

Item No. 9.	Classification: Open	Date: 25 May 2016	Meeting Name: Planning Committee
Report title:		Article 4 Directions to withdraw the permitted development rights granted by Schedule 2, Part 3, Class M, Schedule 2, Part 3, Class O, Schedule 2, Part 3, Class P and Schedule 2, Part 3, Class PA of the Town and Country Planning (General Permitted Development) Order 2015 (as amended)	
Ward(s) or groups affected:		All	
From:		Director of Planning	

RECOMMENDATIONS

That the Planning Committee:

1. Approves three immediate Article 4 Directions (Appendix A) to withdraw the permitted development rights granted by Schedule 2, Part 3, Class M, Schedule 2, Part 3, Class O and Schedule 2 Part 3, Class P of the Town and Country Planning (General Permitted Development) Order 2015 (as amended) for changes of use from shops (Class A1), financial and professional services (Class A2), betting offices, pay day loan shops or launderettes (Sui Generis use), offices (Class B1a), or storage and distribution (Class B8) to a dwellinghouse (Class C3) in any railway arches in Southwark (Appendix B).
2. Approves one non-immediate Article 4 Direction (Appendix A) to withdraw the permitted development rights granted by Schedule 2, Part 3, Class PA of the Town and Country Planning (General Permitted Development) Order 2015 for changes of use from light industrial (Class B1c) to a dwellinghouse in any railway arches in Southwark (Appendix B). The direction will allow more than 12 months notice prior to the date when Class PA will come into effect (1 October 2017).
3. Notes the equalities analysis of the proposed Article 4 Directions (Appendix C).

BACKGROUND INFORMATION

4. There are over 800 railway arches in Southwark, which are located on key connecting railway routes which extend across the river from Blackfriars Bridge southwards through Elephant and Castle and Camberwell, across Cannon Street Railway Bridge through London Bridge station, and southwards to Bermondsey. Additional arches are located around routes east-west from London Bridge station towards Waterloo and around Herne Hill and Peckham town centres. The extent of railway arches in Southwark is shown on the maps at Appendix B.
5. Most of the railway arches are located on land owned and managed by Network Rail. Many arches have been redeveloped and provide a variety of new uses from light industrial units, warehousing and storage, office space, retail units, food manufacturing or breweries. The emerging New Southwark Plan proposed policy DM25 seeks to

encourage the use of railway arches for business (B Use Classes), retail (A Use Classes) or community facilities (D Use Classes).

6. The general permitted development order (2015) consolidated permitted development rights for England and introduced new provisions. A number of these provisions include changes of use to dwellinghouses without the need for a full planning application. Some railway arches in use as offices, storage or distribution units, retail units or betting shops would therefore be permitted to change to residential units under these provisions. The GDPO was amended in 2016 with some new provisions and amendments to permitted development coming into force on 6 April 2016, including the addition of launderettes within Class M. The provision for light industrial change of use to dwellings will come into force on 1 October 2017.
7. The council is aware of recent interest in converting arches to residential dwellings. There are a number of concerns with regard to creating residential units in railway arches which should be subject to a robust analysis in determining whether such a use would be acceptable. Converting railway arches to dwellings could result in negative impacts on residential amenity through restricted access to outdoor space, restricted access to natural light and fresh air, exposure to excessive noise and vibration from the railway, safety concerns and incompatibility with surrounding uses. It is therefore considered appropriate to implement immediate Article 4 Directions to remove certain permitted development rights which relate to changes of use of railway arches.

Article 4 directions

8. An Article 4 Direction can be used to remove specific permitted development rights in all or parts of the local authority's area. It would not restrict development altogether, but instead ensure that development requires planning permission. A planning application for the proposal would need to be submitted that would then be determined in accordance with the development plan.
9. Article 4 Directions must apply to all uses within the relevant use class and it cannot restrict changes within the same use class.
10. The government's on-line national planning practice guidance (NPPG entitled "When is permission required?") sets out guidance on the use of Article 4 Directions. The NPPG states that an Article 4 Direction to remove national permitted development rights should be limited to situations where this is necessary to protect local amenity or the wellbeing of the area. It also states that in deciding whether an Article 4 Direction would be appropriate, local planning authorities should identify clearly the potential harm that the direction is intended to address (paragraph 038).
11. Article 4 Directions can either be immediate or non-immediate depending upon when notice is given of the date on which they come into force. Immediate directions can be made where the development presents an immediate threat to local amenity or prejudices the proper planning of an area (NPPG paragraph 045). In the case of this report, the council is proposing to make three immediate Article 4 Directions for which the process is as follows:
 - Stage 1 (the current stage) - the council makes an Article 4 Direction withdrawing permitted development rights with immediate effect.

- Stage 2 – Publication/Consultation stage. The council:
 1. publishes the notice of direction in a local newspaper
 2. formally consults with general members of the public and the owners and occupiers of every part of the land within the area or site to which the Direction relates over a period of 21 days
 3. and places notices up on site for 6 weeks.
- Stage 3 – On the same day that notice is given under Stage 2 above, the council refers its decision to the Secretary of State who has wide powers to modify or cancel a Direction.
- Stage 4 – Confirmation Stage - the Direction comes into force on the date on which the notice is served on the owners/occupiers of the land. The council has between 28 days from the date of when the notice comes into effect and 6 months to decide whether to go ahead and confirm the Direction, taking into account any representations which have been received. If this does not happen within 6 months, the Direction will lapse.

12. The process for confirming a non-immediate Article 4 Direction is as follows:

- Stage 1 (the current stage) - the council decides whether to go ahead and introduce a Direction setting a date in the Notice for when the Direction will come into force which must be at least 28 days and no more than 2 years after representations can first be made, which is usually after the last publication/service date.
- Stage 2 – Publication / Consultation stage. The council:
 1. publishes the notice of direction in a local newspaper
 2. formally consults with general members of the public and the owners and occupiers of every part of the land within the area or site to which the Direction relates over a period of at least 21 days
 3. and places notices up on site for 6 weeks.
- Stage 3 – On the same day that notice is given under Stage 2 above, the council refers its decision to the Secretary of State who has wide powers to modify or cancel a Direction.
- Stage 4 – Confirmation Stage - the council cannot confirm the Direction until after a period of at least 28 days from publication/service of the Notice. Once a Direction has been confirmed, the council must give notice of the confirmation in the same way as it gave notice of the initial direction, and must specify the date that the direction comes into force. A copy of the direction as confirmed must also be sent to the Secretary of State.

Compensation

13. In some circumstances the council can be liable to compensate developers or landowners whose developments are affected by Article 4 Directions. Local planning authorities are liable to pay compensation to landowners who would have been able to

develop under the permitted development rights that an Article 4 Direction withdraws, if they:

- Refuse planning permission for development which would have been permitted development if it were not for an Article 4 Direction, or
 - Grant planning permission subject to more limiting conditions than the GPDO would normally allow, as a result of an Article 4 Direction being in place.
14. Compensation may also be claimed for abortive expenditure or other loss or damage directly attributable to the withdrawal of permitted development rights. 'Abortive expenditure' includes works carried out under the permitted development rights before they were removed, as well as the preparation of plans for the purposes of any work.
15. Loss or damage directly attributable to the withdrawal of permitted development rights would include the depreciation in the value of land or a building(s), when its value with the permitted development right is compared to its value without the right.
16. However, the compensation arrangements differ for cases where a development order in respect of prescribed development is being withdrawn. The definition of prescribed development can be found in regulation 2 of the Town and Country Planning (Compensation) (England) Regulations 2015 (as amended). In cases such as these compensation is not payable if the following procedure is followed, as set out in section 108 of the Town and Country Planning Act:
- The planning permission withdrawn is of a prescribed description as set out in the Town and Country Planning (Compensation) Regulations 2015 (as amended).
 - The permitted development right is withdrawn in the prescribed manner.
 - Notice of withdrawal is given in the prescribed manner:
 - Not less than 12 months before it takes effect
 - Not more than the prescribed period of two years.
17. Permitted development rights granted by Schedule 2, Part 3, Classes M, O, P and PA are prescribed development, which means that compensation will only be payable for 12 months from the date that the immediate Direction comes into force. If more than 12 months notice of the withdrawal were given no compensation would be payable (in the case of the Class PA non-immediate Direction).

Planning applications

18. If permitted development rights are withdrawn and planning permission is required, the council would be obliged to determine the proposal in accordance with the development plan unless material considerations indicate otherwise. In Southwark's case, the development plan includes the London Plan, the Core Strategy, saved policies in the Southwark Plan and adopted area action plans. The relevant saved policies relating to change of use in the Southwark Plan are policy 1.2 (Strategic and Local Preferred Industrial Locations) where the railway arch is located within a designated industrial area, policies 1.7 and 1.10 relating to retail uses and policy 1.4 where the railway arch has an established B use class.

19. Notwithstanding any change of use which may occur, the main reasons for the Article 4 Directions are in relation to residential amenity for future occupiers and the quality of residential accommodation. The relevant policies that would therefore apply would be saved Southwark Plan policies 3.2 (protection of amenity) policy 3.12 (quality in design), policy 4.2 (quality of residential accommodation). The council's Residential Design Standards SPD (2015) also contains a wealth of guidance relating to the quality of residential accommodation which would be applicable in the determination of planning applications for dwellinghouses in railway arches. Many other policies would also apply relating to energy efficiency in design, conservation of the historic environment and transport impacts.
20. It should be noted that where submission of a planning application is required as a result of withdrawal of permitted development rights through an Article 4 Direction, the council cannot charge a planning application fee.

KEY ISSUES FOR CONSIDERATION

21. As is noted above, the NPPF advises that the use of Article 4 Directions to remove national permitted development rights should be limited to situations where it is necessary to protect local amenity or the wellbeing of the area. This is reiterated in the NPPG which also states local planning authorities should identify clearly the potential harm that the direction is intended to address and that immediate directions can be made where the development presents an immediate threat to local amenity or prejudices the proper planning of an area.
22. There are five relevant classes within Schedule 2, Part 3 of the GPDO which allow changes of use to dwellinghouses subject to prior approval which could all apply to railway arches. Schedule 2, Part 3, Class N relates to two sui generis uses; casinos and amusement centres which would be permitted to change use to residential. It is not proposed to implement an Article 4 Direction relating to Class N as this is unlikely to affect Southwark. New proposals for such development would require planning permission and would not be eligible for permitted development in the future due to the restrictions on Class N. The 2016 amendment to the GPDO introduced a new provision (Class PA) to change the use of light industrial units to dwellings; however this will not come into force until 1 October 2017. It is considered this will also impact on railway arches for the same reasons and therefore a non-immediate Article 4 Direction is appropriate.
23. Schedule 2, Part 3, Classes M, O, P and PA of the GPDO requires prior approval from the local authority for a determination of the transport and highways impacts of the development, and contamination and flooding risks in relation to the building. Class O was amended in 2016 which now requires consideration of the impacts of noise from commercial premises on the intended occupiers of the development. The temporary provisions of Class O have been made permanent. Class P is a temporary provision until April 2018 and requires consideration of air quality on the intended occupiers of the development, noise impacts of the development, in addition to whether the introduction of residential uses would have an adverse impact on important industrial areas to deliver services. The latter consideration is also applicable to Class PA. Class M also requires assessment as to whether the change of use of a retail unit or launderette would have an impact on shopping/similar facilities in the area, in addition to prior approval for the design and external appearance of the building.

24. While these criteria go some way in constraining unsuitable development, it is considered that the local authority would need to consistently assess these criteria in detail for the redevelopment of railway arches. Many railway arches in Southwark are located in commercial areas or located adjacent to busy roads, and noise mitigation for future occupiers would always be a priority concern for above passing trains. Furthermore there is no opportunity to consider whether railway arches would be suitable for the delivery of good quality accommodation and to protect the amenity and safety of future residents. The prior approval process also offers no opportunity for the local authority to impose conditions on development to protect future occupiers. For these reasons and the detailed considerations outlined below, it is considered that all proposals for changes of use to residential within railway arches should be subject to a planning application where a thorough assessment can be given to the merits of the proposal.

Implications for residential amenity

25. There are clear problems associated with residential amenity for surrounding residents and future occupiers associated with the conversion of railway arches to dwellings, with no opportunity for the council to consider these issues when determining a prior approval application. Railway arches have one principal elevation, with limited ability for the dwelling to receive an appropriate level of daylight and sunlight. Principal habitable rooms created inside the arch, such as bedrooms, may be windowless and receive no natural light, and the only windows that could be created on the principal elevation are potentially restricted by privacy issues. The lack of natural light in a dwelling could have implications for public health.
26. There will also be limited ability for new dwellings to provide any outside amenity space. Railway arches do not traditionally encompass any curtilage and land outside the railway arches would not lend itself to provide gardens or external amenity space. For these reasons it is also unlikely any external car or cycle parking or bin storage would be able to be accommodated adjacent to dwellings in railway arches. Many arches are located within goods or storage yards, distribution centres, adjacent to highway land or on land to the rear of existing development. There are a number of access and safety concerns for future occupiers of dwellings created within the arches. In many cases vehicular access to the arches is difficult, which has a negative impact for access for emergency vehicles. The arches are often located to the rear of existing development which results in an urban environment that faces away from the arches. As a result many routes to the arches are unlit, poorly integrated with existing urban development and may result in concerns of the safety of new residents.
27. Railway arches are also often located to the rear of existing residential properties, and are overlooked by gardens and back windows. There would therefore be further amenity considerations with regard to overlooking, privacy and security for both existing residents and future occupiers of railway arches.
28. The conversion of railway arches for use as residential dwellings would need a bespoke ventilation system to accommodate for the lack of windows and fresh air to the property. The prior approval process does not require assessment of the air quality impacts for new residents in relation to Classes M, O and PA (the conversion of retail, offices and light industrial). In order to safeguard future residents from poor ventilation, the council should ensure such bespoke systems are fully assessed and

a planning condition requiring their use would be essential. This is not possible to achieve through the prior approval process for permitted development.

29. One of the major concerns for residential amenity arising from permitted development rights in railway arches is the impact of noise from passing trains on occupiers of potential dwellings beneath the lines. In many areas in Southwark, multiple lines pass over the arches, particularly on the north-south routes to London Bridge station. Therefore occupiers would be subject to regular train movements overhead, posing potential significant noise and vibration issues. Trains to and from London Bridge and the surrounding routes also carry trains operating throughout the daytime, late at night and early in the morning.
30. A noise report for development within railway arches indicates that train passes would almost double the highest recommended target internal noise level for passing trains. This level is reported to still be audible but at a level that has not been found to cause disturbance to most people. However this target level is significantly higher than the guideline internal noise level for dwellings (between 30dBA at night and 35-40dBA in the daytime). Vibrations were also found to occur in all parts of the archway, most significantly occurring towards the highest part of the arch. Whilst there does exist methods of insulation and construction techniques which could reduce noise and vibration to a safer level, it is considered this would need to be of a significant quality and will be unlikely to reduce noise to guideline internal noise levels for the average dwelling. It is vital that the council assess noise mitigation techniques for proposed residential conversions in railway arches in order to determine whether it would be safe for future occupiers. It is considered a full planning application would be required to assess and provide conditions for noise mitigation in all cases of conversion.

Implications for use

31. As many railway arches are located within informal industrial areas, distribution centres or yards, it is considered there would frequently be an issue of compatibility with adjoining uses. Parts of the arches to the north of Old Kent Road/Bermondsey are located within a Preferred Industrial Location (PIL) and in operation for industrial uses. The introduction of residential dwellings within working yards or industrial areas would have implications for compatibility in relation to heavy traffic movements, noise from adjoining uses, odours, pollutants and dust which are not suitable neighbouring activities for residential development. There would also be safety concerns for accessing dwellings within railway arches situated within working yards. While Schedule 2, Part 3, Class P and Class PA require assessment as to whether the introduction of residential uses would have an adverse impact on important industrial areas to deliver services, the incompatibility of uses within railway arch locations in Southwark would be a consistent concern justifying the need for individual planning applications for converting railway arches.
32. The conversion of railway arches to dwellings could also pose a domestic fire risk. This would be a significant risk to the rail network above which could result in damage to railway infrastructure, unprecedented train delays and potential risk to railway staff and passengers.

Areas affected

33. The NPPG states that an Article 4 Direction to remove national permitted development rights should be limited to situations where this is necessary to protect local amenity or the wellbeing of the area. For the reasons outlined above it is considered necessary to remove all permitted development rights relating to conversion to residential in Southwark's railway arches. Within the Central Activity Zone (CAZ), there are already exemptions relating to Schedule 2, Part 3, Class O (conversion of offices to residential) which would also apply to railway arches. However this exemption will not be extended after 2019 and the council will need to implement a further Article 4 Direction to continue to restrict the conversion of offices to dwellings. It is therefore not considered that railway arches in the CAZ should be excluded from the proposed Article 4 Direction relating to Class O development.

Conclusions

34. An Article 4 Direction can be made if the council is satisfied that it is expedient that development should not be carried out unless planning permission is granted on application and that in the case of immediate directions, development presents an immediate threat to local amenity or prejudices the proper planning of an area. The council is aware of recent interest in converting arches to residential dwellings and immediate Article 4 Directions are considered appropriate.
35. The use of an Article 4 Direction would not restrict development altogether, but instead ensure that development requires planning permission. It is recognised that converting railway arches is an efficient use of space and is a creative way to accommodate small businesses, shops and community facilities which can add character to an area. However there are a number of concerns relating to the suitability of railway arches for residential use, which should be subject to a full planning application and assessment by the local authority. The specific nature, purpose and location of railway arches differs from conventional office, retail and light industrial units which would not lend itself to conversion to residential dwellings without unique circumstances and innovative design.
36. The council is satisfied that permitted development rights granted by Schedule 2, Part 3, Classes M, O, P and PA would present a significant risk to the provision of good quality residential accommodation in relation to dwellings within railway arches and would be incompatible with surrounding uses and consequently prejudice the proper planning of the borough. This presents an immediate threat to the residential amenity of future occupiers and the compatibility of uses in railway arch locations.

Consultation

37. Consultation on the Article 4 Directions will comply with provisions set out in the GPDO. Notice of the Directions will be made by:
 - Local advertisement in the press.
 - Site notices placed in visible locations along the stretches of railway arches shown in the accompanying maps for a period of at least 6 weeks.
 - Written notification sent to every owner/occupier of railway arches, specifying a period of at least 21 days in which representations can be made.

38. Following consultation and within 6 months, a report recommending whether the Direction should be confirmed will be reported back to Planning Committee.

Community impact statement

39. Southwark Council is striving to deliver quality homes of every kind to meet the needs of a diverse range of households and families within the borough. The council is working hard to deliver new housing with a strong commitment to the delivery of new affordable homes. The demand for housing in Southwark and across London is extremely high, and it is vital that a strong policy framework ensures new housing maintains a high quality of design of residential accommodation and protects the amenity of residents. The Article 4 Directions seek to protect the conversion of potentially unsuitable railway arches for residential occupation and is part of a longer term strategy to provide good quality residential accommodation in the borough.
40. The equalities analysis (Appendix C) has concluded that the Article 4 Directions will have a positive impact on equalities and they will assist the council in implementing its planning policy framework, which has also undergone equalities analysis.

Financial implications

41. As is noted above, should the local authority refuse planning permission for development that otherwise would have been granted by Schedule 2, Part 3, Classes M, O and P, the council's potential liability for compensation is limited to one year from the date the Direction is introduced. Any compensation may relate either to a depreciation in the value of land or buildings which results from failure to gain planning permission or to abortive expenditure. Therefore there is a risk that the proposed Directions will make the council liable to compensation claims. Because circumstances vary widely, it is not possible to gauge the magnitude of such claims. Any claim for compensation will be dealt with through the council's official complaints procedure and it is anticipated that any award would be contained within the Planning division's budget. Should this not be possible support from council reserves would be sought.
42. Any potential drawdown from council reserves for the payment of compensation claims will be subject to agreement by the relevant cabinet member, or full cabinet in the case of claims over £50,000.

SUPPLEMENTARY ADVICE FROM OTHER OFFICERS

Director of Law and Democracy

43. Planning Committee is being asked to approve the making of three immediate Article 4 Directions and one non-immediate Article 4 Direction both of which relate to "prescribed development" as defined by regulation 2 of the Town and Country Planning (Compensation) (England) Regulations 2015 (as amended) .
44. Part 3F of the council's constitution entitled "Matters reserved for decision by the Planning Committee" at paragraph 3 reserves to Planning Committee any authorisations under Article 4 of the Town and Country Planning Permitted Development Order. This, therefore, confirms that Planning Committee has authority to take the decisions being asked of it.

45. In regard to compensation matters, section 108 of the Town and Country Planning Act 1990 (as amended) specifies the circumstances under which compensation is payable for the refusal or a conditional grant of planning permission which was formerly granted by a development order or a local development order.
46. Section 107 of the 1990 Act which sets out the entitlement to compensation where planning permission has been revoked and modified is of relevance here as section 108 of the 1990 Act extends the entitlement for compensation under s107 to circumstances where planning permission granted by a development order has been withdrawn by an Article 4 Direction.
47. However, section 108 has been recently amended to deal with those circumstances where permission granted under a development order has been withdrawn for development of a 'prescribed description' which is defined in regulation 2 of the Town and Country Planning (Compensation) (England) Regulations 2015 (as amended). The effect of these new provisions is to limit the circumstances where compensation is payable for "prescribed description" development. In cases where notice of the withdrawal of the permitted development rights was published at least 12 months before the direction took effect NO compensation will be payable, even if the claim was made within 12 months of the direction coming into effect.
48. Therefore, in regard to the non-immediate Article 4 Direction relating to the withdrawal of permitted development right under Schedule 2 Part 3 Class PA, compensation would not be payable because the council is giving advance notice of between 12 months and 24 months of the withdrawal ahead of the Article 4 Direction taking effect.
49. However, in regard to the immediate Article 4 Directions withdrawing rights granted under Schedule 2 Part 3 Class M, Class O and Class P as they fall within the definition of a 'prescribed description' development and because they are immediate directions (the council is not giving more than 12 months notice of the making of the direction) then the council will need to pay compensation for claims made within 12 months of the date of the direction.
50. The value of the claim for compensation would differ in each individual case but in the event that claims are between £5,000 and £50,000 then they would be sanctioned by the relevant cabinet member under Part 3D paragraph 5 of the Constitution. Any compensation claims over that amount would require the approval of full Cabinet.

Human rights and equalities

51. Section 6 of the Human Rights Act 1998 prohibits public authorities from acting in a way which is incompatible with the European Convention on Human Rights (ECHR). Various Convention rights may be engaged in the process of making and considering these Article 4 Directions, including under Article 1 of the First Protocol (Protection of property) and Article 8 (Right to respect for a private and family life). The European Court has recognised that "regard must be had to the fair balance that has to be struck between the competing interests of the individual and of the community as a whole". Both public and private interests are to be taken into account in the exercise of the council's powers and duties as a local planning authority. Any interference with a Convention Right must be necessary and proportionate.

52. The council has carefully considered the balance to be struck between individual rights and the wider public interest. The rights of those affected by the proposed Article 4 Directions have been considered under the Human Rights Act 1998 and it has been determined that none of the Articles will be triggered.
53. In consulting upon the introduction of the Article 4 Directions the council has had regard to its public sector equality duty (PSED) under s.149 of the Equality Act 2010.
54. The PSED is only one factor that needs to be considered when making a decision and may be balanced against other relevant factors. The council also took into account other relevant factors in respect of the decision, including financial resources and policy considerations. In appropriate cases, such countervailing factors may justify decisions which have an adverse impact on protected groups.
55. The council has given consideration to all the protected characteristics in the Equality Act 2010 to ensure that any potential impacts of the proposed immediate Article 4 Directions and the non-immediate Direction on these groups of people have been considered and where possible mitigated (Appendix C).

Strategic Director of Finance and Governance

56. This report is requesting planning committee to approve three immediate Article 4 Directions (Appendix A) and one non-immediate Article 4 directions to withdraw the permitted development rights as part of the regulation 2 of the Town and Country Planning (Compensation) (England) Regulations 2015 (as amended), as detailed in the recommendations. Full details and background are contained within the main body of the report.
57. The strategic director of finance and governance notes the legal comment that while no compensation would be payable to the non immediate Article 4 directions to withdraw permitted development rights, there is a risk of compensation claims on the immediate removal of Article 4 directions.
58. It is noted that it is not possible to gauge the magnitude of such claims and any claim for compensation will be dealt through the council's official complaints procedure and sanctioned by the relevant cabinet member under the council's constitution as reflected in the report. It is also noted that any agreed claims for compensation would be contained within the existing departmental revenue budgets where possible before funding from councils reserves are requested.
59. Staffing and any other costs connected with this recommendation to be contained within existing departmental revenue budgets.

BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
Saved Southwark Plan 2007	http://www.southwark.gov.uk/info/856/planning_policy/1241/the_southwark_plan	planningpolicy@southwark.gov.uk
The Core Strategy 2011	http://www.southwark.gov.uk/info/200210/core_strategy	planningpolicy@southwark.gov.uk
Residential Standards SPD 2015	http://www.southwark.gov.uk/downloads/download/2257/residential_design_standards_spd	planningpolicy@southwark.gov.uk
General Permitted Development Order 2015	http://www.legislation.gov.uk/uk/si/2015/596/pdfs/uksi_20150596_en.pdf	planningpolicy@southwark.gov.uk

APPENDICES

No.	Title
Appendix A	Draft Article 4 Directions to withdraw the Permitted Development Rights granted by Schedule 2, Part 3, Class M, Class O, Class P and Class PA of the Town and Country Planning (General Permitted Development) Order 2015 (as amended)
Appendix B	Maps of railway arches subject to proposed Article 4 Direction
Appendix C	Equalities analysis

AUDIT TRAIL

Lead Officer	Simon Bevan, Director of Planning	
Report Author	Laura Hills, Senior Planning Policy Officer	
Version	Final	
Dated	12 May 2016	
Key Decision?	No	
CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / EXECUTIVE MEMBER		
Officer Title	Comments Sought	Comments included
Director of Law and Democracy	Yes	Yes
Strategic Director of Finance and Governance	Yes	Yes
Cabinet Member	Yes	No
Date final report sent to Constitutional Team		12 May 2016