

Item No. 6.1 and 6.2	Classification: Open	Date: 17 December 2013	Meeting Name: Planning Committee
Report title:	<p>Development Management planning application: Applications 13/AP/2979 for: Full Planning Permission and 13/AP/3168 for Conservation Area Consent</p> <p>Address: FORMER SOUTHWARK TOWN HALL, 31 PECKHAM ROAD, LONDON, SE5 8UB</p> <p>Proposal:</p> <p>(13/AP/2979) Demolition of buildings to the rear of the Town Hall including Theatre Peckham to facilitate redevelopment of the site. Erection of a part 7, part 4 storey building and refurbishment of the Town Hall to provide student accommodation (149 rooms), a new Theatre (1,244 sq metres), professional artist studios (Use Class B1a-c) and a cafe (Use Class A3). Construction of a one storey structure as a roof extension to the Town Hall and new building for use as a student common room with associated roof terrace. Creation of a new public space at the rear of the site, linked to the new entrance to Theatre Peckham, with associated landscaping works and cycle parking; and</p> <p>(13/AP/3168) Demolition of theatre and data centre in association with planning application 13/AP/2979 to redevelop the site.</p>		
Ward(s) or groups affected:	Brunswick Park		
From:	Director of Planning		
Application Start Date	16/09/2013	Application Expiry Date	16/12/2013
Earliest Decision Date	09/11/2013	Planning Performance Agreement Date:	31/01/2014

RECOMMENDATIONS

- 1 That full planning permission is granted for application 13/AP/2979 subject to conditions and the applicant entering into a satisfactory legal agreement.
 - 2 That conservation area consent be granted for application 13/AP/3168 subject to conditions
- and/or
- 3 In the event the legal agreement is not entered into by 31st January 2014 then the Director of Planning be authorised to refuse planning permission if appropriate for the reasons set out in paragraph 180 of this report.

BACKGROUND INFORMATION

Site location and description

- 4 The site, measuring 0.24 hectares is a rectangular plot located on the north side of Peckham Road east of its junction with Havil Street. To the west of the site is 29 Peckham Road (Grade II Listed), which has been recently been converted into an employment academy. To the east of the site are a group of buildings known as Central House (Grade II Listed), West House and East House (Grade II Listed), which have recently been converted into student accommodation for the University of Arts London (UAL). South of the site across Peckham Road is the Grade II Listed South House which also forms part of the student accommodation provision for UAL. To north of the site there are residential flats and associated garden space which comprise part of the Sceaux Gardens Estate.
- 5 The site comprises three buildings, including the Town Hall, the data centre and the community building in use by Theatre Peckham.
- 6 The Town Hall building, measuring five storeys in height, was up until recently used for committee meetings and other local government functions, with ancillary office space (Use Class Sui generis). It was vacated in 2011 with the relocation of council functions to other office sites in the borough, predominantly the council offices on Tooley Street.
- 7 A single storey data centre, constructed of brick and with a pitched roof, remains in use providing IT network functions for the council.
- 8 Theatre Peckham is a 158 seat auditorium with a total of 390 sqm of floorspace. It is a brick building, accessed from the north of the site and has a blank brick facade on Havil Street.
- 9 The site falls within the Sceaux Gardens Conservation Area which is predominantly residential to the north of the site. The site is within walking distance of Camberwell, Peckham Town Centre and Camberwell College of Arts.

Details of proposal

- 10 The scheme consists of the refurbishment and extension of Southwark Town Hall to provide student accommodation, artist studios and a ground floor cafe/gallery. It would also include the demolition of the existing data centre and theatre building and the erection of a seven storey building that would incorporate student accommodation and a new theatre with associated facilities at ground and first floor level.

Student accommodation

- 11 Floors 1-4 of the refurbished Town Hall building (plus the rooftop extension) will provide 69 student rooms providing a total of 77 bedspaces.
 - 61 standard rooms (61 bedspaces)
 - 8 twin rooms (16 bedspaces)
- 12 A seven storey new build extension is proposed to the Town Hall that would provide student accommodation on floors 2 – 7 of which 80 rooms would provide 85 bedspaces.

- 59 standard rooms (59 bedspaces)
- 5 accessible rooms at second floor level (5 bed spaces)
- 5 twin rooms (10 bedspaces)
- 11 studio rooms (11 bedspaces)

- 13 Each room will have an en-suite bathroom and a desk. Clusters of 3 – 9 bedspaces will share kitchen facilities and a living room. Studio rooms will have their own kitchen facilities.

A roof top pavilion will provide access to a communal roof terrace for all students.

Theatre Peckham

- 14 The proposals include the provision of a larger, bespoke facility for Theatre Peckham that would provide modern facilities. The space would include a new 232 seat capacity auditorium with flexible format and folding seating for versatile performance space. A dedicated backstage area, costume storage, general storage and changing areas would be provided at ground floor level, in addition to two new studios providing space for rehearsals, workshops and education work. A theatre back-office, storage area and toilets would be provided at first floor level. A large foyer area would be provided with new entrances on Havil Street to provide a street presence. An entrance to the north of the site would also be provided fronting on to a new public square that would have new trees, cycle parking, benches and planters and landscaping to provide a higher profile entrance.

Artist studios (Use Class B1 a-c)

- 15 The ground and lower ground floor of the refurbished Town Hall will accommodate 458 sqm of artist's studios (Use Class B1 a-c) that would be managed by SPACE studios. SPACE studios are a charitable organisation with a large portfolio of affordable studios in London, providing creative workspace, professional training and a school and young people programme. It is proposed that the SPACE will rent the studios to local artists at below market rents and from time to time the studio spaces will be open to the public for exhibitions of artist work.

Cafe

- 16 A cafe would be provided on the ground floor at the front of the building and will be open to the general public. It is expected to be operated by Hotel Elephant and also provide display and gallery space for artists. Hotel Elephant currently operate an art gallery and cultural venue established in 2009 at Elephant and Castle.
- 17 Landscaping works are proposed to the entrance forecourt, the entrance to the theatre to create a new public square, an area to the east of the refurbished building and the roof of the proposed building.

Planning history

- 18 None of relevance.

Planning history of adjoining and nearby sites

33-35 Peckham Road

- 19 10/AP/2623 Full planning permission and associated listed building consent (10/AP/2622) for the change of use of the buildings from offices (Use Class B1) to student accommodation (Sui Generis) comprising 125 student bedrooms (155 bedspaces), and associated staff, communal and laundry spaces, including a 4

storey side extension to Central House and other internal and external alterations. Retention of 5 car parking spaces, including 2 disabled parking bays, provision of cycle storage and refuse storage areas and new plant, ventilation and air source heat pump equipment to be located in and around the buildings. Erection of new railings to the rear of South House, adjacent to Lucas Gardens. (Associated application for Conservation Area Consent for the demolition of existing buildings on the site, reference 10-AP-2622). This permission has been implemented and the buildings are now occupied.

29 Peckham Road

- 20 10/AP/0873 Full planning permission and associated listed building consent (10/AP/0874) for the refurbishment and restoration of existing Grade II Listed Building, with limited removal of internal walls and demolition of single storey elements to rear; and construction of new build extension to north and west boundaries, with infill to existing elevations, to create a part single, 2 and 3 storey building, all to accommodate an employment academy (training facility to help the local long term unemployed find employment) changing the use of the building from Class B1 (office) to flexible use Class D1 (community use / training) and B1 (office space) as well as a new cafe (Class A3). The permission has been implemented and the Thames Reach Employment Academy is now open.

KEY ISSUES FOR CONSIDERATION

Summary of main issues

- 21 The main issues to be considered in respect of this application are:
- a) Principle of the proposed development and conformity with strategic policies, including the need for student accommodation;
 - b) Affordable housing;
 - c) Impact upon the amenities of neighbouring residents and occupiers;
 - d) Quality of accommodation;
 - e) Impact of adjoining uses on the proposed development;
 - f) Transport;
 - g) Design;
 - h) Trees and landscaping including the provision of new theatre space;
 - i) Planning obligations (s106) and community infrastructure levy;
 - j) Sustainability;
 - k) Flood risk;

Planning policy

- 22 The development plan for the borough comprises the London Plan 2011, the Southwark Core Strategy 2011 and Saved Policies from the Southwark Plan 2007.
- 23 The site is located within the following designations as identified by the Core Strategy (2011) Proposals Map:
- Urban Density Zone
 - Sceaux Gardens Conservation Area
 - Air Quality Management Area
 - The site has a Public Transport Accessibility rating of 4.

Core Strategy 2011

- 24 Strategic Targets Policy 1 - Achieving growth
Strategic Targets Policy 2 - Improving places
- 25 Strategic Policy 1 - Sustainable development
Strategic Policy 2 - Sustainable transport
Strategic Policy 3 - Shopping, leisure and entertainment
Strategic Policy 4 - Places for learning, enjoyment and healthy lifestyles
Strategic Policy 5 - Providing new homes
Strategic Policy 6 - Homes for people on different incomes
Strategic Policy 7 - Family homes
Strategic Policy 8 - Student homes
Strategic Policy 10 - Jobs and businesses
Strategic Policy 11 - Open spaces and wildlife
Strategic Policy 12 - Design and conservation
Strategic Policy 13 - High environmental standards
Strategic Policy 14 – Implementation and delivery

Southwark Plan 2007 (July) - saved policies

- 26 The council's cabinet on 19 March 2013, as required by para 215 of the NPPF, considered the issue of compliance of Southwark Planning Policy with the National Planning Policy Framework. All policies and proposals were reviewed and the council satisfied itself that the policies and proposals in use were in conformity with the NPPF. The resolution was that with the exception of Policy 1.8 (location of retail outside town centres) in the Southwark Plan all Southwark Plan policies are saved. Therefore due weight should be given to relevant policies in existing plans in accordance to their degree of consistency with the NPPF.
- 27 Policy 1.1 - Access to employment opportunities
Policy 2.2 - Provision of new community facilities
Policy 2.5 - Planning obligations
Policy 3.1 - Environmental effects
Policy 3.2 - Protection of amenity
Policy 3.3 - Sustainability assessment
Policy 3.4 - Energy efficiency
Policy 3.6 - Air quality
Policy 3.7 - Waste reduction
Policy 3.9 - Water
Policy 3.11 - Efficient use of land
Policy 3.12 - Quality in design
Policy 3.13 - Urban design
Policy 3.14 - Designing out crime
Policy 3.28 - Biodiversity
Policy 4.2 - Quality of accommodation
Policy 4.4 - Affordable housing
Policy 4.5 - Wheelchair affordable housing
Policy 4.7 - Non self-contained housing for identified user groups
Policy 5.2 - Transport impacts
Policy 5.3 - Walking and cycling
Policy 5.6 - Car parking
Policy 5.7 - Parking standards for disabled people and the mobility impaired

London Plan 2011

- 28
- Policy 3.3 Increasing housing supply
 - Policy 3.1 Ensuring equal life chances for all
 - Policy 3.8 Housing choice
 - Policy 3.9 Mixed and balanced communities
 - Policy 3.10 Definition of affordable housing
 - Policy 3.11 Affordable housing targets
 - Policy 3.12 Negotiating affordable housing on individual private residential
 - Policy 4.7 Retail and town centre development
 - Policy 4.10 New and emerging economic sectors
 - Policy 4.12 Improving opportunities for all
 - Policy 5.1 Climate change mitigation
 - Policy 5.2 Minimising carbon dioxide emissions
 - Policy 5.3 Sustainable design and construction
 - Policy 5.5 Decentralised energy networks
 - Policy 5.6 Decentralised energy in development proposals
 - Policy 5.7 Renewable energy
 - Policy 5.9 Overheating and cooling
 - Policy 5.15 Water use and supplies
 - Policy 5.10 Urban greening
 - Policy 5.11 Green roofs and development site environs
 - Policy 5.12 Flood risk management
 - Policy 5.13 Sustainable drainage
 - Policy 6.3 Assessing effects of development on transport capacity
 - Policy 6.13 Parking
 - Policy 6.9 Cycling
 - Policy 6.10 Walking
 - Policy 6.11 Smoothing traffic flow and tackling congestion
 - Policy 7.1 Building London's neighbourhoods and communities
 - Policy 7.2 An inclusive environment
 - Policy 7.3 Designing out crime
 - Policy 7.4 Local character
 - Policy 7.5 Public realm
 - Policy 7.6 Architecture
 - Policy 7.8 Heritage assets and archaeology
 - Policy 7.21 Trees and woodlands
 - Policy 7.13 Safety, security and resilience to emergency
 - Policy 7.14 Improving air quality
 - Policy 7.15 Reducing noise and enhancing soundscapes
 - Policy 8.3 Community infrastructure levy

National Planning Policy Framework (NPPF)

- 29
- Section 1 - Building a strong, competitive economy
 - Section 4 - Promoting sustainable transport
 - Section 6 - Delivering a wide choice of high quality homes
 - Section 7 - Requiring good design
 - Section 8 - Promoting healthy communities
 - Section 10 - Meeting the challenge of climate change, flooding and coastal change
 - Section 11 - Conserving and enhancing the natural environment

Principle of development

Loss of the Town Hall function

- 30
- The lawful use of the Town Hall building is 'Sui generis' meaning the use provided is in a class of its own. The property is now surplus to the council's requirements

and is currently unoccupied, other than on-site security and computer servers which are still operational.

- 31 Whilst the property was until recently (2011) occupied as an office space, the District Valuers Service (DVS) concludes it is unlikely to be lettable in its current condition. The necessary alterations required to bring the property up to a modern standard would require significant work and investment which, given the site's location, outside of a town centre or established office location, is unlikely to be viable given that demand for office space which is generally focused in the SE1 area. Since the lawful use of the Town Hall is not an 'office' space (Use Class B1) it would not be protected by saved policy 1.4 of the Southwark Plan. As such, there are no restrictions, in terms of land-use, to this building being used for student accommodation, which would make productive use of a largely unoccupied site provided policy requirements relating to student housing can be met.

Student Housing

- 32 London Plan policy 4.10 requires boroughs to give strong support for London's higher and further education institutions, recognising their need for accommodation. London Plan policy 3.8 requires boroughs to ensure that strategic and local requirements for student housing meeting a demonstrable need are addressed by working closely with stakeholders in higher and further education and without compromising capacity for conventional homes. The supporting text to this policy states that whilst there is uncertainty over future growth in the London student population and its accommodation needs, there could be a requirement for some 18,000-27,000 places over the 10 years to 2021.
- 33 Strategic policy 8 of the Core Strategy sets out the strategic approach to student housing in the borough allowing their development within town centres and places with good access to public transport, provided they would not harm the local character of an area. The policy also emphasises that provision of new student homes needs to be balanced against other types of housing, such as affordable and family housing and therefore requires 35% of student housing to be provided as general needs affordable housing. This is applied in line with strategic policy 6 of the Core Strategy.
- 34 In Southwark student housing is considered to be non self-contained accommodation and is defined as 'Sui Generis' under the Use Classes Order. Policies relating to housing targets, dwelling mix and quality of residential accommodation are therefore not directly applicable. Notwithstanding this, the GLA monitor student housing and consider it as housing for general monitoring purposes.
- 35 Saved policy 4.7 supports the implementation of the council's student housing policy by applying development control criteria that would apply to any assessment of non-self contained housing accommodation. In considering the appropriateness of a site it requires an assessment to be made of the need, and suitability of, the proposed accommodation for its intended users; that its provision would not result in a significant loss of amenity to neighbouring occupiers; adequate infrastructure is in the area to support any increase in residents; and that the scheme would provide a satisfactory standard of accommodation, including shared facilities.
- 36 Section 4.3 of the Residential Design Standards SPD provides guidance specifically relating to student housing requiring details of affordability, security and long term management and maintenance arrangements. This is to ensure an adequate assessment can be made of the scheme and its affordability for the user

group by being benchmarked against other similar student accommodation.

- 37 The Southwark Student Housing Study (July 2010) set out the number of student schemes under construction and schemes consented but not yet implemented. The study found that Southwark had the second highest number of student schemes of any London borough in the development pipeline. Additionally, there are a number of new student schemes that have been granted permission since the date of the study.
- 38 The applicant has submitted a report which assesses the need for student accommodation in Camberwell, Southwark and London area. It sets out that there are currently 330 student bedspaces in Camberwell for 1,950 full time students. The study reports that the key institution in the Camberwell area is the Camberwell College of Arts (part of the University of the Arts London), and that this college can provide accommodation for 21% of its full time students. This is below the overall provision across London (28%) and Southwark (25%). It is noted that student accommodation proposed is not tied to the Camberwell College of Arts and would be available to students attending universities across London.
- 39 The study also concludes that there is a relatively high concentration (over 25% across 7 wards of Newington, Faraday, East Walworth, South Bermondsey, Livesy, Camberwell Green, Brunswick Park and Peckham) of students living in the private rented sector due to the lack of specialist student accommodation in the area. Taking account of the evidence submitted by the applicant, it is considered that the need for student accommodation has been adequately demonstrated.

Affordability of student accommodation

- 40 Proposed rental levels are £180 per week for cluster rooms, £210 for twin rooms and £240 for studio rooms which the District Valuers Service (DVS) confirms would fall within a range that is comparable to proposals elsewhere in the borough. The rents proposed are not subsidised or below market rent levels but would be comparable with other schemes in the borough as required by the Residential Design Standards SPD. Based on this analysis, the accommodation is affordable for the identified user.

Security and long term management

- 41 A student accommodation management plan forms part of the submission which details that CCTV would be installed in and around the building and the scheme would have a dedicated on site manager from Monday to Friday (09:00 -17:00). Maintenance and repairs would be handled by an on-site handy person and designated staff will be in place in respect of health and safety. A reception area would form the hub for all student and visitor enquiries and will be manned from 09:00 to 17:00.
- 42 Out of hours supervision would be covered by resident wardens who will provide a point of contact for students and any other parties involved in the monitoring of student behaviour. Proactive liaison with local residents associations and community groups is also proposed during the operation of the development and students will be required to sign up to tenancy agreements that bind them to a code of conduct. A move in plan would also be in place to manage student arrival and departures to minimise the impact on the surrounding area. Based on this analysis, a range of management and security measures are proposed that enable the scheme to operate without adversely impacting upon residential amenity. It is recommended that management and security measures be secured throughout the S106 agreement and for these to remain in place throughout the lifetime of the

development.

Quality of student accommodation

- 43 Criteria (iv) of saved policy 4.7 of the Southwark Plan and the Residential Design Standards SPD require proposals for student accommodation to provide a satisfactory standard of accommodation, including shared facilities. There are no policy standards for the size of units within student accommodation.
- 44 The scheme would provide 149 rooms arranged as either en-suite cluster rooms (a mix of 3 to 9 bed flats) with access to shared communal areas including kitchen/diner facilities, twin rooms or studio rooms. Rooms would be between 14 m² – 19 m² and include the provision of 5 wheelchair accessible rooms with a further 3 rooms that are capable of being fitted to wheelchair accessible standards. This equates to an accessible provision of up to 5%.
- 45 Outlook and privacy for future occupiers is expect to be of a good standard, owing to the distance of separation with neighbouring properties and orientation of windows in the new and refurbished buildings. Based on the analysis of properties above it is anticipated that future occupiers of the student housing will experience a good standard of accommodation.

New Theatre

- 46 Strategic objective 1D of the Core Strategy sets out the expectation that Southwark will have a range of arts and cultural facilities for its diverse community. Saved policy 1.11 supports the provisions of new cultural facilities detailing that planning permission will be granted for new facilities outside of strategic cultural areas where it would not have a significant detrimental effect on the environment or local amenity and has good public transport accessibility.
- 47 Theatre Peckham has an established role in the local community providing structured education and training in performing arts for over 30 years. It has a long history of outreach, working with other theatres, schools and community centres primarily engaging with young people and communities who have historically been excluded from more than marginal participation in theatre. For many it has provided discounted tickets for productions, personal development skills, a place of discovery and opportunities to develop skills and positive prospects for future employment.
- 48 Problems with the building have limited opportunities for it to extend its reach and achieve financial independence. A combination of a lack of space, shortcomings with the fabric of the theatre and its layout has resulted in the theatre having to use alternative spaces nearby such as the Harris Academy. Use of this space is reported to be inefficient to manage and costly to the theatre due to the logistical issues involved with the management of these services across these sites.
- 49 Furthermore, by virtue of the building's low profile and poor street presence, the theatre is said to be hampered in its ability to generate income from bids for funding and its appeal to local audiences. As a result the theatre has been limited in its ability to become financially independent, to engage in wider range of activities and to fulfil its potential as a resource for young people and a focal point for cultural development in South London.
- 50 Redevelopment of the site would increase the floor area of the theatre from 390sqm to 1244 sqm and create a substantial area of landscaped public realm at its entrance. The new facility would have dedicated rehearsal space and larger

auditorium that would enable the theatre to host a greater range of activities on site. The report states that the new facility would create opportunities for the theatre to engage with a wider group of people and free up income currently spent on hiring other local facilities and offer the opportunity for it generate revenue streams and secure its long term future.

Artist studios

- 51 The development would provide 458 sqm of workspace (Use class B1a-c) that will be used as artist studios and let to local artists / occupiers at below market rates. The intention is that from time to time studio spaces would be open to the public for the exhibition of artist works.
- 52 In terms of rent, the DVS have confirmed that proposed rent levels would be subsidised and significantly below the market rent for comparable space. It is recommended that rental levels below market rental levels are secured by a legal agreement.
- 53 The Core Strategy supports the provision of new workspace and this scheme would comply with Strategic Policy 10 of the Core Strategy. Whilst the policy provides no guidance on affordability of workspace, the provision of start up space can be supported as would be in accordance with broad aspirations to support the development of creative industries associated with the Camberwell College of arts and the wider town centres of Peckham and Camberwell.

Café

- 54 A ground floor café (Class A3) will be open to the general public and would also provide display and gallery space for artists. The space is expected to be managed by Hotel Elephant who operate an art gallery and cultural venue in Elephant and Castle. The provision of a small scale café facility for residents, users of the workspace and student accommodation would improve the long term sustainability of the site in meeting day to day needs and enhance the vibrancy of this part of Peckham Road. By virtue of the scale of the provision it would be in accordance with Saved policy 1.10 of the Southwark Plan and Strategic policy 3 of the Core Strategy.

Summary

- 55 In summary there is no objection to the provision of purpose built student housing as it would meet a need, could free up accommodation in the private rented sector and would be affordable to the identified user group. Adequate information has been provided detailing provisions for long-term security and management that suggest that the scheme would not result the loss of amenity. Furthermore, there are no policy restrictions to the change of use and so in terms of land use student accommodation at this site can be supported.
- 56 The provision of a café can be supported as it would add vibrancy and activity that would be of benefit to this area. The provision of affordable artist studios can also be supported as it would offer good quality space for artists and start-ups in the area and vibrancy through the periodic show of public exhibitions.
- 57 The provision of a new theatre at this site would be a significant benefit, representing a rare opportunity to deliver a high quality facility at the site of the existing theatre. It is highly unusual that a theatre should be built at this time and in support of the scheme, Theatre Peckham remark that its presents 'a very special opportunity that the theatre would never be able to finance independently'. The new theatre would have modern facilities that would enable it to meet the needs of

a greater range of people, to generate jobs and revenue to undertake outreach work with more members of the community. Such an investment would secure a significant resource for future generations of young people and is capable of bringing substantial benefits.

Density

- 58 Strategic policy 5 of the Core Strategy requires that residential developments in the urban density zone to fall within a range of between 200-700 habitable rooms per hectare. The density ranges set out in both the Core Strategy and the London Plan were derived from an understanding of the space needs and general configurations of mainstream (Class C3) housing. It assumes a standard layout of accommodation, with flats or houses each with their own kitchen and bathroom and living rooms. It also assumes space requirements for things like play, and for car parking. The straight translation of the density ranges to non-self contained accommodation is not therefore considered to be as relevant, since the floor areas and likely number of occupiers would not be directly comparable.

Affordable Housing

- 59 The provision of student housing has to be balanced with the provision of other types of housing, particularly affordable and family homes. Strategic Policy 8 of the Core Strategy seeks to address the balance between the provision of student accommodation and other types of housing by requiring 35% of student developments as affordable housing in line with Strategic policy 6. By requiring affordable housing or a contribution to its provision, where it is has been demonstrated that it is not viable to provide it on site, the Council can ensure that it is meeting the needs for both student accommodation and general needs affordable accommodation.
- 60 The draft Affordable Housing SPD (June 2011) explains that all student schemes providing 30 or more bedspaces will be required to provide affordable housing. The SPD also sets out the mechanism for calculating the level of affordable housing and states that each student bedroom and communal living / dining room must be counted as a habitable room.
- 61 As with all housing developments, the quantum of affordable housing to be provided will be impacted by the financial viability of the overall development. In cases where an applicant does not propose to provide 35% affordable housing, they are required to submit a financial appraisal.
- 62 A viability assessment has been submitted which explains that the applicant does not propose to provide either on-site general needs affordable housing or off-site affordable housing. The applicant has explained that the comprehensive redevelopment of the Theatre Peckham would come at a cost estimated to be circa £2.3 million with no revenues to offset the cost. Theatre Peckham would be granted a long lease for a peppercorn rent with the expectation that they reasonably contribute to servicing and maintenance costs of the new facility. Together with offering subsidised artist studios the applicant considers that these facilities comprise substantial planning contributions that would bring a comprehensive range of activities and services of significant benefit to local residents, community groups and individuals. Furthermore, the applicant's financial assessment concludes that the level of investment in the theatre is such that it would not be possible for the scheme to support a further contribution towards the provision of affordable housing as it would result in the scheme becoming financially unviable.

- 63 If pooled contributions towards affordable housing were to be accepted a contribution of £100,000 per habitable room of affordable housing not being provided on site would normally be expected. The scheme provides 149 bedrooms plus communal kitchens and living rooms as well as the large communal area provided within the roof extension. Residential Design guidance states that where a habitable room would exceed 27.5 sq metres it can be counted as two habitable rooms. The sum of these 'other' spaces generates an equivalent of 48 habitable rooms bringing the total number of habitable rooms generated by the scheme to 197. Using this methodology a sum of £6,900,000 would be required (being 35% of 197 habitable rooms = 69 x £100,000) as an in-lieu payment in the absence of any proposed on-site or off-site provision.
- 64 The DVS has reviewed the appraisal and although there are differences of opinion over certain elements of the appraisal the DVS concludes that the scheme is financially viable and can support a contribution of circa £500,000. The £500,000 would include both an affordable housing contribution and other S106 costs above and beyond what has been allowed for in their assessment.
- 65 The factors which have the most impact on the scheme's viability are the current use value of the Town Hall and the build costs associated with the extension and the new theatre. Reduced rents for the artist studios would not have a significant impact on the viability of the scheme.
- 66 Following discussions with the DVS, Alumno have made a revised S106 offer which comprises £527,906 in cash contributions, plus in kind benefits (works to create a new public square and entrance to Sceaux Estate from Havil Street) which equates to a total S106 contribution of £580,284 (including admin fee). This is a significant improvement upon the initial S106 offer (£150,000) and would result in policy compliant contributions that are sufficient to mitigate the impacts generated from this development.
- 67 The SPD explains that there may be circumstances where, after the minimum section 106 requirements are met, a financial appraisal shows it is not viable to provide the full policy requirement of affordable housing due to the scheme providing other exceptional community benefits. It explains that the applicant must demonstrate that the community benefits are additional to the standard minimum section 106 requirements and that the scheme is exceptionally beneficial to the wider community and meets the council's objectives.
- 68 The revised S106 offer creates a residual surplus of circa £69,752 which the DVS conclude is within the range of sensitivity of their assessment of viability. The DVS acknowledge that the costs of the theatre could rise depending on its final specification which may impact the scheme's viability. Furthermore, the purchase price of the Town Hall is much higher than the DVS estimate of its current use value. The DVS conclude that, if it sold with the benefit of planning permission, the value of the Town Hall would be considerably higher than the DVS have allowed for in their assessment.
- 69 Based on this analysis, after full S106 contributions are taken into account, it would be reasonable to conclude that the scheme is not capable of supporting any further contributions without significant risk to the viability of the project. Officers consider it a matter of judgement that this is a unique opportunity to secure significant investment into a community resource that is capable of delivering exceptional community benefits.

Wider community benefits

- 70 The SPD does not define what is meant by 'exceptionally beneficial' nor is it defined within the Core Strategy, London Plan or the National Planning Policy Framework. As such there is no formally agreed definition that can be applied when assessing the benefits of this scheme on the wider community. For this reason Members are advised to consider the assessment of the scheme's benefits in its broadest possible terms. This may include the magnitude or scale of benefit, such as the opportunity provided by the new theatre to undertake a wider range of activities or increasing the number of productions it runs. It must also be considered against unique social and cultural context of this site and the rare opportunity to deliver a purpose built bespoke space at the heart of a local community.
- 71 An appreciable level of support has been received from local residents and organisations such as the Theatres Trust who report that Theatre Peckham has had a long history of transforming the lives of young people. By providing opportunities to learn, develop technical skills and embark on career in the creative arts, they strongly support the proposal, particularly in this area where there are no other equivalent facilities.
- 72 It is also recognised that there are benefits offered by the scheme that can be inter-connected and dynamic. The submitted report titled 'Theatre Peckham – Unlocking its Potential' identifies opportunities that will be provided by the scheme to link the work of the theatre with the Camberwell College of Arts, the South London Art Gallery, the new artist studios and nearby Vanguard Court studios. The scheme can therefore provide a focal point for not only the local residential community but has a role in the long term sustainability of this area in supporting the arts and creative industries. This should be viewed as a benefit that adds value above and beyond the delivery of the theatre project on its own as it would support emerging identity of the wider area as a cultural hub. The scheme would go some way to strengthen this identity in the long term and support the council's cultural development aspirations for Camberwell and Peckham.
- 73 Members should give appropriate weight to benefits of the theatre, which if they consider significant could override the need for affordable housing in accordance with policy. Viability aside, officers consider that it would not be possible to construct affordable housing as part of this scheme as it would require a separate entrance, lift core, private outdoor amenity spaces and cycle parking which would not be possible owing to physical constraints.
- 74 Officers consider this to be an exceptional opportunity to deliver a new theatre at this site that would represent a significant investment in a local community resource which would provide significant benefits. In these circumstances it would be acceptable for the community theatre use to be provided in lieu of affordable housing.

Environmental impact assessment (EIA)

- 75 An EIA is mandatory for development described under Schedule 1 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011. The proposed scheme does not fall under any of the categories of projects listed under Schedule 1 of the Act and so there is no mandatory requirement for an EIA.
- 76 Notwithstanding this there is a need to assess whether it would fall under the list of

projects listed under Schedule 2 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011, and if so to determine if the scheme is likely to have significant environmental effects.

- 77 Schedule 2 lists a range of projects and relevant thresholds that must be considered when screening a project for EIA. Taking account of the provisions set out in the Schedule it is considered that the scheme is capable of being considered a 10 (b) 'urban development project' as it proposes the demolition of buildings, construction works and the change of land use of existing buildings in an urban area. The relevant threshold applicable for these projects is for the development area to exceed 0.5 hectares.
- 78 Whilst the site, measuring 0.24 hectares, falls below this threshold case law has shown that the European EIA Directive, which is implemented by the EIA regulations has wide scope and purpose.
- 79 The site adjoins 33-35 Peckham Road which was recently granted planning permission for a change of use from offices (Class B1) to student accommodation (Sui generis) (10/AP/2623). The conversion of that building formed part of a much larger project to provide 125 student rooms (155 bedspaces) in buildings that were formerly offices.
- 80 Given the site adjoins these properties, the scheme is capable of being understood as an extension of the approved student accommodation. Taking this into account, the site area, covering the Town Hall buildings, Theatre and student housing project at 33-35 and 30-32 Peckham Road would measure 0.8 hectares. This would exceed the threshold for an urban development project and trigger the need to screen the cumulative impact of the whole student housing project to determine whether it is likely to have significant environmental effects.
- 81 A detailed assessment of these combined student projects is outlined in Appendix 3 to this report. It concludes that the cumulative impact of these developments is not likely to have significant effects upon the environment by virtue of factors such as the nature of the project, its size or location.

Impact of proposed development on amenity of adjoining occupiers and surrounding area

- 82 Saved policy 3.2 of the Southwark Plan states that permission will not be granted for developments where a loss of amenity, including disturbance from noise, would be caused. In addition, saved policy 4.7 states that the provision of non self-contained housing should not result in a significant loss of amenity to neighbouring occupiers. The adopted Residential Design Standards SPD expands on policy and sets out guidance for protecting amenities in relation to privacy, daylight and sunlight. Strategic policy 13 of the Core Strategy 'High environmental standards' seeks to ensure that development sets high standards for reducing air, land, noise and light pollution and avoiding amenity and environmental problems that affect how we enjoy the environment in which we live and work.

Daylight, sunlight and overshadowing impacts

- 83 A Daylight and Sunlight Report has been prepared by Right of Light Consulting for the application site, which assesses the proposed development against the Building Research Establishments (BRE) guide 'Site Layout Planning for Daylight & Sunlight 2011: A Guide to Good Practice, Second Edition'.
- 84 The following properties have been assessed:

- 132-142 Havil Street (even);
- 1-72 Mistral House, Sceaux Gardens; and
- 33-35 West House, Peckham Road.

85 In terms of daylight an assessment of the 'Vertical Sky Component' (VSC) has been carried out. The assessment estimates the likely amount of daylight reaching a window expressed as a percentage. The guidance recommends that the windows of neighbouring properties should achieve a VSC of at least 27%, and notes that if the VSC is reduced to no less than 0.8 times its former value (i.e. less than a 20% reduction) following the construction of a development, then the reduction will not be noticeable.

86 In terms of sunlight, an assessment of Annual Probable Sunlight Hours (APSH) has been undertaken. This is required to be considered for all windows facing within 90 degrees of due south (windows outside of this orientation do not receive direct sunlight in the UK). The guidelines advise that windows should receive at least 25% APSH, with 5% of this total being enjoyed during the winter months. It should not be reduced to less than 0.8 times its former value.

87 In terms of overshadowing, an assessment of the development on gardens and amenity areas has been carried out. The guidance recommends that for an area to appear adequately sunlight throughout the year, at least half of the garden or amenity area should receive at least 2 hours of sunlight on 21st March. If, following a development it does not achieve this or the area that can receive this is less than 0.8 times its former value, the loss of sunlight is likely to be noticeable.

132-142 Havil Street (even)

88 This is a row of 2 storey terraced houses on the western side of Havil Street, north west of the application site. All windows at the front of these properties (24) have been assessed against the BRE guidance. The assessment reports that none of the assessed windows would retain a VSC of 27%, although it should be noted that nineteen of these windows already experience a VSC below the recommended BRE minimum of 27% and so the results of the analysis should be considered against the existing context.

89 Further analysis of the affected properties shows that 12 of the assessed windows serve either bathrooms or circulation areas. The guidance advises that windows to these areas need not be analysed as they are non-habitable rooms. Of the remaining 12 windows 6 serve bedrooms and 6 serve kitchens. All 6 bedrooms have a VSC which is already compromised (below 27%) and 5 would experience a reduction of more than 20%. These 5 windows would therefore not meet BRE guidelines. Of the kitchen windows affected, 1 is already compromised in terms of VSC and the remaining 5 would fall below 27%. Five of these kitchen windows would experience a reduction of more than 20% and as result these windows would not meet BRE guidelines.

90 In accordance with BRE guidance no assessment has been carried out in respect of sunlight as the windows on these properties do not face within 90 degrees of due south. Equally, no assessment is required of the impact of the scheme on the gardens of these properties to owning the position of these gardens in relation to the development.

1-72 Mistral Estate Sceaux Gardens

91 This is large block of flats located north east of the Town Hall that forms part of the Sceaux Gardens Estate.

92 Forty eight windows have been assessed against the BRE guidance of which all are understood to be habitable rooms. The analysis shows one window would have a VSC that would fall below 27% as a result of this development but that the reduction of daylight would be less than 20%. The remaining windows at Mistral House would also experience a reduction of less than 20%.

93 Turning to sunlight, 24 windows were assessed at this property. The results conclude that the annual probable sunlight hours at these windows would be similar to existing and in accordance with BRE standards.

94 With regard to overshadowing to the garden areas, the study reports that there would be no noticeable overshadowing in these garden areas.

33-35 West House

95 This is a 3 storey building plus basement which adjoins the Town Hall on its eastern elevation. 39 windows were assessed against the BRE guidance. The assessment reports that 2 windows would experience a reduction of VSC to below 27%. However the reduction in daylight would not be more than 2.4% and therefore less than 20%. For this reason the impact to these windows would not be noticeable.

96 Turning to sunlight, only one window at this property is orientated south. The study reports that sunlight to this window would not be affected. Similarly, the study shows that the garden areas to this property would not be overshadowed.

Summary

97 It is acknowledged that there will be noticeable adverse impacts for occupiers at 142, 140, 138, 136 and 134 Havil Street affecting a kitchen and bedroom window at the front of each of these properties. However these impacts must be considered in the context of the guidelines as 5 of the 10 affected habitable rooms serve bedrooms which are considered to be less important. Similarly, the guidance advises that it is a guide that should be used flexibly, particularly in highly urbanised locations.

98 The impact of the scheme must be weighed against the benefits of the proposal which would provide a rare opportunity to provide a new theatre and significant investment in a community resource at the heart of the community. The scheme would provide a much needed student accommodation and provide substantial improvements to the public realm directly adjacent to the dwellings affected. The critical mass of student rooms proposed is required to achieve significant investment in the theatre and to deliver the public space. Officers consider that the proposal would deliver exceptional community benefits which, on balance, outweigh the effects of the scheme on daylight to kitchen and bedroom windows at the properties identified on Havil Street.

Outlook and privacy

99 Turning to outlook, the Residential Design Standards SPD advises that the design of new development should not have negative impact on neighbouring properties. The SPD does not formally define what is meant by 'good' outlook. However it recognises that improvements to outlook can contribute to better internal living conditions. It also advises that new development should achieve a separation distance of 12 metres at the front of a building and any elevation that fronts on to a

highway and a minimum distance of 21 metres between new development and existing properties at the rear.

132-142 Havil Street (even)

100 The distance of separation these properties would remain as existing. Floor to ceiling glazing would be introduced along the extended Havil Street elevation introducing outlook towards these residential properties where it previously did not exist. However, taking account of the distance of separation (13 metres) the scheme is not considered as likely to result in the loss of privacy, as this distance is in excess of what is normally required for residential properties fronting onto road.

101 A substantial area of landscaped public realm, including trees, benches and planters would be introduced to the north of the theatre directly in front of these properties. Outlook from these properties, at eye level, therefore has the potential to improve when compared with the existing blank brick façade provided by the existing theatre.

1-72 Mistral Estate Sceaux Gardens

102 There is a flank wall with no openings between this building and the theatre. The resulting scheme would also have a flank wall, maintaining the same distance of separation (5 metres), although it would appear more prominent in views from windows near the western boundary of the site.

103 Flatted dwellings in this building are arranged around an external deck access walkway with windows set back from the boundary. By virtue of this set back and the orientation of these windows (north), outlook would remain as existing with views of the theatre only limited to oblique angles.

104 No loss of privacy is anticipated for occupiers of this building owing to the adequate distance of separation between windows in the new and refurbished building. The theatre would have no openings on its eastern flank elevation and so the impact on these dwellings, in terms of privacy would be neutral.

33-35 West House

105 The distance of separation between the new buildings on site and the rear of this property would be no less than 30 metres and as such would exceed minimum policy requirements. Taking account of the distance of separation, outlook for these occupiers would remain as existing.

106 Turning to privacy, the relative distance of separation between windows with a direct view to those in the new building would exceed the minimum of 21 metres and for this reason the scheme is not anticipated to give rise to any loss of privacy to occupiers of this building.

Impact of students on the character of the area

107 Concerns have been raised that the incremental increase in students in the area may have cumulative impacts to the detriment of local environment and residential amenity.

108 The scheme adjoins a student housing project at 33-35 and 30-32 Peckham Road that provides specialist housing for students. In the event consent is granted, 317 student bedspaces would be provided across these sites which would support the daytime economy and the council's aims to support mixed and balanced communities. Student housing would be the predominant use at this part of

Peckham Road representing a change from what previously were council office buildings, however it is not considered that the resulting scale of student bedspaces would have a significant impact on the overall demographic mix in the area. Furthermore, as the main entrance for student accommodation will be on Peckham Road it is anticipated that activities will be focused on the main road around Camberwell College of Arts and nearby bus stops. In any case, adequate details have been provided regarding proposed arrangements for on-site security and management in respect of student behaviour including noise. Based on the plan provided it is considered that adequate controls would be in place to monitor any noise disturbance arising from future students at this development.

- 109 An outdoor amenity area that would be ancillary to a large student common room would be provided on the roof of the building. Careful consideration needs to be given to balancing the needs of users of this space whilst ensuring that those already living alongside do not suffer unacceptable noise disturbance and a harmful erosion of their living conditions. Whilst the use of this space in itself would not generally result in noise nuisance it is considered necessary to control the use of this space to minimise the potential for disturbance to local residents at anti-social hours. A condition is recommended that would require the roof terrace to close no later than 21:00 Monday – Sunday (including bank holidays) to safeguard the standard of residential amenity.

Plant, mechanical ventilation and noise associated with the proposed student accommodation, theatre and café

- 110 Plant including mechanical ventilation will be required to serve the scheme and has the potential to impact upon the amenity of nearby properties. Consideration has also been given to the impact of these noise generating sources on internal noise levels for future occupiers including the likely noise generating activities associated with the new theatre (i.e. amplified speech and music). Conditions requiring the submission of details to ensure internal noise levels within habitable rooms are recommended and in connection with this a separate condition concerning noise generated from amplified music and speech. This would ensure that the impact of these noise generating sources would not have an adverse impact existing and future residents.

Impact of adjoining and nearby uses on occupiers and users of the proposed development

Peckham Road/Havil Street

- 111 The dominant noise source affecting future occupiers of the student accommodation is road traffic noise generated from the flow of vehicles on Peckham Road and Havil Street. The noise report shows that daytime levels are fairly high for facades that have a direct line of sight to Peckham Road, with night-time noise marginally reduced across the site.
- 112 It is generally accepted that these impacts would be most pronounced for the Town Hall which would be refurbished. Glazing and ventilation openings within the external façade have been identified to be the weakest elements acoustically. While the majority of rooms facing Peckham Road would function as common rooms, at least 6 rooms would directly face Peckham road, with a similar number of rooms near the front of the refurbished Town Hall having a direct line of sight. For these reasons it is recommended further details of noise attenuation are provided prior to the occupation of habitable rooms that would principally be used for sleeping to ensure suitable glazing and ventilation attenuation is implemented to achieved an acceptable standard of internal noise levels for future occupiers in

accordance with Core Strategy policy 13 and guidance in the adopted Sustainable Design and Construction SPD.

Transport issues

- 113 Saved policy 4.7 of the Southwark plan states that development for identified user groups, such as student accommodation would normally be permitted where there is adequate infrastructure to support the increase in the number of residents. Saved policy of 5.1 requires major development to be located near transport nodes. Saved policy 5.2 states that planning permission will be granted for development unless there is an adverse impact on the transport network or if provision for adequate servicing is not made. Saved policy 5.3 requires provision to be made for pedestrians and cyclists and saved policies 5.6 and 5.7 relate to car parking. Core Strategy policy 2 reasserts the commitment to encourage walking, cycling and the use of public transport rather than travel by car.
- 114 The site has a Public Transport Accessibility Rating (PTAL) of 4 which equates to 'Good' in terms of access to public transport. The site fronts onto Peckham Road which is a red route with regular buses heading east (Peckham), west (Camberwell) and towards Central London. Denmark Hill and Peckham Rye Stations are located between 1300 to 1400 metres from the site. The applicant reports that these stations are within walking distance of the application site. However for the purposes of PTAL ratings, these services are located too far away to be included in the PTAL assessment. Night buses services also operate along the site frontage.
- 115 The site is also located within a controlled parking zone which controls parking in Havil Street and Vestry Road from Monday to Friday 08:30-18:30.

Trip generation

- 116 The trips associated with the student accommodation have been assessed and found to be acceptable. The vast majority of trips (96%) in association with this use are predicted to be undertaken by foot, cycle or public transport.
- 117 The number of trips associated with the new theatre is not anticipated to result in a significant material change in travel patterns to this area, taking account of the fact that workshops that had otherwise been undertaken off-site could take place on-site. The submission explains that these workshops take place during the day, in the evenings and on a Saturday and do not coincide with peak movements on the local transport network. Furthermore it explains that they have typically taken place at Harris Academy which is in walking distance from the site.
- 118 The enhanced level of activity generated by the artist studios and café gallery is not anticipated to result in significant negative impacts.

Car parking

- 119 The scheme is proposed as 'car free'. It is accepted that it would not be practicable to provide parking due to the location and site constraints. Students and visitors to the site, including those travelling to the theatre and workspace would not be able to park within the immediate vicinity of the site unless they are in possession of parking permit. Students would be prevented from being eligible to apply for parking permits through their tenancy agreements. A condition to secure this is recommended.
- 120 Previously the Town Hall provided limited car parking in front Central House with the vast majority of visitors that arrived by car having to park on street or within a

'pay and display' parking bay or outside the controlled parking zone. The theatre has operated well within this arrangement too. There is therefore a reasonable expectation that the site could operate within the limits of local parking restrictions.

Disabled parking

- 121 Given the physical constraints of the site it would not be practicable to provide up to 8 disabled parking bays off-street. Five wheelchair accessible rooms would be provided as part of the scheme with a further 3 rooms that could be adapted subject to demand for spaces. The applicant reports that based on their experience at the adjoining site they do not anticipate any take up of blue badge parking at this site.
- 122 Given that the demand for wheelchair parking will vary throughout the lifetime of the development, the needs of potential users needs to be carefully balanced against the need to maintain an adequate car parking provision for existing and future residents and users of the theatre.
- 123 On balance, it is considered acceptable for no additional on-street disabled car parking spaces to be provided as part of this development given that the likely level of demand for disabled parking is reported as likely to be low. The likely level of demand from future residents and visitors to the theatre is reasonably capable of being accommodated on Havil Street and Vestry Road.

Cycle storage

- 124 The London Plan requires one space for every two students (or bedspaces) which equates to 81 cycle spaces. In this case 128 spaces are provided across the development which taking account the policy requirements for the café (2 spaces) and workspace (2 spaces) would exceed the minimum number required. The majority of these spaces would be Sheffield stands and provided in secure locations. In addition to these spaces, the applicant has also proposed to include Brompton Docks within the landscaped forecourt of the site although insufficient details have been provided on its design and appearance. A condition requiring the detailed design of cycle parking facilities to be the provided, including the Brompton Docks is recommended.

Travel plan

- 125 A Travel Plan was submitted with the application which seeks to promote more sustainable travel choices such as walking, cycling and public transport. The Travel Plan has been reviewed and on balance has been found to be acceptable subject to surveys taking place on an annual basis for the first three years rather than on a biannual basis. It is recommended that travel plan is secured through the s106 agreement.

Student arrival and departure

- 126 The submission advises that residents of the student occupation will move in and out of the accommodation at the start and end of the academic year and that this process would be managed. It details that appointment times will be allocated when students can arrive and unload and that they will be sent an information pack relating to nearby unloading positions and public transport routes. The applicant advises that student arrival and change over would take place at weekends.
- 127 This could have the potential to cause disruption to neighbouring residents and the surrounding highway network and would need to be carefully managed. Submission of a detailed strategy should be secured by condition, setting out measures to manage the impact of student changeover having regard to the

scheme of management at 30-32 and 33-35 Peckham Road where changeover is also understood to take place at the weekend. It is also noted that there could be a mix of undergraduate and postgraduate students from different Higher Education Institutions with 40 and 52 week contracts respectively, which would result in a more dispersed process.

Servicing and waste management

- 128 A Servicing and Management Plan has been provided detailing that the collection of waste would take place on Havil Street from dedicated waste and recycle collection points adjacent to the footway. Whilst the details concerning waste are in principle acceptable, little detail has been provided about the frequency of deliveries associated with the café, theatre or where these vehicles would be directed to park. A condition requiring an updated service management plan is recommended to ensure the servicing needs of the development are acceptable and not adversely impact upon residential amenity.

129 Construction Impacts

A preliminary assessment of construction traffic movements formed part of the submission. The applicant suggests relaxation of waiting and loading restrictions on Havil Street during the construction period, however little detail has been provided on how this would be implemented. A detailed construction management plan (CMP) with traffic impact modelling is recommended and required to be submitted to the Council and TfL for approval in writing prior to commencement. It is expected that construction works would take place between the hours of 08:00-18:00 Monday to Friday and 08:00-13:00 on Saturdays unless otherwise agreed with the council.

Design issues

- 130 Strategic policy 12 of the Core strategy 'Design and conservation' states that 'Development will achieve the highest possible standards of design for buildings and public spaces to help create attractive and distinctive places which are safe, easy to get around and a pleasure to be in'. Saved policy 3.12 of the Southwark Plan asserts that developments 'should achieve a high quality of both architectural and urban design, enhancing the quality of the built environment in order to create attractive, high amenity environments people will choose to live in, work in and visit' and saved policy 13 requires the principles of good urban design to be taken into account in all developments. This includes height, scale and massing of buildings, consideration of the local context, its character and townscape as well as the local views and resultant streetscape.
- 131 Southwark Town Hall is in the Sceaux Conservation Area. It is an unlisted building but is noted as a key building in the conservation area appraisal, which states that "The most notable unlisted building is the highly detailed Southwark Town Hall". It has perhaps not been statutorily listed because the building has been much altered and enlarged since its original listed construction as the Victorian Vestry Hall was adapted to use as a town hall in the late C19, then greatly enlarged and embellished between the wars. But much of the present building, especially on the front elevation, has a powerful architectural presence on the street and is one of the most important of the buildings in this stretch of former public buildings that front onto Peckham Road. It should therefore be regarded as an important heritage asset.
- 132 The proposal involves the substantial conversion of the town hall building, preserving the Peckham Road and Havil Street frontages, the main entrance and a

number of key rooms on the upper ground and first floors as well as its ornate stair and lift core. Internally the building is to be gutted and transformed into student housing in a cluster arrangement on the upper floors with service spaces and artist's studios on the lower floors. To the north of the existing building a new extension has been designed on the site of Theatre Peckham and the data centre. This extension accommodates an enhanced new theatre on the lower floors, including new lobby, studios and administrative spaces, at the base of the extension with bespoke student accommodation above.

133 The extension is designed as a T-shaped block located over a new 2-storey theatre and adds 5-storeys of student rooms on the Havil Street frontage and 3-storeys extending towards Mistral House at the rear. The existing building and the extension are topped by a linear roof-top pavilion that would be set well-back from the main street frontages.

134 The current Havil Street frontage is not well activated and is dominated by the poor frontages of the lower ground floor of the town hall. At the northern end of the site the frontage is dominated by the largely blank flank wall of the much-loved Theatre Peckham. This has meant that the existing Havil street frontage has lacked animation, with narrow and constrained pavement and no main entrance or access point. The theatre is accessed from the north across an existing estate pathway. In the proposed the scheme elevation onto Havil Street at pedestrian level (lower ground floor) is animated by the new artist's studios in the base of the former town hall, the new theatre and includes an entrance serving the new student housing above.

The Theatre

135 The ground and mezzanine level of the proposed extension have been devoted entirely to the theatre. In its design, the architects have responded to its cultural significance and developed it as a bespoke space that responds to the theatre's needs and gives the theatre a new identity separate from the student housing above with its own main entrance and landscaped forecourt which it shares with the estate to the rear.

136 The theatre has worked with a specialist architect to develop the design of the interior and the result is a new cultural space that engages with the street and the community that it serves. The main public spaces, the entrance hall, box office and main studio and rehearsal spaces form part of the new Havil Street frontage returning along the northern face of the building. To the rear of the site is the theatre. The architects have designed it as a pure geometric form, an angled 'box' clad in translucent ceramic tiling which is of a high standard. This is the main feature that will be visible from the central amenity space of Sceaux Gardens. Following discussions with officers it is proposed to articulate the façade through detailing that introduces powerful shapes supported by up-lighting providing a strong architectural presence that will elevate its appearance whilst being sensitive to the context of the conservation area. This design response is driven by the theatre's needs for adequate soundproofing which would not be possible with windows or openings on this elevation and has been balanced against the need to deliver a building that successfully responds to the local context. The detailed design of its articulation and lighting is recommended to be reserved by condition.

The T-shaped Student Block extension

137 Concerns have been raised that the design of the extension would not be in keeping with the conservation area or respect the character of the building. Comments were received concerning the building's design from English Heritage,

The Design Review Panel and other local amenity groups.

- 138 Saved policy 3.13 requires that the “*height, scale and massing of buildings*” should result in a building “*that is appropriate to the local context*”. The proposal takes the flank of the former town hall and transforms it into a new frontage onto Havil Street. In this context, the 1873 hall and its 1930s extension present a varied townscape which does not necessarily require a stylistic 'pastiche' in the extension but does raise the expectation for the architectural quality of any proposed extension.
- 139 The proposed height and massing of the extension on Havil Street matches that of the former town hall adjusted to ensure that the extension can sit next to the important unlisted building, being deferential rather than overly dominant or deliberately contrasting. The proposed design of the extension manages to achieve this by following the main proportions of the existing building in its vertical articulation, utilising brick as the main cladding material, and making subtle and significant adjustments to the design where it meets the existing building. The main proportions of the existing building are broadly reflected in the 2-storey base, next to the 3-storey scale of the main 1870s building topped by the 2-storey 1930s extension. These proportions are carried through to the architecture of the new extension with the student windows grouped and articulated to reflect these proportions. Next, the brick cladding has been designed to pick up on the theatrical function with windows expressed as deep and angled reveals that echo the folds and pleats of stage curtains. Finally, where the extension meets the former town hall, the parapet line has been adjusted to step down from that of the main building with the aim of retaining the deferential relationship with the original building. Vertically, the joint between the old building and the new is expressed as a recessed joint to express the separation and knit the new with the old appropriately.
- 140 To the rear the T-shaped extension is aligned with the existing Mistral House to reflect its height. This is considered an appropriate response in urban design terms as the building steps down from the main street frontages reflecting the existing context of the conservation area. The architectural proportions and expression of the main Havil Street frontage have been extended to this part of the extension. In its materiality it retains the brick cladding to ensure that it retains its identity and is appropriate.
- 141 Finally, at the roof level the proposal is for a narrow linear block with vertical ‘fins’ which includes the main communal facilities of the student block with a roof-top lounge and landscaped terrace. The terrace is set back from the extension parapet behind a landscaped edge. On top of the former town hall the roof-top structure includes some additional studio rooms accessed by a corridor linking the two cores.
- 142 The quality of architectural design of the extension will rely to a great degree on the choice of materials and the architectural detailing of the constructed building and should be reserved by condition requiring sample panels of the proposed brickwork and angled brick reveals as well as samples of the remaining cladding materials, windows and roof-top structures. Equally a condition requiring the submission of architectural details especially the jamb, cill and head details of all openings, parapets and roof-top structures as well as the junctions of the existing and the new building included.

Building Interior

- 143 Paragraph 138 of the NPPF states that “Not all elements of a World Heritage Site

or Conservation Area will necessarily contribute to its significance. Loss of a building (or other element) which makes a positive contribution to the significance of the Conservation Area or World Heritage Site should be treated either as substantial harm under paragraph 133 or less than substantial harm under paragraph 134". Southwark Council has distinguished between those parts of the Sceaux Gardens Conservation Area which make a more positive contribution to the significance of the conservation area. Paragraph 4.2.2 of the appraisal describes is as "The most notable unlisted building is the highly detailed Southwark Town Hall, which is not only significant in its own right, but adds to the group value of the neighbouring Council offices of both Georgian and early 20th century date". The building should therefore be seen as a key building of the highest significance and be considered under the more proscriptive Paragraph 133 of the NPPF.

- 144 Paragraph 133 of the NPPF states: "*Where a proposed development will lead to substantial harm to or total loss of significance of a designated heritage asset, local planning authorities should refuse consent*" The most significant internal fixtures and fittings of the former town hall are within the central circulation space, especially the entrance hall, the principal stair well and the landing on the first floor with the two large panelled meeting rooms. These have a high quality of detailed finish and are well laid out to make for a grand approach to the council meeting rooms on the first floor and especially the main council chamber.
- 145 It is noted that concerns were raised that the council chamber had not been retained given its historic value and connection with site. The applicant reports that they investigated options to retain the space and approached art galleries, Theatre Peckham and independent cinemas to investigate if they would have any interest in using the space. However, difficulty with access, security, lack of street frontage, signage and servicing have provided to obstacles in finding a suitable alternative use that would be economically viable.
- 146 Whilst these proposals involve the loss of the council chamber, this needs to be balanced against a number of significant features that would be saved by this proposal. Taking account the main building would be similar in appearance albeit substantially refurbished, it is considered that the loss of the council chamber would result in 'less than substantial harm' as defined by the NPPF.
- 147 Paragraph 134 of the NPPF states that "*Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.*" In this case it is considered that the proposal reflects the requirements of the NPPF adapting the former town hall to a new use that preserves its historic and architectural significance and its main contribution to the conservation area. Further, the substantial re-provision of the theatre and the welcome improvements to the Havil Street frontage would on balance outweigh the loss of the council chamber features of which, if necessary, could be disassembled and re-used elsewhere. Accordingly the proposals for the interior of the building are supported and a condition requiring the archaeological building recording of the existing building including its interior should be imposed prior to commencement of work on site. Furthermore, an assessment of the condition of the council chamber with a view to the careful removal and setting aside for re-use of its key fixtures and furniture is recommended to be secured by legal agreement that would allow for its future use either at this site or at an alternative location in the borough. Given the intrinsic communal value of the council chamber, there is potential scope

for re-use of these items on-site within the café or theatre or other municipal building within the borough.

Landscaping

- 148 A landscaping master plan forms part of the submission which details the approach to landscaping comprising four distinct areas that would either be accessible to the public and visitors or residents of the building. Of these areas, the forecourt of the Town Hall and Theatre would be accessible to the public, the latter of which would also act as an improved gateway to the Sceaux Gardens Estate.
- 149 To front of the Town Hall the scheme would create a stepped terrace layout that would add interest to this elevation successfully integrating a ramp and outdoor amenity cafe space with space for tables and chairs. Cycle parking and access for cyclists would also be integrated for users within the design of the terrace.
- 150 Turning to the Theatre, its entrance would be re-modeled to create a public space featuring wooden seating, decorative surfacing, up-lighting, hedging and perennial ornamental flower planting in raised beds. However, to facilitate the redevelopment of the site the applicant proposes to remove a mature chestnut tree and three lime trees which is discussed later in this report. To mitigate the loss, replacement planting and a financial contribution is proposed towards the re-provision of trees that would be secured by a legal agreement. These works would improve the entrance to the theatre and access to the Sceaux Gardens Estate providing significant benefits that, on balance, would outweigh the loss of these trees.
- 151 Bio-diverse roof planting would be incorporated on roof spaces where access is restricted making good use of this area to improve and enhance biodiversity. Taking account of the approach to landscaping at this site, the scheme would be in accordance with Strategic policy 11 of the Core Strategy as it would improve the quality of open space encourage biodiversity.

Comments of the Design Review Panel

- 152 The scheme was reviewed by the Design Review Panel on two occasions. The first occasion was at pre-application stage in June 2013 when the proposal included the refurbishment and extension of the existing theatre with a large block set back to the rear of the site which the Panel would not endorse. As a consequence of that review the scheme was fundamentally amended to incorporate a new Theatre Peckham at the ground floor and a remodelled extension to the existing building as shown in the current application. The DRP revisited the proposal when they reviewed the application scheme in October 2013. In conclusion, the Panel endorsed the scheme, its arrangement, and landscape as well as the distribution of uses on the site. They welcomed the substantive changes which followed the earlier review and raised detailed questions over the architectural design and internal arrangement which were echoed by English Heritage. These issues have, on balance, been addressed by the applicant through the introduction the replacement of the brick base of the theatre with glazing, more visual separation between the refurbished Town Hall and the new extension and reduction in height of the brickwork of the parapet of the new student accommodation so that it has a better relationship with the parapet of the Town Hall.

Summary

- 153 Overall, the design of the scheme provides an opportunity to deliver a number of significant benefits. The scheme would introduce animation to Havil Street by introducing floor to ceiling glazing, an entrance to the theatre and an entrance to the new artist's studios where currently the site is dominated by a largely blank

flank wall. The new theatre building would respond to the needs of Theatre Peckham giving it an identity and street presence that it would never be able to finance independently and in doing so represent significant investment in a local community resource. The level of investment needed to provide the new theatre has been a key driver in the scale of the extension to the Town Hall which, on balance, is an appropriate response in urban design terms to the architectural proportions of the original building and the context of the conservation area. A new public square would represent significant improvements to the public realm and a valuable local resource for the theatre and local residents adding vibrancy to this part of Havil Street.

- 154 In conclusion, this scheme offers a significant opportunity to deliver buildings of high standard, significant investment in community resources and meaningful improvements to the public realm.

Impact on character and setting of a listed building and/or conservation area

- 155 Saved policy 3.18 states that planning permission will not be granted for developments that would not preserve or enhance the immediate or wider setting of a listed building; an important view of the listed building; or the setting of a conservation area; views in an out of a conservation area; the setting of a World Heritage Site; or Important views of/from a World Heritage Site.
- 156 As well as impacting on views of the Town Hall the scheme would impact upon the setting of several important buildings including Central House (Grade II Listed), South House (Grade II), East House (Grade II) 29 Peckham Road (Grade II) and St Giles Tower (Grade II). It would also impact upon the Sceaux Gardens Conservation Area and involve the demolition of the theatre building and data centre.
- 157 The materiality, hierarchy and verticality of the new block and the theatre will contrast with all of these buildings and concern has been raised that the approach to redevelopment of this site should be more sympathetic to the historic character of the local environment.
- 158 It is recognised that development needs to respond appropriately to the historic context of a site. This development proposes a contemporary approach to design that must take account of the historic character of the area, particularly with regard to the new Theatre and the new seven storey building.
- 159 Paragraph 58 of the NPPF states that development should “*respond to local character and history, and reflect the identity of local surroundings and materials, while not preventing or discouraging appropriate innovation*”.
- 160 As noted above, the architectural detailing, proportions and expression of the scheme have emerged from a detailed and thorough understanding of the context, the communal and cultural significance of the buildings and the conservation area. The resulting scheme is considered to be a fitting modern intervention that compliments its historic setting in a way that would conserve and enhance the character and appearance of the conservation area and listed buildings that would be affected. Based on this analysis, there would no conflict with local or strategic planning policy.

Demolition of existing theatre and data centre building

- 161 Saved policy 3.16 requires the character and appearance of conservation areas to be preserved. It states that there is the general presumption in favour of retaining buildings that contribute positively to the character or appearance of the conservation area and that planning permission will not be granted for proposals that involve the demolition or substantial demolition of a building that contributes positively to the character or appearance of the conservation area.
- 162 The existing theatre building is less architecturally and historically significant to the conservation area. As noted earlier in the report, the existing Havil Street frontage is not well activated and is dominated by the poor frontages of the lower ground floor of the town hall. The aesthetic value of the theatre has been assessed to be low, although it is recognised that it has an intrinsic communal value as a community resource. The data centre at this site is not visible from the public highway and but in any case is considered to be a low quality building that does not make a positive contribution to the conservation area. Development of the site therefore offers an opportunity for enhancement
- 163 The scheme would have a high standard of design and improved street presence making a positive contribution to the conservation area. It would provided improved access for wheelchair users and would be able to host greater range of activities on site for the benefit of the local community. In light of this it is considered that the demolition of the existing building and the subsequent redevelopment would comply with saved policy 3.16 of the Southwark Plan and design policies of the Southwark Plan and Core Strategy. Redevelopment of the site would offer the opportunity for substantially improve the aesthetic value of Theatre Peckham to conservation area which would be a significant benefit.

Impact on trees

- 164 The site has a mature chestnut tree positioned to the north of the Theatre, near the entrance of the Sceaux Estate when accessed from Havil Street. The tree is significant in terms of its size and one of a number of mature trees within the Sceaux Gardens Estate. These trees are of significance and make a positive contribution to the character of the Sceaux Conservation.
- 165 The submission indicates that the chestnut tree and three lime trees would need to be removed to facilitate redevelopment of the entrance to the theatre. The Chestnut tree is reported to be awkwardly located disrupting the pavement around the existing entrance. The applicant has explained that removal of these trees is necessary to carry out public realm works proposed to re-model the entrance and improve usability of these spaces. They propose to carry out the works sensitively and to mitigate any tree loss through a combination of replanting on-site and a contribution towards replanting in the nearby Sceaux Gardens Estate. Having regard to the applicant's justification it is accepted that these trees would need to be removed to enable the redevelopment of the theatre and the remodeling of this public space to create a new entrance to the residential estate and space for the theatre. Mitigation by way of replacement tree planting on-site and at the adjacent Sceaux Estate provides and opportunity for the planting of several trees which would ensure long term tree cover in the locality. This is considered an necessary and acceptable and should be secured by S106.

Planning obligations (S.106 undertaking or agreement)

- 166 Saved policy 2.5 'Planning obligations' of the Southwark Plan and policy 8.2 of the London Plan advise that Local Planning Authorities should seek to enter into

planning obligations to avoid or mitigate the adverse impacts of developments which cannot otherwise be adequately addressed through conditions, to secure or contribute towards the infrastructure, environment or site management necessary to support the development, or to secure an appropriate mix of uses within the development. Further information is contained within the Council's Planning Obligations Supplementary Planning Document.

167 Alumno have yet to acquire leasehold of the site but have been granted an option to purchase a long lease, and as such have an interest in the land which would enable them to enter into a S106 agreement.

168 Heads of Terms based on the Council's Planning Obligations SPD have been a subject of negotiations during the course of the application. The following table sets out the contributions required based on the s106 SPD and accompanying toolkit compared to what the applicant has offered:

Topic Area	SPD Requirement	Applicant's Offer
Employment construction	£120,484	£120,484 Work Place Coordinator (WPC) to be provided.
Employment construction management fee	£9,036	£9,036
Public open space and sports development	£89,137	£89,137
Transport strategic	£41,338	£41,338
Transport site specific	£81,000	£81,000
Public realm	£121,500	£80,500 plus £41,000 'in kind' contribution through landscaping to the theatre forecourt.
Tree mitigation	£16,500	16,500
Health	£89,911	£ 89,911
Total	£ 568,906	£527,906 plus in-kind works to public realm to a value no less than 41,000 (which equates to £568,906)
Admin fee (2%)	£11,378	£11,378
Total (including admin fee)	£580,284	£580,284

Employment and construction through the development

170 The applicant proposes to provide their own WPC to oversee the employment during construction obligations and have been working with Thames Reach Employment Academy at 29 Peckham Road. The council's economic development team has advised that this would need to be secured and this will be included in the s106 agreement. In the event that training and employment outputs are not met, full payment of this sum would be required.

Public open space and sports development

171 The toolkit generates a figure of £89,137 which includes contributions to public open space and sports development. Given the site is in close proximity to Peckham Pulse and Camberwell Leisure centre it would be reasonable to expect students to use these facilities during their leisure time as these are the closest leisure facilities. Similarly, some of this contribution is likely to be used to improve open spaces in close proximity that are likely to be used by students such as the nearby Lucas Gardens. The applicant has agreed to the payment in full.

Transport strategic

172 The toolkit generates a figure of £41,338 which given the site's location is expected

to be used to support works at Peckham Rye Station forecourt, Camberwell Town centre and/or improvement works at Elephant and Castle.

Transport site specific

- 173 The toolkit generates a figure of £81,000 which is expected to be used to for local improvements to crossings, particularly on Havil Street and Peckham Road.

Public realm

- 174 A new public square would be created to the north of the theatre that would improve its visibility from the street and the entrance to the Sceaux Gardens Estate. The applicant has agreed to carry out in-kind works to this area for the benefit of the theatre and local community to a value of no less than £41,000. A financial payment would also be made to support other public realm works including pavements around the site to off-set impacts that may result through the construction phase of the scheme.

Trees

- 175 A contribution of £16,500 would be paid to off-set the loss of trees on site and replanting in the vicinity of the theatre and the Sceaux Gardens Estate.

Health

- 176 The scheme would not provide a dedicated health centre or equivalent facilities for students and so there is a reasonable expectation that they would use facilities in close proximity to the site. The applicant has agreed to pay the full contribution to mitigate the impact on health facilities in the area that would result from the increase in students in the area.

Other S106 requirements

- 177 Clauses are included in the s106 that require rent levels of the student accommodation to be no greater than rents of comparable student housing and for the artist studio's to be significantly below market rent for comparable spaces. A residence management plan would be secured in relation to the security and management of student accommodation and a clause that would prevent the accommodation being used other than for seminars and conferences out of term time.
- 178 A clause requiring details of the theatres design and construction to be submitted will be required to ensure it is built to the agreed specification and has a clause requiring a detailed breakdown of the in-kind works to the public realm.
- 179 A community use strategy will also be secured setting out a scheme of activities to be undertaken by the operators of the theatre, how it will function as a community resource with a view to maximise access to local residents, socially excluded groups, children and a commitment to periodic monitoring. As such, it has been considered necessary to make Theatre Peckham a party to the legal agreement as they would deliver the activities and manage this community asset for future generations. In doing there will be an adequate mechanism to ensure the facility remains as a community-orientated resource. The strategy and its outputs would be tied to the theatre building and would bind any future successors in the long term. In the unlikely event that the theatre were to go into administration receivership or liquidation, a clause has been added that gives the Council 12 months with which to decide whether it wants to take up the lease of the building, nominate a new tenant or vary the user clause in the lease of the community facility. These clauses are considered reasonable and necessary to ensure the delivery of community benefits from this facility in the long term.

180 In accordance with the recommendation, if the Section 106 Agreement is not signed by 31st January 2014 the Director of Planning should be authorised to refuse permission if appropriate, for the reason below:

181 'In the absence of a signed Section 106 Agreement, there is no mechanism in place to avoid or mitigate the impact of the proposed development on employment, public open space, the transport network, the public realm, health care services or mechanism to ensure the community resource provide would deliver outcomes that are exceptionally beneficial to the wider community. The proposal would therefore be contrary to saved policy 2.5 of the Southwark Plan (2007), strategic policy 14 of the Core Strategy (2011) and Policy 8.2 of the London Plan (2011) and the draft Affordable Housing SPD (2011)'.

Mayoral Community Infrastructure Levy (CIL)

182 S143 of the Localism Act 2011 states that any financial sum that an authority has received, will, or could receive in the payment of CIL as a material 'local financial consideration' in planning decisions. The requirement for Mayoral CIL is a material consideration. However, the weight to be attached to a local finance consideration remains a matter for the decision-maker. Mayoral CIL is to be used for strategic transport improvements in London, primarily Crossrail.

183 The proposed development would have a total gross internal area of 7,850sqm, of which 1244sqm would be the Theatre. The whole development would be CIL liable equating to £1111,313. However, as Theatre Peckham is a charity they would be able to apply for relief, potentially reducing the scheme's total CIL liability.

Sustainable development implications

184 Policy 5.2 of the London Plan requires major developments to provide an assessment of their energy demands and to demonstrate that they have taken steps to apply the Mayor's energy hierarchy. Policies 5.5 and 5.6 require consideration of decentralised energy networks and policy 5.7 requires the use of on-site renewable technologies, where feasible. An energy strategy has been submitted with the application detailing how the proposal would comply with the Mayor's energy hierarchy, together with BREEAM and Code for Sustainable Homes pre-assessment indicators.

185 The submission reports that the scheme has been designed in accordance with 'Be Lean, Be Green and Be Clean' principles reducing CO₂ emissions by up to 22%. Gas fired combined heat and power together with roof mounted solar photo-voltaic panels (250 m²) would contribute toward this reduction with solar PV accounting for approximately 5% of the reduction. While this figure is small, physical and environmental constraints make a number of renewable options unsuitable at this site. Of the options explored biomass (fuel storage and delivery constraints), ground source heat pumps (insufficient site area) and wind turbines (not appropriate in the local setting) were discounted as were fuel cells which are reported to not be available at this scale for commercial development.

186 Ground source heat pumps and solar water heating were considered as viable options but solar PV have been maximised at this site as, on balance, it would result in more efficient operation of the proposed CHP. Based on this analysis, it would not be possible to achieve a significant improvement in energy from renewables and for this reason the level of carbon reductions proposed would be reasonable in this context.

- 187 A BREEAM 'very good' rating is anticipated to be achieved for the student accommodation (new and refurbished), cafe and artist studios which given the nature of the refurbishment is considered acceptable on balance as design issues relating to the existing Town Hall that would not enable it to be retrofitted to achieve this standard. In any event, a rating of 'Excellent' is proposed for the Theatre which would be in accordance with Strategic policy 13. A condition requiring the submission of post-construction certificates is recommended.

Flood Risk

- 188 The site is located within Flood Zone 1 and is not considered to be at risk of fluvial or tidal flooding. The submission includes a Flood Risk Assessment (FRA) which concludes that the most significant potential sources of flooding to the site are likely to be surface water and sewers. The scheme incorporates brown roofs above the theatre and Town Hall building which are considered a sustainable urban drainage technique. Further details regarding permeable paving should be required by condition in respect of landscaping to ensure the new areas of public realm to support surface water attenuation.

Other matters

Statement of Community Involvement

- 189 A Statement of Community Involvement was submitted detailing pre-application consultation that has been carried out by the applicant. It advises that information about the scheme was provided on a website (www.31peckhamroad.co.uk), and public exhibitions held with the local community groups to answer questions about the proposals and to provide reassurance that key issues likely to affect the community have been addressed. It describes how a range of communication techniques were employed comprising one-to-one meetings with Theatre Peckham, and invitations to local community groups, including the Camberwell Society, Sceaux Gardens Estate Tenants and Residents Tenants Association, SE5 Forum. Consultation leaflets were distributed to 1,454 local residents and businesses, and letters sent to residents including those living immediately adjacent on Havil Street.
- 190 The report concludes that comments were predominantly supportively with strong support for the re-provision of Theatre Peckham. It also reported support to retain the Council Chamber but listed issues with re-using this space for the theatre or within the proposed development. The scheme which has been amended in response to consultation and pre-application advice to preserve a significant proportion of the former council building. The applicant also anticipates further liaison with Sceaux Gardens Estate Residents and Tenants Association over the detailed design of the public square.

Economic Impacts

- 191 A Socio-Economic report has been submitted which details the economic impact of the proposed scheme. The report details that the principal impacts that would result from this scheme are construction jobs during the 15 month construction period and the employment and training of local people that would be secured through the S106 agreement. An investment of £10-12 million in construction costs is estimated to generate up to 100 jobs (full and part-time) over this period with employment reaching a peak as the building is fitted out at the end of the construction period. Labour costs (principally wages) are estimated to be a third of total spend at around £4 million in association with the redevelopment of the site. The resulting student population is estimated to contribute £850,000 per year

through direct spending and the need for at least 2 full-time staff and 4 (part-time) staff in connection with day to day running of the site. Management and administrative positions are also estimated as likely to be needed to support the site who, through direct spending, could contribute to the local economy.

Conclusion on planning issues

- 192 The scheme would bring the Former Town Hall building back into productive use enabling the building to be restored whilst retaining a number of key features of significance and provide specialist accommodation for students that could free up accommodation in the private rented sector.
- 193 The approach to redevelopment of the site has been revised in accordance with consultation to become more strategic and comprehensive, resulting in an opportunity to incorporate the theatre in the design of the Town Hall extension and to deliver meaningful long term community investment and resources that would provide a number of significant benefits.
- 194 It would introduce animation to Havil Street by the introduction of glazing and entrances to the theatre and artist studios where currently the site is dominated by a large blank flank wall. It would create a new public square that would significantly improve the public realm, providing a valuable local resource for the theatre, Sceaux Gardens and local residents adding vibrancy to this part of Havil Street.
- 195 The level of investment needed to deliver a new theatre and substantive improvements to the public realm has been a key driver in the scale of the extension. It is noted that by virtue of the urban setting of the theatre it would have noticeable daylight impacts for a small number of dwellings. However, these impacts are considered to be outweighed by the rare opportunity this scheme offers to secure investment in a community resource that would deliver significant community benefits.
- 196 The resulting scheme is considered to be a fitting modern intervention that compliments its historic setting in a way that would conserve and enhance the character and appearance of the conservation area. Its scale is in part a function of the significant investment in the new theatre building that would enable it to be financially independent, delivering a community resource for future generations on its historic site at the heart of the community. This is a special opportunity to and could reasonably be considered to outweigh the requirement for affordable housing which would not be viable or feasible as part of the redevelopment of this site.
- 197 In conclusion, this scheme offers a significant opportunity to deliver buildings of a high standard, significant investment in community resources and meaningful improvements to the public realm. Taking all matters into consideration, the development proposal is considered acceptable and it is recommended that planning permission is granted.

Community impact statement

- 198 In line with the council's community impact statement the impact of this application has been assessed as part of the application process with regard to local people in respect of their age, disability, faith/religion, gender, race and ethnicity and sexual orientation. Consultation with the community has been undertaken as part of the application process.

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

Consultations

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

Consultation replies

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

Summary of consultation responses

202 Objections (2)

- Visual impact of the roof extension;
- Scale and massing of proposed rear addition to the Town hall;
- Loss of the former Council Chamber.

203 Supports (17)

- Provision of affordable creative workspace;
- Support local creative businesses and local economy;
- Better facilities /opportunities for local for young people provided by new theatre;
- Secures the future of the theatre which helps young people develop life skills;
- Provides a use for the wider community rather than just new housing;
- Help improve the future for Peckham;
- Provides jobs for young and old people.

General support / no objection but with comments (3)

204 Support as above but concerns regarding:

- Scale and massing of proposed rear addition to the Town Hall in relation to local context;
- Impact on the local character of the area;
- Potential for inadequate assessment and mitigation of cumulative impacts resulting from piecemeal student housing schemes in close proximity.

Human rights implications

205 This planning application engages certain human rights under the Human Rights Act 2008 (the HRA). The HRA prohibits unlawful interference by public bodies with conventions rights. The term 'engage' simply means that human rights may be affected or relevant.

206 This application has the legitimate aim of redeveloping the former Southwark Town Hall to provide student accommodation, a new theatre, professional artist studios and cafe. The rights potentially engaged by this application, including the right to a fair trial and the right to respect for private and family life are not considered to be unlawfully interfered with by this proposal.

BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
Site history file: TP/2282-31 Application file: 13/AP/2979 Southwark Local Development Framework and Development Plan Documents	Chief executive's department 160 Tooley Street London SE1 2QH	Planning enquiries telephone: 020 7525 5403 Planning enquiries email: planning.enquiries@southwark.gov.uk Case officer telephone: 020 7525 5461 Council website: www.southwark.gov.uk

APPENDICES

No.	Title
Appendix 1	Consultation undertaken
Appendix 2	Consultation responses received
Appendix 3	Environmental Impact Assessment
Appendix 4	Item 6.1 Recommendation
Appendix 5	Item 6.2 Recommendation
Appendix 6	Images

AUDIT TRAIL

Lead Officer	Gary Rice, Head of Development Management	
Report Author	Daniel Davies, Senior Planner	
Version	Final	
Dated	6 December 2013	
Key Decision	No	
CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER		
Officer Title	Comments sought	Comments included
Strategic director of finance & corporate services	No	No
Strategic director of environment and leisure	No	No
Strategic director of housing and community services	No	No
Director of regeneration	No	No
Date final report sent to Constitutional Team	6 December 2013	

APPENDIX 1

Consultation undertaken

Site notice date: 25/09/2013

Press notice date: 17/10/2013

Case officer site visit date: 25/09/2013

Neighbour consultation letters sent: 17/09/2013

Internal services consulted:

Design and Conservation Team
Urban Forester
Archaeology officer
Environmental Protection Team
Planning policy
Housing regeneration initiatives
Public realm
Economic Development & Strategic Partnerships Team
Waste Management

Statutory and non-statutory organisations consulted:

English Heritage
Design Review Panel
Theatres Trust
Environment Agency
Transport for London
Metropolitan Police
London Fire and Emergency Planning Authority
EDF Energy
Thames Water
The Peckham Society
The Camberwell Society
The Victorian Society
Twentieth Century Society
Conservation Area Advisory Group

Neighbours and local groups consulted:

The proposal has been advertised in the press and site notices were displayed on Peckham Road, directly in front of the site; to the rear near the entrance of the theatre and adjacent to the path which runs through Sceaux Gardens Estate and also on Havel Street. Three hundred and twenty nine letters were sent to properties near to the site at Fontenelle Sceaux Gardens, Mistral Sceaux Gardens, Havel Street, and Peckham Road including Central, East, West and South House, Sceaux Gardens Tenants Hall and other nearby properties on Peckham Road.

Re-consultation: N/A.

Consultation responses received

Internal services

Design and Conservation Team

These comments have been incorporated into the main body of the report.

Urban Forester

These comments have been incorporated into the main body of the report.

Archaeology officer

The site is not located within an archaeological priority zone, however, the former town hall of, originally, Camberwell and later Southwark Boroughs is of interest and worthy of record. It is recommended that a programme of archaeological building recording is undertaken on site prior to the commencement of development works. It is recommended that this programme of work is secured condition.

Environmental Protection Team

Air quality – no specific comments were provided in respect of the air quality report provided

Land Contamination – The phase 1 (desk study) investigation advises that a discovery strategy should be put in place to deal with any suspect or potentially contaminated materials are uncovered during the in the course of construction.

Ventilation Statement – No specific comments were provided in respect of the ventilation report.

Acoustic report – Conditions are recommended concerning plant noise, internal noise levels and noise generated from the theatre.

Construction management – A condition is recommended requiring an environmental management plan to be submitted details of the demolition and construction phase of the development.

Planning policy

Land use – The principle of a student accommodation led- mixed use development that would provide an improved theatre on site, affordable workspace and café is acceptable.

Student accommodation – While there is an acknowledged London-wide need for student housing, the level of student housing in the borough should not prejudice the development of general needs housing and affordable housing. Strategic policy 8 of the Core Strategy requires the provision of 35% affordable housing within student accommodation schemes to help meet the need for affordable housing. The draft Affordable Housing SPD (June 2011) sets out the sequential approach that should be followed in delivering affordable housing. A financial appraisal should be submitted to justify that at least as much affordable housing will be provided through a pooled contribution as would have been in the minimum 35% affordable housing requirement were achieved on-site.

There may be circumstances where, after the minimum section 106 requirements are met, a financial appraisal shows that it is not viable to provide the full policy requirement of affordable housing due to the scheme providing other exceptional community benefits.

The applicant must demonstrate that the community benefits are additional to the standard minimum section 106 requirements and that the scheme is exceptionally beneficial to the wider community and meets the council's objectives. In this case a financial appraisal has been submitted and the applicant reports that the redevelopment of the theatre together with offering affordable workspace and a subsidised space for the operator of the café. We will require applicants to submit a financial appraisal to demonstrate why the affordable housing can not be provided due to the cost of the community benefits to be delivered.

Housing regeneration initiatives

No comments received.

Public realm

Paving enhancements are anticipated following completion of the development along the the eastern side of Havil Street and to the south of the Town Hall building on Peckham Road. A financial contribution will be required to reinstated this area of paving.

Economic Development & Strategic Partnerships Team

No objection to the scheme. The new affordable workspace units and café will support the burgeoning creative industry that has emerged in Camberwell and Peckham.

Waste Management

No comments received.

Statutory and non-statutory organisations

English Heritage (General support with comments)

Comments received from English Heritage indicate that they have concerns regarding the scale of the extension to the Town Hall. Their concern being that it would have a bulk that would compete with the original building and nearby municipal and estate buildings as well as impacting on views along Havil Street resulting in harm to the conservation area which they conclude would be 'less than substantial'.

In line with paragraph 134 of the National Planning Policy Framework (NPPF) English Heritage have considered the harm identified and weighed this against the public benefits of the proposal including securing its optimum viable use.

They recognise that Theatre Peckham encourages community engagement, and so improved visibility and access to the theatre would demonstrate some public benefit.

They advise that the harm identified could be reduced by strengthening the ground floor and stepping back the Havil Road elevation from the existing building and reducing the parapet height on this elevation to match the level of the front section of the building. Consideration should also be given to retaining the floor levels in the extension.

They also consider that a clear break between the two buildings by the introduction of a glazed link or down pipe between the two buildings would allow the extension to be understood as a separate building. They also considered that the proposed materials should relate sensitively to the surroundings buildings of merit within the conservation area.

The comments conclude that the issues above should be addressed and the application determined in accordance with national and local policy guidance on the basis of Southwark Council's specialist conservation advice.

Design Review Panel (General support with comments)

The Panel welcomed the opportunity to review this important scheme and thanked the architects for their clear and comprehensive presentation. The presentation included an analysis of the historic context and the theatre, plans and elevations of the proposals, a massing model and a detailed model of the lower floors, as well as a number of artist's impressions and rendered views of the scheme in its context. The Chair acknowledged that the scheme had been presented to the DRP before, that the proposal had responded positively to the comments of the earlier Panel and made a substantial move in the right direction. In particular, the Panel Members who had reviewed the earlier scheme endorsed the strategic move to incorporate the theatre into the design. The Panel endorsed the general arrangement, the proposed height scale and massing as well as the landscaping and raised detailed comments about the architectural expression and the internal arrangement which they asked the designers to consider together with their client.

The first point raised by the Panel related to the arrangement of functions on the ground floor. The current arrangement includes the two main student entrances and a cafe separated by the artist studios. The consequence of this is that the two main student entrances are not interconnected and students have to follow a circuitous route to the rear to get from one student core to the cafe. This appears to be designed to maintain a separation between the artist's studios and the main student accommodation. The Panel asked whether they had considered providing a separate access to the artist's studios either from Havil Street or the courtyard to the east to allow a more natural and direct connection between the two student entrances and the cafe. The Panel felt the current arrangement appeared uncomfortable in the shorter term and may become more complex to manage in the longer term affecting the experience of both the students and the artists.

Next the Panel raised the question of future sustainability of the design. They clarified that this related to the relationship of the extension to the original town hall building. These are two distinct structures and, in the view of the Panel, should remain as such to give the owners flexibility in the longer term which they may wish to exercise. This question related to the planning of the core which serves new extension and is currently designed at the northern end of the existing building. The Panel asked the designers to consider moving this core into the footprint of the new building to give that building its own entrance and core and its own identity separate from the old building. They acknowledged that this affected the arrangement of the theatre and access to the upper floors in the existing building may be affected, but felt that such a move would distinguish the new building from the old, change its character from that of an extension to a separate building in that street, and improve the sustainability of the two parts in the longer term.

The Panel considered the elevations and considered the architectural expression of the theatre and the composition of the extension to be uncomfortable. The theatre currently takes up the lower two floors of the extension on Havil Street and wraps around onto the estate. In order to be successful the design of the theatre will have to establish its identity through its architectural expression separate from the existing building and the student accommodation above. At the moment the architectural expression of the theatre is made up of three separate parts, the translucent tiled auditorium, the largely glazed entrance hall and box office and the brick-clad studios on Havil Street. The Panel felt these separate parts of the design lacked a unifying device which will give the theatre its identity and add to the overall composition of the extension.

The Panel acknowledged the efforts of the designers and endorsed the vertical and horizontal articulation of the extension especially the proposed depth of the facade and

the tri-partite arrangement of the elevation. However, they questioned the legibility of the entrance, the separation of the old building from the new extension and the hierarchy of the old and the new.

- The legibility of the entrance relates to the earlier point about the identity of the theatre and affects the expression of the building at its base. At the moment the Havil street elevation lacks a distinguished base and could benefit from taking its clue from the existing building where the base wraps round onto Havil Street in Stone.
- The separation of the new from the old relates to the joint between the two buildings. The current proposal simply abuts the extension up to the original building in a consistent alignment without any refinement or adjustment resulting in an uncomfortable relationship. This is a relationship which the Panel feel is fundamental to the expression of the building and requires further careful attention, either setting back or introducing a recess at the junction to allow for the two buildings to sit side by side naturally.
- The hierarchy of the old and the new relates to the subtle proportions of the extension relative to the original building. This is a matter of the composition of the Havil Street elevation and the cornice line of the extension. The current proposal simply extends the cornice line of the original building across to the extension. Added to this, there is a gentle slope down to the north which could result in the extension appearing larger and overly dominant. The Panel challenged the architects to refine this relationship further, to maintain the hierarchy of the original building over the extension and to alter the cornice line to reflect this, perhaps reflecting the current relationship of the building at the southern end where again it steps down to the main entrance on Peckham Road.

Finally, the Panel questioned the separation of the cafe from the theatre. They felt this relationship had a synergy between two complimentary parts of the development and could enhance the sustainability of both. Put simply, the theatre is likely benefit from access to the cafe and this should not be exclusive to the students and artists. As such it is likely to be beneficial to the theatre and the student accommodation alike to have a sustainable and high quality cafe that enables access to the separate the parts of the development. The Panel encouraged the architects to consider this link between the theatre and the cafe as they develop the scheme further, either along the Havil Street frontage or internally to the rear and to develop a closer synergy between these complimentary parts.

In conclusion, the Panel endorsed the scheme, its arrangement, and landscape as well as the distribution of uses on the site. They welcomed the substantive changes which followed the earlier review but raised concerns over the architectural detailing and internal arrangement of the proposed scheme and encouraged the designers to develop the architectural design as well as the access arrangements and links across the ground floor to address their questions.

Environment Agency

Flood Risk Assessment – No objection to the scheme. It has been assessed as having a low environmental risk.

Transport for London

The development is car free which is strongly supported, and students tend to have dispersed, varied trip patterns that results in bus service impacts being dispersed. The

theatre is a slight intensification of an existing facility.

There are concerns however in respect of off-street space for servicing and deliveries.

Student 'change over' must be controlled and take place at off-peak periods and must respect current waiting and loading restrictions, in order to minimise adverse impacts on traffic and road safety. The council should consider how best to secure the staggered arrival and departure of students at weekend at the beginning and end of their tenancy agreements. The student change over could be covered in a deliveries and servicing management plan.

Construction, servicing and delivery, whilst temporary could be potentially disruptive to traffic flow and have an adverse impact on road safety. The applicant suggests relaxation of waiting and loading restrictions on Havil Street during the construction period, however the south end of this road is narrow, with double red lines for this reason, and any land closure could impact on the junction with Peckham Road, with subsequent impacts on traffic flow and road safety on Peckham Road itself. It might be that a temporary lane closure could be more acceptable if Havil Street was temporarily one-way, or if the land closure took place well away from the junction with Peckham Road. However both these would required the council to agree, as Highway Authority.

Therefore it is requested that a detailed construction management plan (CMP) with traffic modelling is required to be submitted to the Council and TfL for approval in writing prior to commencement of development, secured by condition. It is suggested that the applicant discuss options for traffic management with the Council and TfL prior to submission of the CMP.

Similarly a deliveries and servicing plan (DSP) potentially including the student change over, should be also be required by way of a condition, to be submitted for approval by the Council and TfL. The aim of both the CMP and DSP should be to avoid peak hours, minimise the number of vehicles and stopping time and respect existing on-street waiting and loading restrictions.

Metropolitan Police

No comments received.

London Fire and Emergency Planning Authority

No comments received.

EDF Energy

No comments received.

Thames Water

No objection to the scheme. However they advise that no piling shall take place until a piling method statement has been submitted and approved. It is recommended that these details be secured condition.

Theatres Trust (Support)

The Trust supports this application because the proposed redevelopment will retain a theatre on the site, improve its street presence, and provide contemporary and up-to-date facilities that will help support and expand the work of Theatre Peckham with young people, disadvantaged groups and the local community.

Theatre Peckham is a well-respected community theatre group that provides participative opportunities for children and young people within a deprived area. It has a strong

educational strand, offering accredited and in-house exams in performing arts disciplines and thereby improving participants' life chances.

The paper 'Theatre Peckham – Unlocking its potential', written in conjunction with Theatre Peckham and the developers, provides a comprehensive rationale for the project. There is a strong argument that the scheme will enable Theatre Peckham to develop. There will be more space and improved facilities so that it can reach more people and develop more programmes. In addition, there will be additional capacity within the theatre to generate more income to support further work. The Trust is keen to see these programmes develop and is pleased that Theatre Peckham has quite clearly been closely involved in developing the scheme.

In terms of design, the proposal is for a flexible theatre space with a reasonable capacity [though the exact number of seats is unclear] and two very good sized studio spaces, both of which are larger than the stage, which is suitable for large groups to work and learn. There are large dressing rooms, which are necessary for work with young people where casts tend to be large, and good space for costume storage, which is also important in youth theatre work where costumes tend to be stored and re-used from one show to another. There is decent office space and a good sized foyer with box office and bar space.

While there is direct external access via a double door in the auditorium, there is no dedicated get-in/ unloading area for sets and props being brought to the theatre, and the set making space behind the stage appears to be restricted and could interfere with access to the dressing rooms. There also isn't any storage space near the foyer, which might prove a problem for operation of the box office and bar. These may not be an issue for a theatre focussed on participative and education work, but should be considered before the design is finalised. A theatre consultant should be involved in the fitting out of the theatre as their expertise will be useful in determining the best materials, fixtures and fittings for the theatre.

The main issue for the proposal, especially with accommodation being built above the theatre, is sound seepage [possibly from both directions, given that this will be student accommodation]. The plans do show some acoustic measures incorporated within the design and Council needs to ensure this is adequate for both the accommodation above and for the neighbouring buildings.

Overall, the proposal will provide Theatre Peckham with a modern and purpose built facility that will support theatre and its community and education work.

Neighbours and local groups

97 Camberwell Grove (Objection)

Roof extension - The pictures in the Heritage Impact Assessment (HIA) were taken in the summer but with now that the leaves are falling from the deciduous trees at Lucas Gardens, a public park opposite the Town Hall, shows that the roof extension can be seen. This is an important view which has not been taken by the applicant's agents. The roof extension is clearly visible but the assessment provided with the submission designates the impact of the value of the view as neutral when it comes to the overall heritage impact assessment. This seems to be a method of argument to down play the extensions impact. The impact of increasing the height of this building to twice its immediate neighbours in the Peckham Road will be apparent.

Impact of development on Havil Street – The HIA states that the fabric of the Theatre in Peckham holds a 'low aesthetic' value in its present form' and 'offers opportunity for

development' and 'does not benefit the overall streetscape'. This seems a scant reason for what is admitted as being as of 'considerably larger in scale; of 'creating greater consistency of massing and scale along Havil Street' by respecting the overall former Town Hall. The HIA does however acknowledge that the new extension 'will dominate 29 Peckham Road (a grade II listed building opposite) to some degree' however, this is not thought to be of considerable detriment'.

This underestimates the impact of this building as the overall building created on a **side** street extending to 30 windows along by 7 storeys high. This is, I think, unprecedented in Camberwell. Pre 20th Century Camberwell is 2-4 storeys in height above ground. Between the World Wars housing tower blocks in the Peckham Road are 5-6 storeys above ground. The Sceaux housing tower blocks are considerably taller, however these are point blocks set back from the road amid landscaping and not hard up against the pavement as the proposed in this application.

Havil Street is quite a narrow street and it will feel much more closed in by this development.

What is most concerning is the likely development pressure that this will bring, should the extension be approved, onto the two storey houses in Havil Street and the streets off and in Vestry Road.

In particular, Somerset Place is a terrace of houses which appear on mid 19th century maps of Camberwell but does not have the protection of (statutory) listing nor does it lie within a conservation area.

This development of an additional seventh floor and extending to this height along this frontage in Havil Street does not comply with the Southwark policy 3.5 that development within a Conservation Area must be a 'development (that) should preserve or enhance the special interest or historic character or appearance of buildings or areas of historical or architectural significance.

Should the council be minded to give approval to this roof extension, a more considered profile for the roof extension which was more sympathetic to the style of the Town Hall would (be) better when viewed from Lucas Gardens and elsewhere.

Loss of the former Council Chamber – I think the loss of the former Council Chamber should be categorised as 'high adverse' as it severely harms (it destroys) the heritage value of the heritage asset (which has historic, aesthetic and communal values) and the ability to appreciate the significant values.

Furthermore, is it not both perverse and wasteful to demolish two large spaces – the former Council Chamber and the Peckham Theatre and build a new theatre? Many new theatres are in old buildings and this can enhance their appearance to the theatre going public.

The arch headed opening in Havil Street could provide an entrance nearby the former council chamber so that it could become the theatre. Theatre Peckham in the Old Council Chamber has added appeal.

Resident, 13 Crofton Road (Objection)

The Council's Core Strategy states at Strategic Policy 8 that its approach to Student Homes will ensure that they will deliver these by:

"Allowing development of student homes within the town centres, and places with good

access to public transport services, providing that these do not harm the local character".

The site of the proposed development is not within the town centre, nor does it have good access to public transport services. It is situated on a heavily congested main road which offers only bus links. Those buses are at peak hours already close to or over full utilization.

Recently, the Council granted consent for the change of use of two substantial former Council properties immediately adjacent to and opposite this site.

There has therefore been a significant introduction of new student housing in this area. It is clearly inappropriate to seek to introduce a student campus in this location through a series of piecemeal applications at adjacent sites.

The Core Strategy identifies that Southwark already offers one of the highest levels of student housing in London. It further recognises that allowing too much student accommodation will restrict our ability to deliver more family and affordable housing. This proposal is at odds with the intention of Strategic Policy 8 which seeks a measured and balanced approach to introduction of any new student housing in any local area.

Students form a very valuable part of the local community. However the introduction of further student housing in this location would concentrate a disproportionately high level of student housing in a single location and would consequently alter the local character of the area. By making piecemeal applications, there is a danger that the overall quantum of student housing delivered in this location will not have been properly assessed nor its impacts upon the local area adequately mitigated. If the development is to be approved, significant contributions should be sought including towards the improvement of Camberwell town centre, public transport, delivery of high quality setts to the pedestrian walkways on Peckham Road, and the developers should fund the introduction of resident parking restrictions in local streets (including paying for the cost of local residents' permits for the lifetime of the development).

The physical nature of the design of the proposal would be detrimental. It is out of keeping with the adjacent buildings, and the part seven storey building appears an oppressive presence on a narrow street. The continuation of the building at the same height as the Town Hall seems out of scale with the surrounding development and would detract from the character of the conservation area. It should be required to be revised downwards so as to respect the primacy of the existing Town Hall and the buildings immediately adjacent to it.

The application could be made acceptable by a significant reduction in scale and the quantum of housing proposed, and through the imposition of proper mitigation requirements which address the impacts of the total amount of housing that would have been delivered through each of the change of use and planning applications at this site and those adjacent/opposite it.

Conservation Area Advisory Group (Comment)

Object to the scheme as they consider it would result in the loss of the Town Hall Chamber, its general scale and design and consider that the extension should be separate to the Town Hall building.

SPACE (Support)

Space is a London based charity which provides affordable creative workspace plus support programmes to help artists' businesses grow. Established in 1968 and now run 17 studios in seven London boroughs. If Alumno Development Proposals for the Town

Hall are approved SPACE will manage and let the new studio space on the ground and basement floors.

SPACE are currently working with Alumno on two projects and believe this development will make a particularly significant positive contribution to the local area. Camberwell is a hub for the arts and culture, which needs support to grow; this development will nurture growth alongside the College, student community and other local organisations.

Affordably priced studio space for artists and small creative businesses is critical to the early stages of their growth, particularly in London where rent are so high. In Camberwell, this will provide viable career paths for graduates from the College and contribute to the local economy by creating jobs as resident businesses grow. A bursary programme with the South London Gallery has been developed to support recent graduates that will become part of the Town Hall scheme.

SPACE are excited about the opportunity to work with Alumno, and to be part of the project which brings together so many parts of the community and creative sector. The council should approve the proposal.

Secretary of Sceaux Gardens T&RA (Support)

Following a discussion and vote on Tuesday October 15th Committee meeting, of the Sceaux Gardens Tenants and Residents Association, please register our support for the planned redevelopment of the Town Hall. At all stages of the planning Alumno have sought the views of the estate through regular meetings with representatives of the TRA and providing leaflets and plans. The TRA's views have been respected. The TRA has done its best to canvass the opinion of residents of Sceaux Gardens Estate. The TRA are of the opinion that residents of the Sceaux Gardens Estate will not be adversely affected by the redevelopment. The redevelopment of Theatre Peckham will have a positive effect by improving the appearance of the main entrance to the estate from Havil Street.

Local resident (SE15 5DB) (Support)

As a Peckham resident, and a former trustee of Theatre Peckham, (I) strongly support these proposals. There is a huge amount of energy and talent in the young people of Peckham, but unfortunately never enough positive outlets to help them develop their potential. Theatre Peckham is doing an outstanding job of providing young people with a place to develop their performance skills, build their confidence, and learn to work as part of a team. Theatre Peckham has done all this despite having inadequate facilities; this proposal would enable them to do so much more. I strongly urge the Planning Committee to approve this proposal, which represents not only a wonderful new opportunity for the young people of Peckham, but also a valuable long-term investment for the community of Peckham as a whole.

Resident (TN9 2PB) (Support)

Theatre Peckham has been like a beacon of hope to the many young people who have passed through its doors over the years. From firsthand experience, as a teacher here for over 20 years, I have seen under confident, depressive children given purpose and aspiration through Theatre Peckham projects. I have also seen children with significant talent, given incredible opportunities which have greatly improved their life chances. Amongst all the continuing pressures and challenges of life in Peckham, against the odds, this wonderful resource for children and young people has continued. It seems right and proper that after 30 years it is to be rebuilt with due honour, to secure its strong future.

Local resident, Vestry Road (SE5 8PG) (Support)

It is great to see a space being developed for use by the wider community, rather than just being reserved for new housing. The additions to the theatre will enhance the local area, and it is good to see more art and cafes springing up along Peckham road.

Director of Co-lab Architects Ltd, and a visiting Lecturer on the FdA Interior Design Chelsea College of Art and Design, University of the Arts, London 341 Oxford Street (Support)

Alumno has worked with myself and students to ascertain exactly what is required for a positive student experience in Camberwell. Alumno and their architects shared the plans for the accommodation with the students and asked for their input. As part of their course the students designed a common room for the scheme and were given professional feedback from the Alumno team, which is invaluable. Alumno have engaged with Chelsea College of Art and Design students, who are part of the wider University of the Arts student community including Camberwell College of Arts.

The refurbishment and renovation of the former Southwark Town Hall will contribute to a new cultural destination and creative hub along Peckham Road. It would address the needs not only of our students, but also offers an exciting opportunity for local residents and the wider community.

Course Director on the FdA Interior Design at Chelsea College of Art, University of the Arts London (Support)

Alumno has worked with myself and my students to ascertain exactly what is required for a positive student experience in Camberwell.

The refurbishment and renovation of the former Southwark Town Hall will contribute to a new cultural destination and creative hub along Peckham Road. It would address the needs not only of our students, but also offers an exciting opportunity for local residents and the wider community.

Local residents from SE15, SE6, SE16, SE14, SE5.

10 letters of support were received requesting that the Planning Committee approve the scheme. None of these letters detailed further comments.

Peckham Society,

No comments received.

The Camberwell Society

We should support the creation of an intricate public space in connection with the new Theatre building, but we should also object to the high massing of a tall structure which is to replace the discreet low level existing original theatre. The issue being that the proposed building is an exact prolongation in massing of the Old Town Hall building facing the main road without any consideration for the very low profile for the rest of Havil Street. This undermines the existing building which had a reason to be one of the highest buildings on Peckham Road. We would prefer to see a smart architectural transition between public and imposing building on main avenues and small/private housing behind.

The Victorian Society

No comments received.

The Twentieth Century Society

No comments received.

APPENDIX 3

Environmental Impact Assessment

Schedule 3 of the EIA regulations sets out selection criteria which must be taken into account in determining whether a development is likely to have significant effects on the environment. It identifies three broad criteria which should be considered:

- the characteristics of the development (e.g. its size, use of natural resources, quantities of pollution and waste generated);
- the environmental sensitivity of the location; and
- the characteristics of the potential impact (e.g. its magnitude and duration).

In the light of these, the Secretary of State has provided guidance on what will or not be significant environmental effect. This is detailed within Circular 2/99 paragraphs 32 to 46 and Annex A. The Circular identifies that, in general, EIA will be needed for Schedule 2 developments in three main types of case:

- a. for major developments which are of more than local importance (paragraph 35);
- b. for developments which are proposed for particularly environmentally sensitive or vulnerable locations (paragraphs 36-40); and
- c. for developments with unusually complex and potentially hazardous environmental effects (paragraphs 41-42).

Turning to criterion 'a' the student housing-led mixed-use project across the Town Hall and adjacent sites would generate 317 student bedspaces resulting in net gain of:

- Up to 6736 sqm of student accommodation (sui generis) (comprising the extensions to Central and East House) (678 sq metres) and the town hall (6058 sqm)
- up to 854 sqm of theatre space floor space (discounting the existing theatre floorspace)
- 208 Cycle parking spaces
- It would also provide a café (class A3) and affordable workspace (Class B1 a-c) within the existing Town Hall building.

These areas are for the most part already developed, with much of the previous student housing scheme confined to existing buildings with limited extension. Notwithstanding this, consideration has been given to the net gain in bed spaces, theatre floorspace and the activities that would be generated at the proposed mix of uses.

It is noted that at least half of the bedspaces across these sites would provide accommodation for students studying at the London College of Communication and the Camberwell College of Arts Campuses. Both of these and other Higher Education Institutions nearby are considered to be within a distance that is capable of being described as local and for this reason the development cannot reasonably be considered to be of more than local importance.

Turning to criterion 'b', certain sites are defined as 'environmentally sensitive' in the EIA

regulations. These are:

- a) Sites of Special Scientific Interest, any consultation areas around them (where these have been notified to the local planning authority under article 10(u)(ii) of the GDPO), land to which Nature Conservation Orders apply and international conservation sites; and
- b. National Parks, the Broads, Areas of Outstanding Natural Beauty, World Heritage Sites and scheduled monuments.

None of these designations apply to area under consideration and so significant environmental impacts as defined in the regulations would occur as a result of this scheme. Notwithstanding this, guidance in the circular advises that in considering the sensitivity of a particular location, regard should also be had to whether any national or internationally agreed environmental standards are already being approached or exceeded.

The site is an Air Quality Management Area, where it has been identified that certain Air Quality Objectives are not likely to be achieved. Air quality objectives are based on information regarding the health effects of air pollution, setting out acceptable pollution concentrations and dates by which these concentrations should be attained. Two pollutants cause most concern within Southwark: particulate matter (PM10 and PM2.5) and nitrogen dioxide (NO₂). It is noted that despite efforts to reduce the levels of these pollutants this is particularly challenging in London as between 30-40% of air pollution is generated from sources outside of Greater London.

Cumulative impacts from the combined student housing schemes having been considered in respect of construction phase (dust, changes in traffic flows on the local road network) as well as changes in movement from operation phase and direct emissions across these sites.

By virtue of the size of the area where demolition and construction would take place it is likely that the impacts of the scheme would be of no more than local importance with regards to dust impacts. Similar observations have been made regarding potential traffic impacts during construction. The likely scale of impacts that considered to be of more than local importance As such it is likely that these impacts could be adequately managed by a condition.

Across these sites two gas fired combined heat and power plants would be in operation replacing existing boilers. The anticipated level of NO₂ and particulate emissions from these scheme are not anticipated to generate significant air quality impacts. Over the course of the development the impact from these facilities are likely to improve in terms of pollutants compared with existing boilers. Although it is recognised that this is not the only source of emissions there would be no significant environmental air quality impacts, although it is noted that the introduction of residential land uses would introduce additional receptors into the air quality management area.

A total of 5 car parking spaces would be provided across these sites reflecting the anticipation that the vast majority of journeys will be made by using either public transport, bike or by foot. The modal share of transport would therefore be similar to the previous use of these buildings which is considered a reasonable assumption taking account the accessibility to the area by public transport and the provision of on-site cycle parking facilities.

Whilst there remains the significant potential for highway impacts at the beginning and end student tenancy, significant environmental effects are not anticipated as these journeys are estimated as unlikely to take place more than up to four times a year. In any event, both developments propose to stagger departure and arrival by way of appointments and welcome packs and it is anticipated that based on their infrequency, scale and the anticipated modal share these journeys are unlikely to result in significant air quality impacts in the context of

the air quality management area. Based on this analysis, that resulting cumulative highway impacts would not have significant effects on air quality and for this reason cannot reasonably be considered to have significant environmental impacts.

Turning to criterion 'c', the site the guidance states that a small number of developments may be likely to have significant effects on the environment because of the particular nature of their impact. It is advised that Industrial development involving emissions which are potentially hazardous to humans and nature may fall into this category. Equally it recognises that on occasion there are other types of development where the development might lead to more hazardous contaminants escaping from the site than would otherwise be the case if the development did not take place.

The scheme would result in the demolition of the Theatre and data centre which in connection with the Town Hall have a history of probable agricultural and residential use prior to development for site for administrative offices, initially as a vestry hall. Based on this analysis, it is not anticipated that the proposed redevelopment would have unusually complex and potentially hazardous environmental effects.

Further guidance is given within Annex A of Circular 2/99 at paragraphs A18 and A19 as to when an urban development project could be expected to give rise to significant environmental effects:

"A18. In addition to the physical scale of such developments, particular consideration should be given to the potential increase in traffic, emissions and noise. EIA is unlikely to be required for the redevelopment of land unless the new development is on a significantly greater scale than the previous use, or the types of impact are of a markedly different nature or there is a high level of contamination (paragraph 41).

A19. Development proposed for sites which have not previously been intensively developed are more likely to require EIA if:

- a. the site area of the scheme is more than 5 hectares; or
- b. it would provide a total of more than 10,000 m² of new commercial floorspace; or
- c. the development would have significant urbanising effects in a previously non, urbanised area (e.g. a new development of more than 1,000 dwellings)."

Within the context of this guidance, it is considered that the level of redevelopment over these sites would not:

- a) be of significantly greater scale than the previous uses
 - b) generate impacts that are of a markedly different nature to surrounding land uses
 - c) involve a high level of contamination
 - d) be cover a site of more than 5 hectares
 - e) provide a total of more than 10,000 m² of commercial floorspace
- have significant urbanising effects in a previously non, urbanised area

In conclusion, having regard to the advice in Circular 2/99, the cumulative impact of student housing in this area, including the proposed redevelopment of the Town Hall the provision of a new theatre, café and affordable workspace are not considered to be likely to have significant effects upon the environment by virtue of factors such as its nature, size or location.