

**Rolfe Judd**

Planning

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On behalf of Pocket Living Ossory Road Ltd

# 2-10 Ossory Road, SE1 5AN

Planning Statement inclusive of Statement of Community  
Involvement and Affordable Housing Statement

September 2021

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# 1.0 Introduction

## 1.1 Summary

1.1.1 This planning statement has been prepared by Rolfe Judd Planning on behalf of Pocket Living Ossory Road Limited ('the Applicant') in support of an application for full planning permission for development at 2-10 Ossory Road, SE1 5AN ('the Application Site') to the London Borough of Southwark ('the Council').

1.1.2 The application scheme involves the erection of a part one, part ten, part eleven-storey building comprising up to 117 one-bedroom homes (39no. intermediate homes and 78no. market homes) with 421sqm GIA of light industrial (Class E) floorspace at ground floor level together with two residential cycle stores, commercial cycle parking and associated plant rooms. The application scheme will deliver high quality amenity space for the residential element of the proposal through provision of attractive communal and private amenity spaces.

1.1.3 The description of development for the application scheme is set out below:

*'Redevelopment for the erection of a part one, part ten and part eleven storey building comprising up to 421sqm of Class E floorspace at ground floor and up to 117 homes (Class C3). Provision of ancillary plant, amenity spaces, cycles and refuse stores.'*

1.1.4 This Application Scheme is one of two linked applications for the redevelopment of sites within the Old Kent Road. The second application scheme is Credon House, Verney Road, SE16 3BA, the development proposals of which comprise the demolition of the existing building and erection of a 9-storey mixed-use building delivering 22 residential units (Use Class C3) and 82sqm (GIA) of affordable workspace (Use Class E). Please see Figure 1 below for the location of the two sites. The two applications (2-10 Ossory Road and Credon House) are linked as the Credon House scheme will deliver the social rented component of the overall affordable housing offer based on a presumption of 50% affordable housing by habitable room across both sites. This will be secured through a Section 106 Agreement which obligates both sites.

1.1.5 Overall, the two linked schemes will deliver a total of 139 homes of which 22 (25% by habitable room) will be for social rent and 39 (a further 25% by habitable room) will be intermediate tenure (discount market sale). Pocket has delivered discount market sale homes across many of London boroughs including at Varcoe Road in Southwark. These homes are normally one bed-one person homes delivered at a discount of 20% below market value. Please see Section 4 for a description of the discount market sale homes.

1.1.6 The Application Site is approximately 0.11ha in size and is located on the western side of Ossory Road, in close proximity to the Old Kent Road. The Application Site is currently occupied by a low-rise commercial building and is in use as offices by an online gift company (Use Class E). The remainder of the site comprises hardstanding with servicing access via Ossory Road.



Figure 1: Location of 2-10 Ossory Road (the Application Site) and linked site at Credon House

- 1.1.7 The Application Site is currently located within the Preferred Industrial Location – Strategic (Old Kent Road) which extends predominantly to the south of the site and comprises a mixture of employment and light industrial uses. However, following the adoption of the New Southwark Plan, which is likely to occur by the end of 2021, a significant portion of the Strategic Industrial Land will be released to support mixed use development including new homes. In respect of the land at Ossory Road the New Southwark Plan will re-designate this as a Locally Significant Industrial Site (LSIS). The Application Site is located within the Core Area of the Draft Old Kent Road Area Action Plan December 2020 / Opportunity Area Planning Framework which aims to create a minimum of 20,000 new homes and 5,000 new jobs. This uplift in residential accommodation and jobs will be linked to the aspiration for the inclusion of the core area of the action plan into the Central Activity Zone (CAZ).
- 1.1.8 In preparing this application, the Applicant is making a commitment to the London Borough of Southwark to deliver a highly sustainable development. Pocket's two linked applications, 2-10 Ossory Road and Credon House, will utilise previously developed 'brownfield' land to deliver 139 new homes for the borough with 50% as affordable housing by habitable room with a policy compliant tenure mix of social and intermediate homes, alongside high-quality commercial Class E floorspace, including 82sqm of affordable workspace at Credon House and 421sqm (GIA) of light industrial floorspace at 2-10 Ossory Road.

1.1.9 Careful consideration of Council and London Plan policies, pre-application meetings with officers, public consultation and a thorough site analysis has resulted in a creative and sympathetic design for the site, created by Hawkins Brown Architects.

## 1.2 Planning Statement

1.2.1 The purpose of this statement is to examine the planning issues raised by the current development proposals for the Application Site. In particular, this statement identifies and describes the key opportunities presented by the proposed redevelopment of an urban 'brownfield' site for a sustainable mixed-use development delivering up to 117 new homes and 421 sqm of commercial (Class E) floorspace.

1.2.2 The statement also provides a comprehensive analysis of the relevant planning policy framework at national, strategic and local levels. As such, the planning statement is structured as follows:

**Section 1:** Introduction

**Section 2:** The Application Site and Surrounding Area – this sets the context of the current proposal and provides a detailed description of the application site and its previous uses;

**Section 3:** The Proposal – describes the proposed development;

**Section 4:** Housing Policy Context – summarises the planning policy relevant to this proposal at national, strategic and local levels;

**Section 5:** Affordable Housing Statement;

**Section 6:** Planning Considerations – reviews the proposal in terms of the relevant policy context and other material considerations;

**Section 7:** Statement of Community Involvement; and

**Section 8:** Conclusion.

## 1.3 Supporting Application Documents

1.3.1 This Planning Statement and Statement of Community Involvement should be read in conjunction with the following additional documents, which accompany the application:

- Covering Letter – prepared by Rolfe Judd Planning
- Planning Application Form - prepared by Rolfe Judd Planning
- CIL Additional Information Form - prepared by Rolfe Judd Planning
- Planning application drawings – prepared by Hawkins Brown
- Design & Access Statement – prepared by Hawkins Brown
- Transport Statement – prepared by TPP

- Delivery and Servicing Management Plan – prepared by TPP
- Daylight and Sunlight Assessments (Within and External) – prepared by Rights of Light
- Flood Risk Assessment – prepared by Whitby Wood
- Outline Fire Strategy Report & Fire Statement – Jensen Hughes
- Archaeological Desktop Based Assessment – prepared by Archaeology Collective
- External Lighting Assessment – prepared by XCO2
- Air Quality Assessment – Prepared by XC02
- Environmental Noise and Vibration Impact Assessment – prepared by XCO2
- Energy Statement (including Overheating Assessment) – prepared by XCO2
- Sustainability Statement – prepared by XCO2
- Utilities Statement – prepared by XCO2
- Phase 2 Environmental Study (Contamination) – prepared by RSK
- Engagement Summary – prepared by Rolfe Judd Planning
- LBS Schedule of Development – prepared by Rolfe Judd Planning
- Drainage Strategy (including SuDS Pro Forma) – prepared by Whitby Wood
- Townscape and Visual Impact Assessment – prepared by Landscape Collective
- Heritage Statement – prepared by Heritage Collective
- Ventilation and Extraction Statement – prepared by XCO2

## 2.0 The Application Site and Surrounding Area

### 2.1 Site Description & Location

- 2.1.1 The Application Site is located on the western side of Ossory Road in close proximity to the junction with the Old Kent Road. The site comprises 0.11 hectares (ha) and was formerly occupied as a showroom and maintenance garage by Robins & Day and is currently occupied on a short-term tenancy as offices by an online retail company (Use Class E). The current tenant will vacate the premises in early 2022 as part of a planned relocation outside of London.
- 2.1.2 The existing building has an L-shaped footprint with concrete hardstanding at its North-East corner fronting Ossory Road. It is constructed of blockwork walls and metal cladding and is comprised of a steel portal frame with a shallow dual pitched corrugated concrete roof and single storey lean-to on its northern boundary. The building is approximately 6.4m at eaves height and has 966sqm of existing GIA floorspace. This floorspace includes storage, offices and plant.
- 2.1.3 Pedestrian and vehicular access into the site is via Ossory Road. The hardstanding at the North-East corner provides seven car-parking spaces; it is predominantly used for car and service vehicle parking and refuse storage. A level access loading door and separate pedestrian access door serve the existing use along Ossory Road.
- 2.1.4 The western side of Ossory Road comprises storage and industrial warehouses and is home to occupiers such as Hireman Tool & Equipment Services (14-22 Ossory Road), Rexel Electrical wholesaler (50 Ossory Road), Kaymet (52 Ossory Road) and Shurgard storage (54-80 Ossory Road). The application site is an area of convergence where the character of Ossory Road transitions from commercial uses to the South into residential uses along its junction with the Old Kent Road. This transition is evident in the adjacent residential development of 434-452 Old Kent Road which lies immediately to the north of the application site.
- 2.1.5 An Asda supermarket forms the entire eastern edge of Ossory Road with the store and service yard to the north and open surface car parking to the south. There is no entry to Asda's car park from Ossory Road. Servicing for Asda is via Ossory Road, adjacent to the application site. To the west of the application site lies the former mineral water and ginger beer Victorian bottling factory which is locally listed and located within the recently extended Glengall Road Conservation Area. An access road, from Ossory Road, leads into a central cobbled yard and provides service access and associated car-parking for the bottling factory.
- 2.1.6 The Application Site is 1.4 kilometres from South Bermondsey Railway Station, approximately an 18-minute walk. High frequency bus routes along the Old Kent Road are within 500 metres of the site and link the area to Bakerloo line services at Elephant and Castle Underground Station and Northern, Jubilee and National Rail services at London Bridge. A manual Public Transport Accessibility Level (PTAL) assessment indicates the site has a PTAL of 4, on a scale of 1-6b with 6b being the highest, indicating the Application Site has good accessibility to public transport. In combination with the aspirations to deliver regeneration within the

Core Area of the Old Kent Road Opportunity Area the Council (and Lewisham Council) are seeking to facilitate the Bakerloo Line Extension. The Bakerloo Line Extension when constructed will bring two new Underground Stations to the area; one in the general vicinity of the Tesco supermarket approximately 0.65 kilometres from the site, approximately an 8-minute walk, and the other in proximity to junction of the Old Kent Road and Commercial Way. As a result, the transport accessibility level at the site is expected to increase significantly over time.

2.1.7 The Application Site is located within Sub Area 2 (Cantium Retail Park and Marlborough Grove) and specifically Site Allocation OKR 10 of the Old Kent Road Area Action Plan (OKR AAP) (see Figure 2 below). The Old Kent Road Area Action Plan December 2020 draft was recently consulted on between January 2021 and May 2021. It is now awaiting the current consultation on Modifications to the New Southwark Plan following the Inspector's Report to be concluded before the proposed submission version is published and consulted on. Following this the AAP will be submitted to the Secretary of State for Examination in Public (EIP) and become adopted planning policy forming part of the development plan for the Borough later in 2021. The OKR AAP seeks to transform the area into a mixed-use neighbourhood commensurate with the anticipated level of regeneration and development more widely along the Old Kent Road. The redevelopment of the application site is a wholly in line with the future aspirations for the Old Kent Road area as outlined within the OKR AAP.



Figure 2: OKR AAP- Sub Area 2 and OKR 10. (Site outlined in red)

2.1.8 It is anticipated that the redevelopment of this site will act as a catalyst for further development which responds to the future aspirations for the area. Pocket Living completed the first major development scheme

to be constructed within the OKR AAP/Opportunity Area at 1 Varcoe Road (Application Ref 16/AP/5235). This demonstrates Pocket's commitment to the area and to the provision of market and intermediate homes at Ossory Road and intermediate homes at Varcoe Road for those that live or work in Southwark. The delivery of 78 market and 39 intermediate homes at the Application Scheme at 2-10 Ossory Road and 22 social rented homes at Credon House, Verney Road, demonstrates Pocket's support for objectives and ambitions of the OKR AAP and that Pocket can help deliver the range of homes needed for the area. The delivery of affordable homes will be secured through a S106 Planning Agreement.

2.1.9 The application site is currently designated as a Preferred Industrial Location-Strategic (Old Kent Road) as per Southwark's current Proposals Map and as Strategic Industrial Land (SIL) as per the adopted London Plan. In view of policy changes at local level the emerging New Southwark Plan proposes the re-designation of the site as a Locally Significant Industrial Site (LSIS). The Application Site is located within Site Allocation NSP63 of the emerging New Southwark Plan, Figure 3 below shows the Council's aspirations for the area and confirms the Council's re-designation of the site as an LSIS.

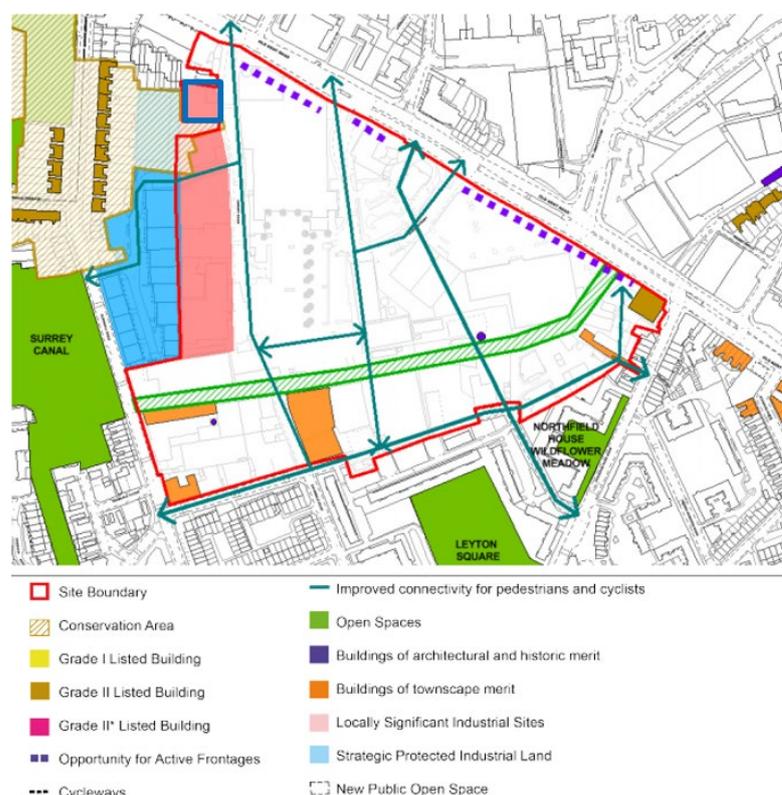


Figure 3: Site Allocation NSP63 of the Emerging New Southwark Plan (Site outlined in blue)

2.1.10 The re-designation of the site to Locally Significant Industrial Site (LSIS) to allow mixed use development is part of the wider strategy which has been developed by the Council and the GLA. The GLA designated the Old Kent Road as an Opportunity Area in the previous London Plan (2016). Following the adoption of the London Plan 2016 the Council and GLA have worked closely together to identify opportunities for release, protection, or intensification of SIL land across the Old Kent Road. Within his letter (see Appendix 1) dated 3<sup>rd</sup> September 2018 the former leader of the Council Peter John OBE outlined an agreed approach between

the London Borough of Southwark and the Greater London Authority in regard to the Old Kent Road Area Action Plan and the Bakerloo Line Extension (BLE).

2.1.11 The letter (see Appendix 1) sets out an agreement to two phases of development within the OKR Opportunity Area, with the first phase comprising 9,500 homes that could be supported by enhancements to the existing public transport network in advance of the delivery of the BLE. The associated SIL release phasing plan identifies the application site to be re-allocated as LSIS and located within the Phase 1 area suitable for redevelopment prior to the delivery of the BLE.

2.1.12 The Application Site is within an Urban Density Zone and an Air Quality Management Area. It is in Flood Zone 3 as identified by the Environment Agency. The application site is not within a Conservation Area; however, the Glengall Road Conservation Area boundary runs to the immediate south and west of the application site.

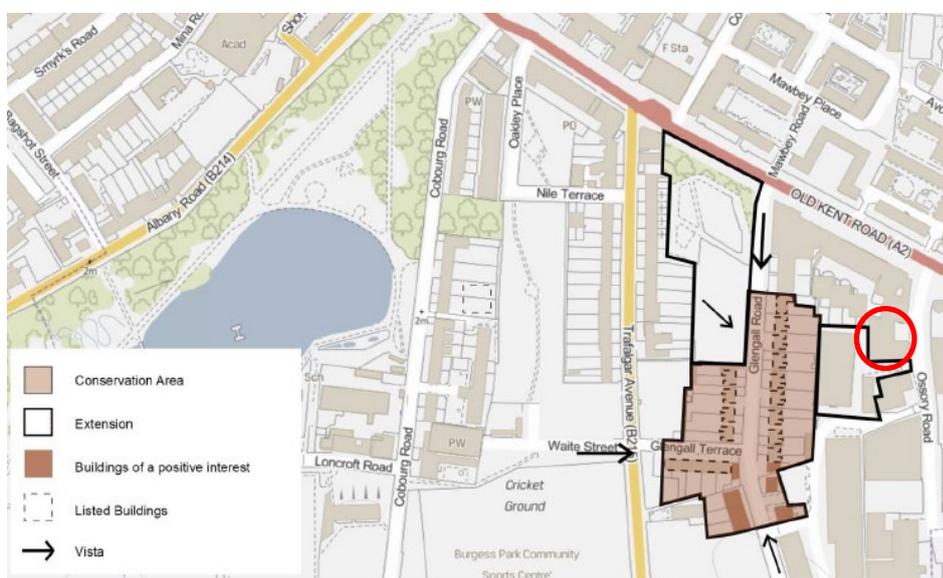


Figure 4: Glengall Road Conservation Area (Application Site Outlined in Red)

## 2.2 Surrounding Area

2.2.1 The surrounding area is a mix of residential and industrial land uses. The Glengall Road Conservation Area is comprised principally of residential properties located on Glengall Road and Glengall Terrace that were built in the 1840s and includes the Grade II listed properties 1-37 Glengall Road. The Conservation Area was recently extended to include the locally listed bottling plant factory which immediately adjoins the application site to the west.

2.2.2 To the east of the Application Site lies the Asda superstore which is a low level and utilitarian in appearance. Beyond Asda lies the Cantium Retail Park which comprises large retail warehouses with expansive car parks.

- 2.2.3 To the north and west (beyond the bottling plant) of the site are lower scale residential properties mainly comprising of 2-3 storey Victorian single houses and 3-5 storey purpose built flatted developments. All of this land lies within the Old Kent Road Opportunity Area and is zoned for mixed use development.
- 2.2.4 Immediately adjacent to the application site on the northern boundary is No. 434-452 Old Kent Road, a modern residential development comprised of three blocks providing 85 residential homes. The development comprises a mansion style block which fronts Old Kent Road, three villa blocks at the centre of the site and a further building fronting Ossory Road to the sites northern edge. 434-452 Old Kent Road varies in height from 6 storeys along Old Kent Road and three storeys at 1 Ossory Road. The main vehicular access for the development is via Ossory Road which has undercroft vehicular access to a central courtyard and basement car park.
- 2.2.5 To the South and South West of the application site the buildings are principally industrial and commercial units.
- 2.2.6 A detailed analysis of the character of the surrounding area is contained within the accompanying Design and Access Statement prepared by the project architects, Hawkins Brown.

### 2.3 Planning History – Previous Application, LPA Reference: 20/AP/0009

- 2.3.1 A previous planning application for the redevelopment of the application site was submitted to the Council on the 30<sup>th</sup> December 2019 and validated on the 20<sup>th</sup> January 2020, LPA Application Reference 20/AP/0009. The description of development for the scheme was as follows:

***‘Demolition of existing building and redevelopment of the site to construct a part two, part ten, part eleven storey (AOD +44.61m) building comprising of 105 units (Use Class C3) 100% affordable by habitable rooms, 1,439 sqm of light industrial space (Use Class B1) including service yard, cycle storage and associated plant rooms.’***

- 2.3.2 The scheme was discussed with Planning Officers and was presented at Committee on the 6<sup>th</sup> October 2020 with a recommendation for approval. Contrary to Officers’ recommendations, the Planning Committee made a resolution to refuse the application.
- 2.3.3 Following the Committee’s resolution to refuse the application, Pocket Living and the London Borough of Southwark have since been in discussions about the redevelopment of the application site in association with the linked application at Credon House. There is a determination and commitment from Pocket Living to work together with the Council to deliver a policy compliant approach across both sites, evident in the making of this application and the revised application scheme at Credon House.
- 2.3.4 Further, to paragraph 2.3.3. above, the planning application history for Credon House is important to the redevelopment of Ossory Road. Similarly to the Application Site, a previous planning application was submitted by Pocket for the redevelopment of Credon House. The application was submitted on the 20<sup>th</sup>

December 2019 and validated on the 23<sup>rd</sup> December, application reference number 19/AP/7550. The proposals comprised the demolition of the existing building and construction of 57 affordable one-bedroom homes and 123sqm of flexible commercial floorspace (A1-A3 and B1, now Class E) in a part 7/part 10 storey building. The application was proposed to be recommended for approval however, following the resolution to refuse the Ossory Road scheme in October 2020, the application will be withdrawn and a new application (as described elsewhere in this Statement) submitted in tandem with this application scheme to deliver 50% affordable housing across both schemes.

## 2.4 Other Relevant Planning History in OKR10

- 2.4.1 On 9<sup>th</sup> May 2013 planning permission was granted (planning ref: 13/AP/0550) for the 'installation of new metal over-cladding, repainting existing external profiled metal cladding, replacement doors and windows and installation of bollards'.
- 2.4.2 Further planning history for the application site includes the 'display of Fascia signage on north and eastern elevations' which was granted in June 2014 (planning ref: 14/AP/0701).
- 2.4.3 Towards the north east of the site 434-452 Old Kent Road was granted planning permission in August 2011 for the redevelopment of three residential buildings to provide 85 residential units comprising 3, 4, 5 and 6 storey buildings.
- 2.4.4 The application site lies within Site Allocation OKR10 (Glengall Road, Latona Road and Old Kent Road) in the Old Kent Road Area Action Plan. The principle of redevelopment of industrial land to deliver mixed use schemes has been supported by the Council in the Old Kent Road Opportunity Area and is evidenced in the schemes below.

### **14-22 Ossory Road**

- 2.4.5 14-22 Ossory Road (referred to as the Hireman Site) lies immediately adjacent to 2-10 Ossory Road. It was granted planning permission at Committee in December 2020 (Application Reference 19/AP/7610) to demolish the existing building and deliver 1,438sqm of light industrial floorspace at basement, ground, and first floor level and 71 homes within a building of part 10 part 11 storeys.

### **43 Glengall Road and 1 Bianca Road**

- 2.4.6 43 Glengall Road and 1 Bianca Road lies 0.1 miles to the south of 2-10 Ossory Road and within Site Allocation OKR10. A planning application for the redevelopment of the site was heard at Planning Committee on the 20<sup>th</sup> July 2020 with a recommendation for approval from Officers (Application Reference 20/AP/0039), with planning permission granted in December 2020.
- 2.4.7 The proposals will deliver a new mixed-use building of up to 15 storeys (plus lower ground and basement) to provide Halls of Residence for the London School of Economics and Political Science. The new building will

consist of 676 student rooms, replacement commercial floorspace of 2,375sqm consisting of 1190sqm of B1c, and 1,185sqm of flexible B1c/D1/A3 Use as a Creative Commercial Centre for University related community uses, a community café, and new areas of public realm.

#### **596-608 Old Kent Road (North Peckham Civic Centre)**

- 2.4.8 Located within OKR10 and Site Allocation NSP63 of the draft New Southwark Plan, formal planning permission was granted in July 2021 for the redevelopment of the North Peckham Civic Centre (Application Reference 18/AP/3284). The mixed-use redevelopment comprises the construction of three buildings ranging in height from 10 to 38 storeys. It will deliver 372 residential units (Use Class C3), place of worship (Use Class F1), retail (Use Class E), and office / light industrial (Use Class E).

#### **Cantium Retail Park**

- 2.4.9 A planning application at Cantium Retail Park (east of the Application Site) was heard at committee on the 5<sup>th</sup> March 2019 with a recommendation for approval from Officers (Application Reference 18/AP/3246) with Members resolving to grant planning permission subject to completion of a s106 legal agreement. The application sought planning permission for the demolition of existing buildings and redevelopment of the site to provide a new basement level and buildings ranging from 3 to 48 storeys in height comprising up to 1,113 residential units (Class C3) up to 5,659 sq. m of office floorspace (Class B1(a)), up to 2,228 sq. m of retail floorspace (Class A1), up to 2,932 sq. m of flexible space including use within Classes A1, A3, B1(a), B1(b), D1, D2 and / or Sui Generis (Theatre). Of the 1,113 new homes 35.48% will be provided as affordable housing, by habitable room.

#### **Malt Street**

- 2.4.10 The Malt Street regeneration site also forms part of the emerging OKR10 Site Allocation. The application (Application reference 17/AP/2773) was taken to committee in June 2019 with a resolution to grant from Members subject to completion of a S106 agreement. The formal decision notice approving the scheme was issued on the 30<sup>th</sup> October 2020. This hybrid application comprises redevelopment in buildings up to 44 storeys providing a total of up to 1,300 homes and up to 7,000sqm commercial floorspace. This application is also currently designated as Strategic Industrial Land and within the committee report (para 91) the officer noted:

*“Taking into account the adopted policy position, when determining whether the principle of the proposed development would be acceptable in land use terms, Members need to consider whether the wider regeneration benefits of the scheme would outweigh any harm caused by the loss of protected industrial site and the introduction of residential, retail, office and community/leisure uses, and whether those benefits therefore justify a departure from the adopted planning policy. Officers consider that there would be wider benefits arising from the proposal that would justify a departure from the adopted policy”.*

## **Nye's Wharf**

- 2.4.11 Nye's Wharf is located at Frensham Street which lies to the south east of the application site. The application was considered at Planning Committee on the 3<sup>rd</sup> September 2018 and was recommended for approval (application ref 17/AP/4596). Members resolved to grant planning permission subject to completion of a S106 Agreement. The application includes the demolition of existing builds and erection of a mixed-use scheme comprising 321 sq.m of flexible A1/A2/A3/A4/B1/D1 and D2 floorspace and 882 of Class B1 floorspace, with 153 Residential Units (Class C3) in a building ranging from 9 to 18 storeys.
- 2.4.12 Again, this site is currently located within SIL and in recommending approval the committee report (para 49) acknowledges the direction of travel of the draft New Southwark Plan in the de-allocation and re-designation of SPIL/SIL stating:

*"Whilst the Old Kent Road area contains designated SPIL which has not yet been amended with a newly adopted policy, the adopted London Plan clearly identifies the Old Kent Road as an opportunity area which will undergo significant transformation where it is expected that a SPIL review will take place to accommodate such change.*

*To conclude in relation to land uses, the proposed development would be contrary to Strategic Policy 10 of the Core Strategy because the introduction of residential uses would represent a departure from saved Policy 1.2 of the Southwark Plan. The adopted London Plan however clearly identifies the Old Kent Road as an opportunity area which will undergo significant transformation which would include residential uses and where it is expected that a SPIL review will take place to accommodate such change.*

*In advance of the draft London Plan and the Old Kent Road AAP being adopted, the proposal must therefore be weighed against the benefits of the scheme including job creation, delivery of affordable workspace, the provision of housing, of which 37% would be affordable, contribution towards the linear park delivery and the provision of good quality, flexible commercial space. In light of this officers consider that the principle of the proposed development in land use terms should be supported."*

## **49-53 Glengall Road**

- 2.4.13 49-53 Glengall Road is approximately 0.3 miles to the south west of the application site and is also currently allocated as SIL. An application for the redevelopment of the site was taken to Committee with a resolution to grant on the 15<sup>th</sup> January 2019, subject to the applicant entering into an appropriate legal agreement (application reference 17/AP/4612). The application comprises the demolition of all existing buildings and structures (excluding some of the facades along Glengall Road and Bianca Road and the industrial chimney) and erection of a part 6, 8 and 15 storey mixed-use development comprising 3,716 sqm (GIA) of flexible workspace (Use Class B1 and B2/B8) and 181 residential units (Use Class C3) with amenity spaces and associated infrastructure.

2.4.14 In recommending this application be approved the committee report (para 103) states:

*“Some limited weight can be attached to the NSP and OKR AAP at present, given that they have been subject of extensive consultation and the emerging policies would support the proposal. Given the changing character of the area, it is not felt that the introduction of housing would prejudice the operation of existing businesses in the area. In light of this officers consider that the principle of the proposed development in land use terms should be supported”.*

## 2.5 Other Relevant Projects

### 1 Varcoe Road

2.5.1 Although outside OKR 10 and within the OKR13 Site Allocation, Pocket Living’s scheme at 1 Varcoe Road is now completed and all flats are sold. The delivery of the site is the first major development to be completed following the designation of the Old Kent Road Opportunity Area and the issuing of the Old Kent Road Area Action Plan (OKR AAP).

2.5.2 1 Varcoe Road was granted planning permission in September 2017 (Application Reference 16/AP/5235). The redevelopment has delivered 57 1 bed 1 person affordable homes and flexible commercial floorspace (Class A1, A2, A3 and B1 uses) at ground floor within a part six, part seven and part eight storey building.

2.5.3 The development by Pocket of 1 Varcoe Road was the first major development under construction following the designation of the Old Kent Road Opportunity Area and the issuing of the Old Kent Road Area Action Plan (OKR AAP). The financial investment made for 1 Varcoe Road demonstrates Pocket’s commitment to working with the Council and other stakeholders in delivering the ambitions of the OKR AAP.

## 2.6 Pre-Application Discussions & Consultation

### London Borough of Southwark

2.6.1 In line with Paragraphs 39-44 of the NPPF, the applicant has actively engaged with the Council in order to improve the efficiency and effectiveness of the planning application process.

2.6.2 Initial discussions about the redevelopment of the application site were held on 15<sup>th</sup> November 2018. The discussions centred around the broad principles of development, considerations including design, unit mix, tenure; density, height and massing were discussed. The Council agreed that redevelopment of the site for a mixed-use scheme would be supported.

### Pre-Application Discussions 2018 / 2019 (Original Scheme)

2.6.3 The initial scheme was proposed at 16 storeys with commercial floorspace (formerly Class B1 now Class E) located on the ground and part of the first floor. Overall, the Council were supportive of a mixed-use

development and Pocket's aspirations for the redevelopment of the site. However, a reduction in height was sought by the Council to better reflect the massing envisioned within the emerging OKR AAP.

- 2.6.4 A second pre-application meeting was held on 5<sup>th</sup> September 2019 following detailed design development. Officers were presented with a scheme of 10 storeys with 95 x 1b1p Pocket homes, substantial amendments to the commercial area were also proposed following detailed discussions with the GLA and Vital OKR. The Council acknowledged that the light industrial uses at ground and first floor looked well refined in line with GLA comments.
- 2.6.5 Following this meeting and in coordination with other development schemes in Ossory Road, the opportunity to add an additional floor of accommodation (11 storeys) was taken. This was with support from planning officers and reflected the scale of the other development schemes coming forward in Ossory Road and OKR10.
- 2.6.6 The proposal for a residential led scheme was wholly in line with the agreed approach between the Council and the GLA (as confirmed in the letter from former Leader of the Council Cllr. Peter John OBE dated 3<sup>rd</sup> September 2018) and the policies of the emerging New Southwark Plan and adopted London Plan. As set out in the relevant policies the Council advised that B Class floorspace should generally be designed to meet Class B1c specifications to maximise employment potential.
- 2.6.7 The Council acknowledged the demographic of Pocket buyers means that to date only one wheelchair user has ever purchased a Pocket home. Nevertheless, they requested that M4(3) wheelchair homes be provided within any future scheme. As a result, 10% of homes are proposed as M4 (3) wheelchair homes, in accordance with the London Plan 2021 and New Southwark Plan requirements.
- 2.6.8 Officers accepted that balconies were not required due to the nature of the affordable offer proposed (i.e. solely 1 bed 1 person discount market sale homes) and as such, requested that Juliet balconies be provided on the kitchen/living/dining room of each home. Additionally, Council Officers sought the insertion of secondary windows in the northern flank elevation to add articulation to this façade. These have been incorporated where fire regulations permit.

#### **Pre-Application Discussions 2020/2021 (Revised Scheme)**

- 2.6.9 Following the Council's resolution to refuse application LPA reference 20/AP/0009, Pocket Living has been in discussions with Southwark and met formally with Council Officers on 24<sup>th</sup> July 2021 to present the revised scheme. The new proposals include the delivery of 117no. 1 bed 1 person (1b1p) homes (including 12no. M4 (3) wheelchair homes) – representing an increase of 12 new homes for the borough compared to the original scheme (which proposed a total of 105 homes). The new scheme will also deliver a significant increase in residential amenity space from the original scheme, with an uplift of 169sqm (previous scheme: 532sqm, proposed scheme: 701sqm).
- 2.6.10 The light industrial floorspace is now located at ground floor only (previously ground and first).

- 2.6.11 Overall, the amended scheme was very well received and the Council welcomed the changes to the scheme which had been informed by collaborative discussions.
- 2.6.12 Following the pre-application meeting and in view of the previous refusal the Council requested that the total private amenity space be increased through the provision of private balconies to the market homes. In direct response to this, Pocket Living has subsequently revised the scheme to provide private balconies or terraces to 78 of the proposed homes.
- 2.6.13 Section 6.0 further demonstrates how recommendations from Officers have been taken on board and incorporated into the application scheme.

#### **Greater London Authority**

- 2.6.14 A pre-application meeting was held with the GLA on 11<sup>th</sup> December 2018, a Planning Officer from the Council was present at the meeting. The scheme presented was 10 storeys comprising 102 residential homes. At this meeting GLA Officers raised no objection to the height of the proposal, indeed they noted that there was potential for a further increase in height given the site's location within the OKR AAP and changing context of the area with much taller buildings coming forward within OKR10 in particular. However, concerns were raised with the quantum and layout of the light industrial floorspace proposed.
- 2.6.15 In March 2019 a design meeting with the GLA was held and an updated scheme was presented at Part 2/Part 10 storeys and with light industrial floorspace located on the ground and first floor and inclusion of a service yard. The formal advice pertaining to the meetings in December 2019 and March 2020 was as follows:
- 2.6.16 In respect of land uses GLA Officers welcomed discussing the proposals at an early stage and were strongly supportive of a mixed-use development which re-provided industrial floorspace.
- 2.6.17 GLA Officers confirmed that the application site is within an area identified as suitable to come forward for redevelopment.
- 2.6.18 A scheme with intermediate affordable 1 bed 1 person homes which are intended to address the needs of middle-income residents and workers in Southwark would respond well to the characteristics of the Site. In addition, GLA Officers recognised that the delivery of wholly one-bedroom Pocket homes was fundamental to the overall affordable housing offer.
- 2.6.19 Given the site's location within an Opportunity Area the GLA supported higher density development. The GLA was also supportive of the residential entrance on Ossory Road but recommended Pocket review the proposed 12 residential homes per core.
- 2.6.20 Given the co-location of light industrial and residential uses the application scheme would need to demonstrate that the development could comply with the 'Agent of Change' principles in accordance with London Plan Policy D13 (previously D12 in draft form).

- 2.6.21 A strategic planning application stage 1 referral was received from the GLA on 16<sup>th</sup> March 2020. The stage 1 outlined that the GLA was supportive of the principle of development on the site. A full copy of the Stage 1 letter can be provided by the applicant on request.
- 2.6.22 Following the resolution to refuse the original application in October 2020 post resolution discussions have taken place between the applicants and GLA officers. GLA Officers confirmed they remain supportive of the revised scheme and principle of redevelopment in strategic terms.

#### **Workshops with the Council and Project Development Teams on Ossory Road**

- 2.6.23 In view of the aspirations of the Old Kent Road AAP and the number of sites coming forward for development along Ossory Road, the Council sought to arrange workshops between the project development teams working on redevelopment proposals for sites on Ossory Road.
- 2.6.24 A workshop was undertaken on 18<sup>th</sup> September 2019 between Pocket, the developers of No. 14-22 Ossory Road and their design team (Maddox Planning Consultants and Alan Camp Architects) and an Officer from the Council. It was noted the emerging proposals for No. 14-22 was for an 11-storey building. The Officer from the Council supported the opportunity for the development scheme for No. 2-10 Ossory Road being increased in height to match the AOD of its neighbour. The material palette for both schemes was discussed and the Officer from the Council requested that the materiality complement each other given the sites prominent location when viewed along the Old Kent Road.
- 2.6.25 The effect of the development proposals for Nos. 14-22 Ossory Road, on the Application Site, was also discussed. It was noted that given No. 14-22 was located due south of the Application Site there may be some effects in terms of daylight and sunlight for the homes located on the southern elevation of the Pocket scheme. It was noted by the Officer from the Council that both proposals were located within the OKR AAP, within an area set to undergo substantial change, and were in line with the proposed massing for Ossory Road. It was accepted that flexibility will be required in respect of daylight and sunlight results within the OKR AAP considering it is an urban regeneration area.
- 2.6.26 A workshop facilitated by the Council was also held on 25<sup>th</sup> September 2019 to discuss emerging mixed use developments along Ossory Road more widely. The attendees included the development team of 14-22 Ossory Road (Hireman Site), Nexus Planning and Broadway Malayan Architects as the development team of 24-50 Ossory Road (Rexel Site) and the development team for the application site - Pocket, Rolfe Judd Planning and Hawkins Brown Architects. The presentation highlighted the opportunity for Pocket to increase the height of the scheme to 11 storeys in line with approach taken on the Hireman Site. This design change was supported by Officers.

#### **Community Consultation**

- 2.6.27 In line with Paragraphs 39, 40 and 132 of the NPPF, the applicant has actively engaged with the local community and those affected by the proposed development to allow the evolution of design to take account of the views of the community.

- 2.6.28 A virtual public consultation was held on Wednesday 28<sup>th</sup> July 2021. The development team presented the proposals for both 2-10 Ossory Road and Credon House. A designated website has been set up to allow members of the public to view the proposals at any time and provide online feedback. The website address is <https://pocketoldkentroad.com/>. Further details on the public consultation and written feedback are provided within the Statement of Community Involvement - Section 7.0 of this statement.
- 2.6.29 A public consultation event was also held for the original application on 11<sup>th</sup> December 2018 at St. Philip's Church Hall, Avondale Square, SE1. Members of the public were invited to view a series of display boards setting out Pocket's approach to the delivery of affordable homes as well as drawings of the proposed schemes. There were approximately 13 attendees who attended over the course of four hours.
- 2.6.30 In accordance with the Council's objectives of positive and constructive engagement a Development Consultation summary has been submitted with this application and outlines the public consultation to date, feedback on the scheme, details on the evolution of the scheme in view of feedback during the stages of development

#### **Vital OKR**

- 2.6.31 The project team met with Vital OKR about the redevelopment of the site in January 2019 and again on 26<sup>th</sup> November 2019. These meetings have informed the design of the commercial (Class E) floorspace.
- 2.6.32 Pocket Living have met with Mark Brearley the owner of Kaymet and founder of Vital OKR to discuss the revised proposals for the site. Mark Brearley attended the virtual webinar on 28<sup>th</sup> July 2021 and, following this webinar, a separate meeting was held with Mr Brearley on 18<sup>th</sup> August 2021. Full details on the engagement with VITAL OKR are provide in Section 7.0 of this Planning Statement.

#### **Secure By Design**

- 2.6.33 The Applicant and Design Team met with the Designing Out Crime Officer (DOCO) on 14<sup>th</sup> January 2019 as part of the design development for the previous scheme.
- 2.6.34 The Designing Out Crime Officer advised the scheme was generally acceptable however, queried the potential for anti-social behaviour on the communal terraces at night and safety concerns regarding access to the highest roof level. In response to this the communal terraces will be restricted for use during specific times thus reducing any potential for anti-social behaviour. The roof will also be used for maintenance purposes only which will be ensured through secure access. The DOCO also provided advice on security measures for the development and Secure by Design products, including a recommended strategy for how the London Fire Brigade access the block in an emergency. These comments have informed the design and operation of the proposed scheme.

## 3.0 The Application Scheme

- 3.1.1 This application scheme proposes a part one/part ten/part eleven storey building comprising up to 117 one bedroom one person (1b1p) homes (Use Class C3) with 421sqm of light industrial floorspace (Class E) at ground floor level together with two residential cycle stores, commercial cycle parking and associated plant rooms. The application scheme will provide high quality external amenity space for the residential element of the proposal.
- 3.1.2 The homes have been designed to create compact but high-quality homes to give people access to home ownership often for the first time. The design of Pocket's award-winning schemes and the internal arrangement of its one bedroom one person homes is predicated on a bespoke Design Code whereby key design principles are adhered to, to deliver an efficient and effective use of space resulting in high-quality residential accommodation.
- 3.1.3 The design optimises internal space, respond to the local context, improve the streetscape, maximise energy efficiency, and promote community interaction both for future residents of the development and those in the wider area.
- 3.1.4 The application scheme has been carefully designed to deliver 421sqm of high-quality light industrial (Class E) floorspace at ground floor which would provide an active frontage at street level in keeping with the industrial character of Ossory Road. The scheme will deliver a genuinely mixed-use scheme in keeping with the emerging character for the area as outlined within the OKR AAP whilst also providing much needed homes for people who live or work in the borough.
- 3.1.5 The building is expressed as one volume along Ossory Road in line with the emerging character of the area. The building defines a strong built edge along Ossory Road with a façade which engages and animates the street scene. The light industrial unit fronting Ossory Road will retain and enhance the industrial character of Ossory Road.
- 3.1.6 The design and rationale behind the aesthetic of the building is described in detail within the Design and Access Statement and the architectural scheme drawings prepared by award winning architects, Hawkins Brown.

### **Light Industrial (Class E) Floorspace**

- 3.1.7 The ground floor incorporates flexible and modern accommodation requirements for industrial users. A light industrial unit (421 sqm – Use Class E) is proposed on the southern edge of the site. Employees and users will access the commercial unit via a legible entrance along Ossory Road. A secondary access point to the rear of the commercial unit will also provide access for additional servicing requirements.

- 3.1.8 The Application Scheme has been designed to provide modern, purpose built commercial space which meets the desires of multiple industrial occupants. The floorspace will have a floor to ceiling height of 4m which Vital OKR has agreed is appropriate for light industrial uses.
- 3.1.9 A robust materiality, large windows and restrained articulation ensures the building has a subtle character which draws on the industrial nature of the area. A key design principle throughout the scheme's evolution has been to create a successful mixed-use scheme which serves the needs of light industrial users and residents and ensures both can co-exist successfully.
- 3.1.10 A dedicated refuse store for commercial waste has been specifically designed to efficiently manage the expected waste generated. The commercial refuse store is located at ground floor and will be accessed and serviced via Ossory Road. All servicing for the Commercial unit will be via the proposed loading bay identified in the Council's emerging amendments to Ossory Road (see Appendix 2).
- 3.1.11 Cycle parking will be provided in accordance with the New Southwark Plan minimum cycle parking standards for the commercial element of the scheme. At ground floor, 2 secure, long stay cycle parking spaces will be provided for the proposed light industrial unit. A separate Sheffield Stand outside the building on the south west corner will provide commercial visitors with 2 short-stay parking spaces.
- 3.1.12 The application scheme has been designed to offer flexible light industrial floorspace which can be tailored to specific requirements. The design of this light industrial floorspace has taken into considerations the Council's light industrial specification and has been designed to be adaptable and flexible to meet the needs of a variety of light industrial businesses. The windows have been designed to be 1.2m above floor level to allow for workbenches to be placed beneath and sufficient wall space free from windows and obstructions have been incorporated on the advice of Vital OKR.
- 3.1.13 As noted previously the Design and Access Statement provides more detail of the design aspects of the scheme and how the objectives for robust flexible workspaces reflect those outlined in Policy AAP10 of the OKR AAP and the meetings with the GLA and Vital OKR.

#### **Residential Uses**

- 3.1.14 At first to tenth floor, 117no. 1 bed 1 person homes (1b1p) are proposed (Use Class C3) – comprising 78 private units and 39 discount market sale homes.
- 3.1.15 Residents will access their homes from an entrance / post lobby on Ossory Road. Separate access for residents and commercial users has been incorporated into the design of the scheme to ensure the successful co-location of uses. The residential entrance will comprise an outer lobby and inner lobby to ensure secure access and will include a stairway and two lifts. The provision of two lifts ensures level access will be retained to all floors even in the event of one lift breaking down.

3.1.16 In summary, the application scheme will provide up to 117no. homes (1 bedroom 1 person) which will be delivered as follows:

- First Floor – 11no. homes (2no. M4(3) Wheelchair User Dwellings)
- Second to Ninth Floor – 12no. homes per floor and 96 homes in total (including 1no. M4(3) Wheelchair User Dwelling per floor)
- Tenth Floor – 10no. Homes (2no. M4(3) Wheelchair User Dwellings)

3.1.17 Following comments received during discussions with the GLA regarding the number of units per core exceeding the eight recommended, the provision of two lifts per core in line with London Plan policy, the layout has been designed to include two corridors at each floor running north to south and east to west. The floor layouts are grouped as four and seven homes per corridor on the first floor, four and eight on the second to ninth; and four and six on the tenth floor. This has been designed to provide high quality communal residential space. This provides two smaller groups of flats on a corridor and creates a community feel to specific areas in the building. Pocket's schemes are exemplars of engendering a sense of community amongst residents. The application scheme includes high quality usable communal amenity spaces that Pocket provides in all of its schemes. These are areas which allow interaction between residents throughout the building and engender a strong community spirit. A window has been provided at the end of the corridor to bring natural light into the communal hallway.

3.1.18 All building services are located off internal corridors at ground floor level which can be used as a secondary means of escape in the event of a fire.

3.1.19 The building is part 1, part 10 storeys along its western and southern boundaries and 11 storeys facing Ossory Road. This has been designed in view of the wider aspirations of the OKR AAP, pre-application discussions and the emerging local context.

3.1.20 The development has been designed to provide high-quality amenity spaces for future residents. Following the resolution to refuse the original application by the Planning Committee, careful consideration has been given to creating usable communal terraces and private balconies for residents of the building. Creating enjoyable spaces has been a guiding principle and orientation, degrees of intimacy and shelter have been considered. In view of this, the scheme will provide two communal terraces; providing 224.4sqm of amenity space at first floor level with a second terrace of 57sqm at 10<sup>th</sup> floor, both of which can be used by residents for their enjoyment and will encourage social interaction. In addition, 78 private balconies and terraces will also be provided. In total, the scheme will provide 281sqm of communal amenity space and 420.3sqm of amenity space in the form of private balconies or terraces.

3.1.21 Cycle parking will be provided in accordance with the New Southwark Plan minimum cycle parking standards for residential uses. At ground floor 118 secure cycle parking spaces will be provided for residents over two cycle stores. The cycle parking will be in the form of 112 two-tier Josta cycle racks and 6 Sheffield stands for

larger or adapted bikes. 12 short-stay spaces will also be provided for residential visitors. For clarity, 130 parking spaces will be available for residents and their visitors.

3.1.22 A residential refuse storage area is located at ground floor, servicing will take place on Ossory Road in conjunction with the servicing arrangements for commercial waste. The Council has commissioned a study to assess long term improvements to Ossory Road which include increasing the width of the pavement on the western side of the road and inserting a loading bay adjacent to the application site (see Appendix 2).

3.1.23 The Application Scheme can be summarised as follows:

- Provision of a high-quality mixed-use scheme within a sustainable location in Southwark.
- Delivery of 78 private market for sale homes and 39 discount market sale homes;
- Provision of 421sqm of high quality, light industrial floorspace (Use Class E) at ground floor;
- High-quality, well considered commercial space incorporating 4m floor to ceiling heights, strategic positioning of windows to provide ample wall space; floors designed to take the weight of associated machinery; flexible layout for use by a variety of light industrial businesses;
- Delivery of up to 117 high-quality residential homes which all exceed London Plan and Nationally Described Space Standards;
- Provision of two terraces delivering 281sqm of communal amenity space designed to foster a sense of community;
- Provision of 78 balconies and terraces providing a total of 420.3sqm of private external amenity space;
- High-quality façade with ground floor light industrial floorspace and entrances to residential and commercial uses providing activation to the streetscene;
- 12no. Wheelchair adaptable homes (10% of total homes) within an accessible building;
- Car-free development with ample cycle parking for residents (118 long stay spaces), employees (92 long stay spaces) and visitors to both uses (14 short stay spaces) to encourage use of sustainable modes of travel.

## 4.0 Relevant Planning Policies

### 4.1 Development Plan

4.1.1 For the purposes of s.70 of the Town and Country Planning Act 1990 and s.38 (6) of the Planning and Compulsory Purchase Act 2004, the Development Plan for the London Borough of Southwark comprises:

- London Plan 2021
- Saved Southwark Plan 2007
- Southwark Core Strategy 2011

4.1.2 The following are, for the purpose of the aforementioned legislation material planning considerations:

- National Planning Policy Framework 2021
- Draft New Southwark Plan August 2020 (as modified August 2021)
- Mayor of London's Affordable Housing and Viability SPG 2017
- Mayor of London's Housing SPG 2016
- Mayor of London's Sustainable Design and Construction SPG 2014
- Southwark's Affordable Housing SPD 2008
- Southwark's Residential Design Standards SPD 2011 (including 2015 technical update)
- Southwark's Section 106 and CIL SPD 2015 (November 2020 update)
- Southwark's Sustainable Design and Construction SPD 2009

### 4.2 Government Guidance

4.2.1 National Planning Policy Framework (NPPF) 2021 sets out the Government's planning framework for England and is a key material planning consideration. At the heart of the NPPF is a presumption in favour of sustainable development. The NPPF recognises that there are three dimensions to sustainable development; economic, social and environmental. These dimensions give rise to the need for the planning system to perform a number of roles, which are mutually dependent and should not be undertaken in isolation:

- An Economic Role – contributing to building a strong, responsive and competitive economy by ensuring that sufficient land of the right types is available in the right places and at the right time

to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure;

- A Social Role – supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high-quality built environment, with accessible local services that reflect the community’s needs and supports its health, social and cultural well-being; and
- An Environmental Role – contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.

4.2.2 Section 11 of the NPPF promotes policies and decisions to support development that makes efficient use of land to achieve sustainable development and gives substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs. The redevelopment of this underutilised brownfield site accords with the aspirations of the NPPF optimising the site for mixed use development.

4.2.3 In promoting sustainable transport, paragraph 105 states significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. Paragraph 60 identifies the Government’s objective to “significantly boosting the supply of homes”.

4.2.4 Finally, Section 12 of the NPPF states that planning policies should ensure that developments: function well and add to the quality of the area; establish a strong sense of place; optimise the potential of sites to accommodation development (including creating and sustaining an appropriate mix of uses, support facilities and transport networks); respond to local character and history, whilst not preventing or discouraging appropriate innovation; create safe and accessible environments; and are visually attractive as a result of good architecture. Added to this, paragraph 134 makes it clear that in determining applications, “significant weight should be given to outstanding or innovative designs”.

4.2.5 Regarding the promotion of intermediate housing Paragraph 65 of the NPPF states:

*“Where major development involving the provision of housing is proposed, planning policies and decisions should expect at least 10% of the total number of homes to be available for affordable home ownership...”*

4.2.6 Annex 2 (Glossary) sets out the definition of Affordable Housing:

*“Affordable housing: housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers); ...”*

4.2.7 The NPPF identifies that the varying types of affordable tenure include Discounted Market Sale homes. These are defined as follows:

*c) Discounted market sales housing: is that sold at a discount of at least 20% below local market value. Eligibility is determined with regard to local incomes and local house prices. Provisions should be in place to ensure housing remains at a discount for future eligible households.*

London Plan 2021

4.2.8 The London Plan 2021 was adopted in March 2021. It is the Spatial Development Strategy for Greater London and sets out a framework for how London will develop over the next 20-25 years. It sets a housing delivery target for Southwark of 23,550 new homes over a ten-year period, annualised at 2,355 new homes per year.

4.2.9 London Plan Policy H4 relates to the delivery of affordable housing. It states that the strategic target is for 50% of all new homes to be genuinely affordable. Policy H5 outlines the threshold for affordable housing is a minimum of 35% or 50% for Strategic Industrial Locations or Locally Significant Industrial Sites which are appropriate for residential uses, as per the Application Site.

4.2.10 As noted in Policy H5 (B) To follow the Fast Track Route of the threshold approach, applications must meet all the following criteria:

- 1) meet or exceed the relevant threshold level of affordable housing on site without public subsidy
- 2) be consistent with the relevant tenure split (see Policy H6 Affordable housing tenure)
- 3) meet other relevant policy requirements and obligations to the satisfaction of the borough and the Mayor where relevant
- 4) demonstrate that they have taken account of the strategic 50 per cent target in Policy H4 Delivering affordable housing and have sought grant to increase the level of affordable housing.

4.2.11 London Plan Policy H6 outlines the GLA's target for a minimum of 30% rented homes (London Affordable Rent or Social Rent); a minimum of 30% intermediate products and the remaining 40% to be determined by the borough. As noted in Policy H6 Part B 'where affordable homes are provided above 35 per cent, their tenure is flexible, provided the homes are genuinely affordable (defined in Part A1 and Part A2), and should

take into account the need to maximise affordable housing provision, along with any preference of applicants to propose a particular tenure.

### **London Plan – Industrial Policies**

- 4.2.12 Policy E4 seeks to provide and maintain a sufficient supply of land in London to meet current and future demands for industrial and related functions. It highlights that London's land and premises for industry, logistics and services falls into three categories; Strategic Industrial Locations (SIL), Locally Significant Industrial Sites (LSIS) and; non-designated industrial sites. In respect of SIL London Plan Policy E5 seeks to protect Strategic Industrial Locations (SIL) and encourages boroughs to explore opportunities to intensify and make more efficient use of land in SILs. Policy E5 states that development proposals for non-industrial uses in SILs (including residential development), should be refused except in areas released through a strategically co-ordinated process of SIL consolidation and development proposals within SILs should not compromise the integrity or effectiveness of these locations.
- 4.2.13 Policy E6 refers to Locally Significant Industrial Sites and states that boroughs should designate and define detailed boundaries and policies for Locally Significant Industrial Sites (LSIS) in policy maps, and; make clear the range of industrial and related uses that are acceptable in LSIS including hybrid or flexible B1c/B2/B8 (now Class E) suitable for SMEs.
- 4.2.14 Policy E7 relates to industrial intensification, co-location and substitution. Notably part B of Policy E7 states that in LSIS the scope for co-locating industrial uses with residential or other uses may be considered and should also be part of a plan-led or master planning process.

### **4.3 Saved Southwark Plan Policies (2007)**

- 4.3.1 Some policies from the 2007 Southwark Plan were replaced by the Core Strategy, however, a number of policies were saved in 2013. The relevant saved policies from the Southwark plan are as follows:
- Policy 3.2 Protection of Amenity states planning permission will not be granted where it would cause loss of amenity, including disturbance from noise to present or future occupiers in the surrounding area of on the application site
  - Policy 3.11 Efficient Use of Land states all developments should ensure that they maximise the efficient use of land, whilst; protecting the amenity of neighbouring occupiers; ensuring a satisfactory standard of accommodation for future occupiers; positively respond to local context; ensuring the proposal does not unreasonably compromise the development potential of neighbouring sites; making adequate provision for servicing; and ensuring the scale of development is appropriate to the availability of public transport
  - Policy 4.2 Quality of Residential Accommodation states planning permission will be granted for residential development provided that they achieve good quality living conditions and include

high standards of accessibility; privacy and outlook; natural daylight and sunlight; ventilation; suitable outdoor space; safety and security; and protection from pollution

- Policy 4.4 Affordable Housing states the LPA will endeavour to secure 50% of all new dwellings within Southwark as affordable with a tenure split of 50% social rented and 50% intermediate within the Old Kent Road Action Area
- Policy 5.6 Car Parking states all developments requiring car parking should minimise the number of spaces provided

## 4.4 Core Strategy (2011)

4.4.1 Southwark's Core Strategy was adopted in April 2011 and sets out the borough's vision for change and improvement to become a sustainable community over a 15-year period. The relevant policies from the Core Strategy are as follows:

- Strategic Policy 2 Sustainable Transport encourages walking, cycling and the use of public transport rather than travel by car.
- Strategic Policy 5 Providing New Homes seeks to deliver 24,450 net new homes between 2011 and 2026 and allows for high density developments within opportunity areas when developments are of exemplary design.
- Strategic Policy 6 Homes for People on Different Incomes seeks to provide homes including social rented, intermediate and private for people on a wide range of incomes and states that development should provide as much affordable housing as is reasonably possible whilst also meeting the needs for other types of development and encouraging mixed communities.
- Strategic Policy 7 Family Homes requires developments to provide family housing with 3 or more bedrooms for people on all incomes.
- Strategic Policy 10 Jobs and Businesses seeks to increase the number of jobs in Southwark and create an environment in which businesses can thrive.
- Strategic Policy 12 Design and Conservation encourages development to achieve the highest possible standards of design for building and public spaces to help create attractive and distinctive places.
- Strategic Policy 13 High Environmental Standards requires development to meet the highest possible environmental standards and minimise greenhouse gas emissions.

## 4.5 Emerging New Southwark Plan - Schedule of Proposed Main Modifications

4.5.1 The Examination in Public of the New Southwark Plan took place between February and May 2021 and the Council have since received post EIP comments from the Inspector. The Council is currently consulting on the Main Modifications to the New Southwark Plan. Consultation opened on the 6<sup>th</sup> August 2021 and will close on the 24<sup>th</sup> September 2021. In accordance with Paragraph 48 of the NPPF, due to the advanced stage of preparation of this emerging plan, the policies within the draft New Southwark Plan 2020 (as modified) are considered to hold very significant weight in the decision-making process.

- Policy P1 requires a minimum of 35% affordable housing on developments of 10 or more homes, subject to viability with a target tenure split of 25% social rent and 10% intermediate housing.
- Policy P13 requires development to be of a high standard of design with adequate daylight, sunlight and outlook for new and existing occupiers.
- Policy P17 requires development to maximise the efficient use of land where development does not compromise activities on neighbouring sites and adequate servicing and circulation space through the site is provided.
- Policy P28 states only industrial uses ((E(g)(ii), E(g)(iii), B2, B8, and sui generis industrial use classes) and ancillary uses to the industrial uses will be permitted on strategic protected industrial land (SPIL).
- Policy P29 seeks to retain or increase the amount of employment floorspace on-site (E(g), B2, B8 use or sui generis employment generating uses) and promote the successful integration of homes and employment space.
- Policy 55 states development should be permitted when it does not cause an unacceptable loss of amenity to present or future occupiers or users.
- Site Allocation NSP63 allocates the application site as part of a wider regeneration area for comprehensive mixed-use redevelopment to include new homes alongside retail, community and employment uses.

## 4.6 Old Kent Road Area Action Plan: December 2020 Draft / Opportunity Area Planning Framework

4.6.1 The Old Kent Road Area Action Plan (OKR AAP) was submitted for consultation between January 2021 and May 2021. The document will, once adopted, form part of the development plan for the borough. Given the

Opportunity Area status of the Old Kent Road designated through the London Plan 2021, the OKR AAP also forms an Opportunity Area Planning Framework in regard to the London Plan.

#### 4.6.2 The relevant draft policies are highlighted below:

- Policy AAP 1: The Masterplan: Development proposals must be in general conformity with the masterplan
- Policy AAP 4: Quality Affordable Homes: The Council will lead the way in London to build more homes of every kind in Old Kent Road and increase the supply of all different kinds of homes. To achieve this the Council will:
  - Build 20,000 new homes by 2036;
  - Build at least 7,000 new social rented and intermediate homes affordable homes by 2036;
  - 10% of new homes as accessible and adaptable homes for wheelchair users and homes for people with physical and mental health needs; and
- Policy AAP 5: Businesses and Workspace - The Bow Tie: The Council will strengthen the vibrant business community of Old Kent Road and promote an innovative mix of uses that includes light industrial, offices, and manufacturing, distribution and creative workspaces. This will include doubling the number of jobs from 10,000 to 20,000 by 2036; and increasing the range of jobs by providing different types and sizes of workspaces including light industrial, maker spaces, warehousing and distribution and offices as well as jobs in retail, leisure, education and entertainment.
- Policy AAP10: Design: The Council will insist on good design to ensure new buildings and places make a positive and sustainable contribution to Old Kent Road and create vibrant, healthy, safe and distinguished places people want to live, work and visit.
- Policy AAP 15: Sub Area and Site allocations: Site allocations have been designated on the Adopted Policies Map. Planning permission will be granted for proposals in accordance with the Adopted Policies Map, site allocations and sub area masterplan. The 'required land uses' within the proposals sites must be included. Planning permission may be granted for 'other acceptable land uses' provided that it is demonstrated that development of the 'required land uses' is not compromised.
- OKR 10 Site Allocation: Development must replace existing employment floorspace (B use class) (this now includes Class E(g)) and provide a range of employment spaces which is consistent with the building and land use types shown in Figure SA2.3 and provide housing.

- OKR 10 – Design: In response to the retained structures including the bottling factory on Ossory Road, architecture will have a more industrious character with solid and robust industrial appearance; a predominance of brick finishes, with a blend of details in concrete or metal
- Figure SA 2.3 of the OKR AAP identifies the building uses for OKR 10. It identifies that 2-10 Ossory Road is suitable for small industrial units with light industrial uses (Class B1c) (now Class E(g)) and maker spaces.

## 4.7 Southwark’s Affordable Housing SPD (Draft) 2011

- 4.7.1 Southwark’s draft Affordable Housing SPD (2011) sets out the Council’s approach to securing affordable housing as part of residential development and expands on policies within Southwark’s development plan.
- 4.7.2 The SPD identifies a considerable need for all tenures of affordable housing, including both social rent and intermediate homes, with only 1.5% of the current housing stock within Southwark being an intermediate tenure.
- 4.7.3 The SPD recognises that with shared ownership products, residents can choose to buy a greater share of their property when they can afford it until they eventually own their home outright; this is known as ‘staircasing’. This means that residents pay a mortgage on part of their property and pay rent on the remaining portion that they do not own. Once the shared ownership unit has been bought outright, it is lost from the affordable housing market forever. Pocket’s bespoke discounted market sale model remains affordable in perpetuity through an innovative Section 106 obligation which ensures the resales of properties have a restriction in the lease which requires only eligible persons can purchase a Pocket home.
- 4.7.4 Alongside this SPD, Southwark also publishes affordability thresholds for intermediate housing. For January 2021, the affordability threshold for intermediate housing was £50,071 for 1-bedroom properties.

## 4.8 Supplementary Planning Guidance & Documents

- 4.8.1 The following Supplementary Planning Guidance and Documents also form material planning considerations in the determination of this application:
- GLA Affordable Housing & Viability SPG (2017)
  - GLA Housing SPG (2016)
  - Southwark’s Residential Design Standards SPD (2011 with 2015 technical update)
  - Southwark’s Section 106 and CIL SPD 2015 (November 2020 update)
  - Southwark’s Sustainable Design and Construction SPD (2009)

## 5.0 Affordable Housing Statement

### 5.1 Policy Context

- 5.1.1 Section 4 of the Planning Statement includes the definition for affordable housing and for discounted market sale homes as set out in the NPPF (paras 4.2.6 and 4.2.7). This demonstrates that the proposed offer of 39 discounted market sale homes by Pocket allied with the provision of 22 social rented homes at Credon House (all secured through a S106 Planning Agreement) is in accordance with national planning policy guidance..
- 5.1.2 Paragraph 62 of the NPPF states that the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes).
- 5.1.3 London Plan Policy H4 relates to the delivery of affordable housing. It states that the strategic target is for 50% of all new homes to be genuinely affordable. Policy H5 outlines the threshold for affordable housing is a minimum of 35% or 50% for Strategic Industrial Locations or Locally Significant Industrial Sites (where there is not a replacement of industrial capacity) which are appropriate for residential uses.
- 5.1.4 In terms of tenure split, London Plan Policy H6 outlines the GLA's target for a minimum of 30% rented homes (London Affordable Rent or Social Rent); a minimum of 30% intermediate products and the remaining 40% to be determined by the borough.
- 5.1.5 Paragraph 4.6.7 of the London Plan notes that other affordable housing products may be acceptable if, as well as meeting the broad definition of affordable housing, they also meet the London Housing Strategy definition of genuinely affordable housing and are considered by the borough to be genuinely affordable. The discounted market sale units proposed meet the NPPF definition and have been supported in the borough previously (Pocket Living's completed development at Varcoe Road). The provision of the discounted market sale homes is part of a wider offer with the linked application at Credon House which will deliver social rent homes and discounted market sale homes (and market housing) across both schemes. This secured be secured through a S106 Planning Agreement.
- 5.1.6 Paragraph 4.6.8 of the London Plan states that intermediate ownership products such as Discounted Market Sale (where it meets the definition of affordable housing), should be affordable to households on incomes of up to £90,000 (the current London affordable housing income cap). In line with all other Pocket Living schemes, the Application Scheme will be subject to a Planning Obligation restricting eligibility to owners with a household income below the London affordable housing income cap.
- 5.1.7 Saved Southwark Plan Policy 4.4 Affordable Housing states the LPA will endeavour to secure 50% of all new dwellings within Southwark as affordable with a tenure split of 50% social rented and 50% intermediate within the Old Kent Road Action Area.

5.1.8 Draft New Southwark Plan Policy P1 requires a minimum of 35% affordable housing on developments of 10 or more homes, subject to viability, with a target minimum tenure split of 25% social rent and 10% intermediate housing (by habitable room).

## 5.2 Census Data for New Homes

5.2.1 The following data sets out the demographics for Southwark which supports the objectives of delivering both discounted market sale homes and market housing.

5.2.2 Southwark's Key Housing Data report (2015/16) is the most up to date set of demographic and housing information within the London Borough of Southwark. This report uses 2011 census data to summarise population and housing trends within the borough. Appendix 3 provides a copy of the data and tables from the Key Housing data report (2015/16) referred to below.

5.2.3 The data shows Southwark generally has a much lower age profile than the national average, with the largest proportion of the population between the ages of 20 and 35. In the 2011 census, the largest single household type in Southwark was single people, making up 33.5% of all households within the Borough. This age group has the highest proportion of people aspiring to be home owners for the first time (English Housing Survey 2019/20 (MHCLG)).

5.2.4 Table 2.01c within the Key Housing Data report shows that between 2001 and 2011, the private rented sector demand within Southwark almost doubled, increasing from 13.5% of all households to 23.7%. Further, this table demonstrates that all housing tenures grew as a proportion of all households, other than private owned, which remained at 31.4% of total households across this 10 year period. This is due to the reduced affordability of market housing for purchasers especially first time buyers seeking to get a foothold in home ownership.

5.2.5 Tables 2.01d and 2.01e of the Key Housing Data report look at the tenure profile of Southwark and how this changes across the different age groups. The data shows that the age group 25 to 34 are most heavily represented within the private rental market, making up over 46% of individuals within this age group. This is further evidence that younger Londoners and especially younger residents of Southwark are increasingly reliant on private rented sector housing. This is a key demographic for purchasing Pocket's one bed one person homes across London and supports Pocket's objectives to secure greater home ownership for younger people. This need is amplified by data that whilst nationally the average age for a first time buyer was 33 (English Housing Survey 2017/18) the age of the average first time buyer in London is 35 and prospective first-time buyers could expect to spend 13 times their workplace-based annual earnings to purchase a property in London in 2017 (ONS First Time Buyer Housing Affordability).

5.2.6 In terms of the supply of new affordable housing, the Key Housing Data report states that the supply of affordable housing in Southwark is typically around 600 additional units per year, between the years of 2003 and 2015. The data separates this total provision between types of affordable housing such as affordable

rent, shared ownership and additional affordable other private sector. It shows that from 2006 onwards there have been no new homes built within this “additional affordable other private sector” which includes discounted market sale. This data was developed prior to the recent completion of 1 Varcoe Road by Pocket, which has delivered 57 discounted market sale homes initially marketed to Southwark residents. The latest Annual Monitoring Report 16 for the Mayor of London indicates that for 2018/19 (the year Varcoe Road was completed) the Council had 619 affordable completions. Pocket thus delivered 9.2% of the affordable homes for the borough that year.

- 5.2.7 The Mayor’s latest Annual Monitoring Report 16 (2018/2019) indicates in Table 3.31 that across London discounted market sale homes comprise only 0.15% of all tenures in the pipeline and only 0.7% of all affordable homes in the pipeline. The pipeline of discounted market homes was 444 units for London.
- 5.2.8 This data highlights that there is a clear need for a wider range of homes including homes for discounted market sale and market homes which are more affordable. However these homes are not being delivered across London or across Southwark.
- 5.2.9 This increasing dependence by younger people on the expensive private rental sector means that those on middle incomes in this area are priced out of home ownership and are likely to move out of the area and potentially out of London to find home ownership options. The inward investment that 25 to 35 year olds bring to a local economy is very significant. Many are starting careers and their presence in the local area supports local employers and local enterprises both through employment or through leisure and recreation. Many will start their own businesses which adds further to the local economy. If these younger people are priced out of the local area this inward investment is lost to areas outside of the borough and often lost to London.
- 5.2.10 The redevelopment of 2-10 Ossory Road will deliver 117 homes, of which 78 will be for market sale and 39 will be discounted market sale homes. Pocket is assisting the Council deliver intermediate homes currently not being delivered elsewhere in the borough. By delivering a range of affordability options it will cater for a wider range of purchasers who either want to stay in the area or are wishing to move to the area but cannot afford to buy in the market or find the range of market homes does not suit them.

### 5.3 About Pocket

- 5.3.1 Pocket Living (Pocket) is an innovative small developer established in 2005 to deliver grant-free affordable homes to purchase for those on moderate incomes: essential to London’s economy but who cannot afford to buy a market home and earn too much for social housing.
- 5.3.2 The importance of what Pocket does is recognised in partnerships with the GLA, TfL and Homes England, established to deliver innovative affordable homes for first time buyers. Pocket first received funding from the Mayor in 2013 to deliver intermediate homes for first time buyers. Further loan funding was awarded in 2017 to increase delivery of Pocket’s “genuinely affordable homes” to over 1,000 starts by 2021. This loan funding is recycled to support continued delivery and represents less than 2% of the Mayoral housing budget.

5.3.3 Pocket specialises in delivering high quality developments on complex brownfield sites, bringing them back in to beneficial use and improving the local streetscape. Pocket takes a design-led approach and has won several awards from RIBA London, the Evening Standard, CABE, The Sunday Times and National Housing Awards.

5.3.4 Pocket is one of the first developers to embrace modular construction (from bathroom and utility pods to full modular construction where site conditions permit) most recently employed at Mapleton Crescent in Wandsworth, Bollo Lane in Ealing and Addiscombe Grove in Croydon.

5.3.5 Pocket encourages a sense of community amongst its residents, starting with welcome drinks and aided by communal spaces such as roof terraces and co-working rooms.

## 5.4 Affordable Housing Offer

5.4.1 This Application Scheme is one of two linked applications for the redevelopment of sites within the Old Kent Road. The second application scheme is Credon House, Verney Road, SE16 3BA, the development proposals for which comprise the demolition of the existing building and erection of a part 8, part 9 storey mixed use building delivering 22 residential units (Use Class C3) and 82sqm of affordable workspace (Use Class E). As noted previously both applications will be linked through a S106 Planning Agreement that will ensure the delivery of the social rent and intermediate homes permitted.

5.4.2 The two applications (2-10 Ossory Road and Credon House) are linked as the Credon House scheme is delivering the social rented component of the overall 50% affordable housing offer by habitable room across both sites. The Ossory Road scheme delivers the intermediate and market housing elements of the overall affordable housing offer.

5.4.3 The affordable housing offer across both sites is set out in the tables below:

Unit Size	Market Units Ossory Road	Intermediate Housing Ossory Road	Social Rent Credon House	Total
1 bed	78	39	8	125
2 bed	0	0	7	7
3 bed	0	0	7	7
<b>Total</b>	<b>78</b>	<b>39</b>	<b>22</b>	<b>139</b>

Table 5.1: Combined Affordable Housing Offer (by unit)

	Market Units Ossory Road	Intermediate Housing Ossory Road	Social Rent Credon House	Total
<b>Habitable Rooms (no.)</b>	156	78	79	313
<b>Habitable Rooms (%)</b>	49.8%	24.9%	25.3%	100%
<b>Total Habitable Rooms</b>	<b>156 (50%)</b>	<b>157 (50%)</b>		<b>313</b>
<b>Units (no.)</b>	78	39	22	-
<b>Total Units</b>	<b>78</b>	<b>61</b>		<b>139</b>

Table 5.2 – Combined Affordable Housing Offer (by habitable room)

- 5.4.4 All rented homes are social rented homes which accords with Policy P1 of the New Southwark Plan and Core Strategy Policy CS5.
- 5.4.5 The intermediate homes proposed at 2-10 Ossory Road are discounted market sale homes (DMS) and will be sold at a 20% discount to local prices, as verified by an independent valuer, to eligible purchasers, defined by income and where they live or work. This enables purchasers to buy and stay in their community. Covenants in the lease ensure that the homes remain affordable in perpetuity. The homes accord with the NPPF definition of DMS (please see paragraph 4.2.7 above) as eligibility is determined with regard to local incomes and house prices and provisions ensure the homes remain at a discount for future eligible households, which shall be explored further below.
- 5.4.6 The two linked applications therefore meet the objectives of both the Mayor of London and Southwark Council in providing 50% affordable housing by habitable room, providing a mix of tenures and unit sizes to meet local housing need. This housing need includes low income families or people living in temporary accommodation seeking the most affordable type of accommodation (social rent) and those who are squeezed out of home ownership and have few options to purchase in the borough.
- 5.4.7 The development by Pocket of 1 Varcoe Road was the first major development to be completed following the designation of the Old Kent Road Opportunity Area and the issuing of the Old Kent Road Area Action Plan (OKR AAP). One third of the residents of 1 Varcoe Road include key workers such as teachers, healthcare professionals, local government workers and emergency service workers.
- 5.4.8 The financial investment made for 1 Varcoe Road demonstrates Pocket's commitment to working with the Council and other stakeholders in delivering the ambitions of the OKR AAP. Together, with the 57 occupied Pocket Homes at 1 Varcoe Road, 22 homes at Credon House and 117 homes at 2-10 Ossory Road, Pocket will ultimately deliver 196 new homes for the borough, with 121 of these being affordable homes – a substantial undertaking.

## 6.0 Planning Considerations

### 6.1 Key Themes

6.1.1 Section 38(6) of the Planning and Compulsory Purchase Act (2004) states the following:

*If regard is to be had to the development plan for the purpose of any determination to be made under the Planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise.*

6.1.2 This Application Scheme has been designed taking account of relevant national, regional and local planning policy. The scheme complies with the following key policies:

- Saved Southwark Plan 2007: Policy 3.4 – Energy Efficiency; Policy 3.11 – Efficient Use of Land; Policy 3.12 – Quality in Design; Policy 3.14 – Designing Out Crime; Policy 4.2 – Quality of Residential Accommodation; Policy 5.6 – Car Parking;
- Southwark Core Strategy 2011: 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 12 – Design and Conservation; Strategic Policy 13 – High Environmental Standards;
- The London Plan 2021: Policy H1 - Increasing Housing Supply; Policy H4 - Delivering Affordable Housing; Policy H5 - Threshold Approach to Applications; Policy H6 - Affordable Housing Tenure; Policy H7 – Monitoring of Affordable Housing; Policy H9 – Ensuring the best use of stock; Policy D3 – Optimising site capacity through the design-led approach; Policy D4 – Delivering good design; Policy D5 – Inclusive Design; Policy D6 – Housing quality and standards; Policy D7 – Accessible Housing; Policy D9 – Tall Buildings; Policy D11 – Safety, security and resilience to emergency; Policy D12 – Fire Safety; Policy D13 – Agent of Change; Policy D14 – Noise; Policy SL 13 – Sustainable Drainage; Policy T5 - Cycling; Policy E4 – Land for industry, logistics and services to support London’s economic function; Policy E6 – Locally Significant Industrial Sites; Policy E7 – Industrial intensification, co-location and substitution;
- Draft New Southwark Plan 2020 (Modified August 2021): Strategic Policy SP1 – Homes for all; Policy P1 – Social rented and intermediate housing; Policy P2 – New family homes; Policy P7 – Wheelchair accessible and adaptable housing; Policy P12 – Design of Places; Policy P13 – Design Quality; Policy P14 – Residential design; Policy P15 – Designing out crime; Policy P17 – Efficient use of land; Policy P22 – Archaeology; P29 – Office and business development; P30 – Affordable Workspace; Policy 52 – Cycling; Policy P53 – Car Parking; Policy 69 – Energy.

6.1.3 The application scheme will deliver up to 117 high quality homes to meet a significant identified housing need within the borough. The scheme has been designed in the context of the emerging Old Kent Road AAP and

the Council and GLA's vision for the Opportunity Area, seeking to optimise the use of this vacant brownfield site by providing high quality residential homes and flexible Class E floorspace.

## 6.2 Principle of Use

6.2.1 Paragraph 11 of the NPPF outlines the presumption in favour of sustainable development where *“for decision-taking this means approving development proposals that accord with an up-to-date development plan without delay”*. The use of previously developed ‘brownfield’ land to provide new high quality affordable homes is supported by current and emerging national, strategic and local planning policy.

6.2.2 Paragraph 119 of the NPPF promotes making effective use of underutilised land, especially where this would help meet identified needs for housing. This is evident at strategic level as set out in Policy SD1 of the London Plan 2021 which seeks to ensure the development of Opportunity Areas, to realise their growth and regeneration potential and ensure that Opportunity Areas maximise the delivery of affordable housing and created mixed and inclusive communities.

### **Re-designation as a Locally Significant Industrial Site**

6.2.3 The application site is ‘previously developed’ or ‘brownfield’ land situated in a sustainable and accessible location. As outlined previously, the application site is currently designated within Southwark’s Core Strategy as a Strategic Preferred Industrial Location – Strategic (SPIL) and within the London Plan 2021 as a Strategic Industrial Location (SIL). The site forms part of the Old Kent Road Opportunity Area and Housing Zone as designated by the London Plan 2021 and Housing Strategy respectively.

6.2.4 The London Plan designates the Old Kent Road as an Opportunity Area, with an indicative capacity of 5,000 new jobs and a minimum of 12,000 new homes. It identifies the potential for residential-led development along the Old Kent Road corridor, with minimum homes and jobs targets to be further explored and refined through a review of the Strategic Industrial Location and capacity to accommodate a phased rationalisation of its functions in the opportunity area or re-provision elsewhere.

6.2.5 Whilst the London Plan 2021 identifies LB Southwark as a borough which should retain industrial capacity, Policy E5 states development proposals for uses in SILs other than industrial and related functions (including residential development, retail, places of worship, leisure and assembly uses), should be refused except in areas released through a strategically co-ordinated process of SIL consolidation.

6.2.6 Paragraph 6.4.4 of the London Plan 2021 states:

*“...there would be scope to release a further 233 hectares of industrial land over the period 2016 to 2041. However, the demand assessment shows that in 2015, 185 hectares of industrial land already had planning permission to change to non-industrial use and a further 653 hectares were earmarked for potential release in Opportunity Area Planning Frameworks, Local Plans and Housing Zones”.*

6.2.7 Within his letter to Jules Pipe, Deputy Mayor for Planning, Regeneration and Skills dated 3rd September 2018 (see Appendix 1), Peter John OBE, former Leader of Southwark Council, confirmed the agreement between the Council and the GLA regarding the strategic objectives for the Old Kent Road Opportunity Area. In the letter Councillor John OBE agrees the redevelopment of the Old Kent Road Opportunity Area being separated into two phases, the first comprising 9,500 homes that could be supported by enhancements to the existing public transport network in advance of the delivery of the Bakerloo Line Extension. The application site is identified within Phase 1 to enable place making to begin in advance of the BLE's completion (see Appendix 4).

6.2.8 In respect of land use the letter acknowledges the re-allocation of land across the OKR AAP from Strategic Industrial Land (SIL) to Locally Significant Industrial Site (LSIS) and the de-designation of additional land from SIL entirely. The maps associated with this letter (see Appendix 5) clearly demonstrate the application site to be re-allocated as a Locally Significant Industrial Site (LSIS) with the agreement of the GLA. The former Leader of the Council acknowledged that:

*"This would give both authorities a stronger negotiating position to secure our aspirations for an innovative mix of commercial and industrial uses with a new residential community" Cllr.  
Peter John OBE*

6.2.9 The letter further acknowledges the agreed position between the GLA and LB Southwark that 48.79 hectares of the existing 82.9 hectares of SIL and LSIS will be retained within the OKR AAP. This figure takes into account the application site being re-allocated from SIL to LSIS and also asserts the Council's commitment to intensifying industrial uses on existing and proposed SIL sites.

6.2.10 This position is confirmed by Deputy Mayor Jules Pipe return letter to Cllr Peter John OBE (Appendix 6) which stated:

*"...The associated maps and tables that set out and confirm the agreed means for Southwark, the GLA and TfL to deliver the scale of change and quality we want to see for Old Kent Road" Deputy Mayor, Jules Pipe*

6.2.11 The GLA's position is further confirmed in Paragraph 41 of the delegated report for the previous application at 2-10 Ossory Road - application reference 20/AP/0009 which stated:

*"GLA officers accept that this site is suitable for SIL release."*

6.2.12 In light of the above, it is evident the re-allocation of the site from SIL to LSIS forms part of a strategically coordinated process of SIL consolidation within the Old Kent Road Opportunity Area. The phasing of development in advance of the BLE and the re-allocation, de-designation and intensification of SIL as proposed within the OKR AAP, has been subject to extensive discussions and rigorous review by LB Southwark and GLA with both parties agreeing a consistent approach to bring forward the mixed-use

redevelopment of the Old Kent Road Opportunity Area. This agreed position proposes the application site to be within Phase 1 of the OKR AAP and for it to be re-allocated as LSIS (see Appendix 4 and 5).

- 6.2.13 In view of the de-designation of the site from SIL to LSIS Policy E6 of the London Plan 2021 applies and states that boroughs should designate and define detailed boundaries and policies for Locally Significant Industrial Sites (LSIS) justified by evidence in local employment land reviews and should make clear the range of industrial and related uses that are acceptable in LSIS.
- 6.2.14 Southwark's Employment Land Review (ELR) details that there is a requirement for an additional 460,000sqm of net office floorspace for Southwark between 2014-2036, around 80% of this should be included within the CAZ. The ELR designates the development site under cluster C4 (Glengall Road, Bianca Road, Old Kent Road) and highlights that the area is suitable for B2/B8 (now Class E) and worth protecting. It also recommends that the area should consider options to encourage investment and encourages mixed-uses.
- 6.2.15 Whilst Southwark's saved Local Plan and Core Strategy are adopted planning policies and form part of the development plan for the borough, these plans are both undergoing review with new policies emerging through the New Southwark Plan. The New Southwark Plan August 2020 (as modified) is at the final stage before being formally adopted and therefore holds very significant weight in the determination of planning applications, showing the direction of travel for the Council's policies.
- 6.2.16 Site Allocation NSP63 of The Draft New Southwark Plan August 2020 confirms that the application site and area of SIL would be re-designated as a Locally Significant Industrial Site (LSIS), as shown in Figure 3 on page 10 of this Planning Statement. The Site requirements for Site Allocation NSP63 state redevelopment must provide new homes C3 and industrial uses (Class E) – which the application scheme would directly support.
- 6.2.17 The application site is located within the Old Kent Road Opportunity Area, within Sub Area 2 as identified in the OKR AAP. Southwark has ambitious targets for the Old Kent Road Opportunity Area with an aim of providing 10,000 additional jobs and 20,000 new homes, including 7,000 new affordable homes. The Old Kent Road Area Action Plan 2020 Draft (OKR AAP) places the site within Site Allocation OKR10 (Land bounded by Glengall Road, Latona Road and Old Kent Road) which has an indicative capacity of 4,800 new homes and 2,350 jobs with an aim of transforming this area into a mixed new neighbourhood with a diverse range of uses.
- 6.2.18 The objectives and vision of the Council and the Mayor of London in regard to the Old Kent Road Opportunity Area accord with those of the Government with a focus on delivering homes and ensuring the objectives of the wider regeneration can be met. The Greater London Authority (GLA) has been heavily involved in the shaping of the Old Kent Road Opportunity Area and AAP with officers from the GLA having multiple meetings with officers from Southwark to ensure a collaborative approach to the regeneration of the area.

- 6.2.19 Strategic Policy 10 of the Core Strategy states that the SPIL will be protected for industrial and warehousing uses while saved Policy 1.2 of the Local Plan states “in preferred industrial locations, planning permission will only be granted for developments falling within the B Use Class (now includes Class B2, Class B8, Class E(g)), and sui generis use class industries which are inappropriate in residential areas”. However, the Core Strategy recognises that structural changes in the economy are resulting in a declining need for industrial land in London. The Core Strategy also recognises that diversifying the range of job opportunities in the industrial locations into new sectors would benefit local people. Further, it sets out the future direction of Old Kent Road as a growth and regeneration action area, subject to a future Area Action Plan (AAP).
- 6.2.20 The vision for the Old Kent Road and specifically site allocation OKR10, which includes the application site, is for the area to continue to provide jobs with any redevelopment proposal.

#### **Provision of High Quality Light Industrial Floorspace (Class E)**

- 6.2.21 Policy E7 in the London Plan actively encourages development proposals to intensify industrial uses on selected sites and where possible deliver an increase in employment capacity. Notwithstanding this, policy direction at both strategic and local level supports the co-location of residential and commercial uses in Opportunity Areas. Accordingly, London Plan Policy E7 states *‘In LSIS (but not in SIL) the scope for co-locating industrial uses with residential and other uses may be considered. This should also be part of a planned or masterplanning process.’* Whilst the proposals represent a divergence away from local policy and strategic policy which seek to provide and intensify commercial floorspace this must be viewed in the context of the overall wider planning benefits of the scheme. The redevelopment will deliver 421 sqm of high quality floorspace and 117 new homes (of which 50% will be affordable across both sites). The reduction of industrial floorspace on the application site has been agreed with the Council during the pre-application process as assisting in delivering a mixed use scheme which in accordance with Policy H5 of the London Plan and Policy P1 of the NSP delivers a balancing provision of 50% affordable housing. This provision meets other policy objectives of the Council. The delivery of 421sqm of attractive and useable light industrial floorspace at ground floor and 82sqm of flexible workspace at Credon House will provide an attractive offer for SME businesses looking to locate in the area.
- 6.2.22 The Application Site is currently in use (on a short-term lease) by an online retail company for offices (Use Class E). The Company will vacate the premises early next year. The application site has a small site area of 0.11ha and comprises a basic single storey building with vehicle parking for seven cars. The building is currently in a usable state of repair and is in operational use, however, the floorplan and existing infrastructure relate to its original function as a garage/repair centre. This has an effect on the opportunities for flexible use of the building and constrain the number and type of operations who would be attracted to let it. Any future occupiers would be required to undertake significant investment in the property to bring it to a standard that would allow effective use of the space.
- 6.2.23 Conversely the application scheme will provide flexible and robust workspace commensurate with the aspirations and needs of businesses in the core area of the OKR AAP. The location of the Application Site

would appeal to a variety of potential occupiers. The proximity to Old Kent Road and the existing infrastructure will support industrial uses on site. Whilst the site is located in close proximity to Old Kent Road it avoids the detrimental effects of noise and disturbance which are synonymous with main road commercial locations. In discussions with Vital OKR at a meeting on 18<sup>th</sup> August 2021, the unit was identified as being both useable and practical and would attract interest from local occupiers.

- 6.2.24 The usability of the light industrial floorspace at ground floor has been carefully incorporated in the design. The industrial floorspace has been designed in line with the GLA's draft Industrial Intensification Primer Guidance (2017) with a design workshop undertaken with the GLA focusing solely on light industrial layout.
- 6.2.25 Modern day requirements for light industrial spaces have been considered and key qualities incorporated. The commercial space proposed is high quality and well considered incorporating 4m floor to ceiling height. The layout of the space at ground floor has been designed to be flexible to enable use by a single occupant or multiple smaller occupiers should demand arise. A number of design recommendations from Vital OKR have been incorporated into the scheme such as 3m wide doors with the potential for higher windows which would allow occupiers to utilise all wall spaces. A separate access door (to the residential) is located on Ossory Road and will provide direct access into the unit ensuring that the operation of the commercial floorspace is not curtailed. Servicing will be from Ossory Road and this was identified as being the most flexible arrangements in discussion with Vital OKR.
- 6.2.26 As outlined above the existing building is in use as an online retailer as offices however they have a short lease and are planning to vacate the property by the end of the year. The redevelopment of the site will provide flexible working space which meets the needs of small and medium businesses and could provide capacity for at least a dozen jobs based on official employment yield of 1 per 35sqm.

### **Summary of Employment Provision**

- 6.2.27 In summary the application scheme will redevelop a previously developed site within a highly sustainable location providing 421sqm. of light industrial floorspace (Class E) at ground floor. Whilst the application results in a decrease in the total commercial floorspace compared to the existing floor area there is a marked improvement in the proposed quality and specification of the new floorspace and this will result in a strengthening of the LSIS. A key objective identified in the Site Allocations in the NSP and OKR AAP is providing both residential and light industrial floorspace on development opportunities. The application scheme when considered with the linked application at Credon House will deliver over 500sqm of commercial and light industrial floorspace, 139 new homes with 50% of this floorspace affordable housing including a policy compliant provision of social rented homes.
- 6.2.28 The application scheme supports the objectives of Site Allocation OKR10 and NSP 63 and the wider emerging planning policy framework for the Old Kent Road, delivering a mixed use scheme including well designed, robust and usable light industrial floorspace which will be attractive for future occupiers in the area.

6.2.29 The application scheme thus supports Policies H4, H5, E4, E6 and E7 of the London Plan 2021, Policy CS10 of the Core Strategy; Policy P1 and P29 of the New Southwark Plan August 2020 and Policy AAP 5 of the OKR AAP.

### 6.3 Provision of Affordable Homes for Southwark

6.3.1 At a local context, the Old Kent Road AAP sets an ambitious target of 20,000 additional new homes, of which 7,000 should be affordable. Policy AAP4 and Table 2 of the OKR AAP require a minimum of 35% of new homes to be affordable homes, with a minimum of 70% of new homes as social rent and 30% intermediate. Policy P1 of the draft New Southwark Plan and Policy CS6 of the Core Strategy requires that development of 10 or more homes must provide the maximum viable amount of social rented and intermediate homes, the minimum of which should be 35% (by habitable room).

6.3.2 The adopted London Plan notes that when negotiating the provision of affordable housing on individual schemes councils should treat each scheme on a site by site basis and have regard to the need to encourage rather than restrain residential development. In applying this policy, consideration should be had to the individual circumstances of the site and other material planning considerations.

6.3.3 The applications for the redevelopment of 2-10 Ossory Road and Credon House are linked applications. Between the two application sites the applicant will deliver 139 new homes with 50% as affordable housing. The housing tenure mix for the linked schemes is shown in the Tables 5.1 and 5.2 of this Planning Statement.

6.3.4 The provision of 50% affordable housing across both Pocket Schemes (Ossory Road and Credon House) accords with London Plan Policy H4 and Policy H5 which state that the threshold level of affordable housing is 50% for Strategic Industrial Locations and Locally Significant Industrial Sites (where there is a net loss of industrial capacity). Policy H5 states that developments which meet or exceed the threshold level of affordable housing (50%) and are consistent with the relevant tenure split and meet other policy requirements, would be considered Fast Track as set out in Policy H5. Such schemes would not require viability assessments to be submitted with an application nor would attract late-stage reviews. The delivery of 50% affordable housing and the proposed complaint tenure mix will be secured through a linked S106 Agreement.

6.3.5 The principle which underpins Pocket's ethos is the delivery of high-quality homes for Londoners. Pocket Living assists working Londoners to secure a foot on the housing ladder. Pocket prides itself on providing for first time buyers who want a home they can afford, a high-quality functional space and which gives them a fantastic quality of life. Pocket's discount market sale homes achieve this.

6.3.6 This application scheme is for up to 117no. homes – 78no. for private market sale and 39no. intermediate Pocket Homes which meet the NPPF definition for Discounted Market Sale homes (DMS) as set out in Annex 2. The 39no. discounted market sale homes will be initially sold at a discount of 20% below market value and sold to eligible persons i.e. those with a household income below £90,000 per annum who do not own another

property. However, Pocket homes sell to purchasers with an average household income of £42,000 across London which is significantly below the Southwark cap for household incomes of £50,071 for intermediate one bed homes as set out in the updates to the draft affordable housing SPD (February 2021). Homes will be sold initially to eligible Southwark residents for a period of 6 months and then widened to eligible Londoners (in the unlikely event there is no purchaser from within Southwark). Through Pocket's innovative and robust S106 Agreement, homes will remain affordable in perpetuity for re-sales.

6.3.7 The provision of 50% affordable housing at Ossory Road and Credon House will contribute to London wide/strategic housing need and London Plan targets. The latest London Plan Annual Monitoring Report (16) published in March 2021 (Table 3.7) indicates that across London in 2018/19 of the 18,300 new additional affordable homes required to be completed each year only 6509 affordable homes were completed. This equates to 35% of the pan London affordable housing target.

6.3.8 There are numerous other sites coming forward in the Old Kent Road Opportunity Area and these are generally delivering between 35% and 40% affordable housing. The redevelopment of 2-10 Ossory Road and Credon House in tandem would deliver 50% affordable housing which would therefore exceed that being provided on development sites elsewhere within the OKR AAP. The development of the two linked sites is therefore a major benefit to the regeneration of the Opportunity Area, providing a significant number of affordable homes, helping the borough to meet its ambitious target of 7,000 additional affordable homes within the Opportunity Area between 2017 and 2037.

## 6.4 Meeting Housing Need

6.4.1 Policy P2 within the Draft New Southwark Plan August 2020 seeks to secure a minimum of 60% of homes as two or more bedrooms in major residential developments with a target of 25% as family homes (with 3+ bedrooms). Strategic Policy CS7 of Southwark's current Core Strategy seeks to provide family homes for people on all incomes with 20% of homes being 3 bedroom (or larger) homes. In direct support of this the linked development at Credon House will deliver 8 x one bed homes (36%), 7 x two bed homes (32%) and 7 x three bed homes (32%), providing over 60% homes with two or more bedrooms and over 25% family homes in accordance with NSP Policy P2.

6.4.2 Policy P1 Figure 2 in the New Southwark Plan highlights the home affordability for the borough. This demonstrates that there is a demand for homes across the household income ranges in the borough. This includes homes for those unable to secure social rented homes due to higher incomes and those who may not be eligible for intermediate homes. The wide range of household incomes shown on Figure 2 in the NSP which are supported by both intermediate housing and the lower end of market housing (broadly between household incomes of £22,000/annum and £90,000/annum) would be served by the application scheme.

6.4.3 Policy H10 of the London Plan 2021 relates to housing size and mix; it seeks to guide boroughs and developers on unit mix within new residential developments. Although Policy H10 states schemes should generally consist of a range of unit sizes, the appropriate mix of unit sizes in relation to the number of

bedrooms for a scheme should also have regard to robust evidence of local need; the need to deliver a range of unit types at different price points across London; and the role of one and two bed homes in freeing up family housing.

6.4.4 Pocket's discounted market sale homes are designed to be one-bedroom homes for younger first time buyers, or persons wishing to get back to home ownership and they provide the type of homes purchasers both need and desire in sustainable well connected locations, making the best and most efficient use of space within the units homes.

6.4.5 When considering previous schemes which Pocket have submitted, most London councils have balanced the delivery of mixed communities and the provision of significant amounts of intermediate affordable housing against the need to provide a mix of homes and tenure. This positive determination demonstrates a flexible approach adopted in the delivery of affordable housing which is a matter to be taken into consideration in the overall planning balance. In this case Pocket is delivering a bespoke approach to the development of the two linked sites to provide a range of tenures, a range of sizes of property and a range of amenity and play spaces to meet the wider local need. At the linked site at Credon House the application scheme delivers social rented homes with a mix of one, two and three bed homes. However, for 2-10 Ossory Road the objective is to provide for a much more varied demographic who are looking for new affordable forms of housing both in the affordable sector and in the market tenure. This includes meeting the needs of younger people for the opportunity to get a foot on the property ladder either through discounted market sale homes or smaller market homes which are themselves more affordable than other properties on the market.

6.4.6 As demonstrated in the Affordable Housing Statement (Section 5) the census data for the borough highlights the high proportion of the population who are aged between 20 and 35 years (33.5%) and that a significant proportion of this demographic (46%) is currently in private rental accommodation. This is a group of people who are stuck in the private rented accommodation, in shared overcrowded housing or living at the parental home and are unable at present to find a way into home ownership. In many cases their only avenue is to move out of London to find cheaper home ownership options. This relocation deprives London of a wealth of young talent and the long-term inward investment these people would bring to an area.

6.4.7 There is also clearly an increasing demand for smaller homes and this is being driven by the younger demographic of areas such as the Old Kent Road. There is clear evidence in the ONS 2018 household projects data that the one person households are increasing. The report summarises that:

*The number of households in England is projected to increase by 1.6 million (7.1%) over the next 10 years, from 23.2 million in 2018 to 24.8 million in 2028....*

*95% of the projected increase in households by 2028 is attributable to one-person and multiple adult households without dependent children.*

6.4.8 This census data shows that young people within Southwark are stuck in the rental market and many are not able to buy their own properties, particularly single people who make up the largest proportion of households

within the borough. This demonstrates a significant gap in the housing market with insufficient properties which are affordable for young, single residents of the borough who are seeking smaller affordable housing options. There is a lack of opportunities in the local market for home ownership and the local tenures in Old Kent Road ward are heavily weighted towards social rented homes or market units for sale or rent. Only 1.5% of homes in the ward are intermediate homes.

6.4.9 The GLA's formal pre-application response was supportive of the provision of one-bedroom affordable homes in this location: The response noted that:

*"...Accordingly, GLA officers recognise that the delivery of wholly one bedroom Pocket Living units is fundamental to the overall affordable housing offer.*

*When considering the schedule of accommodation proposed, GLA officers are of the view that the proposed one-bedroom intermediate units (intended to address the needs of single young professionals in particular) would generally appear to respond well to the characteristics of this small, constrained site. It is also acknowledged that intermediate affordable housing products generally operate most successfully at the smaller unit sizes."*

6.4.10 In light of the above, it is clear the 39 one bedroom one person discount market sale homes will help address an evidence based local housing need in compliance with Policy H10(A)(1) of the London Plan 2021. The application scheme will provide genuinely affordable homes for those that live or work in the borough currently unable to own their own home.

6.4.11 The provision of the 78 market one bedroom one person homes within the scheme reflects the objectives of the Pocket's Discounted Market Sale homes in helping to address housing needs of a younger demographic, but without the restrictions on eligibility, geographic location and restrictions on resales that are applicable to Pocket's affordable homes.

6.4.12 The provision of market homes which are attractive to younger purchasers and by virtue of the layout more affordable will assist in meeting local demand and help reduce upward price pressure. Whilst there are a large number of planning permissions in the Old Kent Road Opportunity Area not many of these have been implemented. This reduces stock and increases price. The early delivery of 78 market units will assist in meeting demand.

6.4.13 Tables 2.01d and 2.01e of the Key Housing Data (see Appendix 3) demonstrates that the age group 25 to 34 are most heavily represented within the private rental market, making up over 46% of individuals within this age group. Discounted market sale homes and market housing help these groups leave over-priced private rental and move into home ownership.

- 6.4.14 As noted in London Plan Policy H10 the importance of providing smaller homes to help release large family homes should be recognized. Downsizing from large under occupied homes or renters moving from family homes which are multi let can release larger homes back to the market for occupation by families.
- 6.4.15 One bed one person homes also support specific groups into home ownership. For example, 14% of Pocket's buyers to date have been from the LGB community. The 2020 ONS Annual Population Survey showed that only 2.2% of the population identify as being LGB. This highlights a specific housing need is being met by Pocket's one bed one person model and it is considered this would equally apply to one bed one person market homes. This is just one example of how one bed one person homes can meet the needs of specific groups in society.
- 6.4.16 In summary the application scheme delivers up to 117 new homes which includes both affordable and market homes to help people onto the housing ladder. When considered in association with the linked application at Credon House the two schemes deliver a range of one bed, two bed and three person homes, where the unit sizes are specifically aimed at meeting the needs of key groups. For social rented homes at Credon House this includes larger two and three bed family homes, whereas for 2-10 Ossory Road the provision of both market and affordable one bed one person homes meets the needs of younger persons, people wanting to leave overpriced rental accommodation and key groups seeking home ownership.

## 6.5 High Quality Homes

- 6.5.1 The proposed one-bedroom would all exceed the minimum space standards in the National Technical Standards, London Plan and New Southwark Plan. The homes have been designed to maximise space, comfort, and sustainability through a series of design principles which are implemented throughout all of Pocket's developments such as generously proportioned windows, low ratio of circulation space to liveable space, effective sound proofing to minimise intrusion from the street and other flats, thoughtfully designed lighting and space for storage.
- 6.5.2 A detailed analysis of the daylight that the proposed homes would enjoy has been undertaken by Rights of Light Consulting. This assessment has been undertaken using the BRE's Average Daylight Factor (ADF) methodology. This a very accurate and detailed form of assessment which includes the size of rooms and the types of materials used and the reflectivity of the materials. The assessment included those schemes nearby which were approved (described as committed) and thus were modelled.
- 6.5.3 The assessment concluded that all windows would benefit from very good light and that the vast majority of windows will meet the ADF guidance for rooms (Being 1% for bedrooms, 1.5% for living rooms and 2% for Lounge Kitchen Diners). On the occasions where windows were achieving ADF below the guidance this was the result of the approved scheme at the Hireman Site to the south of the application scheme. Both schemes have been developed in line with the OKR AAP and in full knowledge of the other scheme and the relationship of the two schemes will have an impact on certain windows. However, all windows in the application scheme

would continue to enjoy good light and this is commensurate with developing a masterplan in the urban context.

6.5.4 The quality of the living accommodation within Pocket homes is very high with all homes accommodating a separate bedroom and living space and are designed to make very efficient use of space. The scheme has been well designed so that space, openness, and resident's amenity is not compromised but is effectively and efficiently maximised within the site.

6.5.5 Pocket has received strong support from many local authorities and the GLA for the quality of its homes. As demonstrated in Section 5.3, Pocket has delivered a significant number of application schemes across London. Many of which are built and are meeting Londoners need for affordable homes to buy. Pocket has also won a range of awards from Housing Design, Building for Life, CABE, and in the Evening Standard Housing Awards through to awards from local authorities themselves (e.g., LB Camden).

## 6.6 Optimising Density

6.6.1 Paragraph 120 of the NPPF states that planning policies and decisions should:

*c) give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land;*

*d) promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively*

6.6.2 Paragraph 124 of the NPPF states that planning policies and decisions should support development that makes efficient use of land, taking into account:

*a) the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;*

*b) local market conditions and viability;*

*c) the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;*

*d) the desirability of maintaining an area's prevailing character and setting (including residential gardens), or of promoting regeneration and change; and*

*e) the importance of securing well-designed, attractive and healthy places.*

6.6.3 Paragraph 125 of the NPPF further adds to the advice noting that:

*a) plans should contain policies to optimise the use of land in their area and meet as much of the identified need for housing as possible and*

*c).... when considering applications for housing, authorities should take a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site (as long as the resulting scheme would provide acceptable living standards).*

6.6.4 The site is in an 'urban' setting as designated by the Mayor's London Plan and with a manual PTAL accessibility rating of 4, indicating good access to public transport.

6.6.5 The London Plan identifies design principles for a compact city and states the Mayor will and Boroughs should seek to ensure that developments optimise the potential of sites. The Mayor's Housing SPG states in paragraph 1.3.17 that *"in broad terms, higher densities (which assume a lower number of habitable rooms per dwelling), will be more suitable for households without children..."* such as Pocket homes.

6.6.6 The London Plan 2021 moves away from defined density targets than the former 2016 London Plan. It adopts a design-led approach with Policy D3 stating *"all development must make the best use of land by following a design-led approach that optimises the capacity of sites, including site allocations"*. This approach supports higher density of development across the capital with the objective of helping to deliver more homes for Londoners.

6.6.7 Policy AAP4 of the Old Kent Road Area Action Plan seeks to increase the delivery of homes within the Opportunity Area and to achieve this encourages high densities that would normally be expected of Central London. As such, Southwark are encouraging higher densities within the OKR Opportunity Area than elsewhere in the borough.

6.6.8 The residential component has a net density which equates to 1,170 units per hectare or 2,340 habitable rooms per hectare using the Maccreanor Lavington method for calculating residential density of mixed-use developments as set out in Mayor's Housing SPG and Policy P1 of the NSP.

6.6.9 There is a pressing need to optimise the use of land in London, particularly in Opportunity Areas which are the focus of regeneration across London. The Application Scheme will result in an excellent standard of accommodation, with many of the 'exemplary' requirements of the Southwark Residential Design Standards SPD met. This is summarised in the table below.

Exemplary residential design criteria from Southwark Residential Design Standards SPD	Commentary
Provide for bulk storage	Each of the homes proposed will have storage space in compliance with the Residential Design Standards SPD. An area within the residential refuse store at ground floor level has been designated for bulk storage of larger waste items.
Exceed minimum privacy distances	The SPD states that a minimum of 12m at the front of the building and any elevation that fronts onto a highway should be achieved, as well as a minimum distance of 21m at the rear of the building. A minimum distance of approximately 15m is retained between the windows in the southern elevation and those within the neighbouring scheme at the Hireman site (14-22 Ossory Road). These properties are separated by a cobbled highway and during pre-application discussions the planning officer confirmed this separation distance was acceptable in an Opportunity Area where substantial regeneration is proposed. Only secondary windows are proposed in the northern elevation and no windows are located in the flank elevation of the adjoining site so no overlooking is considered to occur. 65m and 80m will be retained from the windows within the Western elevation of the Application Scheme and those at Glengall Road, thus significantly exceeding the minimum privacy distance of 21m.
Good sunlight and daylight standards	The Daylight and Sunlight Report prepared by Right of Light Consulting confirms that the proposed homes broadly achieve an extremely high level of compliance with all the requirements set out in the BRE guide 'Site Layout Planning for Daylight and Sunlight'.
Exceed minimum ceiling heights of 2.3m	All homes will have a minimum ceiling height of 2.5m, thus exceeding the Council's minimum standards.
Exceed amenity space standards (both private and communal)	Two communal roof terraces will be provided at the 1 <sup>st</sup> and 10 <sup>th</sup> floors. These will provide a total of 281sqm of communal amenity space. Private balconies and terraces will also be provided for 78 homes. The total amenity provision across the site will be 701.3sqm, thus exceeding the requirements of the London Plan of 5sqm per unit (585sqm).
Secured by Design Certification	Detailed pre-application discussions have taken place with a Metropolitan Police Designing Out Crime Officer to ensure the proposed development achieves the principles of Secure by Design.
No more than 5% studio flats	The application scheme proposes no studio flats. Pocket's award-winning homes are genuine one bedroom one person apartments

	(as opposed to studios) which can comfortably accommodate a double bed in a bedroom alongside a separate living and kitchen and dining room.
Maximise the potential of the site	The potential of the application site has been maximised by providing a substantial contribution to the affordable housing target for the area as well as a high-quality light industrial space at ground floor level. The scheme makes efficient use of land in accordance with the NPPF and contributes to the regeneration of the Old Kent Road Opportunity Area.
Include a minimum 10% of homes that are suitable for wheelchair users	The Application Scheme includes 12 wheelchair adaptable dwellings which meet M4(3) standards with all remaining home being wheelchair accessible and adaptable M4(2). This meets the 10% minimum requirement of wheelchair user dwellings.
Have excellent accessibility within buildings	The Application Scheme has been designed to provide excellent accessibility to all, including the residential and light industrial spaces, and communal amenity space. The scheme will include two lifts, both of which access all levels of the development, thus ensuring the building will remain fully accessible in the event of one lift being out of service. All thresholds to the homes and communal amenity spaces will be level.
Have exceptional environmental performance	The Application Scheme is highly sustainable and has very good sustainability credentials. The three-step Energy Hierarchy has been implemented and the estimated regulated CO2 savings on site are 69.2% for the domestic part and 59.8% for the non-domestic part of the development, against a Part L 2013 compliant scheme with SAP10 carbon factors. The application site has been designed to connect to the planned District Heating Network at SELCHP when this becomes available.
Minimise noise nuisance between flats by stacking floors so that bedrooms are above bedrooms, lounges above lounges	The stacking of homes has been maximised across the residential element of the proposed scheme. The same typical floor plan has been used across all residential floors, resulting in bedrooms over bedrooms and lounges above lounges throughout the whole residential element of the development. The Application Scheme has also been designed to minimise noise transfer between the light industrial use on the ground floor and residential homes on the first floor.
Make a positive contribution to local context, character and communities	The application scheme will make a positive contribution to the local context in delivering a well-designed building on this prominent plot when viewed from the Old Kent Road. High quality materials have been chosen which reflect and complement surrounding buildings.

	<p>The design of the proposed building has taken cues from the existing and emerging character and context of the application site.</p> <p>The Application Scheme will provide substantial regeneration benefits including substantial level of affordable housing, private market housing and light industrial floorspace, providing activation at street level within the OKR Opportunity Area.</p>
Include a predominance of dual aspect homes	<p>Dual aspect homes have been maximised where possible across the development. Considering the constrained nature of the site, the efficient layout and provision of 1b1p homes it is considered the proposal provides the maximum level of dual aspect units which can reasonably be achieved. The key habitable rooms for each flat will be provided with generously portioned windows and a range of useable accessible balconies to maximise the levels of daylight received resulting in the provision of high-quality homes for future residents. Four homes on each floor will be dual aspect.</p>
Have natural light and ventilation in all kitchens and bedrooms	<p>All Pocket homes are fitted with large windows to maximise the amount of light received by the home. Each bedroom within the scheme will have a window allowing for natural light and ventilation. Open plan kitchen / living rooms will be fitted with opening windows to maximise air flow and natural light entering the space. Four homes on each floor will be dual aspect (40 in total) which will allow cross-ventilation through the apartments.</p>
At least 60% of homes contain two or more bedrooms	<p>All 117 homes at 2-10 Ossory Road will be specifically designed as 1b1p homes. However, larger homes (including family homes) will be provided as part of the linked application at Credon House delivering 7no. 2 beds and 7no. 3 beds as well as 8no. 1 beds. The provision of a policy compliant 50% affordable scheme, is considered to be a material planning consideration which significantly outweighs the provision of larger homes in this location. The proposed type and tenure of housing at both linked schemes meets an identified housing need within the Borough. The provision of 117 one bed one person market homes further meets a need both in terms of providing opportunities for home ownership for local residents not eligible for discounted market sale homes or who wish to buy a market home, as opposed to a DMS home, helping reduce price pressure on existing housing and thus reducing pressure on affordable housing values.</p>
Significantly exceed the minimum floor space standards	<p>Pocket homes have a highly efficient internal layout and space. In this instance, all homes will exceed the 37sqm minimum internal floor area for 1 bedroom 1 person dwellings, with 78 homes at</p>

	38.3sqm; 27 homes at 38.4sqm; 10 homes at 47.4sqm; 1 home at 50sqm and 1 home at 54sqm of additional residential floorspace equating to a 6.3% increase above London Plan space standards.
Minimise corridor lengths by having additional cores	<p>Although only one core will be provided through the building, the stairwell and two lifts have been provided centrally within the building reducing the maximum distance between lift and flat entrance.</p> <p>The corridors have been split so that between 6 and 8 homes would be accessed from one corridor which runs north-south with between 4 and 5 homes accessed from another east-west section of corridor. This prevents long corridors being provided and ensures future residents retain a sense of ownership over their communal areas. It is also worth noting that Pocket homes are designed for single occupancy meaning far fewer people will be using each core than a traditional development.</p>

*Table 6.1: Exemplary residential design criteria*

6.6.10 The Design and Access Statement prepared by Hawkins Brown which accompanies this application outlines the design process of the proposal taking into consideration the prevailing and aspired character of the area; scale, massing and height of surrounding buildings; and the high-quality design of the proposed building. It considers the context of the application site and the surrounding area and concludes that the scale and massing is appropriate within the context of the site and the aspirations of the OKR AAP as has been agreed by both Southwark and the GLA through pre-application discussions.

6.6.11 The application scheme has followed a design-led approach to optimise the capacity of the site, in accordance with Policy D3 of the London Plan.

## 6.7 Design and Residential Quality

6.7.1 The application scheme provides a total of 117no. homes, which would all meet or exceed minimum space standards, as follows:

- 78 homes at 38.3sqm
- 27 homes at 38.4sqm
- 10 homes at 47.47sqm
- 1 home at 50sqm
- 1 home at 54sqm thus providing an additional 273.2sqm of additional residential floorspace equating to a 6.3% increase above London Plan space standards.

- 6.7.2 Pocket's ethos is built on high quality design and Pocket has developed design standards through various consultations with varying levels of planning bodies, existing and prospective purchasers, and built environment professionals. The design standards seek to ensure a consistently high standard of residential accommodation across all Pocket schemes.
- 6.7.3 London Plan Policy D3 relates to the architecture of new developments to ensure designs make a coherent public realm, streetscape and wider cityscape. It states developments should incorporate the highest quality materials and design appropriate to its context. The Application Scheme has been carefully designed so that it is of a high standard of design and quality and is considered to be compatible with and respects the scale and existing and emerging character of the surrounding area and its setting. The design sensitively integrates into the existing built form and landscape and will meet high standards of sustainability and minimises its effects upon local resident's amenity.
- 6.7.4 Dual aspect homes have been maximised where possible across the development with 4 out of 12 homes per floor being dual aspect. Only 9 units across the application scheme would be single aspect and north facing (6.8%). The daylight and sunlight assessment submitted in support of this assessment demonstrates that the north facing homes would still receive very good levels of daylight to ensure the occupants of these homes have suitable levels of residential amenity. The provision of a small number of north facing homes needs to be considered on balance with the wider objectives of delivering 20,000 homes (7,000 of them affordable) across the Old Kent Road Opportunity Area. The homes will receive very good levels of daylight and provide a high-quality internal space standard alongside the wider public benefits of the scheme, such as delivering a genuinely mixed-use development with a high-quality industrial unit at ground floor and the delivery of 39 affordable homes (61 affordable homes when considered with the linked application at Credon House).
- 6.7.5 The Application Scheme will be a high quality, proposal which integrates and respects the existing townscape. It makes the most efficient use of scarce land resources and the design of the scheme is in accordance with the policies of national, strategic and borough planning guidance.

## 6.8 Access and Compliance with Housing SPG 2016

- 6.8.1 A detailed Design and Access Statement accompanies this planning application which demonstrates how the application scheme provides access for all and how the new development meets the highest standard of access and inclusion. All the homes will meet Building Regulations M4(2) accessible and adaptable dwellings and will have step-free access to each level and the first and tenth floor amenity spaces. The provision of 12no. wheelchair adaptable homes exceeds the requirements of Policy D7 of the London Plan and CS5 of the Core Strategy to provide 10% of all homes as M4(3) compliant. Additionally, two residential lifts are provided to ensure that the building continues to be fully accessible in the event of one lift breaking down.
- 6.8.2 These adaptable wheelchair units are provided despite the evidence that to date only one Pocket wheelchair unit has been sold to a wheelchair user (at 100 Bollo Lane) despite extensive marketing exercises. This is

supported by the situation at the Pocket's other development at Varcoe Road also within the OKR AAP (application ref: 16/AP/5235) where two wheelchair homes were required for the planning application. This development has been completed and all flats are sold and occupied. Despite an extensive 12 month marketing process, direct to wheelchair users, no interest was received from wheelchair users and the homes were sold to non-wheelchair users.

- 6.8.3 Notwithstanding the lack of demand Pocket will provide 12no M4(3) wheelchair homes within the application scheme which exceeds London Plan and Local Plan policy. It is proposed that following 3 months from point of initial marketing, if no interest from a wheelchair user has been received, then these eleven homes would revert back to occupation by non-wheelchair users.

## 6.9 External Amenity Space

- 6.9.1 External communal amenity space will be provided at the first and tenth floor providing 224.4sqm and 56.8sqm respectively (281.2sqm in total). Communal amenity space is incorporated into Pocket developments and fosters a sense of community amongst residents according with the aspirations of Pocket's ethos. These spaces often become the meeting places for residents with events or activities occurring in these communal spaces.
- 6.9.2 In addition to these communal spaces, 78 private balconies and terraces will be provided for residents, providing 420.3sqm of private external amenity space.
- 6.9.3 The Mayor's Housing SPG at Standard 26 requires a minimum of 5sqm of private outdoor space to be provided for 1-2 person dwellings. For the proposed 117 homes, this would equate to a total requirement of 585sqm. The Application Scheme provides 701.3sqm of amenity spaces thus exceeding the Mayor's requirements for amenity space by 116sqm.
- 6.9.4 Southwark's Residential Design Standards SPD as Section 3 sets out the borough's requirements for outdoor amenity space for new flatted developments. The SPD requires 50sqm of communal amenity space per development plus "ideally" 10sqm of private amenity space per unit for homes containing two or less bedrooms, where it is not possible to provide 10sqm of private amenity space, as much as possible should be provided as private amenity space with the remaining amount added towards the communal amenity space requirement.
- 6.9.5 Using the requirement set out in this SPD, the application scheme would have a total requirement of 1,220sqm of amenity space which is more than double the requirement of the London Plan.
- 6.9.6 The application scheme includes more than the 50sqm communal amenity space required by the Council, plus at least 5sqm of private amenity for 78 of the homes, with more than the equivalent of 5sqm private amenity space for the remaining 39 homes provided communally. As noted above, this results in a total of

701sqm of amenity space, resulting in a deficiency of 518.7sqm against the Council's local amenity requirements.

6.9.7 The proposed amenity space has been maximised within the scheme, however, due to the constrained nature of the Application Site and the objective of delivering the maximum number of affordable homes, it is not possible to provide any more amenity space.

6.9.8 The communal amenity spaces have been designed to be places of enjoyment, accessible all residents with the aim of fostering a sense of community.

6.9.9 The current provision of external amenity space should be weighed against the public benefits of the scheme, including the provision of 50% affordable housing (across the two linked applications) which addresses an identified need in the Borough, as well as consideration for the constrained nature of the site. If the external amenity space provision within the development were to be increased, this would result in the loss of affordable homes and light industrial floorspace and jeopardise the viability of the scheme to a point where it would not be deliverable.

6.9.10 Whilst there is no restriction on children within apartments, no homes to date have been initially occupied by couples with children or single persons with children. The child yield based on the GLA calculator (and reflected in Southwark's Residential Design Standards SPD) for a 100% one bedroom one person (1b1p) scheme is de-minimis, and in line with London Plan policy, no play space is required.

## 6.10 Residential Amenity

### Potential for Overlooking

6.10.1 Southwark's Residential Design Standards SPD states new development should not subject neighbours to unacceptable noise disturbance, overlooking or loss of security. The SPD expects a minimum distance of 12 metres at the front of the proposed building and any elevation that fronts onto a highway and a minimum distance of 21 metres at the rear.

6.10.2 To the East of the Application Site across Ossory Road sits the Asda superstore, which is in excess of 12m distance and in commercial use. As such, no unacceptable overlooking of these premises will occur.

6.10.3 To the South of the Application Site, separated by a cobbled courtyard, sits the Hireman site at 14-22 Ossory Road. This building is currently in use for commercial purposes however, Pocket is aware that the site is being bought forward for a mixed-use redevelopment including residential accommodation from second floor and above. This site received a resolution to grant planning permission at Planning Committee in December 2020 (Application Reference 19/AP/7610) to demolish the existing building and deliver 1,438 sqm of light industrial floorspace at basement, ground, and first floor level and 71 homes within a building of part 10 part 11 storeys. The Application Scheme would maintain 15m minimum distance to the closest habitable rooms within this scheme. In pre-application discussions planning officers have confirmed such a distance is

appropriate given the changing character of the area and the Council's ambitious aspirations for the regeneration of the Old Kent Road Opportunity Area. The planning officer noted the massing proposed at the Application Site is in line with that envisioned as part of the OKR AAP and the separation distances proposed are considered to be acceptable.

- 6.10.4 The bottling plant factory lies immediately to the West of the Application Site and the New Southwark Plan seeks to retain this as SIL. Given its ongoing industrial use and protection as such through the New Southwark Plan, no overlooking is considered to occur in this instance. The Application Scheme is a minimum of 65m from closest habitable windows to the rear of the properties on Glengall Road. Given the considerable separation distance of 65m proposed, no overlooking is considered to occur. This significantly exceeds requirements contained within Southwark's Residential Design Guidance SPD and ensures no loss of privacy will occur for the residents of Glengall Road.
- 6.10.5 There are no windows located in the nearest adjoining property at 2B Ossory Road, located to the North of the Application Site. One secondary window and one window servicing the communal hallway are proposed in the Northern flank elevation, which could if necessary be conditioned to be obscure glazed. As such, no overlooking is considered to result for these properties.
- 6.10.6 The amenities of existing residents on the Old Kent Road and Glengall Road will be retained by the provision of a balustrade and planting along the edges of the external terraces to ensure no direct overlooking will occur.
- 6.10.7 The application scheme will therefore protect the privacy of neighbouring residential properties to both the north and east of the application site.

#### **Daylight and Sunlight**

- 6.10.8 The effect of the application scheme on sensitive receptors to surrounding buildings has been assessed in terms of daylight and sunlight as outlined in the Daylight and Sunlight Assessment Report prepared by Right of Light Consulting (ROLC). The tests within the report were undertaken in accordance with the Building Research Establishment (BRE) 'Site Layout Planning for Daylight and Sunlight – A Guide to Good Practice' (second edition, 2011), the British Standard – BS 8206: Part 2 and the Chartered Institute of Building Services Engineers Applications Manual on window design. Further assessment was undertaken on the likely levels of daylight being achieved within habitable rooms in the application scheme (known as light within testing). The findings of
- 6.10.9 In regard to the effect on neighbouring properties the ROLC Report confirms that the application scheme achieves a high level of compliance with the guidance set out in the BRE guide 'Site Layout Planning for Daylight and Sunlight'. The ROLC Report concludes that the application scheme will have a limited effect on the light enjoyed by neighbouring properties. This assessment includes the effect of the application scheme on the approved but not constructed Hireman Scheme directly to the south. Whilst there is some degree of

reduction to daylight to this property it is limited and is a function of the relationship of the two sites and that they are both development opportunities within a wider site allocation (NSP63 and OKR10).

6.10.10 The assessment includes that those reductions which are significant only occur in isolated areas and are commensurate with development proposals in an Opportunity area such as the Old Kent Road.

6.10.11 The interior daylight, sunlight to windows and overshadowing to open spaces has also been assessed in relation to the proposed building using the criteria as set out in the BRE guide to good practice. The submitted Daylight and Sunlight Study for the units within the development demonstrates that the vast majority of units are above the guidance in the BRE report. As for the neighbouring properties there are a small number of windows which have reductions which are significant however these are almost all the result of developing the masterplan and the relationship of the application scheme and Hireman Site being developed in close proximity.

6.10.12 The BRE method of assessment is used as guidance only in the overall planning balance and instances of non-compliance are not unusual within the context of urban locations. The application scheme would have limited impact on the adjacent residential properties and given the urban setting of the proposal and the aspirations of the evolving OKR AAP for the Old Kent Road, this effect is outweighed by the other material planning considerations.

## 6.11 Heritage Assets

6.11.1 The existing building on the application site is neither statutorily nor locally listed and the application site does not lie within a Conservation Area however there are a number of heritage assets within the vicinity as noted in Section 2 of this Statement. To address the effect of the application scheme upon these heritage assets a Heritage Statement has been prepared by Heritage Collective.

6.11.2 The Heritage Statement assesses the effect of the proposal for the redevelopment of 2-10 Ossory Road on the setting and significance of the Grade II listed group Nos 1-35 and 24-38 Glengall Road, the locally listed water bottling factory, and upon the setting of the Glengall Road Conservation Area. This brings the assessment in line with Paragraph 194 of the National Planning Policy Framework (NPPF 2021). The Heritage Statement was prepared in conjunction with the application drawings and Design and Access Statement prepared by Hawkins Brown, the rendered 3D model views produced by Cityscape Digital, and the Townscape and Visual Impact Assessment prepared by Landscape Collective. This assessment was informed by a combination of desk-based historical research and a site visit.

6.11.3 As summarised within the Heritage Statement, the redevelopment of 2-10 Ossory Road has to be assessed within the setting of a number of designated and non-designated heritage assets. The existing application site building makes no contribution to the setting of these assets and does not better reveal their heritage significance.

6.11.4 The Heritage Assessment assesses the impact of the Proposed Development on the following heritage assets:

- Nos. 1-35 and 24-38 Glengall Road – Grade II Listed Buildings
- Glengall Road Conservation Area
- Trafalgar Avenue Conservation Area
- Old Mineral Water Bottling Factory – locally significant historic industrial building

6.11.5 In regard to the setting of nos. 1-35 and 24-38 Glengall Road, the Heritage Assessment identifies a very limited degree of less than substantial harm by way of change to the setting of these listed buildings; the assessment concludes that only those buildings on the east side of Glengall Road will be negatively impacted, given that the development will not be appreciable in views of the front elevations of those listed buildings located on the west side of the road.

6.11.6 In regard to the Glengall Road Conservation Area, the assessment identifies only a small level of less than substantial harm to the aesthetic values and significance of the Conservation Area and identifies no harm to the Trafalgar Avenue Conservation Area.

6.11.7 Finally, in regard to the Old Mineral Water Bottling Factory, despite being close and of a greater scale to this locally listed building, the proposals are not considered to innately erode or harm the local interest of this building.

6.11.8 As such, the greatest level of harm identified by the Heritage Assessment is a small level of less than substantial harm. Paragraph 202 of the NPPF (2021) states that:

*‘Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.’*

6.11.9 As highlighted in this Statement and within the application submission the application scheme provides a range of major public benefits:

- The provision of 117 new high-quality homes, including 39 affordable homes provided as discount market sale, to address an identified housing need;
- The provision of 22 new social rented homes through the linked application at Credon House;
- The delivery of a high-quality building which will improve the quality and appearance of the application site and streetscene;
- The provision of cycle parking for residents, employees and visitors, as well as the removal of existing car parking on site to reduce car dependency to encourage sustainable modes of transport;

- The provision of a highly sustainable building which significantly exceeds the minimum on site carbon reduction targets set out in the London Plan and local policy (69.2% reductions achieved on site for the residential element and 59.8% achieved for the non-residential element);
- The re-provision of high quality and flexible light industrial floorspace informed by engagement with Vital OKR;
- The provision of high quality and usable amenity space for residents, through the provision of private balconies and communal terraces;
- Contribution to the wider regeneration of the Old Kent Road Opportunity Area, in accordance with the aspirations of the emerging OKR AAP.

6.11.10 The limited effect on the surrounding historic environment as identified in the Heritage Statement will therefore be outweighed by the very significant public benefits the application scheme will deliver, in accordance with the requirements of the NPPF.

## 6.12 Agent of Change

6.12.1 Policy D13 of the London Plan 2021 places the responsibility for mitigating impacts from existing noise-generating activities or uses of the proposed new noise-sensitive development. This consideration is two-fold: firstly to protect future residents from potential disturbance from the existing industrial uses adjacent to the site, as well as ensuring the proposal does not prejudice the potential future redevelopment of adjoining sites.

6.12.2 Policy D13 states that:

*“...development should be designed to ensure that established noise generating venues remain viable and can continue or grow without unreasonable restrictions being placed on them”.*

6.12.3 The adjoining sites to the south and west of the application site are currently in industrial and commercial use. As such, the Application Scheme has been designed to protect future occupants from any potential noise disturbance from this adjoining site, in order to not prejudice the viability or daily industrial activities taking place on this site.

6.12.4 A noise assessment has been submitted in support of this application, prepared by XCO2 which demonstrates a robust glazing specification would provide internal noise levels for all residential environments which would comply with the British Standard for residential accommodation. No further mitigation measures are considered to be required in order to protect the proposed habitable space from external noise intrusion.

- 6.12.5 As demonstrated in the Acoustic Report, with suitable glazing and through the design layout proposed by the application scheme future residents will not experience undue noise disturbance from neighbouring industrial processes.
- 6.12.6 The marketing of the properties will make it clear to potential purchasers that they will be living next to an industrial estate so that they are aware they may be some noise generating activity taking place on the adjoining site (although any noise disturbance should not be significant, as demonstrated by the noise assessment). They will also be made aware that No. 14-22 Ossory Road may come forward for redevelopment in the future given the approval of planning permission reference 19/AP/7610 granted in December 2020. As such there may be windows to key habitable rooms within close proximity.
- 6.12.7 It can be demonstrated that the application scheme will protect the existing noise generating businesses and will not impact on their viability through the design of the scheme, appropriate glazing and will not prejudice the potential redevelopment of the adjoining site, thereby complying with London Plan Policy D13.

## 6.13 Parking, Servicing and Highways Considerations

### **Impact on Highways Network**

- 6.13.1 A Transport Assessment has been prepared by TPP in support of this application and should be read in conjunction with this statement. The Transport Assessment provides greater detail with regards to the impact of the development and demonstrates that there will be a minimal impact on the surrounding traffic network as a result of the proposal.
- 6.13.2 The highways implications are minimal given that the proposal will be car free; Pocket is willing to agree that all occupiers of the homes (other than disabled drivers) will be restricted from obtaining parking permits in any existing or future CPZs in the area which will be secure by Section 106 Agreement.

### **Car Free Development**

- 6.13.3 Policy T6 of the London Plan 2021 states car free development should be the starting point for all development proposals in places that are (or are planned to be) well-connected by public transport. Encouraging use of sustainable modes of transport, such as public transport any cycling, is a key part of Pocket's ethos. Pocket has developed car free schemes across London including Outer London locations (as defined by the draft London Plan). These include Cowleaze Road in Kingston upon Thames (Travel Zone 5), Wester Avenue in Southall (Travel Zone 4), Addiscombe Grove in Croydon (Travel Zone 5) and Gainsford Road in Walthamstow (Travel Zone 3).
- 6.13.4 The Council is reviewing the introduction of parking restrictions on Ossory Road as part of the wider strategy for healthy streets and promotion of sustainable forms of travel. There will be few if any on street parking bays available on street other than a limited number of Blue Badge holders.

- 6.13.5 It is expected that the level of car ownership associated with the proposed one bedroom one person homes in this location would be very low and that the proposal for a car free development is justified. Further, all residents of the scheme (other than Blue Badge Holders) would be restricted from obtaining a Residents Parking Permit to park within current or future Controlled Parking Zones in the area.
- 6.13.6 The proposed car free development is wholly in line with the London Plan, as well as the Council's Core Strategy and emerging policies in the New Southwark Plan and Old Kent Road AAP. The application scheme is not considered to result in additional kerbside parking and will not detrimentally affect highway or pedestrian safety.

#### **Wheelchair Accessible Car Parking Spaces**

- 6.13.7 Given the constrained nature of the site, there is no space on site for the provision of accessible parking spaces. However, there is currently on street parking along Ossory Road. Southwark are currently looking at amending the availability of on street parking across the entire Old Kent Road AAP area including the introduction of a Controlled Parking Zone which would restrict the number of vehicles parking along this road but occupants of the development who are Blue Badge holders would be eligible for a Residents Parking Permit.
- 6.13.8 In discussions with the Council the proposals for significant changes to the parking and road layout on Ossory Road have been discussed (see Appendix 2). The Council proposes to bring forward significantly reduced car parking spaces on Ossory Road in order to support a car free environment and encourage the use of sustainable forms of transport. The Council's approach was to seek on site servicing and reduced car parking on street in order to improve the quality of the landscaping and pedestrian experience on Ossory Road. This meant the Council would support very low provision of disabled car parking on site or off site for schemes below that encouraged in the London Plan (3%). The Council's draft approach to parking and servicing to Ossory Road wholly supports the objectives of the applicant's scheme. Please see Section 4.11 of the Transport Statement for further details of the proposed changes to Ossory Road.

#### **Cycle Parking**

- 6.13.9 The London Plan at Table 10.2 requires 1 space per unit for one bedroom one person homes (1b1p). It also requires 1 short stay visitor space to be provided for every 40 residential homes; however, the New Southwark Plan requires 1 visitor cycle parking space per 10 homes.
- 6.13.10 The application scheme provides a total of 130 secure cycle parking spaces for future residents of the development and their visitors, located at ground floor. This will be provided through 118 secure, long stay spaces for residents, plus 12 visitor spaces.
- 6.13.11 Two long stay cycle parking spaces will be provided for commercial users. One Sheffield stand externally in the courtyard, in the south west corner of the building, will provide 2 short stay spaces for cyclists visiting the commercial occupants.

6.13.12 In summary, the application scheme will provide sufficient secure cycle parking for both the residential and commercial elements of the scheme, in accordance with both the London Plan and New Southwark Plan, thereby encouraging alternative sustainable methods of transport.

#### **Servicing for Commercial and Residential**

6.13.13 A detailed description of the servicing strategy can be found in the Transport Statement and Delivery and Servicing Management Plan prepared by TPP.

### **6.14 Environmental Considerations**

#### **Energy**

6.14.1 In support of this application an Energy Statement has been prepared by XCO2. In line with the energy policies of the London Plan and the London Borough of Southwark's Local Plan the energy performance and carbon dioxide emissions have been assessed and the energy strategy based around the Mayor's energy hierarchy:

- Be lean: use less energy;
- Be clean: supply energy efficiently; and
- Be green: use renewable energy

6.14.2 The Applicant's energy consultant has been fully involved in the design process to ensure that a highly sustainable and energy efficient strategy was incorporated from the early concepts of design.

6.14.3 The Application Site is located within an area where there are plans for the delivery of a District Heating Network (DHN). As such, the Council has recently engaged Veolia to assess the opportunity to connect to the District Heating Network connected to SELCHP. The delivery of this is likely to be available either prior to or not long after completion of the scheme; this has been addressed in the energy strategy for the development which will include appropriate connections to link to the DHN. High efficiency gas boilers will be installed as a temporary heat source until the development connects to the wider district heating network, if this is not available upon completion of the development.

6.14.4 In accordance with Policy SI3 of the London Plan, the proposed development has exceeded the minimum 35% improvement over Part L, achieving overall on-site reductions of 69.2% for the residential element and 59.8% for the non-residential element. In line with all schemes in the Old Kent Road which have been submitted over the past two years the application scheme is unable to achieve the full 'zero carbon' target on-site. As such, any carbon offset contributions will be subject to viability discussions and detailed design stage calculations.

6.14.5 Overall, there is a significant reduction on Building Regulations Part L. The Application Scheme is thus in accordance with London Plan Policy SI3, Core Strategy Policy 13 and New Southwark Plan Policy P69.

#### **Contaminated Land**

6.14.6 Policy P63 of the emerging New Southwark Plan seeks to ensure development remedies any contaminated land within the development site or land outside of, but related to, the development site.

6.14.7 A Phase 1 Environmental Study has been undertaken by RSK and assesses the possibility of ground contamination on site. The report identifies that complete contamination linkages have been identified however, there is no direct evidence of significant ground contamination on the site with the exception of unknown made ground. Given the use of the site there were areas of surface staining identified. RSK confirm that there is no evidence of the storage of fuels on site and the local Petroleum Officer has been contacted to assess for any records of fuel storage.

6.14.8 The preliminary findings suggest that the site is unlikely to be classified by the local authority as 'Contaminated Land' under the current contaminated land regime (Environmental Protection Act 1990: Part IIA).

6.14.9 The report concludes that prior to demolition an asbestos survey is recommended to assess for any asbestos within the building fabric. A drainage survey and geo-environmental survey is recommended to assess the possible presence of waste oil tanks on site and further assess for any contamination.

#### **Air Quality**

6.14.10 The site is located within an area declared as an Air Quality Management Area which measures exceedances of the annual mean nitrogen dioxide (NO<sub>2</sub>) objective and the 24-hour mean PM<sub>10</sub> objective. The potential air quality constraints on the proposed development site have been reviewed and summarised with the report prepared by AQA.

6.14.11 An assessment has been undertaken to quantify the potential impacts on local air quality associated with the construction and operation of the proposed development at 2-10 Ossory Road. Based on the results of the assessment, it is considered that redevelopment of the site would not cause a significant impact on local air quality.

6.14.12 An assessment of potential air quality impacts arising from the construction and operation of the proposed development in the London Borough of Southwark has been undertaken.

6.14.13 During the construction phase, the site has the potential to generate dust nuisance beyond the application boundary. However, through the implementation of a Dust Management Plan, the impacts will be effectively minimised and are unlikely to be significant.

6.14.14 Emissions from operational traffic associated with the proposed development is not anticipated to significantly affect local air quality however dispersion modelling of emissions from traffic on the local road network has been undertaken to ascertain the likely level of exposure of future users of the proposed development to elevated nitrogen dioxide and particulate concentrations. The assessment indicates that NO<sub>2</sub>, PM<sub>10</sub> and PM<sub>2.5</sub> concentrations will be well within the relevant long and short-term air quality standards.

6.14.15 The application scheme is air quality neutral with respect to building and transport-related emissions.

#### **Ecology**

6.14.16 Policy P59 of the emerging New Southwark Plan requires development to contribute to net gains in biodiversity through avoiding damage to populations of protected species and priority habitats/species.

6.14.17 It is noted that the site is not identified to be within an area afforded biodiversity protection in the adopted or emerging Local Plan.

#### **Flood Risk**

6.14.18 The site is located within Flood Zone 3 as identified by the Environment Agency; as such, a detailed Flood Risk Assessment has been submitted in support of this application.

6.14.19 To inform the Flood Risk Assessment a drainage strategy, prepared by Whitby Wood to comply with national planning policy and guidance including the DEFRA Technical Standards and LBS guidance which requires the inclusion of SuDS in major developments such as this, has been reviewed and assessed as part of this FRA. As the application site is 100% hardstanding, raised planters and soft landscaped areas have been included at roof level to minimise surface water runoff. In addition, SuDS including planting at roof level, and an attenuation tank with a Hydro-Brake flow control device below the slab, have been included to restrict peak sewer flows for rainfall events from 54 to 5l/s up to the 1 in 100 year event including a 40% allowance for climate change. This will offset the foul increase (6.45l/s) to the combined sewer from the proposed development and create an overall reduction of 79% in overall peak flows from the site. Thames Water has confirmed that the drainage strategy can be accommodated without the need for upgrade.

6.14.20 Based on the consultants understanding of the site setting and the development proposals, it is considered that the risk of flooding from all sources is generally low, and the development can be operated safely and without significantly increasing flood risk elsewhere.

6.14.21 However, a number of residual risks have been identified associated with failure of the Thames Tidal Flood Defences, public sewers, site drainage and water supply pipes, groundwater and intense rainfall. These are considered 'typical' of a site in the defended flood plain and such as this, and appropriate mitigation measures have been provided in the FRA to address and manage the residual risk from these forms of flooding.

6.14.22 Flood resilient design to the ground floor and preparation and implementation of a very basic flood warning and flood response plan have been recommended to manage residual risks to site users and property in the extremely unlikely event of a breach in the Thames Tidal Defences protecting the site.

6.14.23 Nonetheless, the development has been designed in such a way that the 'more vulnerable' development comprising the residential homes will be located at first floor level with the less vulnerable development located on the ground floor. The first floor of the proposal is above the modelled breach flood level and thus the occupants of the residential homes will have a safe place of refuge during a breach event.

6.14.24 The application site is currently wholly developed comprising an existing building and hardstanding. The development proposals will aim to reduce the peak run-off rates from the site.

## 6.15 Archaeology

6.15.1 The application site is located with an archaeological priority zone; these are areas known or suspected early settlement or activities which have higher potential for significant sub-surface remains.

6.15.2 In line with the policies of the local planning authority and national government guidance as set out in the NPPF, an archaeological desk-based assessment has been undertaken by the Archaeology Collective to clarify the archaeological potential of the Site.

6.15.3 The archaeological desk-based assessment concludes that the application site does not contain any world heritage sites, scheduled monuments, registered parks and gardens, or registered battlefields where there would be a presumption in favour of their physical preservation in situ and against development.

6.15.4 Based on the information within the HER, supplemented by historic mapping, the application site has been shown to have a moderate potential for archaeological remains from the Prehistoric and Roman periods, with a low potential for archaeological remains from the Saxon/early Medieval, Medieval and Post Medieval periods. A high potential for archaeological remains is identified for those areas within the Site where the foundations of the 19th century terraced properties might be encountered, whereas a low potential is considered for the Modern period for the remainder of the Site.

6.15.5 It is considered that the application scheme accords with current legislation, the planning policies contained within the NPPF and the policies of the Southwark Plan policies (2007) and Core Strategy (2011).

## 6.16 Section 106 Obligations & Draft Heads of Terms

6.16.1 The applicant is willing to enter into a legal agreement pursuant to Section 106 of the Town and Country Planning Act 1990 (as amended) with the Council to ensure the proposed intermediate homes remain as affordable housing in accordance with the definition set by the London Plan, in perpetuity.

- 6.16.2 The S106 will be linked to the development of Credon House to ensure delivery of social rent homes as part of the development of both sites. The phasing between the schemes is to be agreed with the Council.
- 6.16.3 The applicant is also proposing a restriction which prevents residents from secure a Residents Parking Permit to park within any future Controlled Parking Zones within close proximity to the site. This restriction does not apply to registered Blue Badge holders who are eligible for on street parking.
- 6.16.4 The application scheme will exceed the minimum carbon reduction of 35%. In order to achieve the objective of Zero Carbon a further carbon offset payment will be made to the Council at a rate of £95 per tonne per year for a period of 30 years in accordance with Southwark's adopted Section 106 Planning Obligations and Community Infrastructure Levy SPD.
- 6.16.5 The Applicant also proposed to ensure the 12no. M4(3) wheelchair user dwellings are first made available for wheelchair users and marketed to a wide audience through appropriate websites for 6 months prior to active marketing and 3 months following active marketing. After this time, wheelchair user dwellings which have not been purchased will be offered to those that meet London-wide eligibility criteria.
- 6.16.6 As set out above, the proposed development will not achieve Southwark's targets for on-site communal amenity space. As such, in line with Southwark's Section 106 Planning Obligations and Community Infrastructure Levy (CIL) SPD, a financial contribution is proposed to address the on-site shortfall.

## 7.0 Statement of Community Involvement

7.1.1 In line with Paragraphs 39, 40 and 128 of the NPPF, the applicant has actively engaged with the local community and those affected by the proposed development to allow the evolution of design to take account of the views of the community.

7.1.2 Paragraph 132 of the National Planning Policy Framework (NPPF 2021) states that:

*'Design quality should be considered throughout the evolution and assessment of individual proposals. Early discussion between applicants, the local planning authority and local community about the design and style of emerging schemes is important for clarifying expectations and reconciling local and commercial interests. Applicants should work closely with those affected by their proposals to evolve designs that take account of the views of the community. Applications that can demonstrate early, proactive and effective engagement with the community should be looked on more favourably than those that cannot.'*

7.1.3 This Statement of Community Involvement and Response to Development Consultation Charter provides a summary of the consultation to date and on-going engagement into the future. The consultation on this Application Scheme has been undertaken in line with Southwark Council's Development Consultation Charter and Statement of Community Involvement (2008).

7.1.4 Pre-application discussions and engagement have been held with Southwark officers, the Greater London Authority (GLA), Transport for London (TfL), key stakeholders and the wider public.

7.1.5 It is fundamental to Pocket that all members of the local community are consulted as part of the development process. Pocket considers and appreciates all comments and input on proposed designs in the run up to submission and once the application has been formally submitted to the Council. Pocket strongly believes that local community involvement is essential in order to create a scheme that is sustainable and is part of the local community.

7.1.6 Pocket has undertaken a series of public and local authority engagements as part of the preparation of the application scheme. A summary of public involvement for the application scheme is outlined below:

### **Public Consultation Webinar - 28th July 2021**

7.1.7 A virtual public consultation webinar was held on 28th July 2021. Members of the public were presented with an overview of Pocket Living and their delivery of affordable homes alongside details of the proposals and scheme drawings for the revised schemes at 2-10 Ossory Road and Credon House. Members of the project team included Pocket Living, Gort Scott (architects of Credon House) and Hawkins Brown. 14 people attended the virtual consultation and were able to ask questions throughout and after the presentation via a chat forum. Questions were then answered by Pocket and the design team.

7.1.8 A dedicated consultation website has been set up and can be found at <https://pocketoldkentroad.com/>. The consultation website provides visitors with the option to view the consultation webinar and submit feedback via an online survey.

7.1.9 To date 28 responses have been received from the online survey. The written feedback is strongly positive and can be summarised as follows:

- Welcoming provision of affordable homes which will be of particular benefit to younger people in London;
- Requesting more information on how one would purchase a Pocket Home;
- Supportive of the delivery of 50% affordable homes across the two schemes;
- Welcoming the opportunity for Southwark residents to buy their own homes, it was considered more developments like this were needed; and
- Supportive of the delivery of high-quality amenity space to encourage social interaction between residents.

**Public exhibition - 11th December 2018 (Previous Scheme)**

7.1.10 Historic consultations have taken place on both Credon House and Ossory Road during the design stages of the original schemes (submitted to the Council in December 2019). The overall bulk and massing of the proposed building has not changed since this previous round of consultation, with the greatest changes to the scheme being in relation to the proposed tenure and the provision of private amenity space. As such, the comments below are still relevant to the current proposals and should be read in conjunction with the feedback received during the latest round of consultation.

7.1.11 A public consultation event was held on 11th December 2018 at St. Philip's Church Hall, Avondale Square SE1 where members of the public were invited to view a series of display boards setting out Pocket's approach to the delivery of affordable homes as well as drawings of the proposed schemes. A public exhibition was held in December 2018. Letters were sent to 2,590 residents and local businesses inviting them to the exhibition. Invitations were also sent to the following stakeholders:

- Ward Councillors
- Vital Old Kent Road
- Kaymet
- Southwark Living Streets
- Walworth Society
- Livesey Exchange
- Pocket registrants in Southwark

## VITAL OKR

- 7.1.12 Pocket and the development team have held several meetings with Vital OKR to discuss the redevelopment of the site. Two meetings were undertaken with Mark Brearley (founder of Vital OKR) to discuss the original redevelopment proposals for the Site. Mr Brearley welcomed Pocket Living's engagement with Vital OKR and quality of the light industrial floorspace proposed. The project team are in the process of arranging a meeting with Mark Brearley to discuss the revised Pocket schemes.
- 7.1.13 Pocket Living met with Mark Brearley the owner of Kaymet and founder of Vital OKR to discuss the revised proposals for the site. Mark Brearley attended the virtual webinar on the 28<sup>th</sup> July 2021 and following this Webinar a separate meeting was held with Mr Brearley on 18<sup>th</sup> August 2021.
- 7.1.14 Overall Mr Brearley was supportive of the proposals although noting it was unfortunate that the application scheme resulted in a reduction in light industrial floorspace from the existing unit and the previous scheme. He recognised however that the need to deliver a viable scheme, link 2-10 Ossory Road with Credon House and deliver 50% affordable housing with a policy compliant mix impacted on overall viability.
- 7.1.15 He noted that there was demand for light industrial and other forms of industrial space in the area and he considered the layout of the proposed ground floor light industrial unit would be useable by local businesses and he stated he would be willing to assist Pocket in finding occupiers following the development of the scheme.
- 7.1.16 Mr Brearley provided expert advice on the proposed arrangement for the proposed light industrial unit, including
- Supporting the proposed 4m floor to ceiling height
  - Suggested increasing door widths to 3m width and 3m height
  - Provide one unit as a starting point with the main access from Ossory Road. Noted that if no demand this could be sub-divided
  - Possibly utilise the access road to the south for a secondary access to the unit and provide a further suitably sized door here
  - Maximize the clear wall space available
  - Identify future areas for plant
  - Use on street loading from Ossory Road and no real need for an inset loading bay
- 7.1.17 Overall Mr Brearley welcomed the opportunity to engage with the applicant and to be able to input into the scheme.

### **Glengall Road Residents**

7.1.18 Throughout the redevelopment of the site the design team have continued to engage with residents on Glengall Road and their appointed planning consultant regarding the emerging design for the scheme. The design team have offered to meet with residents of Glengall Road in their homes or in a local community facility to further discuss the redevelopment proposals but have received little response. Pocket and the design team will continue to engage with local residents during the course of the planning application.

### **Development Consultation Charter – Engagement Summary**

7.1.19 In accordance with the Council's objectives of positive and constructive engagement a Development Consultation summary has been submitted with this application and outlines the public consultation to date, feedback on the scheme and details on the evolution of the scheme in view of feedback during the stages of development

7.1.20 A full explanation of the changes to the scheme is set out in the Design and Access Statement prepared by Hawkins Brown.

## 8.0 Conclusion

- 8.1.1 The development of 2-10 Ossory Road is linked with the redevelopment of Credon House, Verney Road. In tandem these two sites will deliver 139 homes in the Old Kent Road. The applications for both sites have been informed through extensive discussions with the Council. Following the resolution to refuse the previous scheme for Ossory Road in October 2020 (Application Reference: 20/AP/0009) the scheme has been revised. This application increases the provision of private amenity space across the site and will deliver up to 117 additional homes for the borough.
- 8.1.2 London Plan Policy E4, E6 and E7 encourage intensification, co-location and relocation for mixed use redevelopment supported in a 'plan led approach'. The redevelopment of this brownfield site in an accessible location would provide an opportunity for the London Borough of Southwark to secure a policy compliant provision of affordable homes (50% by habitable room) across both Pocket sites meeting both identified social rent and intermediate housing needs for Southwark.
- 8.1.3 The design of the scheme has evolved through pre-application consultation with local residents as well as the London Borough of Southwark and the Greater London Authority and the design has been shaped by feedback received on the proposals. The application scheme is considered to be consistent with the relevant planning policies set out within the London Plan, the existing and emerging development framework for Southwark and is in keeping with the aims of the National Planning Policy Framework.
- 8.1.4 The application site is currently designated as Strategic Industrial Land (SIL) where Local and London policies seeks to protect industrial capacity. However, through the emerging New Southwark Plan and OKR AAP, the site will be de-allocated as SIL and re-designated as Locally Significant Industrial Site (LSIS).
- 8.1.5 The application site is designated in the OKR AAP (Site Allocation OKR10) for mixed use development, delivering new homes and new employment floorspace. The Application Scheme has been designed to provide 421 sqm of high-quality flexible Class E floorspace which can be used for a variety of businesses and will generate 7 new jobs with the objectives of these being taken by local people. The construction of the scheme will also generate significant employment with training and apprenticeship opportunities for local people. Whilst the quantum of proposed floorspace is less than existing, the provision of affordable housing and mixed-use development on the site provides a balance and has been agreed by the Council during pre-application discussions.
- 8.1.6 The Old Kent Road AAP sets ambitious targets for the regeneration of the area, including the delivery of 20,000 new homes, 7,000 of which should be affordable, along with 10,000 new jobs. The application site is allocated for mixed use redevelopment within Policy OKR10 which is identified to have an indicative capacity of 4800 new homes. The proposed 117 residential homes will help achieve this target, as well as providing 50% affordable homes (linked to Credon House) which will greatly assist in reaching the overall target for the Opportunity Area of 7,000 new affordable homes.

- 8.1.7 The provision of up to 117 one-bedroom homes supports the need for a range of affordable homes and private market sale homes in the borough with census data demonstrating that the development will be addressing an identified need and will aid residents and workers of the Borough who are currently stuck in expensive rental accommodation in purchasing their own home. Further, the provision of genuinely affordable housing will outweigh this conflict in local policy, providing significant public benefits to the regeneration of the Old Kent Road Opportunity Area and the borough as a whole.
- 8.1.8 The proposed design will be of a high quality and will meet high standards of sustainability with a longer term plan to connect to the upcoming District Heating Network (subject to viability and acceptability of the terms of any connection). The Application Scheme has been designed to address issues associated with scale, bulk and height and will be commensurate with the envisaged prevailing heights as set out in the emerging OKR AAP. The application scheme has been designed to respect the local context of scale and massing in the area, stepping up in a logical manner from the adjoining development while also reducing any effect on the daylight/sunlight or privacy that local residents enjoy.
- 8.1.9 On balance, the proposed development will make efficient use of a previously developed brownfield site, aiding in the regeneration of the area and helping to achieve the ambitious targets of the Old Kent Road Opportunity Area. The scheme will provide high quality residential homes, 50% of which will be genuinely affordable when considered with the linked application at Credon House (secured through a S106 agreement), alongside enhanced commercial floorspace at ground floor for local businesses. The development complies with the NPPF's overarching aim of delivering sustainable development, helping the borough to achieve their housing targets and providing a building of high-quality design which will enhance the character and appearance of the area.
- 8.1.10 The development by Pocket of 1 Varcoe Road is the first major development which has been completed following the designation of the Old Kent Road Opportunity Area and the issuing of the Old Kent Road Area Action Plan (OKR AAP). The financial investment made for 1 Varcoe Road demonstrates Pocket's commitment to working with the Council and other stakeholders in delivering the ambitions of the OKR AAP. Together, with the 57 already occupied homes at 1 Varcoe Road, and the proposed 22 homes at Credon House and 117 homes at Ossory Road, Pocket will ultimately deliver a total of 196 new homes for the borough with 118 of these being affordable homes.
- 8.1.11 Overall, the application scheme is in accordance with the adopted development plan and is supported by the London Plan 2021, New Southwark Plan August 2020 and OKR AAP. There are not relevant material considerations which outweigh this policy support. The commitment by Pocket to deliver the homes as soon as possible in line with the approach at 1 Varcoe Road gives further support to the application scheme.
- 8.1.12 In accordance with Section 38(6) of the Planning and Compulsory Purchase Act (2004) applications should be determined in accordance with the development plan unless material planning considerations indicate otherwise. The application by Pocket for the redevelopment of 2-10 Ossory Road is fully in line with the development plan and planning permission should be granted.

## Appendix 1 – Letter from Cllr Peter John

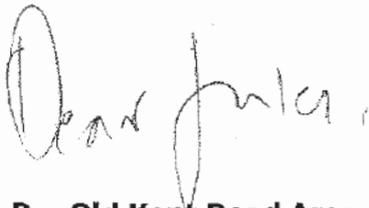
**Jules Pipe, Deputy Mayor for Planning,  
Regeneration & Skills  
Greater London Authority  
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**Councillor Peter John, OBE  
Leader of the Council**  
Labour Member for Champion Hill Ward  
Cabinet Suite, Chief Executive's Department  
peter.john@southwark.gov.uk

Tel: 020 7525 7158

**3<sup>rd</sup> September, 2018**

**Ref: Cllr PJ/H9211/jcm**



**Re: Old Kent Road Area Action Plan and Bakerloo Line Extension**

Thank you for your letter of 28.6.18 and for the follow up meeting on 16.7.18 which was held in a very positive and collaborative spirit and which I hope has given us an agreement on the direction of travel of both the AAP and the referred applications that are currently coming forward in Old Kent Road.

We both clearly share an aspiration to deliver considerable growth of the highest quality that should benefit the residents of Southwark through the provision of jobs and homes and create the confidence to enable the Bakerloo Line Extension (BLE) to be delivered. That confidence in the project, from our own residents and from the development community is key to delivering an infrastructure project that has a London wide significance, connecting 10 Opportunity Areas which in total have the potential to deliver over 100,000 homes and 130,000 jobs, with up to 20,000 homes and 10,000 jobs being delivered within the Old Kent Road Opportunity Area. It is also vitally important that we collectively make the case to government that only the delivery of the BLE will unlock the areas full potential, and that without it housing delivery would be limited to 9,500 homes rather than 20,000. This point will be emphasised strongly in the redrafted AAP. Our key points of agreement in the meeting were as follows.

Phasing. We agreed to a two phase development, the first comprising 9,500 homes that could be supported by enhancements to the existing public transport network in advance of the delivery of the BLE. The sites in the first phase have been agreed in subsequent meetings between our officers and are set out in the attached phasing plan. These first phase sites will be subject to standard 3 year consents and should enable place making to begin in advance of the BLE's completion. The second phase schemes would be subject to a Grampian agreement within the s106 that would have a three way sign off between the GLA/TfL and LB Southwark. These Grampians would fall away on the signing of the contract for the construction of the BLE (anticipated to be 2021-22). In order to encourage investment in the development of second phase schemes planning permissions would be granted for 6 year or longer periods. There

would be an annual review of both the grant of planning permissions and the implementation of schemes to confirm progress. If schemes from phase 1 had not been implemented and their consents lapsed there would be an opportunity to review the order in which development comes forward and phase 2 schemes may at that point be moved to phase 1. This would give the phasing some flexibility and robustness and would only be done with your agreement. The second phase comprises primarily larger sites in the ownership of pension and investment funds. Most of the sites have leases with current occupiers that last until the mid 2020's. We have discussed with both the freeholders and current commercial occupiers the approach outlined above and all parties have been generally receptive. As agreed my officers will incorporate the phasing plans and a description of the phasing mechanism and how that applies to individual site allocations in a further revision to the draft AAP to ensure it is given maximum planning weight to defend against challenge and to support the BLE business case. I would suggest that we start to calculate progress towards the delivery of the first phase from the date of this letter.

As discussed at the meeting we share your commitment to achieving the highest quality of place making and we consider that the proposed phasing would achieve that aim by initially concentrating the majority of development along the Old Kent Road frontage and close to the new BLE stations, (and in the case of Hatcham Road the existing South Bermondsey station) thereby helping to establish the two new town centre designations. Development will also come forward along the western alignment of the linear park delivering a key strategic open space connection to Burgess Park. Our view is that the phasing set out is robust enough to withstand challenge at the Examination In Public (EIP) should they be made, because it is based on both deliverability (related to lease arrangements) and sound place making principles.

Phase	Description	Planning consent given	Build out	Units
1	Pre BLE TWAO Approval 3 year consents	2018-2023	2019-2028	9,500
2	Post BLE TWAO Approval 6 year (or more) consents with Grampian conditions	2023-2027	2024-2036	10,500
			<b>Total</b>	<b>20,000</b>

Land Use. We agreed that the land between Ossory Road and the Glengall Road business park would become a Local Significant Industrial Site (LSIS) and that additional Strategic Industrial Land (SIL) sites would be designated at Admiral Hyson and Jamaica Road (see the attached plan). The central portion of SIL at Hatcham Road would be re-designated as LSIS and its northern and southern arms along Ilderton Road de-designated from SIL. Mandela Way would retain its LSIS designation. As you set out in the meeting this would give both authorities a stronger negotiating position to secure our aspirations for an innovative mix of commercial and industrial uses with a new residential community. It would be our intention to generally conform with the aspirations of the draft New London Plans LSIS policy approach which seeks to increase or have at least no net loss of industrial capacity when intensification of SIL and LSIS takes place. This is already set out in policy AAP6 of the draft AAP. In addition we would be happy to further stress in the text for the Mandela Way and Hatcham LSIS sub area masterplans the importance of the intensification of last mile distribution and industrial uses for both Southwark's and London's economies.

We will also set out in the AAP that new B class floorspace within schemes that would result in the loss of existing B1c, B2 or B8 accommodation will generally be designed to B1c specifications to maximise employment potential. My officers and yours are already applying this approach through the pre-application and planning application process, most recently with the Ruby Triangle scheme.

It would also be the intention of the AAP to secure the delivery of other aspects of the New London Plan policies including the provision of open space and social infrastructure to support this intensification and deliver good growth. This is demonstrated in our proposals for new parks in Mandela Way, on the gas works site and along the old Surrey Canal alignment, which would all contribute to the Mayor's manifesto commitment to make London at least 50% green by 2050; as well as through the provision of a new secondary school on Sandgate Street and primary schools on Mandela Way and in the Cantium sub area. On this basis the GLA would confirm its support for the plan lead mixed use intensification illustrated in the masterplans and built typologies in the draft AAP sub area plans for Mandela Way and Hatcham-Ilderton.

On Admiral Hyson we feel that this could operate well as SIL (it was SIL until 2007 when it was de-designated and currently has no land use allocation but has continued in use as an industrial estate). It is entirely self contained, is 100% let, and is occupied by a number of arts distribution and storage companies that are clustered in the area (albeit the leases are expiring in 2019). We do need to manage SILs intensification and also the impacts from vehicle pollution and movements, (our draft plan promotes the use of electric commercial vehicles) but feel that in a context of your draft New London Plan policy direction it would be best to re-designate this site as SIL.

As requested the summary table of the land use changes based on this agreed position is set out below.

<b>Sites</b>	<b>Area (ha)</b>
Current SIL (strategic)	64.1
Current LSIS (local)	18.8
<b>Total existing SIL and LSIS</b>	<b>82.9</b>
Proposed retained SIL in Southwark	26.72
New SIL proposed – Admiral Hyson (contained in NSP/AAP) and Old Jamaica Road (potential new site)	2.36
<b>Total SIL proposed</b>	<b>29.08</b>
LSIS - Mandela Way, west of Ossory Road and Hatcham/Ilderton	19.71
<b>Total SIL + LSIS</b>	<b>48.79</b>
Potential additional SIL in Lewisham (joint study on dive-under site)	3-4ha

Intensifying existing and proposed SIL sites. The Council is committed to intensifying industrial uses on existing and proposed SIL sites. We are currently leading by example by developing a multi story depot proposal over our car park sites at the Waste Transfer Station. We have commissioned work jointly with Lewisham and Network Rail which is proposing multi story industrial uses on the dive under site, managing industrial land strategically with our neighbours rather than just locally. As agreed in the meeting we will expand the section in our AAP that encourages intensification, by providing best examples of how that might be achieved on the retained SIL land including the privately owned SIL sites such as those on Ormside Street. The

written policy in that section of the AAP (page 148 ) is taken directly from the draft New London Plan, but I would be happy to supplement that further in discussion with your officers.

In addition the Council is committed to a retention and relocation strategy for existing industrial occupiers through its business network, which we will develop further. We are currently actively looking for opportunities to match businesses that need relocating with sites they can move to.

In addition the Council is in the process of purchasing significant additional land holdings in Old Kent Road to help enable and deliver this relocation strategy.

Design Review. We agreed that the Council would engage with the Mayor's design advocates to explore in more detail the mixed use and place making proposed in the AAP masterplans. My officers have now met with yours and agreed a programme to take this forward.

Town Centre Designation and place making. We agreed that Old Kent Road would comprise two District Town Centres based around the two southerly tube stations in Old Kent Road. (The Council of course continues to maintain that there should be a third tube at Bricklayers Arms). Broadly these town centres would be focused around the existing Tesco to the north and the Cantium/Toys R Us sites to the south. Indicative plans showing their broad location were provided by GLA officers at our meeting and it was agreed that further drafts would be exchanged and agreed by officers for their inclusion in a revised AAP which will also depict and emphasise our shared "High Street" objectives. We consider that Lidl and Asda should be included within the town centre designations, given their importance to the retail function of the area, the number of people they employ and the important function they play in providing access to affordable food for deprived communities. We would like to see the use of the sites intensified in line with draft New London Plan, New Southwark Plan and AAP policy and consider that having them within the District Centres would help us achieve that aim, whilst demonstrating to the local community our support for their continued operation.

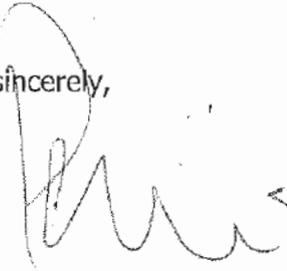
Since our meeting my officers and TfL/GLA officers have been holding further joint meetings on the proposed station sites at Tesco and Toys r Us with landowners/developers and these have been extremely useful and productive for all parties. In addition discussions are also ongoing in respect of bus, cycle and public realm contributions with a shared aim of producing a transparent, consistent and clear framework for delivering public transport and public realm enhancements in advance of the BLE. Your team's positive engagement in these discussions has been very helpful.

On the basis of the above agreed positions on phasing, land use, intensification, design review and town centre designations we agreed that GLA would issue updates to Stage 1 reports as necessary and would also update its comments on the draft AAP on the general conformity issues raised in your letter of 31 May 2018.

I believe this covers the substantive points and will provide a firm basis for a common public authority position going forward, which is essential to engendering a clear sense of direction and confidence in a project which is critical to meeting London's needs for growth as set out in the Mayors NLP.

Once again can I thank you and your officers for their positive and constructive engagement. At a time when London faces so many challenges not least a significant housing crises, the on going erosion of local government finance and the national level the threat from Brexit, it is more than ever critical that local government provides strong and effective leadership for London and Londoners.

Yours sincerely,



**Councillor Peter John, OBE  
LEADER OF THE COUNCIL**

**Enclosures**

**Copies to:**

Cllr Johnson Situ, Southwark  
Prof Kevin Fenton, Southwark  
Simon Bevan, Southwark  
Steve Platts, Southwark  
Colin Wilson, Southwark  
Juliette Seymour, Southwark  
Sally Crew, Southwark  
Kim Hooper, Southwark  
Lucy Owens, GLA  
Juliemma Mccloughlin, GLA  
Lyndon Fothergill, GLA  
Darren Richards, GLA  
Gerard Burgess, GLA  
Alex Williams, TfL  
Lucinda Turner, TfL  
Chris Porter, TfL  
Tim Thomas, TfL

## Appendix 2 – Proposed changes to Ossory Road highway layout



Figure 2: Location of linear park within redevelopment area shows a plan of the area with the proposed linear park and several existing features highlighted.

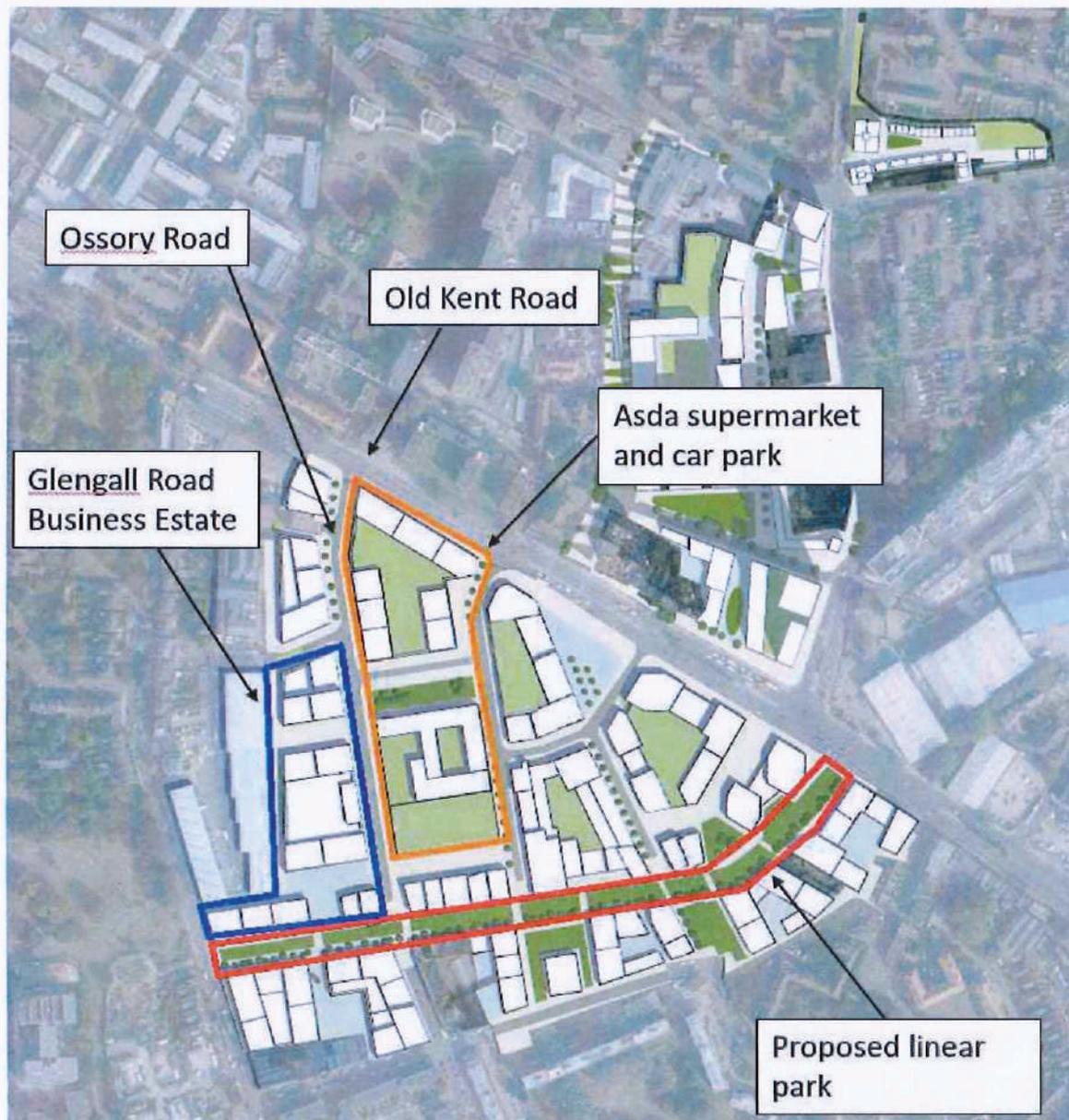


Figure 2: Location of linear park within redevelopment area

## 1. REQUIREMENTS AND METHODOLOGY

The main design criteria include:

1. Redesign the layout of Ossory Road, including changes to parking/loading arrangements to make the road more pedestrian-friendly.
2. Ensure changes to the road continue to work for business deliveries and visitors.
3. Determining where best to link Ossory Road to the linear park, given the topography.

A design drawing is enclosed with this summary note. A summary of how the above items were factored into the design follows.

### 1.1 Ossory Road Layout

Ossory Road is a dead-end, with no through road to Bianca Road to the south. There are areas of double yellow lines at the entrances to the estate, however the rest of the road is unmarked, allowing for unrestricted parking or loading.

The current road layout is as follows:

#### **Between junction with Old Kent Road and property no.2**

- 5m wide western footway
- 9m carriageway
- 2.4m wide eastern footway

#### **Between property no.2 and no.22**

- 2.5m wide western footway
- 9m carriageway
- 2.4m wide eastern footway

#### **Between property no.24 and Olmar Street**

- 2m wide western footway
- 8m wide carriageway
- 2.4m wide eastern footway

Given the primary aim is to transform Ossory Road into a more pedestrian-friendly street, it is recommended to remove several areas of parking/loading. It is recommended to maintain parking/loading towards the north of Ossory Road and remove parking/loading closer to the south, in order to generate the feeling of transition between a heavily urbanised area like Old Kent Road and the proposed linear park. Furthermore, there are some residential units already in place towards the northern end of Ossory Road (properties 2-10), with more to be introduced as

part of the redevelopment. While it is anticipated that future residents will not be granted CPZ parking permits, it nonetheless makes sense to maintain some parking closer to the residential units for visitors.

In addition, it is recommended to widen the footway where parking/loading is being maintained to facilitate footway level parking/loading. All parking that is being retained on Ossory Road should be either pay and display (P&D), or shared use residential/P&D. This will prevent commuters from parking here all day, then using the Underground to travel into Central London and will provide some car parking space for those visiting the area – while residents may not be granted parking permits, it will be necessary to provide some parking for visitors or courier deliveries. It should be noted that Ossory Road falls within Controlled Parking Zone (CPZ) T, with hours of operation being Monday to Friday, 8:30am to 6:30pm.

In addition to parking, it is recommended to install two loading bays – three in total – to serve the new developments in the northern portion of the road.

Widening the footway will result in a narrower carriageway, but given the existing carriageway is between 8 and 9m wide, there is adequate space to do so. Thus, where parking/loading is to be retained (on the west side of the road, between property no.22 and the junction with Old Kent Road), it is recommended to widen the footway by 3m, giving a total footway width on this side of 5.5m between properties no.2 and 22, and 8m between property no.2 and the junction with Old Kent Road. 2m of this width can be used as parking/loading as and when required, and when not being used for these purposes, can be used as extra footway. Three extra trees are recommended for this section at intervals of 15-20m, allowing for three or four vehicles between trees. Finally, alongside the widening of the western footway in the north section of Ossory Road it is also recommended to widen the eastern footway by 1m, bringing the total width to 3.4m. This gives pedestrians on this side some extra space, which is important given the proximity to nearby bus stops on Old Kent Road.

Existing parking outside properties no. 24 – 50, along with all parking on the east side of Ossory Road, is to be removed. The footway on the east side of the road, outside properties no. 43 – 47, is to be widened by 2m, bringing the footway width to 4.4m. One further tree (in addition to the five existing trees) is proposed here to further enhance the public realm. In addition to this, the western footway at this location should be marginally widened by 1m to 3m; the existing width of 2m is very narrow.

Footways are widened in this staggered arrangement in order to maximise the available space for pedestrians. If both footways were widened equally, there would

not be enough space to provide wide enough footways with the additional parking/loading. Furthermore, the staggered arrangement will force vehicles to slow down when negotiating the bend, ensuring vehicle speeds are kept low.

The carriageway is to be narrowed to 5m wide throughout Ossory Road, allowing for 2.5m of carriageway in each direction. This has been deemed acceptable by Manual for Streets for a very low traffic road such as this; it is unlikely that two large vehicles will ever be using this road in different directions at any given time. Southwark Streetscape Design Manual advocates a minimum footway width of 2.4m, which is satisfied by this design.

In summary, Ossory Road's new layout will be as follows:

**Between junction with Old Kent Road and property no.2**

- 8m wide western footway (with 2m available for parking/loading)
- 5m carriageway
- 3.4m wide eastern footway

**Between property no.2 and no.22**

- 5.5m wide western footway (with 2m available for parking/loading)
- 5m carriageway
- 3.4m wide eastern footway

**Between property no.24 and Olmar Street**

- 3m wide western footway
- 5m wide carriageway
- 4.4m wide eastern footway

Olmar Street will remain as it is; an area for vehicles to turn around, with double yellow lines preventing parking.

## **1.2 Linking Ossory Road to Linear Park**

The proposed linear park is situated at a higher elevation than Ossory Road, necessitating a ramp of sorts to link the two. It is proposed that this ramp mimics the parallel Glengall Road, which has a gentle gradient. Furthermore, this area should be a fully pedestrianised area, with no access permitted for motorised traffic.

Properties 80-86, situated in between Ossory Road and the proposed linear park, are also part of the redevelopment. Plans currently state these properties will have their building line extended outwards. This will need to be taken into account when ramping up to the proposed linear park.

There is an electrical substation towards the south of the site which will require relocation in order to link Ossory Road to the linear park.

### 1.3 Short Term Vision

In the short term, the immediate focus should be on changing the way Ossory Road is used. For this, it will be necessary to prioritise the proposed removal of parking. This will prevent drivers from entering Ossory Road with the desire of free, unrestricted parking as is currently the case. Doing this will necessitate widening the footways and realigning kerbs as outlined in the design drawing, along with introducing the proposed footway level parking/loading section to the north of Ossory Road.

The proposed new trees can be implemented once the kerb works are done. Cycle parking can also be introduced once an idea of the numbers of cyclists expected to be using this route is gained, ensuring appropriate levels of cycle parking are provided.

The extra footway space will create the opportunity for sustainable drainage and planting locations to improve air quality. In addition, benches (such as outside a possible school) and other street furniture can be provided on the areas of widened footway to ensure the area is more inviting to pedestrians.

It will be necessary, for the immediate future, to maintain access to Asda for 7.5t articulated vehicles via Ossory Road as per the current arrangement.

### 1.4 Long Term Vision

Linking Ossory Road to the proposed linear park could prove challenging due to the topography of the area. The existing building line could pose an issue if this is retained, as it would be difficult to ramp up to the linear park starting right outside the entrance. However, if the new development's building line is further back, this will be made easier.

There is a possibility that a school may come to the area, but this is dependent on many factors.

Also, it is likely that a new Bakerloo line station will be introduced within the vicinity of Ossory Road, as part of the proposed Bakerloo line extension which will have a significant impact on the area.





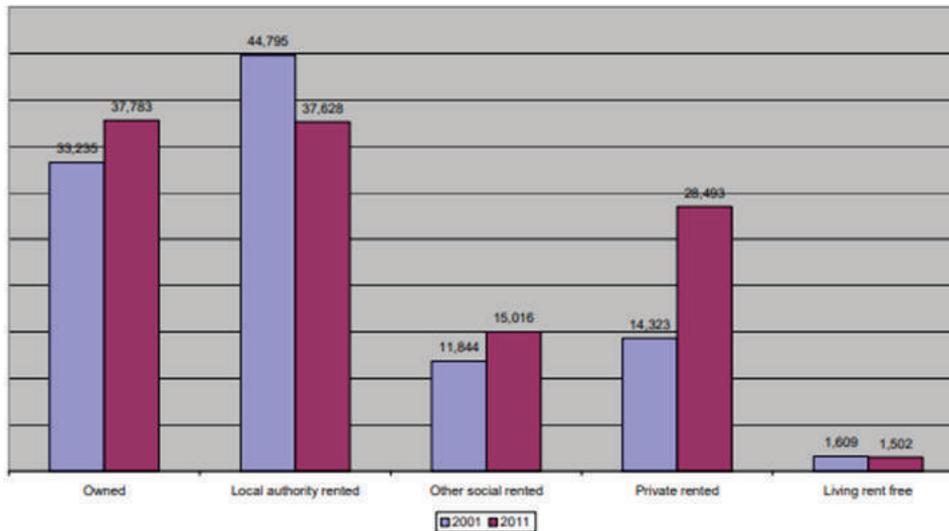
## Appendix 3 – Southwark Key Housing Data Report 2015/2016

Table 2.01c Overview of tenure by number of households and as percentage of all households:

Housing tenure	2001	2001	2011	2011
Owned	33,235	31.4	37,783	31.4
Local authority rented	44,795	42.3	37,628	31.2
Other social rented	11,844	11.2	15,016	12.5
Private rented	14,323	13.5	28,493	23.7
Living rent free	1,609	1.5	1,502	1.2
Total households	105,806	100	120,422	100

Source: Census 2001 and 2011

Table 2.01d The changing tenure profile of Southwark between 2001 and 2011 (households)



Source: Census 2001 and 2011

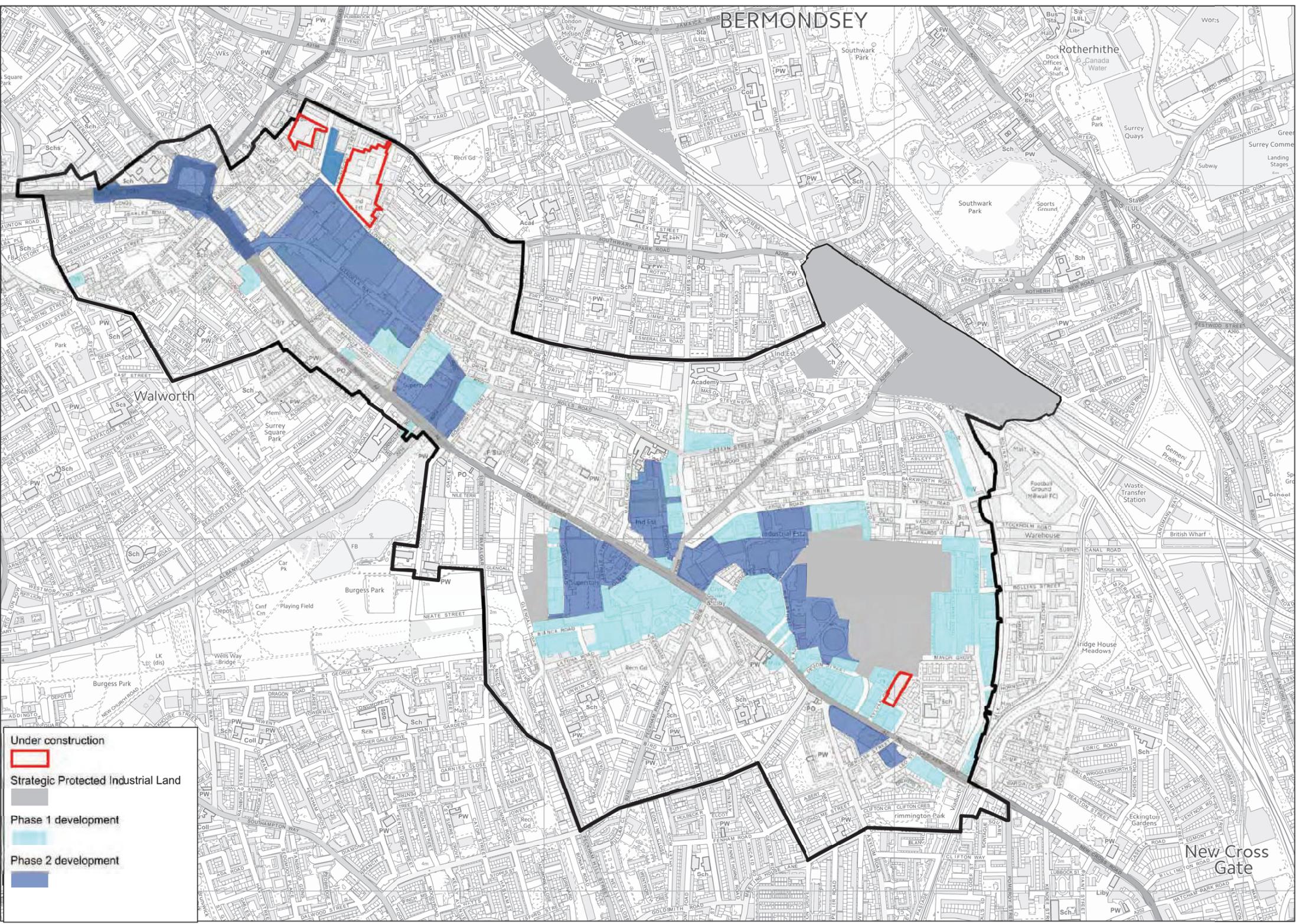
Table 2.01e Age and Housing tenure

Age (HRP)	Owned or shared ownership	Rented from council (Local Authority)	Other social rented	Private rented or living rent free	All tenures
Age 24 and under	1.5%	4.3%	4.3%	12.0%	5.3%
Age 25 to 34	19.5%	14.2%	16.7%	46.9%	24.3%
Age 35 to 49	40.8%	35.1%	39.6%	30.1%	36.2%
Age 50 to 64	24.4%	26.3%	25.2%	7.5%	20.9%
Age 65 to 74	7.1%	9.9%	7.4%	1.8%	6.7%
Age 75 to 84	4.9%	7.3%	4.8%	1.1%	4.7%
Age 85 and over	1.7%	3.0%	2.1%	0.6%	1.9%
All ages	31.4%	31.2%	12.5%	24.9%	100%

Source: Census 2011

## Appendix 4 – OKR Phasing Maps

# BERMONDSEY



**Under construction**  


**Strategic Protected Industrial Land**  


**Phase 1 development**  


**Phase 2 development**  


New Cross Gate

## Appendix 5 – OKR SIL Release Plan