sqm	10sqm

- 64 With the exception of five bedrooms which would be marginally undersized (one by 1.3sqm and the others by 0.4m) all of the individual room sizes would meet the minimum requirements set out in the Residential Design Standards SPD. The layout of the units would be acceptable and all of the 3-bed social rented units would have separate eating and living spaces. Thirteen of the units would have access to their amenity space from both the living space and a bedroom which could limit its useability. However, eleven would be 1-bed units which would be occupied by a single person or a couple so this should not be significant issue and no 3-bedroom units would be affected in this way. A number of the units would have large balconies or wrap-around terraces which would run outside living spaces and bedrooms, particularly on the top floors of the building, but given the size of the amenity spaces this should not restrict their usability and this in any event is not an uncommon arrangement.

Internal light levels

- 65 The majority of the units (72%) would be dual or triple aspect and none of the single-aspect units would be north-facing. A daylight and sunlight report based on the Building Research Establishment (BRE) Guidance has been submitted which considers light to the proposed dwellings. The light levels to the rooms has been calculated using the Average Daylight Factor (ADF) which determines the natural internal light or day lit appearance of a room. The BRE guidance recommends that an ADF of 1% be achieved for bedrooms, 1.5% for living rooms and 2% for kitchens.
- 66 Most of the units would have open plan living spaces and an ADF of 1.5% is considered to be acceptable for this type of room. Of the windows tested, 80% would comply with the BRE guidance and 20% would fail. Of those which would fail, some are as a result of the depth of the rooms, some are affected by recessed or overhanging balconies, and a number are also affected by the trees in Cossall Park which overhang the site boundary. The Council's Parks and Open Spaces Service has raised the proximity of the proposed development to the trees as a concern, on the grounds that there may be pressure from future occupiers to cut them back to allow more light into the accommodation. Parks has advised that the Council's tree management strategy is to carry out works to trees for arboricultural reasons only, and not to allow more light into proprietress.
- 67 There would be 44 units within blocks C and D (36%) which would have low ADFs owing to the room depths, balconies, and predominantly due to the trees. Some of the results would be marginally lower than the BRE recommendation (for example a

number of bedrooms would achieve 0.7%-0.9% which would not be significantly far from the target of 1%), but some would have open plan living spaces with ADFs as low as 0.2% (4 units affected), 0.3% (3 units affected) and 0.4% (4 units affected). These results are based on the trees in their current condition and the Council's Urban Forester has advised that some pruning and crown lifting would be required in order to facilitate the development.

- 68 The trees are deciduous therefore the greatest effect would be during summer when they would be in full leaf. Whilst there could be pressure from future occupiers to cut them back, the windows in block C would be south-facing so the trees would provide some shading during the summer and would make for a more secluded relationship with the park. The units in blocks C and D would be private which people would either choose to buy or rent or not, and future occupiers would be aware of the proximity to the trees. In light of this whilst the close relationship is noted, when weighed in the balance in terms of making an efficient use of the site and contributing to the stock of housing in the borough including affordable housing, this is considered to be acceptable. It is recommended that Tree Preservation Order (TPO) proceedings be initiated to protect the trees from inappropriate works.

Amenity space

- 69 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:
- 70
- 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.
- 71 All of the units would have access to private amenity space in the form of a garden, balcony or terrace and all of the 3+ bedroom units would have at least 10sqm of private amenity space. Some of the smaller units would have less than the required 10sqm and overall the shortfall of private amenity space would be 309sqm. However, 1,188sqm of communal amenity space would be provided in an attractive landscaped courtyard and in accordance with the approach recommended in the Residential Design Standards SPD, this would be more than sufficient to meet the 50sqm communal amenity space requirement for the development and to compensate for the shortfall in private amenity space.
- 72 Section 3.2 of the Residential Design Standards SPD advises that children's play areas should be provided in all new flat developments containing the potential for 10 or more child bed spaces. It is proposed to provide doorstep play facilities within the development for children up to five years old which would be spread out across the development and would include a sand pit and playable objects in the communal garden. There would be a requirement for 120sqm of children's play space to serve the development and a condition for details is recommended to ensure that this is met, the delivery of which should be linked to the occupation of the development. As detailed in the planning obligations section of this report, a contribution towards children's play facilities in the area would be provided.

Light levels to external amenity space

- 73 In relation to external amenity space, the BRE guidance advises that for an area to appear adequately sunlit throughout the year, at least half of the garden or amenity area should receive at least 2 hours of sunlight on 21st March. A shadow assessment has been submitted which shows that the communal garden would achieve this.

Noise

- 74 No noise assessment has been submitted with the application although the site is located in a predominantly residential area and as such the environment is not considered to be unsuitable for housing in terms of background noise levels. The Council's Environmental Protection Team (EPT) has reviewed the application and recommended conditions to ensure that noise levels within the flats would fall within acceptable limits, and these form part of the draft recommendation. These would ensure that the occupiers would not be adversely affected by any noise associated with the school or church. It is noted that EPT recommend a condition relating to noise levels to the external amenity spaces, but there are other residential properties and gardens closer to Queens Road than the site and this is not considered to be necessary.

Secure by Design

- 75 The Metropolitan Police Secure by Design Officer has raised no objections in principle to the scheme, and has advised that consideration should be given to a number of measures including secure windows, doors and lobbies. This is with a view to the development achieving Secure by Design certification which should be secured by way of a condition.

Wheelchair accessible housing

- 76 Saved policy 4.3 of the Southwark Plan requires at least 10% of all major new residential developments to be suitable for wheelchair users, except where this is not possible due to the physical constraints of the site.
- 77 There would be 12 wheelchair accessible units within the development which would equate to 10% provision. They would comprise 3 x 1-bed, 6 x 2-bed and 3 x 3-bed units which would represent a good mix of unit sizes, and of these, 4 x 2-bed and 1 x 3-bed units would be in the affordable sector. Large-scale drawings of a typical layout of the wheelchair units have been provided and are found to be acceptable, with sufficient circulation space, clearance for door openings and mobility space around kitchen and bathroom utilities. It is recommended that all of the wheelchair units within the scheme are required to be fitted out to a base standard and marketed. If wheelchair users wishing to occupy the flats are found, the developer would then be required to fully fit out the units in accordance with the end-user requirements. It is recommended that one of the private wheelchair units be fully fitted out from the out-set to enable people to view it and this should be secured through the s106 agreement. All of the units would be lifetime homes compliant which is welcomed.
- 78 **Impact of proposed development on amenity of adjoining occupiers and surrounding area**
- 79 Strategic policy 13 of the Core Strategy 'High environmental standards' seeks to ensure that development sets high standards for reducing air, land, noise and light pollution and avoiding amenity and environmental problems that affect how we enjoy the environment in which we live and work. Saved policy 3.2 of the Southwark Plan

states that permission will not be granted for developments where a loss of amenity, including disturbance from noise, would be caused. The adopted Residential Design Standards SPD expands on policy and sets out guidance for protecting amenities in relation to privacy, daylight and sunlight. Concerns have been raised that the proposal would result in unacceptable loss of light, overshadowing and loss of privacy to neighbouring dwellings, John Donne school and Cossall Park.

- 80 The use of the site for housing would be consistent with the majority of the surrounding uses. Part of the site is currently being used as a scaffold yard and the movement of large vehicles and other activities associated with this would cease which could improve the amenity of the nearest residential properties. It is not considered that the proposal would impact upon the day-to-day operation of the doctors surgery and although there would be more vehicle movements associated with the development (as set out in the transport section of this report) Heavy Goods Vehicles (HGVs) would no longer use the site which could be considered an improvement. It is recognised that there could be some temporary disruption during construction which is considered further below, but upon completion of the development it is not considered that the operation of the school or church would be hindered by a residential use on the site. The new dwellings would be sound-proofed, limiting the likelihood of noise complaints from activities taking place at the church and it is noted that both the school and the church currently share a close relationship with a number of dwellings.

Overlooking

- 81 Starting at the north of the site, the proposed Gate House block would not contain any windows in its north or west-facing elevations and as such would not result in any loss of privacy to the neighbouring properties on Woods Road. There would be a balcony in its southern elevation, but this would be set 7m off the boundary and would not result in any significant loss of privacy. There would be a minimum separation distance of 48m to the rear of Cherry Tree Court which is a 3-4-storey block of flats to the north-east of the site and 24m to Peckham Methodist Church, all significantly exceeding the 12m distance recommended in the Residential Design Standards SPD.
- 82 Concerns have been raised that the development would overlook the school playground which could be a security risk, but schools are commonly found in dense urban locations and are often surrounded by dwellings; this would not be an unusual situation and could in fact improve the security of the school by increasing natural surveillance of the area. It is also noted that a large proportion of future occupiers could be at work during school hours. There would be a minimum separation distance of 14m between the proposed development and the playground, 16m to a temporary classroom in the playground and 28m to the main school building, all exceeding the 12m minimum requirement. There are flats within a 3-storey building at 6-22 Woods Road to the south-east of the site and the separation distance would be 42m.
- 83 With the exception of number 3, the separation distance between the proposed perimeter block and the adjoining properties on Consort Road to the west would range from 30m to 60m, well in excess of the recommended 1m. There could be an increased sense of overlooking of the gardens of numbers 5-9, but the building would be located 10m off the boundary and any overlooking would be at the bottom of their gardens which are approximately 22m long. It is noted that mature tree planting is proposed along the boundary and it is not considered that the relationship would cause a significant loss of amenity to these properties or gardens. Number 3 Consort Road (Consort Club) has been extended right up to its rear boundary and contains no windows in its rear elevation therefore there would be a limited impact on this building in terms of privacy or outlook.

- 84 Concerns have been raised regarding loss of privacy to Cossall Park but the park is a public space and saved policy 3.14 of the Southwark Plan 'Designing out crime' advises that design solutions should incorporate natural surveillance, by designing buildings with windows overlooking places such as parks and streets. Although not part of the proposals, the part of the park annexed by the former Tuke School would be returned to the park in the future thereby increasing the amount of useable space for residents.

Outlook

- 85 The separation distances described above are considered to be sufficient to ensure that the proposal would not have an overbearing impact upon any of the surrounding buildings and that they would retain a good level of outlook. It is noted that the Gate House block would share a boundary with numbers 4a, 4b, 6-8, 10 and 12 Queens Road and with the exception of number 12 which is a doctors surgery, all of these buildings are understood to be in residential use and have large rear gardens. There is currently a large metal shed in this location and the proposed Gate House block would occupy a broadly similar footprint and would only be 1m higher. It would extend further into the site towards the doctors surgery, but given the non-residential use of this building it is not considered that its outlook would be unduly compromised. It is intended that the rear wall facing the gardens of 4a and 4b Queens Road would be planted to become a green wall which would soften its appearance.

Daylight and sunlight

- 86 The BRE daylight and sunlight report submitted with the application considers the impacts on the following properties:

- 87 1-14 Cherry Tree Court, Woods Road
Peckham Methodist Church
John Donne Primary School
6, 8, 10 and 12 Queens Road
1a, 3a, 5a, 7a 9a, 1, 3, 5 and 7 Consort Road

- 88 The following tests have been carried out:

- Vertical Sky Component (VSC) - the amount of skylight reaching a window expressed as a percentage. The guidance recommends that the windows of neighbouring properties achieve a VSC of at least 27%, and notes that if the VSC is reduced to no less than 0.8 times its former value (i.e. 20% reduction) following the construction of a development, then the reduction will not be noticeable.
- No-Sky Line (NSL) - the area of a room at desk height that can see the sky. The guidance suggests that the NSL should not be reduced to less than 0.8 times its former value (i.e. no more than a 20% reduction).
- Sunlight - Annual Probable Sunlight Hours (APSH). This should be considered for all windows facing within 90 degrees of due south (windows outside of this orientation do not receive direct sunlight in the UK). The guidance advises that windows should receive at least 25% APSH, with 5% of this total being enjoyed during the winter months. If a window receives less than 25% of the APSH or less than 5% of the APSH during winter, and is reduced to less than 0.8 times its former value during either period and has a reduction in sunlight received over the whole year of greater than 4%, then sunlight to the building may be adversely affected.
- Overshadowing. The BRE guidance advises that for an area to appear

adequately sunlight throughout the year, at least half of the garden or amenity area should receive at least 2 hours of sunlight on 21st March. If an area would not meet the above and the area which can receive two hours of sun on 21st March is less than 0.8 times its former value, the loss of sunlight is likely to be noticeable.

1-14 Cherry Tree Court, Woods Road

- 89 One window within this building would fail the VSC test but the room affected is served by two other windows which would comply therefore the overall impact would not be significant. It is also noted that the room would pass the NSL test. All of the rooms within this block would pass in relation to the sunlight test and given the separation distance, the BRE consultant has confirmed that its amenity space does not need to be tested.

2 Woods Road

- 90 The BRE report confirms that the relationship of the perimeter block with 2 Woods Road is such that would not be adversely affected in terms of daylight and sunlight, therefore the proposal would not compromise the ability to convert the building to good quality residential accommodation in the future. With regard to its garden, there would be some shadowing to the eastern garden area but this should not be significant and it has an additional garden area to the south.

Peckham Methodist Church

- 91 Although this use would not be considered sensitive with regard to light or privacy, the impact upon its windows has been tested and would comply with the BRE guidance in relation to VSC, NSL and sunlight.

John Donne Primary School

- 92 Concerns have been raised that the daylight and sunlight report shows that five windows would fail to comply with the BRE guidance in relation to VSC and sunlight, that the impact on the school playground has not been tested, and that an independent report should be commissioned to verify the results.
- 93 All of the windows tested would comply with the BRE guidance in relation to VSC and NSL. The VSC for five of the windows would experience a percentage reduction of up to 23.95%, exceeding the 20% recommended in the guidance. However, the guidance makes it clear that if a window would retain a VSC of 27% there would be enough skylight reaching the windows, and the windows in question would retain VSCs of between 27.85% to 36.83%.
- 94 In relation to sunlight, four windows all serving the same room would experience a reduction in sunlight of greater than 20% (ranging from 33.3% to 50%). However, all of the windows would receive 5% or more annual probable sunlight hours during the winter and more than 25% during the summer and as such would comply with the BRE guidance. An overshadowing study of the school playground has been submitted which concludes that there would be a 2.3% reduction in the area immediately outside the building (north), well below the 20% maximum recommended in the BRE guidance therefore a good level of sunlight would be retained.

6, 8 and 10 Queens Road

- 95 All of the widows tested would comply with the BRE guidance in relation to VSC and NSL. Three windows to 10 Queens Road would not comply in relation to sunlight,

but the room is served by three other windows and would therefore remain well lit. In relation to overshadowing of external amenity areas, this would comply with the BRE guidance.

12 Queens Road (surgery)

- 96 All of the windows tested would comply with the BRE guidance in relation to VSC, NSL and sunlight. This building does not appear to have any external amenity space.

1a -9a and 1-7 Consort Road

- 97 All of the windows tested would comply with the BRE guidance in relation to VSC, NSL and sunlight. In relation to overshadowing of external amenity areas, all would comply with the exception of 1 Consort Road which would experience shadow during the winter in excess of the BRE guidance. It would however, comply during the summer months when the garden is likely to be most used.
- 98 Concerns have been raised that the proposed development would significantly overshadow the park. The impact on the park has not been specifically considered in the BRE report, but the orientation of the site is such that shadow from the development would be cast in a northerly direction away from the park for most of the day.

Construction impacts

- 99 Neighbouring residents have raised concerns regarding the lack of information in the submission about how the construction of the development would be managed, particularly given the proximity to the school and in conjunction with the nearby Wood Dene development. Concerns raised relate to noise and disturbance which could disrupt teaching and affect learning, the impact of construction vehicles including on pedestrian safety and routes to and from the school, and the impact upon air quality including for those with conditions such as asthma.
- 100 It is recognised that there would be some disruption during building works, although this is a temporary process and the impacts can be minimised; it is also not unusual for developments to take place in close proximity to schools. A condition for a construction method statement is recommended which has also been requested by TfL given the proximity to the red route. This would consider issues such as the routes that large construction vehicles would take, the times that they would arrive at and depart from the site, noise reduction and dust control measures.

Transport issues

- 101 Policy 2 of the Core Strategy 'Sustainable transport' asserts a commitment to encourage walking, cycling and the use of public transport rather than travel by car, and requires transport assessments to be provided with applications to show that schemes minimise their impacts, minimise car parking and maximise cycle parking to provide as many sustainable transport options as possible. Saved policy 5.1 of the Southwark Plan is also relevant which requires major developments to be located near transport nodes. Saved policy 5.2 states that planning permission will be granted for development unless there is an adverse impact on the transport network or if adequate provision for servicing is not made, saved policy 5.3 requires provision to be made for pedestrian and cyclists and saved policies 5.6 and 5.7 relate to car parking. A Transport Statement (TS), Travel Plan and annual survey of car clubs document have been submitted in support of the application.

Access and site layout

- 102 The site has a public transport accessibility level (PTAL) of 6a (high) and is not located in a controlled parking zone (CPZ). The nearest bus stops are on Queens Road approximately 120m from the centre of the site and Queens Road station is approximately 500m to the north-east. Woods Road connects with Queens Road which forms part of the A202 which is a Red Route for which Transport for London (TfL) is the Highway Authority. The section of Queens Road which runs adjacent to the site has a bus lane on the westbound carriageway and two lanes on the eastbound carriageway with bus stops and cycle lanes on either side of the road; there is a signal controlled pedestrian crossing on Queens Road approximately 60m from the site. There are currently double yellow lines and a redundant vehicle access outside the former school site, and waiting restrictions and a vehicle entrance outside John Donne school.
- 103 The existing vehicular access to the north of the site would be retained and upgraded to accommodate 2-way vehicular and pedestrian access to the site. This would lead to parking spaces along the western site boundary and there would be two pedestrian accesses from the southern part of the site next to the park. There would be automatic gates into the development and whilst gates are not generally encouraged, it is recognised that there would be the need to keep the rear of the development secure. They would be set approximately 16m back from the junction so that vehicles would not have to wait on Woods Road and the set-back is such that they would not appear overly dominant in the streetscene. The details have been reviewed by the Council's Transport Planning Team and are found to be acceptable, subject to a condition for detailed drawings of the access including visibility splays.

Trip Generation

- 104 Concerns have been raised by neighbouring residents on the grounds of traffic generation which would add to existing congestion in the area, the safety of pedestrians including children travelling to and from the school, and safety at the junction of Woods Road with Queens Road.
- 105 The Transport Statement submitted with the application concludes that the anticipated level of vehicular trip generation associated with the development would be greater than its existing use. It concludes that there would be 16 more vehicle movements during the morning peak (this could be vehicles 8 arriving at the site and 8 departing) and 38 additional trips during the evening. The peak hours in this location are identified as 0730-0830 and 1700-1800 and this would equate to an extra vehicle every 7.5 minutes during the morning peak and an extra vehicle every 3.5 minutes during the evening peak. The TS advises that there would be an additional 6 vehicle movements arising from the development between 2-4pm which would coincide with school pick-up time which would not be significant. In relation to Peckham Methodist Church, trip generation data indicates that it would result in seven vehicles arriving and seven departing on a typical Sunday morning. The catchment of the church is likely to be fairly local and the site is in any event very well served by public transport.
- 106 The increase in vehicle trips would not impact significantly on the operation of the junction of Woods Road with Queens Road. The trip generation modelling takes account of the existing operation on the site and existing vehicle movements associated with the school and the results show that there would be no significant increase in queue length / times or impacts on the junction capacity or operation. There is a crossing close to the site on Queens Road and as part of works to create a cycle super highway along Queens Road there would be a raised table across the Woods Road junction and an extended footway. This would help to slow traffic and make the junction safer for pedestrians, and there would no longer be HGVs associated with the scaffold yard in and out of the site on a regular basis. A

contribution towards a car club space would be provided, together with 3 years membership for future occupiers and a travel plan which could reduce the number of vehicle trips to and from the site.

Car parking

- 107 Policy 15 of the AAP establishes maximum parking standards for developments and advises that in the core area developments can have a maximum of 0.3 spaces per unit, with the level of parking to be justified through a transport assessment. The proposed development would provide 25 on-site parking spaces to serve the 122 flats, which would equate to 0.2 spaces per unit, below the policy maximum; of these spaces 13 would be wheelchair accessible. Concerns have been raised that this would not be sufficient to serve the development, and that the parking survey carried out did not properly take account of whether parking would be needed around the school during the evenings, a possible increase in car ownership from people currently living in Woods Road, the impact of controlled parking zones which have been introduced in neighbouring streets and cumulative impacts with neighbouring developments.
- 108 Car ownership levels for the development based on census information is estimated to be 35%, which for a development of 122 units would equate to 43 vehicles. As 25 spaces would be provided on site, the proposal could result in 18 vehicles being parked on street. In order to establish whether there would be capacity on-street to accommodate this, parking surveys of Woods Road, Colemore Mews and Burchell Road were undertaken on Tuesday 18 March 2014 and Wednesday 19 March at 0100. Concerns have been raised that the times during which the surveys were undertaken would not capture commuter parking which has increased following improvements to local rail services. However, peak parking demand from the development would be during the evenings when people return home from work and the timing of the surveys would capture this; it would not necessarily coincide with demand for commuter parking during the day. It is also noted that parking controls were introduced on neighbouring streets before the surveys were undertaken so any impact would have been captured.
- 109 The survey identified that there is space for 139 cars to park on-street within the survey area and it is noted that the keep clear lines on Woods Road outside the school are only enforceable between the hours of 0800 and 1700 on weekdays. The survey found that on average Woods Road experiences 72% parking stress, with 23 spaces remaining available during the survey times. Four vehicles counted were parked on double yellow lines, but these spaces were not included in park-able kerbside space. The on-street capacity would be sufficient to accommodate the predicted 18 overspill vehicles from the proposed development, with five spaces remaining. As stated it is proposed to provide a travel plan and a car club space within the vicinity of the site which could reduce levels of car ownership. The location of the car club space would need to be agreed with the Council's Highways Department and the car club operator, and providing it on-street in a visible location could reduce levels of car ownership among existing residents. The development would require a site-specific transport contribution of £61k and it is recommended that part of this be used for the car club space.
- 110 A review of the Wood Dene Transport Assessment has been undertaken. That proposal was for 333 residential units and 115 parking spaces, equating to 34.5% parking provision. Based on census details of car ownership of 35% this would result in only one car having to park on street and it is likely that it would be parked closer to Wood Dene on the northern side of Queens Road.
- 111 In light of the above, the proposed level of parking for the development is considered

to be acceptable and there would be one more wheelchair accessible space than required. The submission advises that 20% of the parking spaces would include electric vehicle charging points and a condition to secure this is recommended.

Cycle parking

- 112 The London Plan (2011) sets more onerous targets for cycle parking and is a more recent document than the saved 2007 Southwark Plan, therefore cycle parking should comply with the London Plan which would require 149 cycle parking spaces for a development of this size. The proposal would provide 180 cycle parking spaces in the form of Sheffield stands which are easy to use, and would also allow for visitor spaces. There are some concerns as to how conveniently located the spaces would be, although there would be cycle parking outside each block. A condition for large-scale details is recommended, to ensure that the stands would be appropriately spaced and weather-proof. It is noted that TfL has requested cycle parking in accordance with more onerous standards in the Further Alterations to the London Plan (FALP), and it is recommended that the condition includes a requirement to identify areas where further cycle parking could be provided. The uptake of the spaces could then be monitored through the travel plan and additional spaces provided if required.

Servicing and waste management

- 113 Communal refuse / recycling stores would be provided throughout the development and a condition to secure these is recommended. It is proposed that refuse collection for blocks A and B would take place from Woods Road outside the school, but this is not considered to be acceptable on safety grounds. A condition for revised details of these stores is therefore recommended, showing them reconfigured so that the bins could be wheeled through to the rear of the site. Tracking diagrams have been submitted which demonstrate that refuse vehicles would be able to enter and leave the site in a forward gear and all servicing could take place from within the site. No information as to the likely frequency or management of servicing has been provided, therefore a condition for a servicing management plan is also recommended. However, given that the scheme would be entirely residential servicing requirements are likely to be low, with weekly refuse collections and occasional deliveries.

Impact on public transport

- 114 Concerns have been raised that the proposal would result in increased pressure on public transport. However, the application has been reviewed by TfL which has not raised any issues in relation to public transport capacity. The s106 contribution required in relation to strategic transport is noted.

Travel plan

- 115 The draft travel plan submitted with the application outlines measures which would be used to encourage more sustainable modes of travel. A travel plan co-ordinator would be appointed three months before the occupation of the development and each unit within the development would be given a marketing pack providing details of public transport options, walking and cycling routes and the car club scheme including 3 years membership for each eligible adult. The travel plan has been reviewed by the Council's Transport Planning Team and is found to be acceptable, although the proposed modal shift target for cycling is only 2% and given how accessible the area is and the new cycle superhighway on Queens Road it is recommended that this be increased to 5% by way of a condition.

Design and impact upon the setting of listed buildings

- 116 The site is not located in a conservation area, but is in an area of historic significance with several important listed or historic buildings in close proximity and a listed C17th building on the northern part of the site. The surrounding buildings are varied, including a 3/4-storey 20th Century blocks of flats to the north-east of the site, 3-storey listed buildings fronting Queens Road to the north-west, 2-storey listed villas on Consort Road and John Donne school on the opposite side of Woods Road to the west. Further west along Woods Road the buildings range from 2-4 storeys and the buildings surrounding Cossall Park are predominantly 3-storey 20th Century buildings.
- 117 The proposed development would comprise a perimeter block ranging from 4-7 storeys high with frontages to Woods Road and Cossall Park. It would be of brick construction with glazed top floors and the tallest part of the building would be located at the south-eastern corner of the site, next to the entrance to Cossall Park. There would be a large communal garden and parking area behind this and a 2-storey block at the rear of 6-12 Woods Road which would comprise undercroft parking and flats above. The listed building on the site would be retained and although sitting within the red line application boundary, only basic repairs and landscaping around it are proposed. Concerns have been raised that the scale of the development would be inappropriate in this location, that it would appear overly dominant and out of keeping, would exceed the ridge height of the school and would dominate, overshadow and dwarf the listed building. The Council for British Archaeology has raised concerns regarding the massing of the development and its impact upon the setting of 2 Woods Road.
- 118 The NPPF stresses the importance of good design and at paragraph 56 states that: "Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people." This is reinforced through strategic policy 12 of the Core strategy which states that "Development will achieve the highest possible standards of design for buildings and public spaces to help create attractive and distinctive places which are safe, easy to get around and a pleasure to be in." Saved policy 3.12 of the Southwark Plan is also relevant, which asserts that developments "should achieve a high quality of both architectural and urban design, enhancing the quality of the built environment in order to create attractive, high amenity environments people will choose to live in, work in and visit." and saved policy 3.13 asserts that the principles of good urban design must be taken into account in all developments, including height, scale and massing of buildings, consideration of the local context, its character and townscape as well as the local views and resultant streetscape. Saved policy 3.15 of the Southwark Plan requires consideration to be given to conservation of the historic environment, and 3.18 of the Southwark Plan affords protection to the setting of listed buildings, conservation areas and world heritage sites.

Site layout

- 119 The position of the proposed perimeter block in relation to 2 Woods Road would provide sufficient separation distance to adequately preserve the setting of the listed building. The breathing space between the two buildings and gently cranked footprint of the block would help to gradually open up the Woods Road frontage when viewed from the listed building.
- 120 The site designation with the PNAAP advises that opportunities to maximise frontages to Cossall Park should be taken and the proposed layout would allow for this, with blocks C and D directly facing the park. There would be a pathway along the southern and eastern boundaries with the park, and individual gardens and entrances which would activate and animate the park frontage. The proposed Gate House block would be

tucked away into the corner of the site, occupying a similar size and position to an existing storage shed on the site and in terms of layout, no objections are raised.

- 121 Concerns have been raised that the communal entrances to the development would be gated and the development would effectively turn its back on the neighbourhood, although the security of the communal gardens at the rear of the site would need to be maintained. The perimeter block would be set back from the street with landscaped gardens fronting Woods Road and along the park, and low level boundary treatment would be required to avoid closing the development off or creating an austere appearance.

Height, scale and massing

- 122 The PNAAP advises that Peckham core action area will see more change, with the potential for taller buildings and denser development. It advises that major development sites, particularly those in the core area, provide opportunities for improved design, public realm and the enhancement of heritage assets. Policy 26 of the PNAAP requires developments in the core area to be similar to existing heights, which it identifies as being up to 7-storeys.
- 123 The listed building at the north of the site has rightly been considered as a starting point for the scale of the development on that end of the site. It is similar in scale to the C18th and C19th listed buildings adjoining the site to the north-west and the other listed buildings at a 30-42 Queens Road which although have less direct impact on the site, do have relevance to the wider townscape on the south side of Queens Road. To the west there are a number of listed villas on Consort Road, the back gardens of which adjoin the site.
- 124 The perimeter block would step up from 4-storeys at the northern end with the top floor set back away from the listed building, to 7-storeys opposite the school. The listed building is 3-storeys high and a 4-storey building next to it which would then gradually step up in height is considered to be acceptable. John Donne school is a substantial board school which although not listed, constitutes an important part of the historic landscape; it is the largest building in the immediate vicinity in terms of bulk and height and measures approximately 18m at its highest point. This is therefore considered to justify the location of the tallest part of the development and although it would be 3.25m higher than the school, on balance it is not considered that this would cause any significant harm to the character or appearance of the streetscene.
- 125 The Woods Road frontage would be a long elevation, and the massing would be broken up through the cranking of the building footprint next to the listed building, the glazed and set back roofs and the provision of a subservient 'link' element containing a double-height opening which would sit next to the tallest part of the development. Beyond this along the park frontages the building would step back down to 4-storeys which is considered to be acceptable. One area which would be less successful would be the glazed top floor of block C3 which would extend right up to the edge of the brick facing the park where all of the other glazed roofs would be set back from the edges. Whilst it would be preferable for this to be set back like the other roofs, this is not considered to be a significant issue.
- 126 The proposed Gate House block would replace a metal storage shed of a similar size and would not result in a significant increase in massing which would encroach onto the setting of the listed building. It would be a 2-storey residential building constructed of brick which would be more suited to the context of the listed buildings around it and in this respect could be considered as an enhancement to their settings.

Elevational design

- 127 The principle facades would be regularly proportioned vertically and horizontally, and most of the windows and balconies would be slightly recessed in pairs. On the longest elevation to Woods Road there would be projecting bays and a variety of window patterns which would be beneficial to the facade given its length. Windows have been added to the northern elevation of the perimeter block facing the listed building to provide more interest to the facade, although they would need to be obscure glazed to prevent any overlooking in the event that the listed building is converted to a house in the future.
- 128 The southern elevation to the park would have a more formal appearance with less variety, although it would nonetheless contain a combination of recessed and projecting balconies and a change in brick between the tallest element and the remainder of the block which would add visual interest. The 4-storey southern-most part of the building would have a more horizontal form which would present an acceptable facade to the park and the proposed Gatehouse block would adopt a very simple and functional appearance to which no objections are raised.

Materials

- 129 The principle material for all the elevations would be brick which would be appropriate in this predominantly brick context, and a contrasting brick to the tallest part of the development would create a focal point. The elevations show the predominant brick type as being rather grey, although details provided in the Design and Access Statement show a warmer colour which would be more appropriate; in any event a condition requiring sample panels of the brick and all other external facing materials is recommended and to ensure a high quality finish.

Heritage assets

- 130 Section 12 of the NPPF relates to conservation of the historic environment and of particular relevance are paragraphs 128 which states that *“In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting”*, 129 which states that *“Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this assessment into account when considering the impact of a proposal on a heritage asset, to avoid or minimise conflict between the heritage asset’s conservation and any aspect of the proposal”* and 131 which states that *“In determining planning applications, local planning authorities should take account of... the desirability of new development making a positive contribution to local character and distinctiveness.”* Further protection is provided by policy 24 of the PNAAP 'Heritage' and a heritage statement and verified views have been submitted with the application.
- 131 As stated the conversion of 2 Woods Road to a dwelling does not form part of the current proposals, although landscaping works are proposed around it. A schedule of basic repairs has been submitted but having reviewed this it is considered that they would require separate listed building consent, and an informative to this effect is recommended.
- 132 The heritage statement identifies the significance of 2 Woods Road as its internal plan form including a number of internal features such as timber panelling which have been retained in spite of the building having been substantially altered over the years. It advises that the building provides an evidential and historical record of the development of Peckham and that its setting has been substantially compromised.

- 133 As set out above, the layout, height, scale and massing of the proposed development is considered to be acceptable and would preserve the setting of the listed building. It would retain its prominence when viewed from Queens Road, and replacing the existing metal storage shed with a brick building would be an improvement. Although not shown in any detail on the application drawings, the heritage statement advises that there would be a landscaped area in front of the building with provision for fencing, a hardstanding for two vehicles and a path to the front door. There are questions regarding the appropriateness of two parking spaces in front of the building, although these details would be considered through conditions for landscaping and boundary treatment. It is also noted that the entire area to the front of the building is currently used for parking so in that sense, a reduction to two parking spaces would improve its setting. It would be important for the landscaping details to be considered holistically, to ensure an appropriate setting to both the listed building and the new development.
- 134 Grade two listed buildings at 2, 4a, 4b, 6, 8 and 10 Queens Road to the north-west of the site and 30-42 to the south-east have been considered. The heritage statement advises that they are of significance as part of the 18th Century and mid 19th Century development of Peckham, and are reasonably intact externally and of architectural merit. The proposed development would be visible from Queens Road and would be viewed in the background, with the listed buildings retaining their prominence. In light of this it is considered that the setting of these heritage assets would be preserved and replacing the metal shed at the rear of 6-10 Queens Road would improve their setting.
- 135 Numbers 1, 5, 7,9, 11 and 15 Consort Road are grade two listed and date from the mid-19th century. The significance of these heritage assets is identified as being in their group value and well-preserved features, and they represent development which reflected the aspiring middle class expansion of the area. Verified views have been submitted which demonstrate that the proposed development would not be visible above these listed buildings and as such would not affect their architectural or historic interest when viewed from the public realm. The setting of the rear of these buildings would also be improved by replacing the existing scaffolding yard including open storage areas and racking with new landscaping.
- 136 Although not listed, the heritage statement also considers the impact upon John Donne school. It advises that this building is significant in heritage terms because Peckham was known in the 19th century for the quality of its schooling and the building forms part of that history. It recognises that the school is a substantial building reflecting the tall room heights typical of Victorian schools and that in the past this would have been balanced by St Marks Church which occupied part of the site until 1971 when it was demolished owing to bomb damage. The presence of a taller building on the corner of the site next to the park would combine with the school to reinstate the identity of the space at the corner of Woods Road.

Design Review Panel comments

- 137 An earlier version of the scheme for a 4-8 storey building containing 130 flats was reviewed by the DRP on 14 January 2014. The Panel was unable to endorse the proposal at that stage and advised the architects to explore and present their analysis of alternative site strategies for the siting and massing of the proposed buildings. They challenged the architects to revise their proposals to develop a vision for the development that encompasses the listed building and address concerns about the height, scale and arrangement. The Panel invited the architects to present the revised proposal in greater detail to the DRP again prior to submitting a planning application.

Whilst the layout of the proposed development remains essentially the same, the height of the development and the massing along the Woods Road frontage have been amended following the DRP review.

- 138 To conclude in relation to design, it is considered that on balance, the proposal would be acceptable and would not result in any significant harm to the visual amenities of the area or the setting of any heritage assets. The quality of the scheme will rely to a great degree on the quality of the architectural detailing and landscaping and these matters can be reserved by condition.

Trees and landscaping

- 139 There are currently 15 trees on the site, predominantly located near the southern and eastern boundaries fronting Woods Road and Cossall Park although there is a large tree and three smaller trees towards the centre of the site; there are a number of trees in Cossall Park which overhang the site boundary. There are no category A trees on or near to the site (high value), 12 category B trees (moderate), three category C trees (low) and one category U tree (unsuitable for retention).
- 140 The proposal would retain some of the trees of greatest amenity value within a soft landscaped area along the Woods Road frontage. It would nonetheless require the removal of eleven trees, comprising one group of three category C trees, seven category B trees and one category U tree. It was originally proposed that tree 10 (Cedar) would be removed but this would now be retained. The loss of a large Cherry tree towards the centre of the site is regrettable, although this is a mature tree and is not expected to have a particularly long lifespan.
- 141 New planting is proposed along the western boundary of the site and at the rear of 2 Woods Road, although there would still be a net loss of tree canopy cover as a result of the proposals. As such and in accordance with policy 20 of the PNAAP 'Trees', a contribution of £8,500 would be required in order to secure off-site planting to replace the lost canopy cover. This contribution has been calculated in accordance with the Capital Asset Value for Amenity Trees methodology and would be secured through the s106 agreement.
- 142 In relation to the retained trees, only a very basic survey has been provided therefore conditions are recommended to ensure that these trees would be adequately protected during construction. The proximity of the perimeter block to the trees in Cossall Park which overhang the boundary is such that there could be pressure from future occupiers for them to be cut back to allow more light to the accommodation, and this has been raised as a concern by the Council's Parks and Open Spaces Service. The Council's Urban Forester has advised that the overhanging branches would need to be cut back and their crowns lifted and thinned on a regular basis, most likely every 3-5 years. The applicant would require consent from the Council to carry out any works to the trees and given their amenity value they should be considered for a TPO which would protect them from inappropriate works.
- 143 High quality landscaping and boundary treatment would be key to the way in which the new buildings would relate to the streetscene, the listed building and to the park. Only very basic details have been provided at this stage, some aspects of which are of concern including the location of a long row of cycle racks which would divide the communal garden in two, and planting leading to the rear of the listed building with no details of the boundary treatment beyond this. Whilst in principle it would be desirable to create a strong viewpoint towards the listed building, it could appear to isolate its rear garden if the boundary treatment is not treated correctly.
- 144 A landscaping plan to be secured by way of a condition would need to consider these

issues, and also accessibility for wheelchair users because there would be a 1m change in level between the eastern and western parts of the site. It would be beneficial if there were no boundary treatment between the listed building and the northern part of the perimeter block other than a very low boundary wall or railings less than 1m high. Boundary treatment along the park frontages would be equally important and should take the form of low rise walls or railings to allow views through.

Archaeology

- 145 The site is located within the Peckham Village Archaeological Priority Zone and saved policy 3.19 of the Southwark Plan requires applications within archaeological priority zones to be accompanied by a desk-based assessment and archaeological evaluation. An archaeological desk-based assessment has been submitted and some monitoring of investigation works on part of the site has taken place. These works have revealed areas of significant truncation where former structures on the site have cut through archaeological remains. There is however, a possibility for surviving material to be identified therefore it is recommended that a programme of archaeological evaluation works be undertaken and this can be secured through conditions.

Planning obligations (S.106 undertaking or agreement)

- 146 Saved policy 2.5 'Planning obligations' of the Southwark Plan and policy 8.2 of the London Plan advise that Local Planning Authorities should seek to enter into planning obligations to avoid or mitigate the adverse impacts of developments which cannot otherwise be adequately addressed through conditions, to secure or contribute towards the infrastructure, environment or site management necessary to support the development, or to secure an appropriate mix of uses within the development. Policy 46 of the PNAAP states that planning obligations and / or community infrastructure levy (CIL) will be used to secure the delivery of key infrastructure and to mitigate the impact of developments, and further information is contained within the Council's Planning Obligations SPD.
- 147 Neighbouring residents have raised concerns that the application fails to consider the likely infrastructure requirements that the proposal would generate, and that local services such as education and health care are already over-stretched and will become worse as new families move into the area. The objections refer to the cumulative impacts of recent consents at the Wood Dene site and on Carlton Grove and a number of objectors have commented that the Council should have required an EIA to look into this issue. The Cossall Estate Tenants and Residents Association (TRA) has advised that two applications for funding under the Council's Cleaner, Greener Safer programme have been rejected, and request that s106 contributions be used to fund these works (to the Cossall Estate and Hook Close play areas) plus further works to the railway bridge on Queens Road.
- 148 As set out in paragraphs 36-39, the infrastructure requirements for the area have been considered through the preparation of the PNAAP which has been through an Examination in Public and found to be sound. The main proposal site designations include indicative capacities which helped to plan for the infrastructure requirements, and s106 contributions are routinely sought to help fund them. The Council's s106 toolkit requires the following contributions for a development of this size which have been included in the draft s106 agreement:

Topic Area	SPD Requirement	Applicant's Offer
Education	£206,467	£206,467
Employment during construction	£93,964	£93,964

Employment management fee	construction £7,111	£7,111
Public open space, children's play, sports development	£19,809	£19,809
Transport strategic	£16,608	£16,608
Transport site specific	£96,681	£96,681
Public realm	£63,210	£63,210
Archaeology	£61,000	£61,000
Health	£91,500	£91,500
Community facilities	£11,173	£11,173
Total	£142,270	£142,270
Admin fee (2%)	£20,468	£20,468
	£830,261	£830,261
	£16,605.22	£16,605.22

- 149 The proposals site designation in the PNAAP requires the fenced-off area to the south of the site to be incorporated into Cossall Park and the s106 agreement should stipulate that the open space contribution be put towards this open space.
- 150 In the event that the legal agreement has not been signed by 7 November 2014 it is recommended that the Head of Development Management be authorised to refuse permission, if appropriate, for the following reason:
- 151 The proposal, by failing to provide for appropriate planning obligations secured through the completion of a S106 agreement, fails to ensure adequate provision of affordable housing and mitigation against the adverse impacts of the development through projects or contributions in accordance with saved policy 2.5 'Planning Obligations' of the Southwark Plan (2007), strategic policy 14 'Delivery and Implementation' of the Core Strategy (2011), policy 8.2 'Planning obligations' of the London Plan (2013) and the Planning Obligations SPD (2007).

Mayoral Community Infrastructure Levy (CIL)

- 152 S143 of the Localism Act 2011 states that any financial sum that an authority has received, will, or could receive in the payment of CIL as a material 'local financial consideration' in planning decisions. The requirement for Mayoral CIL is a material consideration. However, the weight to be attached to a local finance consideration remains a matter for the decision-maker. Mayoral CIL is to be used for strategic transport improvements in London, primarily Crossrail.
- 153 The proposed development would include a CIL chargeable area of 7,606sqm therefore a CIL payment of £280,535.00 would be due.

Sustainable development implications

- 154 Policy 5.2 of the London Plan requires major developments to provide an assessment of their energy demands and to demonstrate that they have taken steps to apply the Mayor's energy hierarchy; it requires developments between 2013 and 2016 to make a 40% improvement in carbon dioxide reductions over the 2010 Building Regulations. Policies 5.5 and 5.6 require consideration of decentralised energy networks and policy 5.7 requires the use of on-site renewable technologies, where feasible. A Sustainability and Energy Statement have been submitted with the application including a Code for Sustainable Homes pre-assessment indicator. Concerns have been raised that the Energy Statement is superficial, does not demonstrate that sustainability has been integral to the proposal, does not follow GLA, and fails to demonstrate how issues of climate change will be addressed.
- 155 All of the dwellings have been designed to achieve Code for Sustainable Homes Level 4, and a condition to secure this is recommended to ensure compliance with strategic

policy 13 of the Core Strategy. All timber to be used in the development would be from a managed source.

Be lean - use less energy

- 156 The energy statement details how the scheme would incorporate a number of passive measures aimed at reducing the amount of energy required. These measures would include good levels of insulation for the external walls, roof, glazing and doors, a reduction in air permeability, the use of 100% low energy lighting and mechanical ventilation and heat recovery. As a result of these measures the development would reduce carbon dioxide emissions by 16.5% when compared with the baseline situation of a scheme compliant with the 2010 Building Regulations.

Be clean - supply energy efficiently

- 157 The use of a combined heat and power system for the development has been considered and has been found to be unviable for a development of this size, therefore no further carbon dioxide reductions would be secured under this heading. Each of the flats would be served by an energy efficient gas condensing boiler therefore there would be no scope to future-proof the development to connect with district heating networks which may become available in the future. However, as set out below the overall carbon dioxide reduction requirement would be met.

Be green - use renewable energy

- 158 The energy statement considers a range of renewable energy technologies but found a number of them to be unsuitable. Solar photovoltaic panels are proposed on the roof of the perimeter block to supply electricity to the building and there would be up to 816sqm of suitable roofspace available to accommodate them. This would reduce carbon dioxide emissions by 15% and although this would fall short of the 20% required by the Core Strategy, combined with the passive measures this would reduce carbon dioxide emissions by 40% when compared to a scheme compliant with the 2010 Building Regulations. This would be policy compliant and it is recommended that a condition be imposed to secure this. It is noted that an objector has commented that the 2013 Building Regulations should be considered, but the policy includes a sliding scale for co2 reductions with the 2010 Regulations as the benchmark, and the co2 reductions required increasing over time. Based on the 2013 Regulations a 35% reduction would be required, which is equivalent to 40% based on the 2010 Regulations.
- 159 In relation to water use, the energy statement details how the flats would be fitted with water efficient fixtures and fittings such as dual flush WCs, aerated taps and flow controlled showers in order to achieve the Code for Sustainable Homes requirement to limit potable water consumption to 105 litres per person per day.

Ecology

- 160 Strategic policy 11 of the Core Strategy 'Open spaces and wildlife' seeks to improve, protect and maintain a network of open spaces and green corridors and to protect important open spaces, trees, woodlands and site of importance for nature conservation. Saved policy 3.28 of the Southwark Plan requires biodiversity to be taken into account in the assessment of all planning applications and requires the submission of ecological assessments where relevant. An ecology report has been submitted with the application which details how a desk-based assessment and walk-over survey have been undertaken, including an internal and external inspection of all buildings on the site, an inspection of the mature trees and a bat roost emergence survey of the listed building.

161 The report concludes that most of the site consists of hardstanding and bare ground of negligible ecological value. A single bat dropping of some age was found in the roof void of the listed building, but there was no evidence that it supports a large or important roost and no bat activity was recorded within the site. The report contains a number of recommendations including requiring a watching brief for bats to be kept during any works to the listed building, for tree clearance to avoid bird breeding season, and for bird boxes to be installed within the development; brown biodiverse roofs would be incorporated into the development and the landscaping condition could secure native planting. The report has been reviewed by the Councils' Ecology Officer and is found to be acceptable, and a number of conditions are recommended.

Land contamination

162 The site has been used as a dye works and furniture factory in the past, and part of it is now in use as a scaffold yard. In light of this a geotechnical report has been submitted which identifies the presence of contaminants within the site and puts forward various recommendation including importing clean top-soil and sub-soil for the gardens and soft-landscaped areas. The report has been reviewed by the Council's Environmental Protection and is found to be acceptable, and conditions are recommended. It is noted that the report in error refers to provision of a 3-4 storey building on the site but EPT has confirmed that this would not impact on its findings.

Air quality

163 The site is located in an air quality management area (AQMA) and an air quality assessment has been submitted with the application. It considers the impact of the proposal including changes in traffic levels along the local road network, construction impacts and the impact of traffic emissions on the proposed flats.

164 The Council's Environmental Protection Team disagrees with the findings of the assessment in relation to nitrogen dioxide concentrations which mainly arise from vehicles. Consequently EPT has recommended a condition requiring the flats be mechanically ventilated to ensure that there would be an acceptable standard of air quality for future occupiers and this forms part of the draft recommendation. A number of residents have raised concerns that the predicted 43 vehicles which the development could generate would cause additional air pollution which could impact upon the health of staff and pupils at the school and those living nearby, including increasing risks for people with asthma. However, EPT has advised that this would have little or no effect on air quality objectives within the AQMA.

Flooding

165 A number of objectors have raised concerns regarding flooding, impact on water supplies and the sewerage system, and maintenance of sustainable urban drainage measures within the site.

166 A flood risk assessment (FRA) and drainage strategy have been submitted with the application. They detail how the development would incorporate a sustainable urban drainage scheme (SUDS) including a 200m³ underground attenuation / storage tank as part of the surface water strategy, rainwater harvesting and the use of permeable surface materials which would increase the permeable areas of the site by 35% compared to the existing situation. The development would incorporate low-water use devices including low flush and reduced water demand showers and toilets.

167 The Council's Flood and Drainage Team initially objected to the application, but their concerns have been addressed following the submission of the drainage strategy.

The FRA has been reviewed by the Environment Agency which has not raised any issues and Thames Water has not raised any objections regarding sewerage infrastructure. The applicant has advised that the attenuation tank and other SUDS measures would be maintained by the freeholder and a number of conditions are recommended.

Statement of community involvement

- 168 A Statement of Community Involvement has been submitted with the application which details pre-application consultation which has been carried out by the applicant. It advises that two public exhibitions were held at 2 Woods Road on 19 and 20 March 2014. Prior to this a leaflet was sent to 250 local residents, the Head Teacher of John Donne school and the ward Councillors informing them of the exhibition. The exhibition was attended by 60 people over the two days.
- 169 Attendees at the exhibition were asked to complete a questionnaire and provide feedback and 26 completed questionnaires were received. The statement advises that most of the people who visited the exhibition did not support the proposals on the basis that they objected to the Council's decision to release the land for residential development and wanted to see a school built. Other concerns raised related to impact on the amenity of residents on Consort Road, the building being too high, impact on local highways and parking. A separate meeting was held with Cossall Park Estates committee on 7 April 2014 and issues raised were the status of proposals to build a secondary school on the site, potential benefit from s106 contributions, the impact on Cossall Park, job opportunities during construction, the phasing and mix of housing, the need to maintain the listed building and maintenance of the doctors' surgery.

Other matters

- 170 An objector has raised concerns that it would be difficult for the Planning Committee to be impartial in its determination of the application, given that the Council has already agreed to dispose of the site. However, the Committee regularly determines applications on sites for sale by the Council and this would be no different.

Conclusion on planning issues

- 171 The site is allocated for housing both in the saved Southwark Plan and the draft PNAAP, therefore although many neighbouring residents consider that it should be used for a school, the proposal would be policy compliant in terms of land use and would sit within the permitted density range. A range of s106 contributions would be secured as mitigation for the infrastructure impacts of the development including for education and health care facilities, as is the usual approach for developments of ten or more units. It would provide a policy compliant amount of affordable housing, mix of units, wheelchair accessible units and an acceptable standard of accommodation. The impacts in relation to neighbouring properties and transport in the area have been considered and are found to be acceptable, and on balance the design of the proposal is considered to be acceptable, and the setting of listed buildings on and near to the site would be preserved. Conditions are recommended in relation to trees, landscaping, archaeology, sustainability, ecology, air quality, contaminated land and flooding. The proposal would provide much needed housing including affordable housing, would make good use of a vacant site within an existing urban area, and is considered to be a sustainable form of development in accordance with the NPPF. It is therefore recommended that planning permission be granted, subject to the completion of a legal agreement and conditions.

Community impact statement

172 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.

a) The impact on local people is set out above.

b) No issues relevant to particular communities/groups likely to be affected by the proposal have been identified.

c) The likely adverse or less good implications for any particular communities/groups have been discussed above.

Consultations

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

Consultation replies

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

Summary of consultation responses

173 Representations have been received from the occupiers of 54 properties objecting to the application and one representation has been received in support.

Human rights implications

174 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.

175 This application has the legitimate aim of providing a new residential development comprising 122 dwellings. The rights potentially engaged by this application, including the right to a fair trial and the right to respect for private and family life are not considered to be unlawfully interfered with by this proposal.

BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
Site history file: TP/2468-4 Application file: 14/AP/1872 Southwark Local Development Framework and Development Plan Documents	Chief executive's department 160 Tooley Street London SE1 2QH	Planning enquires telephone: 020 7525 5403 Planning enquires email: planning.enquiries@southwark.gov.uk Case officer telephone:: 020 7525 5410 Council website: www.southwark.gov.uk

APPENDICES

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

AUDIT TRAIL

Lead Officer	Gary Rice Head of Development Management	
Report Author	Victoria Lewis	
Version	Final	
Dated	24 September 2014	
Key Decision	No	
CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER		
Officer Title	Comments Sought	Comments included
Strategic director, finance & corporate services	No	No
Strategic director, environment and leisure	Yes	Yes
Strategic director, housing and community services	Yes	Yes
Director of regeneration	No	No
Date final report sent to Constitutional / Community Council / Scrutiny Team		

Consultation undertaken

176 **Site notice date:** 08/07/2014. Site notices were displayed on Woods Road, Consort Road and within Cossall Park.

Press notice date: 26/06/2014

Case officer site visit date: 08/07/2014

Neighbour consultation letters sent: 08/07/2014

Internal services consulted:

177 Parks and Open Spaces Service
Flood and Drainage Team
Ecology Officer
Transport Planning
Environmental Protection Team
Planning Policy
Transport Planning
Public Realm Asset Management
Public Realm Project Design
Urban Forester
Waste Management
Housing Regeneration Initiatives
Archaeology Officer

Statutory and non-statutory organisations consulted:

178 Natural England
Thames Water
Environment Agency
Transport for London
Aqiva
Metropolitan Police
English Heritage
Council for British Archaeology
London Fire and Emergency Planning
EDF
National Grid
The Georgian Group

Neighbours and local groups consulted: Refer to Appendix 3.

The Peckham Society

Re-consultation: No re-consultation undertaken.

Consultation responses received

Internal services

179 Parks & Open Spaces Service

- All trees on parks land will be retained therefore any new building should be an appropriate distance to not inhibit future growth. It is not in the Council's tree strategy to carry out works to trees to allow more light to properties.
- Further information on the boundary treatment between the site and the park is required.
- The plans show the existing ball court being removed, for which there are no plans. Given it is 24 hour access, there could be noise complaints from future occupiers of the development - Officer response - the existing ball court has now been shown on the drawings.
- There must be no direct access from individual properties to the park, no fire escape onto the park, no balconies overhanging it and no air conditioning units or similar discharging onto it. New lighting should not light any area of the park to prevent pollution and protect wildlife.
- The Park Service has identified that Cossall Park requires improvement and given the large number of units, increase in population and potential park usage, a s106/CiL agreement to support the Council in delivering those improvements would be required.

Flood and Drainage Team

- 180 Large areas of the borough experience surface water flooding and any measures that can be taken to reduce this through new development should be encouraged. The site is within the East Southwark Critical Drainage Area which has a relatively higher risk of surface water flooding than other parts of the borough. Cannot support the current drainage strategy as it would not achieve its potential for SUDs. A site drainage strategy should be prepared to achieve greenfield runoff rates for surface water discharge from the site, during events up to and including the 1% Annual Exceedance Probability (AEP) pluvial storm event (equivalent to a return period of 1 in 100 years), with an allowance for the effects of climate change. As the site is shown to be vulnerable to surface water flooding of up to 0.5m deep during the 1% AEP pluvial event, taking climate change into account, the site should incorporate flood resilient techniques, the level of which should be agreed between the applicant and the Flood and Drainage Team. Follow-up response that the drainage strategy subsequently submitted is acceptable and conditions to ensure that the development is carried out in accordance with the strategy and the FRA are recommended.

Ecology Officer

- 181 The ecology report is acceptable. A single bat dropping was found below a missing tile in the listed building therefore the ecology report's recommendations in relation to bats must be implemented. The type of brown/green roof provided requires clarification as the roof plan shows brown roof under the PV panels while the revised Design and Access Statement shows sedum roofs. For ecology purposes a brown biodiverse roof is desirable, together with a SUDs scheme which could link to the annexed green space being returned to the park. A number of conditions are recommended.

Transport Planning

- 182 Comments incorporated into report. In summary, Transport Planning support the application as it complies with relevant policies and there will be no significant negative impact on the performance and safety of the surrounding highway network.

Environmental Protection Team

- 183 Recommend approval with conditions relating to internal noise levels, plant noise, noise levels to amenity space, mechanical ventilation, contamination and construction management; informative recommended relating to air quality. Follow-up response that the impact of 43 vehicles from the development would not compromise objectives to improve air quality in this area.

- 184 Public Realm Asset Management and Project Design - no response received at the time of writing.

- 185 Urban Forester - comments incorporated into report.

Waste Management - no response received at the time of writing.

- 186 Archaeology Officer - comments incorporated into report.

Statutory and non-statutory organisations

Natural England

- 187 The lack of specific comment from NE should not be interpreted as a statement that there are no impacts on the natural environment, but only that the application is not likely to result in significant impacts on statutory designated sites or landscapes. The Local Authority should determine if it is consistent with national and local policies on biodiversity and landscape to fully take account of the environmental value of the site in the decision making process; the Council should seek the view of its own ecologist when determining this.

Thames Water

- 188 Regarding surface water drainage it is the responsibility of a developer to make proper provision for drainage to ground, water courses or a suitable sewer. Regarding surface water the applicant should ensure that storm flows are attenuated or regulated into the receiving public network through on or off site storage. When it is proposed to connect to a combined public sewer, the site drainage should be separate and combined at the final manhole nearest the boundary. Connections are not permitted for the removal of groundwater. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. With regard to sewerage infrastructure capacity, Thames Water would not have any objection to the application. Condition recommended requiring a method statement for any impact piling and recommend that petrol / oil interceptors be fitted in all car parking/washing/repair facilities. Failure to enforce the effective use of petrol / oil interceptors could result in oil-polluted discharges entering local watercourses. An informative is recommended regarding minimum water pressure.

Environment Agency

- 189 This application has a low environmental risk and therefore the EA has no comments to make. The applicant may require other consents directly from the EA including

consents, permissions or licenses for activities such as water abstraction or discharging to a stream.

Transport for London

- 190 The site is 50 metres from Queens Road which is part of the Transport for London Road Network (TLRN). TfL is the highway authority for the TLRN, and is therefore concerned about any proposal which may affect its performance and/or safety.
- Vehicle charging points would meet London plan standards but a further 20% passive spaces should be provided.
 - Cycle parking should be increased to accommodate 160 as 3+ bed dwellings should have two spaces and there should also be visitor spaces. FALP promotes additional provision for 2 bed units which the applicant is encouraged to consider. Splitting the cycle parking into smaller stores closer to the dwellings where possible would encourage more use.
 - With a PTAL rating of 6a, a car free or light development except for disabled parking should be considered. A reduction in parking would enable better location of cycle parking closer to the flats. Cycle parking for block E is too far away from the other residential units; block E could then be developed as two-storey houses or more flats.
 - The number of disabled parking spaces meets London Plan standards but most are some distance from the accessible units. A reduction in general parking or a rearrangement in provision would enable a better location of the disabled spaces.
 - Due to scale and location of the development a Construction Logistics Plan should be secured by condition. A Travel Plan and parking permit exemption should be secured through a s106 agreement.

Arqiva

- 191 Arqiva is responsible for providing the BBC and ITV's transmission network and can only address the integrity of our broadcast networks. This involves checking the lines of sight for our Re-Broadcast Links (RBL's), which are point to point dish links, essential for network operation. With regard to the network and lines of sight used by our RBL's, Arqiva have no objection or issues to raise based upon the information provided. Cannot comment on potential interference with signal reception which should be checked with Ofcom.

Metropolitan Police

- 192 In principle, no specific objections to the proposal at this point. The area suffers from above average levels of crime generally, but specifically burglary, Anti-Social Behaviour and Violent crime. This is of concern when proposing a new development, and security measures need to be an essential component of any further plans. Recommend a condition requiring secure by design certification to be achieved.

English Heritage

- 193 EH have considered the information and do not wish to offer any comments on this occasion. The application should be determined in accordance with national and local policy guidance, and on the basis of your specialist conservation advice.

Historic Buildings and Conservation Committee (on behalf of the Council for British Archaeology)

- 194 Concern regarding the build up of mass towards the park end of the site, particularly in relation to the listed building and the neighbouring board school. This could be mitigated by an improved design and possibly with further details of the refurbishment of the listed building. A dramatic reduction in mass would seem appropriate in terms of the setting of the heritage asset.

Neighbours and local groups

- 195 Objection letters have been received from occupiers of the following 55 properties / groups:

John Donne Primary School and two properties on Woods Road

Jam Consultancy (on behalf of John Donne School)

The Cossall Tenants and Residents Association

Six properties on Consort Road

Three properties on Queens Road

One property from the Clifton Estate

Two properties on Mortlock Close

One property on Nazareth Gardens

Three properties on Lugard Road

One property on Hillingdon street

Two properties on Brayards Road

Two properties on Hollydale Road

One property on Lausanne Road

Three properties on Kirkwood Road

One property on Dennetts Road

One property on Friary Road

One property on Wroxton Road (two objections)

Five properties on Gordon Road

One property on Bird in Bush Road

One property on Asylum Road

Three properties on Hooks Close

Three properties on Sunwell Close

One property on Cossall Walk

Two properties on Evan Cook Close

One property on Rye Hill Park

One property on Kings Grove

One property on Naylor Road

One property on Almond Close

Two x no address provided.

- 196 The reasons for objecting have been summarised as follows:

197 Land use and infrastructure

- Increased demand for school places including cumulatively with Wood Dene and Carlton Grove developments which would bring 500 new homes into the area.
- Question where new children would be schooled and would prevent children

- currently living in the area from attending John Donne School.
- Satisfaction at some schools in the area below the national average.
- John Donne school already accepting bulge classes which is impacting on the school.
- Site should be used to provide a school; John Donne school pursuing option of a free school on the site and previously put forward plans for shared health / education facility.
- Site allocation put forward as a land-swap as Tuke School relocating to a new site but Cherry Garden school not built so has been an increase in housing land and a loss of education a land.
- PNAAP originally designated housing and community use on the site and community use subsequently dropped with no indication as to why and no consulted.
- Impact on health services, policing, waste collection, open space and sports facilities which are already stretched.
- Would result in the irreversible loss of an important area of local amenity for vital school provision.
- The site has always been earmarked for education and the Council already has the Acorn site for housing.
- This part of Peckham has not had any secondary education, appears the Council want secondary provision closer to Dulwich.
- Part of the park would be taken again after spending years trying to get it back.
- Cannot build new houses without infrastructure to support it.

198 Lack of Environmental Impact Assessment

- An EIA is required given size of site and scale of proposals..
- No EIA carried out to consider stress on local services, water and sewerage, traffic, transport and amenities, construction impacts, cumulative impacts and alternatives for the site which could help solve housing and education shortages.
- Screening opinions not carried out in a transparent way, neighbours sent letter stating 'do not send' and not properly informed of decision in spite of repeated requests.
- Delay in screening opinions being uploaded onto website.
- Screening opinions not adopted in 3 weeks and insufficient information provided by the developer to consider the impacts.
- Reasons for not requiring an EIA contradictory and not properly substantiated; mis-judged not to require an EIA and decisions flawed.
- Screening opinions do not consider sensitive location next to a school, housing, listed buildings and a park and was a lack of information about construction impacts, traffic and social infrastructure which would be significant.

199 Construction impacts

- Not considered in submission, concerns regarding proximity to school, noise, dust, vibration, impact on lessons, highway safety and construction traffic, impact on air quality including on people with asthma (during construction and post-completion from additional traffic).
- Construction could take place at same time as Wood Dene and Carlton Grove.
- Demolition of former Tuke School not carried out in accordance with a Council report and was lack of consultation with school and residents.

200 Amenity

- Noise pollution will impact on quality of teaching.
- Air pollution and impact on health.
- Overshadowing, overlooking, loss of outlook and loss of light to school, houses and

- park.
- Geo-technical report based on 3-4 storey building not 4-7 therefore question its accuracy.
- Quality of accommodation and size of flats; question whether they would be large enough.
- Block E would not be higher than existing sheds therefore the impact will be limited; no windows are shown so would be no overlooking and this must not be compromised.
- Area already experiences social problems and anti-social behaviour.
- No community benefits and will reduce quality of life for existing residents.
- Would reduce the amount of local open space which is need by residents.
- Will increase vermin and insects on neighbouring estates.
- Loss of trees in Cossall Park.

201 Density

- Listed building not included in density calculation.
- The area is already overcrowded and congested.

202 Transport

- Disruption for parents parking, coaches for school trips and safe routes to and from the school.
- Roads already congested, will cause hazardous situation for pedestrians including children; junction with Queens Road is already dangerous and will get worse.
- Problem of cars parking illegally on Woods Road.
- Lack of parking on-site.
- Increased demand for on-street parking and accuracy of parking surveys questioned.
- Impact on public transport.

203 Design

- Unacceptable height, scale and massing and negative impact on Cossall Park, the streetscene and listed buildings.
- Recognise effort put into design and materials but proposals driven by commercial factors by stacking highest value flats at the edge of the park.
- Would welcome alternative proposals of the same density if height reduced by at least two floors and massing broken up.
- Planning and layout could be redesigned to move away from the boundaries with Consort Road.
- Council has reputation for good, sympathetic design ; will be a retrograde step to approve this.
- Would be out of keeping and would dramatically change the skyline.
- Disagree with submission which advises that existing buildings do not address the park or that northern part of park is less used.
- Proposal gives nothing back to the park, would be a gated, inward-facing development that would exclude other residents.

204 Sustainability

- Planning statement fails to consider all relevant planning policies, does not address how the NPPF requirement for consideration of a social, economic and environmental role will be addressed.
- Development not sustainable just because the site is allocated for housing.
- Energy statement is superficial and does not follow GLA guidance; fails to

- demonstrate climate change or sustainability fully considered.
- Solar gain from south-facing glazing.

205 Water and flooding

- Issues raised by Thames Water in response to screening opinion not addressed.
- Increased demand for water and pressure on drainage and sewer infrastructure.
- Welcome use of permeable surfaces but question who will maintain SUDs measures and request Thames Water confirmation that sewer capacity is sufficient.
- Have been flooding and sewage problems in the area.

206 Other matters

- Lack of affordable housing.
- Fails to comply with housing mix policy.
- Pre-application advice not followed.
- Unsatisfactory consultation which has not shown a transparent or inclusive process.
- Community not made fully aware of the PNAAP and site allocation for housing.
- Question how the Council can be an impartial judge of the planning application given that it approved the disposal of the site for housing.
- Cossall Estate TRA applied for CGS funding which was rejected. S106 contributions would enable the TRA to continue facilitating social events and work towards community cohesion
- TRA not consulted about a new property on Burchell Road and would have raised concerns regarding shadowing, sunlight and air quality.
- Request that commitments under the approved CGS scheme be honoured including new planting. Request s106 funds to improve railway bridge along Queens Road.
- Request provision be made for separate refuse and recycling storage.
- Impact on property value. Officer response - this is not a material planning consideration and cannot be taken into account.
- Description of building as 4-storeys when it is five with a set back top floor disingenuous and does not encourage trust.
- Concerns of Cossall TRA not properly reflected in submission.
- Under s106 suggest an allotment for the community and outside gym.

207 One representation has been received in support of the application on the grounds that there is a need for more housing and to speed up the process of building on derelict sites in the area (no address provided).

Neighbour consultee map



Consultation undertaken

Site notice date: 08/07/2014

Press notice date: 26/06/2014

Case officer site visit date: n/a

Neighbour consultation letters sent: 08/07/2014

Internal services consulted:

Archaeology Officer
Design and Conservation Team
Ecology Officer

Environmental Protection Team [Noise / Air Quality / Land Contamination / Ventilation]
Housing Regeneration Initiatives
Parks & Open Spaces
Planning Policy
Public Realm - Asset Management
Public Realm - Project Design Team
Surface Water Flood Management Team
Transport Planning Team
Urban Forester
Waste Management

Statutory and non-statutory organisations consulted:

Council for British Archaeology
EDF Energy
English Heritage
Environment Agency
London Fire & Emergency Planning Authority
Metropolitan Police Service
National Grid UK Transmission
Natural England - London Region & South East Region
Rob Taylor
Thames Water - Development Planning
The Georgian Group
Transport for London (referable & non-referable app notifications and pre-apps)

Neighbour and local groups consulted:

178 Peckham Rye London SE22 9QA
Flat 31 Martock Court SE15 2PL
Flat 30 Martock Court SE15 2PL
Flat 33 Martock Court SE15 2PL
Flat 32 Martock Court SE15 2PL
Flat 2 Martock Court SE15 2PL
Flat 12 Martock Court SE15 2PL
Flat 3 Martock Court SE15 2PL
Flat 29 Martock Court SE15 2PL
Flat 34 Martock Court SE15 2PL
Flat 4 Martock Court SE15 2PL
Flat 39 Martock Court SE15 2PL
Flat 5 Martock Court SE15 2PL
Flat 40 Martock Court SE15 2PL
Flat 36 Martock Court SE15 2PL
Flat 35 Martock Court SE15 2PL
Flat 38 Martock Court SE15 2PL
Flat 37 Martock Court SE15 2PL
Flat 27 Carnicot House Clifton Estate SE15 2PJ
Flat 26 Carnicot House Clifton Estate SE15 2PJ
Flat 3 Carnicot House Clifton Estate SE15 2PJ
Flat 28 Carnicot House Clifton Estate SE15 2PJ
Flat 23 Carnicot House Clifton Estate SE15 2PJ
Flat 22 Carnicot House Clifton Estate SE15 2PJ
Flat 25 Carnicot House Clifton Estate SE15 2PJ
Flat 24 Carnicot House Clifton Estate SE15 2PJ
Flat 4 Carnicot House Clifton Estate SE15 2PJ
Flat 1 Martock Court SE15 2PL
Flat 9 Carnicot House Clifton Estate SE15 2PJ
Flat 11 Martock Court SE15 2PL
Flat 10 Martock Court SE15 2PL
Flat 6 Carnicot House Clifton Estate SE15 2PJ
Flat 5 Carnicot House Clifton Estate SE15 2PJ
Flat 8 Carnicot House Clifton Estate SE15 2PJ
Flat 7 Carnicot House Clifton Estate SE15 2PJ
10 Burchell Road London SE15 2ST
13 Burchell Road London SE15 2ST
12 Burchell Road London SE15 2ST
Flat 8 Cherry Tree Court SE15 2PY
Flat 7 Cherry Tree Court SE15 2PY
Flat 6 44-46 Queens Road SE15 2QW
Flat 5 44-46 Queens Road SE15 2QW
College Hall 1a Burchell Road SE15 2ST
15 Colmore Mews London SE15 2QU
Flat 2 44-46 Queens Road SE15 2QW
Flat 1 44-46 Queens Road SE15 2QW
Flat 3 Kendrick Court SE15 2SS
Flat 2 Kendrick Court SE15 2SS
Flat 5 Kendrick Court SE15 2SS
Flat 4 Kendrick Court SE15 2SS
Flat B 62 Queens Road SE15 2QW
Flat A 62 Queens Road SE15 2QW
Flat 1 Kendrick Court SE15 2SS
Flat C 62 Queens Road SE15 2QW
Flat 32 Sonesta Apartments SE15 2AJ
Flat 31 Sonesta Apartments SE15 2AJ
Flat C 1 Consort Road SE15 2PH
Flat B 1 Consort Road SE15 2PH
Flat 28 Sonesta Apartments SE15 2AJ
Flat 27 Sonesta Apartments SE15 2AJ
Flat 30 Sonesta Apartments SE15 2AJ
Flat 29 Sonesta Apartments SE15 2AJ
Flat A 27 Consort Road SE15 2PH
Flat 4 6-8 Queens Road SE15 2PT
Flat 2 6-8 Queens Road SE15 2PT
Flat 6 6-8 Queens Road SE15 2PT
Flat 5 6-8 Queens Road SE15 2PT
Flat 7 6-8 Queens Road SE15 2PT
Flat 3 6-8 Queens Road SE15 2PT
Flat 1 6-8 Queens Road SE15 2PT
Living Accommodation Red Cow SE15 5EG
Flat 15 Sonesta Apartments SE15 2AJ
Flat 14 Sonesta Apartments SE15 2AJ
Flat 17 Sonesta Apartments SE15 2AJ
Flat 16 Sonesta Apartments SE15 2AJ
Flat 11 Sonesta Apartments SE15 2AJ
Flat 10 Sonesta Apartments SE15 2AJ
Flat 13 Sonesta Apartments SE15 2AJ
Flat 12 Sonesta Apartments SE15 2AJ
Flat 18 Sonesta Apartments SE15 2AJ

Flat 1 54-56 Queens Road SE15 2QW
Flat 9 Cherry Tree Court SE15 2PY
14 Burchell Road London SE15 2ST
20 Burchell Road London SE15 2ST
2 Burchell Road London SE15 2ST
23 Burchell Road London SE15 2ST
21 Burchell Road London SE15 2ST
16 Burchell Road London SE15 2ST
15 Burchell Road London SE15 2ST
19 Burchell Road London SE15 2ST
17 Burchell Road London SE15 2ST
4b Queens Road London SE15 2PT
4a Queens Road London SE15 2PT
Flat 10 Cherry Tree Court SE15 2PY
Flat 1 Cherry Tree Court SE15 2PY
Flat 7 Martock Court SE15 2PL
Flat 6 Martock Court SE15 2PL
Flat 9 Martock Court SE15 2PL
Flat 8 Martock Court SE15 2PL
Flat 11 Cherry Tree Court SE15 2PY
Flat 4 Cherry Tree Court SE15 2PY
Flat 3 Cherry Tree Court SE15 2PY
Flat 6 Cherry Tree Court SE15 2PY
Flat 5 Cherry Tree Court SE15 2PY
Flat 13 Cherry Tree Court SE15 2PY
Flat 12 Cherry Tree Court SE15 2PY
Flat 2 Cherry Tree Court SE15 2PY
Flat 14 Cherry Tree Court SE15 2PY
9 Hooks Close London SE15 2TP
8 Hooks Close London SE15 2TP
32 Sunwell Close London SE15 2TR
31 Sunwell Close London SE15 2TR
5 Hooks Close London SE15 2TP
44 Hooks Close London SE15 2TP
7 Hooks Close London SE15 2TP
6 Hooks Close London SE15 2TP
33 Sunwell Close London SE15 2TR
39 Sunwell Close London SE15 2TR
38 Sunwell Close London SE15 2TR
1b Gordon Road London SE15 2AA
1a Gordon Road London SE15 2AA
35 Sunwell Close London SE15 2TR
34 Sunwell Close London SE15 2TR
37 Sunwell Close London SE15 2TR
36 Sunwell Close London SE15 2TR
1 Hooks Close London SE15 2TP
88 Woods Road London SE15 2SW
3 Hooks Close London SE15 2TP
2 Hooks Close London SE15 2TP
82 Woods Road London SE15 2SW
80 Woods Road London SE15 2SW
86 Woods Road London SE15 2SW
84 Woods Road London SE15 2SW
36 Hooks Close London SE15 2TP
41 Hooks Close London SE15 2TP
40 Hooks Close London SE15 2TP
43 Hooks Close London SE15 2TP
42 Hooks Close London SE15 2TP
38 Hooks Close London SE15 2TP
37 Hooks Close London SE15 2TP
4 Hooks Close London SE15 2TP
39 Hooks Close London SE15 2TP
Flat 11 Carnicot House Clifton Estate SE15 2PJ
Flat 10 Carnicot House Clifton Estate SE15 2PJ
Flat 13 Carnicot House Clifton Estate SE15 2PJ
Flat 12 Carnicot House Clifton Estate SE15 2PJ
7a Consort Road London SE15 2PH
5c Consort Road London SE15 2PH
Flat 1 Carnicot House Clifton Estate SE15 2PJ
9a Consort Road London SE15 2PH
Flat 14 Carnicot House Clifton Estate SE15 2PJ
Flat 2 Carnicot House Clifton Estate SE15 2PJ
Flat 19 Carnicot House Clifton Estate SE15 2PJ
Flat 21 Carnicot House Clifton Estate SE15 2PJ
Flat 20 Carnicot House Clifton Estate SE15 2PJ
Flat 16 Carnicot House Clifton Estate SE15 2PJ
Flat 15 Carnicot House Clifton Estate SE15 2PJ
Flat 18 Carnicot House Clifton Estate SE15 2PJ

Flat 24 Sonesta Apartments SE15 2AJ
Flat 23 Sonesta Apartments SE15 2AJ
Flat 26 Sonesta Apartments SE15 2AJ
Flat 25 Sonesta Apartments SE15 2AJ
Flat 20 Sonesta Apartments SE15 2AJ
Flat 19 Sonesta Apartments SE15 2AJ
Flat 22 Sonesta Apartments SE15 2AJ
Flat 21 Sonesta Apartments SE15 2AJ
Flat 2 76 Queens Road SE15 2QW
Flat 1 76 Queens Road SE15 2QW
Flat 3 76 Queens Road SE15 2QW
Room 24 3 Consort Road SE15 2PH
Flat 5 10 Queens Road SE15 2PT
Room 26 3 Consort Road SE15 2PH
Room 25 3 Consort Road SE15 2PH
Flat 4 76 Queens Road SE15 2QW
Flat 10 60 Queens Road SE15 2QW
Flat 9 60 Queens Road SE15 2QW
Flat 12 60 Queens Road SE15 2QW
Flat 11 60 Queens Road SE15 2QW
Flat 6 60 Queens Road SE15 2QW
Flat 5 60 Queens Road SE15 2QW
Flat 8 60 Queens Road SE15 2QW
Flat 7 60 Queens Road SE15 2QW
Flat 13 60 Queens Road SE15 2QW
Flat 19 62 Queens Road SE15 2QW
Flat 18 62 Queens Road SE15 2QW
Flat 21 62 Queens Road SE15 2QW
Flat 20 62 Queens Road SE15 2QW
Flat 15 62 Queens Road SE15 2QW
Flat 14 62 Queens Road SE15 2QW
Flat 17 62 Queens Road SE15 2QW
Flat 16 62 Queens Road SE15 2QW
Basement Flat 50a Queens Road SE15 2QW
Top Floor 50 Queens Road SE15 2QW
Flat A 1 Consort Road SE15 2PH
80b Queens Road London SE15 2QW
Top Floor 38 Queens Road SE15 2QW
Ground Floor Flat 38 Queens Road SE15 2QW
Flat 3 50 Queens Road SE15 2QW
Flat 1 50 Queens Road SE15 2QW
Flat D 1 Consort Road SE15 2PH
Flat 2 60 Queens Road SE15 2QW
Flat 1 60 Queens Road SE15 2QW
Flat 4 60 Queens Road SE15 2QW
Flat 3 60 Queens Road SE15 2QW
Second Floor Flat 80 Queens Road SE15 2QW
First Floor Flat 80 Queens Road SE15 2QW
70 Queens Road London SE15 2EP
Fifteen And A Half Consort Road SE15 2PH
Flat 44 62 Queens Road SE15 2QW
Flat 43 62 Queens Road SE15 2QW
Flat 45 62 Queens Road SE15 2QW
Flat 40 62 Queens Road SE15 2QW
Flat 39 62 Queens Road SE15 2QW
Flat 42 62 Queens Road SE15 2QW
Flat 41 62 Queens Road SE15 2QW
Flat 1 Sonesta Apartments SE15 2AJ
Flat 7 Sonesta Apartments SE15 2AJ
Flat 6 Sonesta Apartments SE15 2AJ
Flat 9 Sonesta Apartments SE15 2AJ
Flat 8 Sonesta Apartments SE15 2AJ
Flat 3 Sonesta Apartments SE15 2AJ
Flat 2 Sonesta Apartments SE15 2AJ
Flat 5 Sonesta Apartments SE15 2AJ
Flat 4 Sonesta Apartments SE15 2AJ
Flat 27 62 Queens Road SE15 2QW
Flat 26 62 Queens Road SE15 2QW
Flat 29 62 Queens Road SE15 2QW
Flat 28 62 Queens Road SE15 2QW
Flat 23 62 Queens Road SE15 2QW
Flat 22 62 Queens Road SE15 2QW
Flat 25 62 Queens Road SE15 2QW
Flat 24 62 Queens Road SE15 2QW
Flat 30 62 Queens Road SE15 2QW
Flat 36 62 Queens Road SE15 2QW
Flat 35 62 Queens Road SE15 2QW
Flat 38 62 Queens Road SE15 2QW

Flat 17 Carnicot House Clifton Estate SE15 2PJ
3a Gordon Road London SE15 2AA
2d Gordon Road London SE15 2AA
3c Gordon Road London SE15 2AA
3b Gordon Road London SE15 2AA
2a Gordon Road London SE15 2AA
1c Gordon Road London SE15 2AA
2c Gordon Road London SE15 2AA
2b Gordon Road London SE15 2AA
5a Gordon Road London SE15 2AA
3a Consort Road London SE15 2PH
13b Consort Road London SE15 2PH
5b Consort Road London SE15 2PH
5a Consort Road London SE15 2PH
5c Gordon Road London SE15 2AA
5b Gordon Road London SE15 2AA
13a Consort Road London SE15 2PH
1a Consort Road London SE15 2PH
25 Burchell Road London SE15 2ST
38 Queens Road London SE15 2QW
Flat 11 54-56 Queens Road SE15 2QW
Flat A 78 Queens Road SE15 2QW
64-72 Queens Road London SE15 2QL
Flat 8 54-56 Queens Road SE15 2QW
Flat 7 54-56 Queens Road SE15 2QW
Flat 10 54-56 Queens Road SE15 2QW
Flat 9 54-56 Queens Road SE15 2QW
Flat B 78 Queens Road SE15 2QW
13 Yarnfield Square London SE15 5JD
12 Yarnfield Square London SE15 5JD
2 Yarnfield Square London SE15 5JD
14 Yarnfield Square London SE15 5JD
1 Yarnfield Square London SE15 5JD
Flat C 78 Queens Road SE15 2QW
11 Yarnfield Square London SE15 5JD
10 Yarnfield Square London SE15 5JD
Flat 28 Kendrick Court SE15 2SS
Flat 27 Kendrick Court SE15 2SS
Flat 30 Kendrick Court SE15 2SS
Flat 29 Kendrick Court SE15 2SS
Flat 24 Kendrick Court SE15 2SS
Flat 23 Kendrick Court SE15 2SS
Flat 26 Kendrick Court SE15 2SS
Flat 25 Kendrick Court SE15 2SS
Flat 31 Kendrick Court SE15 2SS
Flat 4 54-56 Queens Road SE15 2QW
Flat 3 54-56 Queens Road SE15 2QW
Flat 6 54-56 Queens Road SE15 2QW
Flat 5 54-56 Queens Road SE15 2QW
Flat 33 Kendrick Court SE15 2SS
Flat 32 Kendrick Court SE15 2SS
6-8 Queens Road London SE15 2PT
Flat 34 Kendrick Court SE15 2SS
Flat 3 52 Queens Road SE15 2QW
Flat 2 52 Queens Road SE15 2QW
Flat 7 44-46 Queens Road SE15 2QW
Flat 4 52 Queens Road SE15 2QW
36a Queens Road London SE15 2QW
30-32 Queens Road London SE15 2QW
Flat 1 52 Queens Road SE15 2QW
36b Queens Road London SE15 2QW
Flat B 50 Queens Road SE15 2QW
Flat D 50 Queens Road SE15 2QW
Basement Flat 80a Queens Road SE15 2QW
Flat D 78 Queens Road SE15 2QW
8 Yarnfield Square London SE15 5JD
7 Yarnfield Square London SE15 5JD
15a Consort Road London SE15 2PH
9 Yarnfield Square London SE15 5JD
4 Yarnfield Square London SE15 5JD
3 Yarnfield Square London SE15 5JD
6 Yarnfield Square London SE15 5JD
5 Yarnfield Square London SE15 5JD
15b Consort Road London SE15 2PH
48d Queens Road London SE15 2QW
48c Queens Road London SE15 2QW
Red Cow 190-192 Peckham High Street SE15 5EG
15d Consort Road London SE15 2PH

Flat 37 62 Queens Road SE15 2QW
Flat 32 62 Queens Road SE15 2QW
Flat 31 62 Queens Road SE15 2QW
Flat 34 62 Queens Road SE15 2QW
Flat 33 62 Queens Road SE15 2QW
Room 27 3 Consort Road SE15 2PH
43 Burchell Road London SE15 2ST
42 Burchell Road London SE15 2ST
47 Burchell Road London SE15 2ST
45 Burchell Road London SE15 2ST
39 Burchell Road London SE15 2ST
38 Burchell Road London SE15 2ST
41 Burchell Road London SE15 2ST
40 Burchell Road London SE15 2ST
49 Burchell Road London SE15 2ST
10 Woods Road London SE15 2SW
9 Burchell Road London SE15 2ST
14 Woods Road London SE15 2SW
12 Woods Road London SE15 2SW
53 Burchell Road London SE15 2ST
51 Burchell Road London SE15 2ST
57 Burchell Road London SE15 2ST
55 Burchell Road London SE15 2ST
Flat 2 54-56 Queens Road SE15 2QW
42 Queens Road London SE15 2QW
11 Burchell Road London SE15 2ST
33 Burchell Road London SE15 2ST
31 Burchell Road London SE15 2ST
37 Burchell Road London SE15 2ST
35 Burchell Road London SE15 2ST
22 Burchell Road London SE15 2ST
18 Burchell Road London SE15 2ST
26 Burchell Road London SE15 2ST
24 Burchell Road London SE15 2ST
6 Woods Road London SE15 2SW
58 Woods Road London SE15 2SW
62 Woods Road London SE15 2SW
60 Woods Road London SE15 2SW
52 Woods Road London SE15 2SW
50 Woods Road London SE15 2SW
56 Woods Road London SE15 2SW
54 Woods Road London SE15 2SW
64 Woods Road London SE15 2SW
76 Woods Road London SE15 2SW
74 Woods Road London SE15 2SW
8 Woods Road London SE15 2SW
78 Woods Road London SE15 2SW
68 Woods Road London SE15 2SW
66 Woods Road London SE15 2SW
72 Woods Road London SE15 2SW
70 Woods Road London SE15 2SW
26 Woods Road London SE15 2SW
24 Woods Road London SE15 2SW
30 Woods Road London SE15 2SW
28 Woods Road London SE15 2SW
18 Woods Road London SE15 2SW
16 Woods Road London SE15 2SW
22 Woods Road London SE15 2SW
20 Woods Road London SE15 2SW
32 Woods Road London SE15 2SW
44 Woods Road London SE15 2SW
42 Woods Road London SE15 2SW
48 Woods Road London SE15 2SW
46 Woods Road London SE15 2SW
36 Woods Road London SE15 2SW
34 Woods Road London SE15 2SW
40 Woods Road London SE15 2SW
38 Woods Road London SE15 2SW
16 Consort Road London SE15 2PU
14 Consort Road London SE15 2PU
20 Consort Road London SE15 2PU
18 Consort Road London SE15 2PU
9 Consort Road London SE15 2PH
7 Consort Road London SE15 2PH
12 Consort Road London SE15 2PU
10 Consort Road London SE15 2PU
22 Consort Road London SE15 2PU
34 Consort Road London SE15 2PU

15c Consort Road London SE15 2PH
 48b Queens Road London SE15 2QW
 48a Queens Road London SE15 2QW
 3 Colmore Mews London SE15 2QU
 2 Colmore Mews London SE15 2QU
 5 Colmore Mews London SE15 2QU
 4 Colmore Mews London SE15 2QU
 2 Queens Road London SE15 2PT
 1 Colmore Mews London SE15 2QU
 114 Parkway London NW1 7AN
 6 Colmore Mews London SE15 2QU
 12 Colmore Mews London SE15 2QU
 11 Colmore Mews London SE15 2QU
 14 Colmore Mews London SE15 2QU
 13 Colmore Mews London SE15 2QU
 8 Colmore Mews London SE15 2QU
 7 Colmore Mews London SE15 2QU
 10 Colmore Mews London SE15 2QU
 9 Colmore Mews London SE15 2QU
 34 Burchell Road London SE15 2ST
 32 Burchell Road London SE15 2ST
 4 Burchell Road London SE15 2ST
 36 Burchell Road London SE15 2ST
 28 Burchell Road London SE15 2ST
 27 Burchell Road London SE15 2ST
 30 Burchell Road London SE15 2ST
 29 Burchell Road London SE15 2ST
 5 Burchell Road London SE15 2ST
 7 Burchell Road London SE15 2ST
 Peckham Methodist Church Woods Road SE15 2PX
 2 Woods Road London SE15 2PX
 Queens Road Phs Practice 12 Queens Road SE15 2PT
 8 Burchell Road London SE15 2ST
 6 Burchell Road London SE15 2ST
 Tuke School 4 Woods Road SE15 2PX
 John Donne Primary School Woods Road SE15 2SW
 Flat 11 Kendrick Court SE15 2SS
 Flat 10 Kendrick Court SE15 2SS
 Flat 13 Kendrick Court SE15 2SS
 Flat 12 Kendrick Court SE15 2SS
 Flat 7 Kendrick Court SE15 2SS
 Flat 6 Kendrick Court SE15 2SS
 Flat 9 Kendrick Court SE15 2SS
 Flat 8 Kendrick Court SE15 2SS
 Flat 14 Kendrick Court SE15 2SS
 Flat 20 Kendrick Court SE15 2SS
 Flat 19 Kendrick Court SE15 2SS
 Flat 22 Kendrick Court SE15 2SS
 Flat 21 Kendrick Court SE15 2SS
 Flat 16 Kendrick Court SE15 2SS
 Flat 15 Kendrick Court SE15 2SS
 Flat 18 Kendrick Court SE15 2SS
 Flat 17 Kendrick Court SE15 2SS
 Flat 4 44-46 Queens Road SE15 2QW
 Flat 3 44-46 Queens Road SE15 2QW
 32 Consort Road London SE15 2PU
 38 Consort Road London SE15 2PU
 36 Consort Road London SE15 2PU
 26 Consort Road London SE15 2PU
 24 Consort Road London SE15 2PU
 30 Consort Road London SE15 2PU
 28 Consort Road London SE15 2PU
 Room 33 3 Consort Road SE15 2PH
 11 Consort Road London SE15 2PH
 Room 29 3 Consort Road SE15 2PH
 Room 28 3 Consort Road SE15 2PH
 Room 32 3 Consort Road SE15 2PH
 Room 30 3 Consort Road SE15 2PH
 17 Consort Road London SE15 2PH
 29 Consort Road London SE15 2PH
 27 Consort Road London SE15 2PH
 31 Consort Road London SE15 2PH
 3 Consort Road London SE15 2PH
 21 Consort Road London SE15 2PH
 25 Consort Road London SE15 2PH
 23 Consort Road London SE15 2PH
 38 Mortlock Close London SE15 2QE
 37 Mortlock Close London SE15 2QE
 40 Mortlock Close London SE15 2QE
 39 Mortlock Close London SE15 2QE
 34 Mortlock Close London SE15 2QE
 33 Mortlock Close London SE15 2QE
 36 Mortlock Close London SE15 2QE
 35 Mortlock Close London SE15 2QE
 57 Harders Road London SE15 2QQ
 34 Queens Road London SE15 2QW
 67 Harders Road London SE15 2QQ
 40 Queens Road London SE15 2QW
 61 Harders Road London SE15 2QQ
 59 Harders Road London SE15 2QQ
 65 Harders Road London SE15 2QQ
 63 Harders Road London SE15 2QQ
 48 Consort Road London SE15 2PU
 46 Consort Road London SE15 2PU
 52 Consort Road London SE15 2PU
 50 Consort Road London SE15 2PU
 40 Consort Road London SE15 2PU
 4 Consort Road London SE15 2PU
 44 Consort Road London SE15 2PU
 42 Consort Road London SE15 2PU
 54 Consort Road London SE15 2PU
 64 Consort Road London SE15 2PU
 62 Consort Road London SE15 2PU
 32 Mortlock Close London SE15 2QE
 8 Consort Road London SE15 2PU
 58 Consort Road London SE15 2PU
 56 Consort Road London SE15 2PU
 60 Consort Road London SE15 2PU
 6 Consort Road London SE15 2PU
 X
 C/O X

Re-consultation: n/a

APPENDIX 2

Consultation responses received

Internal services

Ecology Officer
 Environmental Protection Team [Noise / Air Quality / Land Contamination / Ventilation]
 Parks & Open Spaces
 Surface Water Flood Management Team

Statutory and non-statutory organisations

English Heritage
Metropolitan Police Service
Natural England - London Region & South East Region
Rob Taylor
Transport for London (referable & non-referable app notifications and pre-apps)

Neighbours and local groups

Basement Flat 50 Lausanne Road SE15 2JB
Basement Flat 50a Queens Road SE15 2QW
Cossall Estate Tenants And Residents Association 48 Mortlock Close SE15 2QE
Email representation
Flat D 1 Consort Road SE15 2PH
Flat 28 1 Evan Cook Close SE15 2HH
Flat 5 90 Queens Road SE15 2QS
Flat 7 Carnicot House Clifton Estate SE15 2PJ
John Donne Primary School Woods Road SE15 2SW
Kirkwood Road London SE15
Lugard Road
100 Gordon Road London SE15 3RP
11 Consort Road London SE15 2PH
110 Hollydale Road London SE15 2TQ
110b Friary Road Peckham SE15 1PX
112 Dennett'S Road London SE14 5LW
15 Bermondsey Square London SE1 3UNN
165 Kirkwood Road Peckham SE15 2BG
17c Kintgs Grove Peckham SE15 2LY
18 Woods Road London SE15 2SW
18 Wroxton Road London SE15 2BN
18 Wroxton Road Nunhead SE15 2BN
19 Consort Road London SE15 2PH
19 Hollydale Road London SE15 2TE
20 Almond Close Nunhead SE15 4HU
23 Sunwell Close Cossall Estate SE15 2TR
25 Consort Road London SE15 2PH
25 Sunwell Close London SE15 2TR
26 Woods Road London SE15 2SW
284 Consort Road SE15
3 Jermingham Road London SE14 5NQ
3 Welland House Rye Hill Park SE15 3JG
32 Sunwell Close London SE15 2TR
34 Nazereth Gardens Peckham SE15 2AB
35 Mortlock Close London SE15 2QE
36 Hooks Close Peckam SE15 2TP
4a Queens Road SE15
41 Bird In Bush Road Peckham SE15 6RN
43 Mortlock Close London SE15 2QE
44 Prescott House Hillingdon Street SE17 3PH
46 Naylor Road London SE15 1QQ
47 Hooks Close Woods Road SE15 2TP
5b Gordon Road London SE15 2AA
5c Gordon Road London SE15 2AA
55 Hook Close London SE5 2TP
61 Brayards Road SE15 2BQ
63 Brayards Road London SE15 2BQ
7 Consort Road London SE15 2PH
7 Evan Cook Close London SE15 2HJ

7 Gordon Road London SE15 2AA
73 Gordon Road London SE15 2AF
73 Kirkwood Road Peckham SE15 3XU
75 Lugard Road London SE15 2TB
76 Lugard Road London SE15 2SZ
79 Cossall Walk London SE15 2TM
86 Asylum Road Peckham SE15 2LW
9 Consort Road London SE15 2PH