

Planning Sub-Committee B

Tuesday 28 February 2017

7.00 pm

Room G02 - 160 Tooley Street, London SE1 2QH

Supplemental Agenda no. 2

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| 7. | Development management items Addendum report – late observations, consultation responses and further information. Tabled at the meeting. | 1 - 15 |

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| Item No: 7. | Classification: Open | Date: 28 February 2017 | Meeting Name: Planning Sub-Committee B |
| Report title: | | Addendum Late observations, consultation responses, and further information. | |
| Ward(s) or groups affected: | | Grange, Nunhead and Camberwell Green | |
| From: | | Director of Planning | |

PURPOSE

1. To advise members of observations, consultation responses and further information received in respect of the following planning applications on the main agenda. These were received after the preparation of the report and the matters raised may not therefore have been taken in to account in reaching the recommendation stated.

RECOMMENDATION

2. That members note and consider the late observations, consultation responses and information received in respect of each item in reaching their decision.

FACTORS FOR CONSIDERATION

3. Late observations, consultation responses, information and revisions have been received in respect of the following planning applications on the main agenda:

Item 7.1 – Application 16/AP/2173 for: Full Planning Permission – 1 Haven Way, London SE1

Clarification of daylighting impacts

- 1.1. The use of the room served by the fourth floor window in the north elevation of the 7-storey block to the rear that would experience a 30% reduction in the area of the room receiving direct skylight (the No Sky Line test). This information is already detailed at paragraph 47 of the officer's report which states that this room serves the second double bedroom in a two-bed flat.
- 1.2. The BRE guidelines state that if the no-sky line moves so that the area of the existing room which does receive direct skylight is reduced to less than 0.8 times its former value, then this will be noticeable to the occupants, and more of the room will appear poorly lit. At the same time the BRE guidelines are clear (paragraph 2.2.8) that while bedrooms should also be analysed they are less important than living rooms, dining rooms and kitchens.
- 1.3. A further test was carried out to try to give a fuller picture of the daylighting impact of the development on this and other windows of neighbouring flats. The BRE guidelines confirm that the acceptable minimum ADF value for a bedroom is 1%. The daylight and sunlight impact report accompanying the application found that the bedroom window in question would still achieve an ADF score of 1.9% after the completion of the development.

Clarification of the density

- 1.4. A late representation received from objectors questions the density calculations in the officer report. The objectors suggest that the density of the site would increase from 1,154 to 1,195 habitable rooms per hectare.
- 1.5. Density calculations are undertaken on the planning site area which is given by the 'red line' plan. This area is not restricted to the area owned by the applicant as is the case for this application. The site area for this application as measured by officers is 0.266 Ha, smaller than the site area for planning application reference 06/AP/2272 which was 0.36Ha. For clarification, the density of the site including the proposed scheme is in the comparison tab

| | Before proposed roof extension | | | With roof extension |
|---|---------------------------------|---------------------------------|-------------------------------|---------------------|
| | | | Present density | Proposed density |
| Site Area (Ha) | 0.36 | 0.266 (Measured) | 0.266 (Measured) | 0.266 (Measured) |
| Residential habitable rooms | 250 | 250 | 282 (250 + 18 + 7 + 3 + 6) | 294 (282 + 12) |
| Commercial floorspace (sqm) and habitable room equivalent | 1100sqm (40 Habitable rooms) | 1100sqm (40 Habitable rooms) | 0 | 0 |
| Total habitable rooms | 290 | 290 | 282 | 294 |
| Density (HR/Ha) | 805 | 1090 (805) | 1057 (783) | 1102 (816) |

- 1.6. As can be seen, the density would increase from 738 to 816 Hr/Ha based on a site area of 0.36Ha and 1057 to 1102 based on a site area of 0.266 Ha.
- 1.7. A technical report undertaken by a Chartered Surveyor (Tim Greenwood Associates – Chartered Building Surveyors) has been submitted by the objectors. This report followed a visit to 4 of the 6 existing top floor flats at 1 Haven Way on 27 January 2017. The report is comprised of sections on structural issues, daylighting and sunlighting impacts, construction methodology and site arrangement, sales and rental values and planning.
- 1.8. In terms of the issues that are relevant to planning, i.e., daylighting and sunlighting impacts, the report notes that there are 21 roof lights and that these serve hallways, bathrooms/shower-rooms and the kitchen areas of open plan living/dining/kitchen rooms. The commentary on the day/sun-lighting impacts is subjective only and does not reference the BRE tests and associated guidance.
- 1.9. A detailed report in objection to the proposal has been received from the Grange Gardens Residents Association. A summary of the main issues raised in the report (together with the corresponding reference) and the officer view in response is set out in the table below:

| Ref. | Issue | Officer view |
|------|---|--|
| 1A | Over-density and development | <i>This issue is addressed by the addendum</i> |
| 1B | Loss of sunlight to residents living in Block B | <i>The proposed extension is to the north of Block B not to the south so this would not be the case.</i> |

| | | |
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| | | |
| 1B | 5th floor Block A residents' balconies will be overlooked by the new units above | <i>There would be no direct overlooking from the proposed new units and the existing balconies would not be overlooked any more than they are presently.</i> |
| 1B | 6th floor Block B residents facing Block A will lose all privacy as the new units will look directly into their living and sleeping areas. | <i>This issue is covered in the officer report (Paragraphs 2, 38 and 39).</i> |
| 1B | Loss of light as a result of loss of skylights | <i>This issue is covered in the officer report (Paragraphs 48-51).</i> |
| 1C | Issues in planning officer's report | <i>This presents a mixture of counter-argument, observations without commentary and allegations of inaccuracy. Where necessary any minor inaccuracies are addressed in the new report.</i> |
| 1D | Proposed design is not keeping with current development | <i>This issue is covered in the design section of the officer report.</i> |
| 1E | Loss of amenity and enjoyment for the residents of 5th floor flats | <i>All material planning consideration listed here are covered in the amenity section of the officer report.</i> |
| 1F | Risks to quality and finishing of 5th floor flats, again resulting in loss of amenity | <i>These are not material planning considerations.</i> |
| 2A | Detailed plans not included which could threaten safety of residents | <i>These are not material planning considerations.</i> |
| 2B | The updated construction method statement does not include a structural report, detailed construction drawings and is generally inadequate. | <i>These details are not appropriate pre-requisites for the determination of a planning application for a development of this nature and scale. The lack of such information is not a material planning consideration.</i> |
| 2C | Risks to the safety of all residents of block a during the construction phase | <i>This is not a material planning consideration.</i> |
| 3 | Applicant is playing up planning system to dodge affordable housing regulation | <i>There is no evidence to support such a claim. The application must be determined on its merits. There is no requirement to provide affordable housing, even when viewed cumulatively with a past planning permission which granted the conversion of commercial floorspace into 7 flats (ref.. 12/AP/3987)</i> |
| 4A | Applicant is demonstrating repeated disregard for planning and regulations | <i>If this view is held it is not a consideration that is relevant to the determination of the application.</i> |

| | | |
|----|------------------------------------|---|
| 4B | Misrepresentation by the applicant | <i>These points are not relevant to the consideration of the application.</i> |
|----|------------------------------------|---|

Item 7.2 – Application 16/AP/4003 for: Full Planning Permission – Carpark, Play Area and Garages, Daniels Road, London SE15 3NA

Car club membership

- 1.10. Paragraph 38 refers to car club membership being made available for residents of the new development. For consistency, this should also be referenced in Paragraph 53 since it would also be secured via the unilateral undertaking.

Condition 5 – Hard and Soft Landscaping

- 1.11. Condition 5 requires a hard and soft landscaping scheme to be submitted prior to above grade works commencing. In the list of issues to be addressed via this condition, the words “any external lighting” should be added. This is to ensure that the impact of lighting on residents would not cause harm.

Pre-application advice

- 1.12. The pre-application advice was not originally appended to the officer report and now has been made available (Appendix 2).

Item 7.3 – Application 16/AP/3983 for: Full Planning Permission – 56-60 Denmark Hill, London SE5 8RZ

Paragraph 17

- 1.13. Highlights the consultation responses from the objector.. One point refers to the access arrangements. To elaborate on this, concerns were raised regarding rear access to the neighbouring properties No. 62, 64, and 66. The proposal maintains emergency escape routes from these properties, which addresses the initial concern.

Paragraph 28

- 1.14. It is stated: The proposed uses on site would not cause unacceptable harm to neighbours nor would it lead to an adverse change in the flow of people to site as it is already a busy area in a town centre. Because of this and the fact the only windows and doors for the gym would face Denmark Hill, behind these openings would be office areas and changing rooms where loud music would not be played.

Paragraph 44

- 1.15. It is stated: Grant planning permission subject to legal agreement to secure monies for archaeology works, on-street cycle stands not provided and for the applicant to enter into a S278 agreement to:

- Reinststate the redundant vehicle crossover as footway;
- Provide a dropped kerb at the front of the bin store on Denmark Hill;
- Repair any damage to the existing footway as a result of site construction works.

- 1.16. To clarify the financial worth of the on-street cycle stands would be **£4,200**.

Paragraph 36

- 1.17. In addition to the service management plan the officers have recommended a condition (No. 10) restricting servicing hours. The servicing hours would be restricted between 7pm to 7am. This is to protect the flow of traffic and highway safety. These conditions would allow officers to review and agree appropriate servicing hours that would protect residential amenity and highway safety and flor once a tenant is identified.
- 1.18. A Construction Management Plan condition was requested by TfL and is recommended (condition 4). This is due to the potential impacts of construction on the highway and would allow officers to review and approval the planned works and control any potential impact of construction.

REASON FOR URGENCY

4. Applications are required by statute to be considered as speedily as possible. The application has been publicised as being on the agenda for consideration at this meeting of the planning sub-committee and applicants and objectors have been invited to attend the meeting to make their views known. Deferral would delay the processing of the applications and would inconvenience all those who attend the meeting

REASON FOR LATENESS

5. The new information, comments reported and corrections to the main report and recommendation have been noted and/or received since the committee agenda was printed. They all relate to an item on the agenda and members should be aware of the objections and comments made.

BACKGROUND DOCUMENTS

| Background Papers | Held At | Contact |
|--------------------------|---|--|
| Individual files | Chief Executive's Department 160 Tooley Street London SE1 2QH | Planning enquiries telephone: 020 7525 5403 |

APPENDICES

| No. | Title |
|------------|---|
| Appendix 1 | Pre-Application Reply Letter 15/EQ/0375 |
| Appendix 2 | Pre-Application Reply Letter 16/EQ/0108 |

**Chief executive's department**

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Mr Thomas Price
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Our Ref: 15/EQ/0375
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Web Site: <http://www.southwark.gov.uk>

Date: 15/04/2016

Dear Mr Price

TOWN & COUNTRY PLANNING ACT 1990 (as amended)
PRE-APPLICATION ENQUIRY

At: 1 HAVEN WAY, LONDON, SE13

Proposal: Extension to 1 Haven Way to accommodate x4 residential units

Detailed below is an assessment of the proposal, including an indication of the main issues that should be taken into consideration in any future application submission to the Council. The depth of analysis provided reflects the scope of information made available to council officers.

Summary

Pre-application advice is sought for the erection of a one storey roof extension to an existing building at the sixth floor level to create four residential units.

The proposed massing and overall design approach is considered to be acceptable, being sympathetic to the host building and surrounding development. The proposal would offer a good standard of accommodation for future occupiers meeting the stipulations of the 2015 Technical Update to the Residential Design Standards SPD 2011.

The creation of four additional units would attract a contribution towards affordable housing provision. A contribution would be required when viewed alongside the recently implemented scheme LBS reference 12/AP/3987. Together the two schemes would be phased development as defined by the adopted Affordable Housing SPD (2008) and the draft Affordable Housing SPD (2011); they would result in the creation of 11 additional residential units and thus trigger a requirement for two affordable dwellings.

Site and surroundings

The site is situated to the south side of Grange Walk. It was formerly known as 'Larnaca Works' which, following permission in 2007 (06-AP-2272), has been redeveloped into a residential led (90 units) scheme known as 'Grange Gardens'. The Grange Gardens development originally accommodated 90 residential units and 1100sqm of commercial space (flexible Use Class A1, A2, A3, B1 & D1 floorspace) to the ground floor in 3 blocks between 5 and 7 storeys in height.

This pre-application enquiry relates to 'Block C' of the Grange Gardens development. A change of use granted under planning permission reference 12/AP/3987 saw 454sqm of commercial floor space on the ground floor of block C converted into 7 residential units.

The immediate context surrounding the site is predominantly residential, however there are a number of commercial uses to the south and west of the site. The built form surrounding the site is varied at between 2 and 7 storeys in height.

Affordable housing contribution

The scheme proposed, alongside the conversion of the ground floor (LBS reference 12/AP/3987) would be phased development.

Section 5.6 of the adopted Affordable Housing SPD (2008) and section 7.3 of the draft Affordable Housing SPD (2011) clearly state that the artificial sub-division of housing sites or phased development will not be acceptable where the effect is to circumvent the council's affordable housing contributions policy. This policy approach is being taken forward in the emerging New Southwark Plan (Policy DM1.1 "The subdivision of sites or phasing of development which has the effect of circumventing this policy requirement will not be permitted").

The Affordable Housing SPD (2008) states:

To make sure that our affordable housing policy is applied consistently and fairly on all proposed housing developments, the requirement for affordable housing will apply to:

1. Sites that are artificially sub-divided or partially developed.

In these circumstances we will consider if the proposed development makes the best use of land. We will do this by:

- *assessing the application against policy 3.11 (Efficient use of land);*
- *looking at whether appropriate density levels have been applied to the site, taking into account the context and character of the surrounding development and public transport accessibility levels;*
- *assessing the application against the design and access statement to see if the proposed development is the best design solution.*

2. Phased developments.

If a housing development is part of the first phase of a much larger development which is over 10 housing units, the affordable housing will required as part of the overall scheme in line with policy 4.4 of the Southwark Plan.

3. Additional units added through amended planning applications.

If a phased housing development with planning permission is amended and the total number of housing units increase, the amount of affordable required will be calculated by the new total number of units. If a development with planning permission for less than 10 housing units is amended to have over 10 housing units, affordable housing will be required in line with policy 4.4 of the Southwark Plan.

4. Later applications on sites with existing planning permission.

If there is an existing planning permission for a development of over 10 units and at the time that application was approved with no requirement to provide affordable housing and a fresh planning application is submitted for a revised scheme, if the site is suitable for affordable housing the Council will seek to secure an element of affordable housing in accordance with policy 4.4.

With a total of 11 units across the two schemes, a requirement for affordable housing would be triggered. In accordance with saved policy 4.4 'Affordable housing' of the Southwark Plan (2007), two affordable dwellings should be provided on the site. In addition to affordable housing, the development would also trigger the requirement for at least one dwelling to be wheelchair accessible, in compliance with the South East London Housing Partnership guidance. These obligations, along with any other contributions triggered would need be secured by a legal agreement. At the time of submitting a planning application you are advised to include a draft heads of terms for such an agreement.

A financial payment in-lieu of on-site affordable provision would be accepted if a full viability assessment can

satisfactorily demonstrate that on-site provision is not financially viable. This payment would be calculated in accordance with the number of proposed habitable rooms across the two schemes as specified by section 3.9 of the Affordable Housing SPD 2008 and Section 6 of the Affordable Housing SPD. The viability assessment would need to comply with the requirements in the council's Development Viability SPD.

Design, appearance and quality of proposed accommodation

The additional floor proposed would be set back on all sides and finished in materials to match the host building. Details such as glazed green brick and aluminium framed windows are proposed.

Overall it is considered that the design of the proposal is suitable. The proposed set back would help strike an appropriate visual balance with the host building. The use of materials which match those on the floors below, in particular the glazed green tiles, would help to secure a good level of visual continuity with the host building and the wider Grange Gardens development.

The proposed set back would largely prevent full views of the additional floor from street level, though careful consideration of the proposed fenestration is advised. The proposed openings, for some elevations, would not fully relate or compliment the floors below. The width and height of the proposed openings, in particular, should better relate to the floors below.

The standard of internal accommodation would meet or slightly exceed the minimum gross internal areas and room sizes specified by the 2015 Technical update to the Residential Design Standards SPD 2011. Access to private outdoor amenity space would be available for all proposed units. All units would have dual aspect and is welcomed. As such a good internal standard of residential accommodation is proposed.

Impact upon the amenity of the occupiers of nearby and adjoining properties

Given the scale of the proposed development, there would likely be no harmful impact on the amenity of neighbours. The proposed set back from all elevations would help to prevent the proposal from shadowing the floors below or unacceptably increasing shadowing beyond the established pattern between the site and adjacent or nearby buildings. Consideration should however be made in regards to any direct loss of sunlight or indirect loss of daylight. You are advised to submit a daylight and sunlight assessment as part of any subsequent planning application.

The proposed openings and outlook from the roof terraces would replicate the views already available from the floors below and as such would not result in a material increase in overlooking. Any noise transfer to the floors below should be considered and measures such as appropriate stacking of room types is recommended.

Access, servicing and transport

Car Parking

The proposal could cause increased stress on local on-street parking. As the site is located within a Controlled Parking Zone (CPZ) the impact for on-street parking can be limited by prohibiting new residents from applying for parking permits by a planning condition.

Cycle Storage

The plans show an area for internal cycle storage but do not fully detail overall provision or means of storage. These details would be required if a subsequent application is submitted. Sheffield stands should be used for storage. Please refer to the Southwark Sustainable Transport SPD for more information. The internal position of the store is considered appropriate.

Refuse Storage

Before finalising the refuse and recycling stores you are referred to the Council document 'Waste Management guidance notes for residential developments' which is aimed at providing developers with the requirements for waste storage at new sites. You are also referred to the Sustainable Design and Construction SPD which contains further information and the calculation for determining the amount of refuse storage required should

be included in your submission.

Mayoral and Southwark CIL

The proposal would be both Southwark and Mayoral CIL liable. Exemptions may apply. You are advised to submit a CIL form with any potential planning application to ensure that an accurate CIL charge is calculated.

Conclusion

It is considered that subject to the provision of two affordable housing units secured via section 106 agreement if an application for planning permission for a similar scheme were submitted it would be received favourably by the Council and would likely be granted.

Should you proceed to make a planning application you should supply the following information:

- Completed planning application form
- The correct planning application fee
- Site location plan
- Existing and proposed floor plans, roof plans, elevations and sections to a stated metric scale; each drawing must include a scale bar and datum levels, (where appropriate)
- Design and Access Statement
- Completed CIL form
- Refuse and cycle storage details
- Daylight and sunlight assessment
- Heads of terms for s106 contributions (including affordable housing)

This advice is given to assist you but is not a decision of the Council. Further issues may arise following a formal planning application, where a site visit and public consultation and consultation with statutory consultees would be undertaken. If you have any questions about this advice, please contact Lewis Goodley in the first instance.

Yours sincerely

Dipesh Patel
Team Leader- Major Applications.

**Chief executive's department**

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Date: 20/07/2016

Dear Mr. Holland

TOWN & COUNTRY PLANNING ACT 1990 (as amended)
PRE-APPLICATION ENQUIRY

At: CARPARK, PLAY AREA AND GARAGES, DANIELS ROAD, LONDON SE15 3NA
Proposal: Construction of 2 no. 3 storey residential (C3 Use) blocks with a total of 19 new council homes. Block A comprises of 5no. 3 bed houses. Block B comprises of 2No. 3 bed flats, 6no. 2 bed flats, 4no. 1 bed flats, 1no. 2 bed wheelchair accessible flat with a dedicated car parking space, 1no. 3bed wheelchair accessible flat with a dedicated car parking space. The proposals include associated communal amenity space and landscaping works, a new 8 space car park and reprovision of playground space.

I write in connection with your pre-application enquiry received on 07/04/2016 regarding a scheme to redevelop the site above. This letter summarises the council's written advice on your proposal and whether, based on the details submitted, it meets local planning requirements

I write in connection with your pre-application enquiry regarding a residential scheme to redevelop the site above. The site has been put forward for redevelopment to deliver more affordable housing in the borough, contributing towards Southwark Council's commitment to deliver 11,000 council homes by 2043 and 1500 of these by 2018. This letter summarises the council's written advice on your proposal and whether, based on the details submitted, it meets local planning requirements.

Planning Policy

The statutory development plan for the borough comprises The London Plan consolidated with further alterations (March 2015); The Core Strategy (2011) and saved policies from the Southwark Plan (2007).

The site is located within the:
 Urban Density Zone
 Air Quality Management Area

The site is not located within a Conservation Area, however the Nunhead Cemetery conservation area and Nunhead Green conservation area are located nearby to the southeast and southwest respectively. There are no heritage assets within the site boundary area or the immediate context of the site.

The site is not within the Archaeological Priority Zone. The site has a PTAL rating of 2.

Other key material considerations

The National Planning Policy Framework

Site and surroundings

The site is a ~0.3ha strip of land currently containing garages, parking spaces, a sub station (to be retained), a play ground and green open space (at the south western end) and a number of small trees along Daniel's Road

within the Basset Estate in Nunhead. On the southern side of Daniel's Road is a two storey row of terraced houses with butterfly pitched roofs. The northern boundary of the site abuts the rear gardens of 3-storey homes facing Tappesfield and Basset Roads (towards the western end of the site) and the gable ends and large communal garden of a u-shaped terraced block facing Basset Road (towards the eastern end of the site). At the eastern end of the site existing garages form two small courtyard areas.

Land Use

Residential use is acceptable in principle on the site given the existing residential character of the immediate area.

The loss of the existing parking and garages may be justified given the overriding need to deliver housing and the proposed re-provision of 8 car parking spaces. The development plan affords no protection to existing residential parking or garages.

The existing play ground will be re-provided in the new development.

Access and site layout

Vehicular access into the site is limited to the 8 car parking spaces accessed from Daniels Road (provided at grade). This is considered appropriate.

The provision of improved pedestrian permeability through the site via two new routes, Basset Road to Daniels Road and Howbury Road to Daniels Road is welcomed and accords with policy 3.13 of the Southwark Plan.

Ground floor elevations would interact and address the street appropriately, and enhance the enclosure of the street by providing a stronger frontage to Daniels Road.

It is not clear at this stage if sufficient space has been provided for cycle parking, refuse storage and plant rooms. This would need to be clearly demonstrated in any planning application.

Scale, height and massing

The submission indicates that the initial massing of Block B has been amended following sunlight and daylight analysis to reduce the impacts on existing homes located on the opposite side of Daniels Road. Further details of the sunlight and daylight issues are highlighted below.

The height, scale and massing of the two blocks is considered appropriate and consistent with the local townscape, which is dominated by two and three storey homes. By combining with the ends of the two blocks fronting Basset Road and Howbury Road Block B completes the 'urban block' while Block A provides a strong frontage to Tappesfield Road.

Detailed design

The 5 terraced houses (block A) are appropriate in size and street pattern and the block of flats should also be acceptable. The simple repeat of the brick frontages of the houses should work well, though the very high and prominent top floor could look somewhat industrial for the buildings in this residential environment, as a result of their metal cladding.

The flats (block B) appear less inviting and domestic (only an indicative elevation is provided) with only two doors onto the street, the largest and most prominent of which are double doors to the refuse store. The ground floor appearance and the accessibility of the ground floor units could be improved by each unit having private entrances onto the street. The 2 bed wheelchair unit especially would be improved by not having to be accessed by entering the main lobby, then exiting it again at the rear and then entering the flat from the rear entrance via a footpath at the back of the building. The inclusion of meaningful areas of green living roofs is supported.

Further information of elevations, axo drawings and materials will be needed to determine that the detailed design will be of a high standard.

The quality of the public realm and the landscaping of the site, including the community garden and play area, are considered broadly acceptable. Further details will need to be provided of the boundary treatment, particularly between the play area and the adjacent rear gardens to the homes fronting Basset Road. Details of the height of the play ground are required and further information on how the amenity impacts on the occupiers of the properties be mitigated.

Density

The proposal is estimated to have a density of 280 habitable rooms per hectare in the Urban Zone, which is within the expected density range of 200 to 700 hrph set out within Core Strategy Policy 5.

Housing Mix

The proposed dwelling mix would include 4x 1 bed units (21%), 7x 2 bed units (37%), 8x 3 bed units (42%). As the combined total of the two and three bed units would exceed the minimum requirement of 60% as set out under Core Strategy Policy 7 the proposed dwelling mix is considered to be acceptable. The scheme also provides over 30% of units of 3 bedrooms or more in accordance with the requirements for family homes set out in the Technical Update to the Residential Design Standards SPD.

Housing tenure

The proposal would provide all 19 units as affordable housing, which exceeds Core Strategy Policy 6 which requires 35% affordable housing on site.

No details have been provided of the proposed tenure split (social rent / intermediate / private). Details of this will need to be provided as part of any planning application, having regard to saved policy 4.4 of the Southwark Plan.

Housing Quality

Based on a review of the unit areas stated on the submitted plans, the internal unit sizes proposed for new dwellings would be in accordance with the Technical Update to the Residential Design Standards SPD, including the space standards for wheelchair housing. The SPD (p.13-14) also sets out standards for bedrooms sizes and guidance on other room areas that the scheme should seek to comply with. Minimum floor to ceiling height should be 2.3m.

The units appear to be predominantly dual aspect, providing good access to daylighting, outlook and cross ventilation, however full details of window locations (not provided here) will need to be verified.

There are some concerns regarding the layout of the ground floor units with respect to doors on the street and access to the wheelchair accessible unit as outlined above. Both wheelchair units will have a designated on-site wheelchair accessible parking space adjacent to Block B. The number of units proposed would satisfy the 10% required in accordance saved policy 4.3 of the Southwark Plan.

All wheelchair units should be designed to meet the South East London Housing Partnership Wheelchair Housing Design Guide space standards. Technical Guidance on these standards is set out in the Technical Update to the Residential Design Standards SPD on the Council's website dated October 2015:
http://www.southwark.gov.uk/downloads/download/2257/residential_design_standards_spd

Please note it is the council's policy to require all non-wheelchair user dwellings to meet M4(2) standard where practical and viable.

Dwellings have been designed to have integral bulk storage facilities and will have a mix of open plan living-kitchen-diners and units with separate kitchen diners to offer choice to potential occupiers. All three bed affordable dwellings have been designed to have self-contained kitchens in accordance with guidance in the Residential Design Standards SPD (2015) which is acceptable.

The 1 and 2 bed flats would have a minimum of 7sqm amenity space; the 3 bed and ground floor flats would have a minimum of 10sqm. A new community garden of 75sqm would be provided alongside Block B. The houses in Block A would have a minimum of 40sqm amenity space each. The scheme broadly accords with private and communal amenity space standards set out in Southwark's Technical Update to the Residential Design Standards SPD (2015). The 1 and 2 bed flats fall short of the preferred standard of 10sqm private amenity space but this is mitigated by the provision of the 75sqm communal amenity space adjacent to Block B as well as the proposed open space and play area nearby in Daniels Road.

Based on the plans provided the area allocated to play space is estimated at approximately 460 sqm. This is in accordance with the Mayor's Play and Informal Recreation SPG and London Plan Policy 3.6 which require a minimum of 10 square metres of play space per child bed space, which equates to 180 sqm of play space for this scheme. The SPG also states that "If there is an opportunity from new development to access existing provision that has excess capacity or is capable of enhancement from the new development, the benchmark standard of 10 sq m per child does not need to be applied." It is recommended that any formal application for planning permission include information on the existing play provision and how the proposed scheme will provide an enhanced play space with increased capacity.

Amenity impacts

The submission indicates that the initial massing of Block B was amended following sunlight daylight analysis to address negative impacts on occupiers of existing homes located on the opposite side of Daniels Road (58-72 Daniel's Road) in terms of daylight and sunlight. The revisions included a set back on the top floor, which

reduced the massing to the front of the building along Daniel's Road. The revised daylight sunlight analysis indicates good levels of compliance with BRE guidance, albeit with some minor derogations (relative to BRE guidance values) with regard to daylight to the 58-72 Daniels Road properties and to 129 and 131 Barsest Road; this is considered acceptable. The scheme demonstrates full compliance with the BRE guide in relation to sunlight amenity.

Insufficient information has been provided to fully assess overlooking, loss of privacy and disturbance, particularly with regard to the properties located to the rear of block B (block B would be located within 5 metres of the flanks of these properties, which is shorter than the minimum distance of 21 metres to the rear of a building specified in the Technical Update to the Housing Design Standards SPD). This must be a critical consideration when developing the rear elevation and boundary treatment.

All new residential units should be designed to achieve good levels of internal daylight and sunlight in accordance with the BRE guidelines. It is recommended that calculations for the proposed new spaces are provided with any formal submission.

Trees

Existing trees on the site are identified as a constraint in the submission but it fails to include consideration of the loss of, or harm to, trees, including the large mature tree located towards the northern end of Daniels Road. A full arboricultural assessment and method statement should be provided where it is proposed to removed existing trees.

Transport issues

Disbursement of existing vehicles using the garages and car park

There is limited on street availability to mitigate for disbursement of existing vehicles using the garages and the hard standing in the vicinity which is uncontrolled. Evidence of on street capacity to protect residents parking displacement will be necessary plus likely mitigation options.

Car parking

The proposal would provide 8 car parking spaces which equates to 0.4 spaces per dwelling, which is acceptable within this location (PTAL rating of 2).

Southwark Plan policy 5.7 required that a minimum of two accessible car parking spaces be provided for disabled people where parking is provided. The scheme proposed dedicated parking spaces for the two wheelchair accessible units which is considered acceptable.

Tracking evidence for the proposed car parking will need to be provided on the plans.

Cycle parking

The provision of secure cycling parking is indicated on the plans but the number of cycle parking spaces is unclear. Provision should meet the minimum standards set out in table 6.3 of the London Plan i.e. 1 space per studio and 1 bedroom unit; 2 spaces per all other dwellings. Cycle parking must be easy to access and use. We are looking for quality usable facilities. Opportunities for electric charging points for electric bikes should be considered.

Servicing

A servicing strategy and tracking drawings will need to be provided with any submission detailing what provision will be made to ensure servicing would be safe and would not have harmful impacts on either vehicle or pedestrian safety. The tracking drawings should illustrate a worst case scenario i.e. for the largest delivery vehicle that could be used by a commercial operator/refuse vehicle. The servicing strategy should include the predicted number of vehicles to and from the site and the nature of those vehicles. The document should be prepared in accordance with Transport for London document "London Freight distribution plan: A Plan for London" and "Managing Freight Effectively: Delivering and Servicing Plans".

Sustainable development implications

Energy

Only a summary energy strategy has been provided at this stage and although it indicates a strong focus on maximising carbon emission savings through the use of a communal heating system and solar PV panels it is unclear if the scheme will comply with London Plan Policy 5.2. The policy requires a reduction in carbon emissions of 35% below Part L 2013 target. A detailed energy assessment to demonstrate how this target for carbon dioxide emissions reduction will be met within the framework of the energy hierarchy will need to be provided as part of any planning application. This should include a roof plan demonstrating how many solar

panels will be included on the roof and how these will be laid out.

Air Quality

The site is in an Air Quality Management Area and potential air quality impacts may arise as a result of demolition/construction impacting on nearby sensitive receptors. Details of appropriate mitigation should be provided with any formal application to demonstrate that the effects of the completed development on air quality would not be significant and would be in accordance with the Mayors guidance.

Flood risk

The site is situated in Flood Risk Zone 1. The submission should include consideration of sustainable drainage measures to mitigate surface water flood risk in accordance with London Plan Policy 5.13 and Strategic Policy 13 of the Core Strategy 2011.

Planning obligations (S.106 undertaking or agreement)

The submission has not set out details of policy compliant planning obligations in accordance with the Planning Obligations SPD. Planning obligations will be required to offset the negative impacts of any development on the site. The Council's SPD on S106 Planning Obligations (2015) sets out the general expectations in relation to the type of obligations that will be sought. It is important to ensure that all future development is sustainable and contributes towards the provision of appropriate infrastructure and services in the area that future residents may use. Draft Heads of Terms should be submitted in accordance with the SPD as part of any formal application and are required for the purposes of validation.

Community Infrastructure Levy

The Community Infrastructure levy has not been taken into account within the submission. This development will be subject to the Mayoral CIL (MCIL) and Southwark CIL (SCIL). The charge will be calculated according to the amount of new floor space the development will provide. The chargeable rate for Southwark is £35 per square metre under MCIL and £200 per square metre (for residential floorspace in CIL zone 2) under SCIL (both subject to indexation). It is necessary to complete a 'Planning Application Additional Information Requirement Form' to determine the amount of chargeable floorspace on the site and submit this with any formal planning application on the site.

The amount to be paid is calculated when planning permission is granted and it is paid when development starts. Further details about the CIL can be found using the links below.

<http://www.planningportal.gov.uk/planning/applications/howtoapply/whattosubmit/cil>

<http://www.communities.gov.uk/publications/planningandbuilding/communityinfrastructurelevymay11>

Construction management

We recommend that the applicant consider how they will construct the constrained site with minimal impact on the surrounding area. Should the construction of a development require the occupation or closure of the carriageway or footway; involve a high volume of construction related vehicle trips; or any other significant impact on the highway network then a Construction Management Plan is required prior to any demolition or construction works on site. Detailed information on producing these plans can be found at:

www.tfl.gov.uk/microsites/freight/initiatives_and_projects.aspx

Other matters

Prior to the submission of an application, it is advised that discussions be had with the Council's Highway Development Control Team regarding any works on or adjacent to the Highway. Regard should be had to the material palette set out in the Council's SSDM (Southwark Street Design Manual). All development will be required to incorporate the principles of inclusive design, with suitable access provided for people with disabilities or those who are mobility impaired.

London Plan (2015) policy 5.15 and optional standard 36(2b) of Approved Document G of the Building Regulations (2015) require residential development to meet a target of 105 litres or less per head per day; this will be conditioned.

Conclusion

Redevelopment of the site would significantly increase housing supply in accordance strategic objectives to deliver more affordable housing in the borough. The proposal broadly complies with adopted policies in the development plan, however recommendations for improving the detailed design of the scheme have been highlighted. Further information will need to be provided on a number of issues as part of any formal planning application, including: detailed elevations for both blocks; tenure split of affordable housing; play space quantity and quality; tree impacts; cycle parking provision; parking and servicing tracking; full energy assessment, arboricultural assessment, full daylight/sunlight report and transport and parking surveys.

This advice is given to assist you but is not a decision of the Council. Further issues may arise following a formal planning application, where a site visit and public consultation and consultation with statutory consultees would be undertaken.

Please accept this letter as the closure of your current enquiry.

Yours sincerely

Simon Bevan
Director of Planning