

Item No. 6.	Classification: Open	Date: 6 November 2018	Meeting Name: Planning Committee
Report title:		Article 4 Direction to withdraw the permitted development rights permitting the demolition of the Old Southern Railway Stables and the Forge, Caitlin Street within Old Kent Road Opportunity Area	
Ward(s) or groups affected:		All	
From:		Director of Planning	

RECOMMENDATIONS

That the Planning Committee:

1. Authorises the confirmation of an immediate Article 4 Direction (Appendix A) to withdraw the permitted development right granted by Class B, Part 11, Schedule 2 of the the Town and Country Planning General Permitted Development Order 2015 (as amended) (GPDO) which would otherwise permit the demolition of the Old Southern Railway Stables and Forge buildings, Caitlin Street ('the Stables and the Forge') (site location identified at Appendix B) in the Old Kent Road Opportunity Area that has been identified as a heritage asset.
2. Notes the updated equalities analysis of the proposed Article 4 Direction (Appendix C).
3. Delegates to the Director of Planning the arrangements for confirming the Article 4 Direction including compliance with the notification requirements under the Town and Country Planning (General Permitted Development) Order 2015.

BACKGROUND INFORMATION

4. The council made an immediate Article 4 Direction to remove permitted development rights which would otherwise permit the demolition of the Stables and the Forge on 5 June 2018. The council must now decide whether to confirm the Direction before the expiry of 6 months from the date the Direction was first made, taking into account any representations received. These are detailed in the Consultation section on page 8 of this report.
5. The London Plan designated the Old Kent Road as an opportunity area and the council is preparing an Area Action Plan/Opportunity Area Planning Framework (AAP/OAPF) which proposes significant transformation of the area over the next 20 years. This transformation will include the extension of the Bakerloo Line with new stations along the Old Kent Road, 20,000 new homes and 10,000 new jobs. A further preferred option of the Old Kent Road AAP (Regulation 18) concluded consultation on 21 March 2018.
6. The vision of the draft AAP is to deliver this transformation, whilst retaining the best of the existing character of the area and encouraging existing businesses, arts and cultural communities to thrive. Although the Old Kent Road has a rich and varied history, much of the historic fabric relating to it has been lost through

Second World War bombing, post war slum clearance and estate building, railway and canal construction and subsequent decline, infrastructure such as the Bricklayers Arms junction and flyover and car-led development. Given their scarcity, those assets that do remain play a very important role in the townscape character of the area and the social and cultural fabric of the local community.

7. The Stables and the Forge have been identified in the draft AAP as buildings of architectural and historic interest and have also been identified on the Draft Local List (March 2018) given their heritage contribution to the area.
8. The General Permitted Development Order (GPDO) (2015) (as amended) consolidated permitted development rights for England and introduced new provisions. The GPDO allows for the demolition of buildings outside conservation areas without planning permission.
9. It is therefore considered appropriate to implement an immediate Article 4 Direction to remove the following permitted development rights from the Stables and the Forge:

General Permitted Development Order 2015 (as amended)

Schedule 2, Part 11

Class B: Demolition of buildings

Article 4 Direction

10. 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 ensures that development requires planning permission. A planning application for the demolition would need to be submitted that would then be determined in accordance with the council's Development Plan.
11. The government's 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).
12. 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. An immediate Direction 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 has made an immediate Article 4 Direction for which the process is as follows:
 - Stage 1 – The council made an Article 4 Direction withdrawing permitted development rights with immediate effect;
 - Stage 2 – Publication /Consultation stage. The council:-
 - 1) published the notice of Direction in a local newspaper;

- 2) formally consulted 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 placed notices up on site for 6 weeks;
- Stage 3 – On the same day that notice is given under Stage 2 above, the council referred its decision to the Secretary of State who has wide powers to modify or cancel a Direction.
 - **Stage 4 – Confirmation Stage (current stage)** - The Direction came 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. The council needs to confirm the Article 4 Direction withdrawing permitted development rights before it lapses.

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.

Planning applications

17. If permitted development rights are withdrawn and planning permission is required, the council would be obliged to determine the proposal in accordance with the Council's Development Plan unless material considerations indicate otherwise. The policy context is set out below.
18. It should be noted that prior to 17 January 2018, where submission of a planning application was required as a result of withdrawal of permitted development rights through an Article 4 Direction, the council could not charge a planning application fee. Under planning application fee amendments that came into effect on 17 January 2018, this is no longer the case. The text in regard to the fee exemption for Article 4 Directions (or previously imposed conditions) has been amended to warn users that the exemption is no longer valid for applications in England and should therefore not be used.

KEY ISSUES FOR CONSIDERATION

Demolition of heritage assets

19. Heritage assets are important to retain the history of the area. Over the years a number of buildings within the Old Kent Road area have been demolished through Permitted Development which could have been considered heritage assets, resulting in a heritage loss to the area.
20. Under the GPDO, buildings can be demolished without any consideration of their heritage value. However the introduction of an Article 4 will avoid this situation, since its demolition will now be assessed in the application process. Any subsequent planning application will need to consider how the heritage value of the Stables and the Forge can be retained or elements reintroduced on the site if redevelopment comes forward. This should encourage heritage led redevelopment of the site.

Contribution of the Stables and the Forge

21. The Stables and the Forge form part of the history and heritage of Caitlin Street and St James's Road. The Stables and the Forge were erected in the years before the First World War by the South Eastern & Chatham Railway as stabling for sick horses at the Bricklayers' Arms Goods Station. The Stables consist of two single storey ranges of 10 stables facing each other across a granite setted yard. Monopitch roofs slope inwards with extended eaves sheltering the horses' heads. Both the Stables and the Forge comprise of plain stock brick on the outer elevations with high level segmental arched windows with buff brick quoins and arch rings and metal casements. The horse hospital sits between the Stables and the Forge. Along Caitlin Street there is a brick boundary wall of the same age as the Stables and the Forge which unifies the composition and creates a unique setting in the local townscape.

Images of the Stables:



Images of the Forge:



22. The Stables and the Forge retain a tight knit and characterful development which is still used to house horses. This is a rare feature within London. A lot of the land in the surrounding area was historically occupied by rail sidings. The Stables, the Forge and boundary walls on St James's Road and Caitlin Road are a reminder of this history of the area.
23. The Stables and the Forge have been identified in the Old Kent Road Area Action Plan as buildings of architectural and historic interest and have also been identified on the Draft Local List given their heritage contribution to the area. The site allocation plan within the AAP (OKR12) recognises the importance of the heritage assets and proposed retaining the existing buildings with new buildings around them.

Policy context

24. The NPPF identified that heritage assets contribute to the social and environmental roles of sustainable development. These are at risk from demolition without planning permission or an assessment of their heritage value. In the instance of this Article 4 Direction, the requirement of removing permitted development rights at the Stables and the Forge seeks to comply with the social and environmental role of the NPPF.
25. **The social role:** Removing the permitted development rights for demolition of the Stables and the Forge will ensure that the contribution to the cultural well-being they provide to the community can be considered within a planning application and it is not lost without consideration through demolition without a forthcoming scheme.
26. **The environmental role:** the NPPF supports the conservation and enhancement of the historic environment, recognising that heritage assets are an irreplaceable resource. The Stables and the Forge contribute to the character and historic fabric of the area. The NPPF highlights that the council should identify and assess the particular significance of any heritage asset that may be affected by a proposal taking account the available evidence and necessary expertise. Removing the permitted development rights for demolition of the Stables and the Forge will allow the council to consider the significance of the heritage value through the planning application process.
27. The London Plan designates the Old Kent Road as an opportunity area which includes the Stables and the Forge site.

28. The London Plan (March 2016) states that London's heritage assets and historic environment should be identified, so that the desirability of sustaining and enhancing their significance of utilising their positive role in shaping can be taken into account (Policy 7.8). Heritage-led regeneration is encouraged, regeneration schemes should identify and make use of heritage assets and reinforce the qualities that make them significant so they can stimulate environmental, economic and community regeneration (Policy 7.9).
29. The Draft London Plan (December 2017) states in Policy HC1 Heritage Conservation and Growth (C), development proposals should seek to avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process. It also states proposals that affect heritage assets and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings. However, it should be noted that since Draft London Plan has not yet gone through the examination process, it should only afford limited weight at this stage.
30. Saved Policy 3.15 – Conservation of the Historic Environment of the Local Plan requires development to preserve or enhance the special interest or historic character or appearance of buildings or areas of historical or architectural interest.
31. Core Strategy Strategic Policy 12 – Design and conservation sets out the development will be expected to conserve or enhance the significance of Southwark's heritage assets, their settings and wider historic environment, including locally listed buildings.
32. The council is also preparing the New Southwark Plan to replace the saved policies in the Southwark Plan and to set out the regeneration strategy for the borough. The council is also preparing the Old Kent Road Area Action Plan which sets out how the area will be developed, with an important consideration of delivering housing and jobs.
33. Public consultation on the Proposed Submission Version of the New Southwark Plan ran from December 2017 to February 2018 and the Further Preferred Option Old Kent Road Area Action Plan (AAP) ran from December 2017 to March 2018. Representations received are currently being considered.
34. Paragraph 216 of the NPPF states that weight can be afforded to relevant policies in emerging plans depending on the stage of preparation of the plan. The New Southwark Plan and AAP have been subject to extensive consultation however they have yet to be subject to an independent examination.
35. The New Southwark Plan requires development to enable the viable use of the heritage asset that is consistent with its on-going and long-term conservation (Policy P18). This policy should be afforded with some weight since there is no objection to the content of the policy itself. The introduction of this Article 4 will support the latest policy position by ensuring a planning application is required to allow the council's assessment of the viable retention of the Stables and the Forge.
36. The New Southwark Plan allocates the Stables and the Forge under site allocation NSP64: Former Southern Railway Stables. This sets out the site vision for the area for redevelopment to provide uses such as employment, public open

space, new homes, community uses. It identifies the Stables and the Forge as buildings of architectural and historic interest. It confirms that further details regarding development of the site will be provided through the AAP.

37. The vision of the AAP is to deliver this transformation, whilst retaining the best of the existing character of the area and encouraging existing businesses, arts and cultural communities to thrive.
38. The Stables and the Forge have been identified in the AAP within the Site Allocation OKR12: Former Southern Railway Stables as buildings of architectural and historic merit. The site allocation plan recognises the importance of the heritage assets through retaining the existing buildings, the forge, stables and former horse hospital which will change uses with new buildings around the retained buildings.

CONSULTATION

39. Consultation on the Article 4 Direction has complied with provisions set out in the GPDO. Notice of the Direction was made by:
 - Local advertisement in the press.
 - Site notices was placed outside the Stables and the Forge for 6 weeks; and
 - Written notifications were sent to every owner/occupier, specifying representation can be made for a period of 21 days.
 - Mail out to over 7,000 email addresses to the council's planning policy consultation notification mailing list
 - Online Consultation Hub Page which provided information on the Direction and a portal for submitting representations.
 - Notification to the Secretary of State.
40. This report recommends that after the consultation and within six months, due considerations have been given to the subject and the Direction should be confirmed.

Summary of representations received

41. During the consultation period, 35 representations were received of which:
 - There are two comments submitted that are identical, from the same organisation, one under the individual's name, one under the organisation's name. Within the representation summary, these are considered as one representation.
 - Of the 33 valid representations received, 32 comments are in support for the direction, one comment is against the direction.

Supporting representations summary

42. It is evident from the representations received that the support for the Article 4 Direction is overwhelming. Many individuals responded to the consultation as well as support received from local organisations including Stevenson Crescent Estate TRA (representing 261 households), the Walworth Society, Peckham Society and Historic England. The reasons given for supporting the Article 4 Directions include:

- The heritage value the Stables and the Forge contribute in enriching the local's social and cultural fabric. This is a highly recognised and acknowledged point in a lot of the comments received.
 - Another highly discussed point is the community value the Stables offers. Remarks are often made on the sound of the horses as a relaxing and unique feature in the otherwise busy build up urban area. Notwithstanding this, the Article 4 Direction protects the heritage of the building, rather than the existing use. Subject to the grant of planning permission, it may be possible for the use to be changed in the future.
43. The supportive comments also raise concerns and alternative ideas regarding the Stables and the Forge, some of which are not directly related to the Article 4 Direction:
- A lot of the comments consider the Article 4 Direction to withdraw the permitted development rights associated demolition of the Stables and the Forge to be long overdue. There are some concerns regarding the appropriateness for the Article 4 Direction, as they consider the Stables and the Forge to be an important piece of heritage and history to be protected, therefore it should at least be designated as a locally listed building.
 - The council concurs with the representations on the importance of the Stables and the Forge from a heritage and social perspective and is now confirming the Article 4 Direction to ensure that the stables cannot be demolished without a fair and thorough assessment through the planning application process. Regarding the status of the Stable and the Forge, they are on the council's draft local list and recognised in the New Southwark Plan and the Old Kent Road Area Action Plan as buildings of architectural and historic interest and seek their retention within any redevelopment of the site.
 - Some comments raise concern about the viability of the business use of the Stables and the Forge in future. Suggestions are made that the Stables and the Forge can be focused as a community space, e.g. a café, artist workshop etc.
 - The Stables and the Forge fall within the Action Plan Area of Old Kent Road, its future use must respond positively to the objectives of the AAP. The Plan requires redevelopment of the site to 'provide employment uses and public open space. It should also provide new homes, and may provide community uses.' Therefore the suggested community element of the Stables and the Forge is likely to be integrated into future redevelopment of the site, should the current use no longer be viable or required.

Objecting Representation Summary

44. The one objection to the confirmation of the Article 4 Direction is made on the grounds of affordable housing.

- The objector expressed concern regarding affordable housing for the local people. They consider the provision of affordable housing to be a more urgent priority than the protection of the Stables and the Forge and that it should be demolished to make room for affordable housing development.
- Housing affordability to the local residents is Southwark's upmost priority. This is reflected in our Fairer Future Commitment – A Place to call home. The council also has a legal duty to look after its heritage asset as set out clearly in the NPPF, as well as the London Plan. In this case, as the Stables and the Forge represent a key piece of local history and is a heritage asset, it warrants protection through an Article 4 Direction. In addressing the objector's concern regarding affordable housing, Old Kent Road AAP aims to deliver 7000 new homes that will be affordable during its plan period. Therefore the policy goals of heritage protection and affordable housing delivery are not in conflict with each other. From this regard, the introduction of an Article 4 Direction to protect the Stables and the Forge from the permitted development rights associated demolition does not compromise the council's ability in affordable housing delivery. Therefore the confirmation of this Article 4 Direction is well justified.

Methodology

45. 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.
46. The council has undertaken an assessment of the heritage value of the Stables and the Forge as set out above. This Article 4 is necessary to require a fair assessment of the demolition of the Stables and the Forge through a planning application to ensure proper planning.

Areas affected

47. 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 the Article 4 Direction should relate to the Stables and the Forge (extent illustrated at Appendix B) due to the heritage significance as outlined above and it should be confirmed at this stage.

Conclusions

48. The consultation responses received have been fully considered in the recommendation to confirm the Article 4 Direction. It should be noted that the heritage/community functions of the Stables and the Forge are highly praised and acknowledged in the representations received from individuals, local residents and organisations and institutions. All except one comment are in support to confirm the Article 4 Direction. The only comment objecting to confirming the Article 4 Direction was made on an affordable housing ground, stating more land should be made available including the demolition of the Stables and the Forge. However, it should be noted that affordable housing

provision is considered in detail in the New Southwark Plan and the Old Kent Road AAP.

49. For the above reasons, the council considers that permitted development rights granted by the GPDO in relation to demolition of the Stables and the Forge are prejudicial to the proper planning of the borough. The use of an Article 4 Direction would not restrict development altogether, but instead ensure that demolition of the Stables and the Forge requires planning permission. Given the heritage significance of the Stables and the Forge as well as the consultation results, any demolition should be subject to a full planning application and assessment by the local authority.
50. This Article 4 Direction should be confirmed if the council is satisfied with the policy and consultation response that demolition should not be carried out unless planning permission is granted. After which the confirmation needs to be publicised, including the date it officially comes into force, and send a copy of the confirmed direction to the Secretary of State.

Community Impact Statement

51. Southwark Council is committed to achieving the best quality of life for its residents. This includes maintaining a strong local economy and revitalised neighbourhoods for the communities within Southwark. It is vital that a strong policy framework ensures the borough's heritage and community values continue to be protected for the benefit of local residents. The Article 4 Direction seeks to protect the demolition of the Stables and the Forge without a robust analysis through the planning process.
52. The equalities analysis (Appendix C) has concluded that the Article 4 Direction will have no impact on equalities as there is no change to the Stables and the Forge through confirming an Article 4 Direction and this will assist the council in implementing its planning policy framework, which has also undergone equalities analysis.

Financial Implications

53. As is noted above, should the local authority refuse planning permission for development that otherwise would have been granted by the GPDO the council has a potential liability for compensation. 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 Direction will make the council liable to compensation claims. Because circumstances vary widely, it is not possible to gauge the magnitude of such claims.
54. 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. This position will be monitored and if the award cannot be contained within existing departmental revenue budgets will be reflected in the council's revenue budget monitoring arrangements for funding from council reserves.
55. 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.

56. Staffing and any other costs connected with this recommendation will be contained within existing departmental revenue budgets.

Human rights and equalities

57. 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 Direction, 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.
58. 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 Direction have been considered under the Human Rights Act 1998 and it has been determined that the Articles will not be triggered.
59. In consulting upon the introduction of the Article 4 Direction the council has had regard to its public sector equality duty (PSED) under s.149 of the Equality Act 2010.
60. 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.
61. 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 Direction on these groups of people have been considered and where possible mitigated (Appendix C).

SUPPLEMENTARY ADVICE FROM OTHER OFFICERS

Director of Law and Democracy

62. Planning Committee is being asked to confirm an immediate Article 4 Direction to withdraw the permitted development rights granted by Class B, Part 11, Schedule 2 of the GDPO to prevent the demolition of the Stables and the Forge; to note the equalities analysis of the proposed Article 4 Direction and to delegate to the Director of Planning the arrangements for confirming the Article 4 Direction including compliance with the notification requirements.
63. 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 confirms Planning Committee has authority to take the decisions being asked of it.

64. The Equality Act 2010 introduced the public sector equality duty, which merged existing race, sex and disability equality duties and extended them to include other protected characteristics; namely age, gender reassignment, pregnancy and maternity, religion and belief and sex and sexual orientation, including marriage and civil partnership. In summary those subject to the equality duty, which includes the council, must in the exercise of their functions: (i) have due regard to the need to eliminate unlawful discrimination, harassment and victimisation; and (ii) foster good relations between people who share a protected characteristic and those who do not. This report notes no negative impact on equalities is anticipated.
65. In addition, the Human Rights Act 1998 imposed a duty on the council as a public authority to apply the European Convention on Human Rights; as a result the council must not act in a way which is incompatible with these rights. The most important rights for planning purposes are Article 8 (respect for homes); Article 6 (natural justice) and Article 1 of the First Protocol (peaceful enjoyment of property). It is important to note that few rights are absolute in the sense that they cannot be interfered with under any circumstances. 'Qualified' rights, including Article 8 and the First Protocol, can be interfered with or limited in certain circumstances. The extent of legitimate interference is subject to the principle of proportionality whereby a balance must be struck between the legitimate aims to be achieved by a local planning authority in the policy making process against the potential interference with individual human rights. In this case the removal of the permitted development rights are considered necessary to achieve a legitimate planning aim.

Strategic Director of Finance and Governance

66. Planning Committee is being asked to confirm an immediate Article 4 Direction to withdraw the permitted development rights granted by Class B, Part 11, Schedule 2 of the GDPO to prevent the demolition of the Stables and the Forge; to note the equalities analysis of the proposed Article 4 Direction and to delegate to the Director of Planning the arrangements for confirming the Article 4 Direction including compliance with the notification requirements.
67. The strategic director of finance and governance notes that the proposed Directions may make the council liable for compensation claims but it is not possible to gauge the magnitude of such claims as circumstances vary. It is noted that 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.
68. 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.
69. 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
New Southwark Plan Proposed Submission Version	http://www.southwark.gov.uk/planning-and-building-control/planning-policy-and-transport-policy/development-plan/local-plan	planningpolicy@southwark.gov.uk
Old Kent Road Area Action Plan	http://www.southwark.gov.uk/planning-and-building-control/planning-policy-and-transport-policy/development-plan/area-action-plans?chapter=2	planningpolicy@southwark.gov.uk
General Permitted Development Order 2015	http://www.legislation.gov.uk/ukxi/2015/596/pdfs/ukxi_20150596_en.pdf	planningpolicy@southwark.gov.uk

APPENDICES

No.	Title
Appendix A	Draft Article 4 Direction to withdraw Permitted Development Rights granted by Schedule 2, Part 11, Class B of the Town and Country Planning (General Permitted Development) Order 2015 (as amended)
Appendix B	Article 4 Direction Boundary
Appendix C	Equalities analysis

AUDIT TRAIL

Lead Officer	Simon Bevan, Director of Planning	
Report Author	Emma-Lisa Shiells, Planning Policy Officer Liang Wu, Graduate Planner	
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Dated	24 October 2018	
Key Decision	No	
CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER		
Officer Title	Comments Sought	Comments included
Director of Law and Democracy	Yes	Yes
Strategic Director of Finance and Governance	Yes	Yes
Cabinet Member	No	No
Date final report sent to Constitutional Team	24 October 2018	