

Item No. 7.3	Classification: OPEN	Date: 1 April 2014	Meeting Name: Planning Sub-Committee B
Report title:	Development Management planning application: Application 13/AP/4420 for: Full Planning Permission Address: GEORGE ELLISTON HOUSE, OLD KENT ROAD, LONDON SE1 5ET Proposal: Construction of 13 residential units comprising 5 x 2 bed units within a new 6 storey building located between the Elliston and Wilkins buildings and 8 further residential units (4 x 1 bed, 2 x 2 bed and 2 x 3 bed) within a single storey extension creating a fifth floor across both Elliston and Wilkins buildings. Associated circulation space, bike store (providing 20 cycle spaces), bin store and 1 disabled parking space.		
Ward(s) or groups affected:	South Bermondsey		
From:	Head of Development Management		
Application Start Date 18/12/2013		Application Expiry Date 01/05/2014	
Earliest Decision Date 08/02/2014			

RECOMMENDATION

- 1 That planning permission be granted subject to conditions and the applicant entering into an appropriate legal agreement by no later than 1 May 2014, and that in the event that an appropriate legal agreement is not entered into by the above date, the Head of Development Management be authorised to refuse planning permission.

BACKGROUND INFORMATION

Site location and description

- 2 The site is part of the wider Avondale Square housing estate which was developed by the City of London Corporation from the 1920s. Most of the development however took place in the post-war period and the residential blocks within the wider site are typical social housing development for this time.
- 3 The site itself includes George Elliston House and Eric Wilkins House, both of which were built in 1952 with red and brown bricks, of note are the walkways and lift shafts. Containing contain 45 and 20 residential flats respectively, George Elliston House is 'U' shaped while Eric Wilkins House is 'L' shaped in plan form and they both site immediately north of the Old Kent Road.
- 4 The site is not located in a conservation area or within the setting of a listed building. It is however subject to the following designations:
 - Air Quality Management Area
 - Archaeological Priority Zone
 - Urban Density Zone
 - Old Kent Road Action Area

- PTAL- 4
- Flood Risk Zone 3a

Details of proposal

- 5 This application is for the creation of 13 new residential units by in-filling the gap between the two blocks to form 5 x 2 bedroom units and a single storey roof extension across the existing buildings (creating a sixth storey) to form an additional 8 units (4x1 bed, 2x2 bed and 2x3 bed). All units proposed would comprise affordable housing, including one wheelchair accessible unit.

Planning history

- 6 13/EQ/0161, pre-application enquiry into:
Roof top extensions (single storey) and construction of a 6 storey infill building resulting in the creation of 13 new dwellings: 4 x 1 bed 7 x 2 bed and 2 x 3 bed units along with cycle and bin stores and a new lift.
- 7 10-EQ-0190, pre-application enquiry into:
Single storey roof extension to existing 5 storey residential blocks flat roof comprising 3 no 2 bed units and 10 no 1 bed units

Planning history of adjoining sites

- 8 ESTATE OFFICE, AVONDALE SQUARE, LONDON, SE1 5PD
12-AP-3860, planning permission granted on 28 February 2012 for:

Demolition of existing community centre to provide new 7 storey building comprising 18 residential apartments (4 x 1 bed, 5 x 2 bed, 5 x 3 bed and 4 x 4 bed) (100% affordable), replacement community centre (326 sq m) with associated facilities and replacement estate office (108 sq m). Provision of 38 cycle parking spaces.

KEY ISSUES FOR CONSIDERATION

Summary of main issues

- 9 The main issues to be considered in respect of this application are:
- a. The principle of the development
 - b. The impact on the residential amenity of the area
 - c. The quality of residential accommodation proposed
 - d. The design of the development

Planning policy

- 10 Core Strategy 2011

Strategic Policy 1 - Sustainable development
 Strategic Policy 2 - Sustainable transport
 Strategic Policy - Providing new homes
 Strategic Policy - Homes for people on different incomes
 Strategic Policy - Family homes
 Strategic Policy - Design and conservation
 Strategic Policy - High Environmental standards
 Strategic Policy 14- Implementation and delivery

11 Southwark Plan 2007 (July) - saved policies

The council's cabinet on 19 March 2013, as required by paragraph 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.

Policy 2.5 – Planning obligations
Policy 3.1 – Environmental effects
Policy 3.2 – Protection of amenity
Policy 3.4 – Energy efficiency
Policy 3.6 – Air quality
Policy 3.7 – Waste management
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 3.19 - Archaeology
Policy 3.31 - Flood defences
Policy 4.2 – Quality of residential accommodation
Policy 4.3 – Mix of dwellings
Policy 4.4 – Affordable housing
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

and Supplementary Planning Documents:

Draft Section 106 Planning Obligations/CIL SPD (December 2013)
Residential Design Standards SPD 2011
Section 106 SPD 2007
Sustainable Design and Construction SPD 2009

12 London Plan July 2011 consolidated with revised early minor alterations October 2013

Policy 3.3 - Increasing housing supply
Policy 3.4 - Optimising housing potential
Policy 3.5 - Quality and design of housing developments
Policy 3.8 - Housing choice
Policy 3.10 - Definition of affordable housing
Policy 3.11 - Affordable housing targets
Policy 3.12 - Negotiating affordable housing on individual private residential and mixed use schemes
Policy 3.13 - Affordable housing thresholds
Policy 5.2 - Minimising carbon dioxide emissions
Policy 5.3 - Sustainable design and construction
Policy 5.7 - Renewable energy
Policy 5.12 - Flood risk management
Policy 5.13 Sustainable drainage
Policy 6.5 - Funding Crossrail and other strategically important transport infrastructure

Policy 6.9 - Cycling
Policy 6.10 - Walking
Policy 7.14- Improving air quality
Policy 7.15- Reducing noise and enhancing soundscapes
Policy 8.2 - Planning obligations
Policy 8.3 - Community infrastructure levy

13 National Planning Policy Framework (NPPF)

This application should be considered against the NPPF as a whole, however the following sections are particularly relevant:

- 4. Promoting sustainable transport
- 6. Delivering a wide choice of high quality homes
- 7. Requiring good design.
- 10. Meeting the challenge of climate change, flooding and coastal change

Principle of development

- 14 Residential use is established on the site. The principle of additional residential accommodation is therefore acceptable.

Environmental impact assessment

- 15 An environmental impact assessment is not required for an application of this scale.

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

Daylight and sunlight.

- 16 A daylight and sunlight report has been submitted with the application. It presents the results of a modeling exercise that has been undertaken in accordance with Building Research Establishment (BRE) report 209- "Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice".

- 17 The analysis of the impact on the amount of daylight received by existing properties is based on the amount of vertical sky component (VSC), an indicator of the amount of sky that will be seen inside the modelled window; analyses were undertaken for the following addresses:

- 1-7 Tevatree House
- 41-48 Avondale House
- 1-44 Colechurch House
- 5-10 Ainsdale Drive
- 1-4 Ainsdale Drive
- 1A Marlborough Grove
- 506 to 510 Old Kent Road
- and selected windows on George Elliston and Eric Wilkins House

- 18 The guidance states that if the resultant VSC is less than 0.8 its current value, the occupants of the affected building are likely to notice the reduction in daylight. Results of the modelling show that for all but two windows at 1-7 Tevatree House, and two on the George Elliston House would have their VSC reduced to less than 0.8 of its former value.

- 19 The windows affected already have their daylight limited by balconies outside in the

case of Tevatree House or balconies in the floor above got George Elliston House. If these balconies are discounted for the assessment, three of the windows would meet the guideline criteria showing that the reduction is more a function of the existing situation than the proposed development. For the remaining window, the resulting VSC would be 0.72 its present value. As this is the only one of 123 windows modelled to be below the guideline should planning permission be granted, it is considered, on balance that the impact on daylight is acceptable.

- 20 For sunlight, the assessment is only undertaken for properties with a window within 90 degrees of south which means that any impact would be limited to properties north of the site. Based on the annual probable sunlight hours (APSH), the assessment shows that of the windows serving habitable rooms, only one would receive sunlight that is lower than the BRE guidelines, however, this window's APSH is already restricted because of the projecting balcony on the floor above. All of the other 26 windows modeled pass the BRE test and it is considered that on balance the impact on sunlight for existing properties is acceptable.

Privacy

- 21 The proposed roof extension would replicate the juxtaposition of the present building with respect to overlooking and privacy and because of this, there is no loss of privacy for existing residents expected over that which already exists.
- 22 The proposed infill block would locate residents where previously none have been and would result in closer proximity of residential accommodation for some flats than is presently the case. Flats most likely to be affected are those on the western flank of Eric Wilkins House and those on the eastern flank of the eastern arm of George Elliston House. Views from the proposed windows to both George Elliston House and Eric Wilkins House would be oblique and at distances of approximately 8 and 18m respectively. The balconies would allow more direct views but the majority of rooms affected are non-habitable (bathrooms and kitchens) and already impacted by some degree by the walkways and existing views. The proposed development would not give rise to unacceptable loss of privacy to existing residents.

Noise

- 23 If permission is granted, the development would result in a higher density at the site. However, the addition of 13 flats on a site containing 65 flats is not likely to give rise to unacceptable harm to local amenity, particularly if one considers the large number of residents on the wider Avondale Estate. Three objections refer directly to noise from the development causing harm but as the uplift is low in comparison to the existing level of accommodation, the impact from noise from the scheme is likely to be low. Should any noise arise through unreasonable behaviour to cause a nuisance, both the council and local residents have the option of taking action under the Environmental Protection Act 1990 (EPA). One objector has referred to noise, dust and other nuisance from the construction phase of the development. The site is a low to medium risk site according to the Site Evaluation Guidelines in the London Councils and Mayor of London's Best Practice Guidance document- The control of dust and emissions from construction sites, being as it is under 1,000sq.m in area. Coupled with the fact that the council have power under the EPA and Control of Pollution Act 1974 to deal with dust and noise from construction, it is not considered necessary for a condition requiring a construction management plan to be submitted.

Housing Mix

- 24 Being in the urban density zone, in order to comply with strategic policy 7- Family Homes of the core strategy, a certain mix of housing should be provided with at least

60% of two more bedrooms and 20% of three bedrooms or more. This development would provide a mix of 70% and 16% respectively, however this is due to the physical constraints of the site and to meet the current demand for smaller dwellings from the City of London tenants. Given the high quality of the proposal (see below) it is considered that the 4% shortfall for three or more bedroom units would not by itself be a reason for refusal.

Affordable Housing

- 25 All 13 units would be affordable social rented housing, meeting exceeding affordable housing targets in regional and local planning policy. Being within South Bermondsey, Strategic Policy 6 states that at least 35% of new housing units should be private. This has not been possible for this proposal because the funding for the scheme is from s106 monies which cannot be utilised to provide any form of private housing. The provision of 100% of social housing for this proposal will not have any significant implications for the wider housing mix in the surrounding area.
- 26 Nomination rights for future tenants have been part of discussions with the City of London Corporation and housing officers at Southwark. Another City of London scheme in Southwark has resulted in an agreed nomination right for one third of the units by Southwark; a similar clause will be written into the legal agreement for this application.

Quality of residential accommodation

- 27 All dwelling and room sizes exceed the minimum space standards detailed in the residential design standards SPED and would provide a suitable living environment. Additionally, there are relatively generous balconies with many being above 10sq.m. There are smaller balconies but these are due to site constraints and it should be borne in mind that there is a generous outdoor amenity space to the north of the site, including a playground and tennis courts. All units would have dual aspect.
- 28 The scheme has been designed to meet most of the lifetime homes standard in the residential design standards SPD. In addition to these, a wheelchair accessible space is proposed on the first floor which will be served by a new lift with a platform lift proposed in case of failure of the main lift.

Noise and air quality

- 29 The site is subject to relatively high levels of environmental noise, mainly from road traffic. A condition has been recommended to ensure that suitable sound insulation against environmental noise is installed providing good internal acoustic conditions
- 30 An air quality assessment submitted has modeled the likely concentrations of pollutants at the site and has concluded that for NO₂ and particulate matter (PM₁₀), concentrations are likely to comply with national and European objective concentrations. No mitigation is therefore recommended.

Transport issues

- 31 The transport assessment submitted with the application concluded that the 13 additional residential units would result in an additional 81 trips per day; an impact on the local transport network that is minor.

Car parking

- 32 Only one parking space is proposed for the development, and that is a disabled bay for the wheelchair accessible unit on the first floor. The applicants have advised that

new residents would be eligible for a parking permit for the Avondale Square Estate which is managed by the City of London. A condition is recommended to prohibit and future residents from applying for a parking permit to park on the highway.

Cycle parking

- 33 20 cycle parking spaces, including two spaces for visitors are proposed which exceeds the minimum requirement of 15. Securely located on the ground floor, the cycle parking provision is good.

Archaeology

- 34 The site lies within the Bermondsey Lake and Old Kent Road archaeological priority zones, covering the course of the old Roman road that is along the line of the Old Kent Road. Potential has been identified for remains associated with the Roman road and even prehistoric remains. While site preparation is only likely to have an impact of outside of made ground, there is the potential for remains under areas not built on. Conditions have been recommended to protect any archaeological remains that may exist.

Refuse and recycling

- 35 The existing buildings' refuse is presently serviced by chutes which would be extended to the fifth floor for occupiers of the roof extension to use. A dedicated refuse and recycling storage area capable of holding one 1,100-litre Eurobin for recycling and one each of 1,100 and 660-litre Eurobins for refuse; a provision which is acceptable.

Flood Risk

- 36 The site is located within Flood Risk Zone 3a, a defended flood zone of the River Thames. The flood risk assessment submitted advised that modeling by the Environment Agency has shown that the site is outside the extent of any modelled breach of the defences of the Thames and that the risk from flooding is considered low. Furthermore, no residential accommodation is proposed on the ground floor meaning mitigating any risk at this level from new accommodation.
- 37 The council's Flood and Drainage Team have recommended that a drainage strategy that includes sustainable drainage systems (SuDS) is implemented. This requirement has been recommended as a condition.

Design issues

- 38 Sitting in a wider estate of heterogeneous building types and forms, the site building itself does have a distinct architectural type with an interesting variety of brick colour. By respecting the overall form, mass and bulk of the existing blocks, the proposed development would add sections that would be clearly modern but finished in materials that respond to the buildings. Indeed, the infill element could be seen as completing the two separate blocks. The extra height resulting from the additional storey of accommodation would not appear as out of keeping in relation to the surrounding built form. Aluminium coated windows are proposed which would provide an elegant finish to the new elements.
- 39 The materials proposed are a textured grey brick for the infill and a rainscreen cladding for the roof extension. The success of these elements would depend on the hue and quality of the materials. To this end a condition is recommended to require details of these materials to be submitted for approval before above ground works.

- 40 In conclusion on design, the proposed extensions are considered to satisfactorily respect the existing building and would not result in any detrimental impacts upon the wider character or visual amenity of the area.

Impact on trees

- 41 No works to trees are proposed, however some works may affect trees in which case suitable mitigation would be required. A condition has been recommended to this effect.

Planning obligations (S.106 undertaking or agreement)

- 42 Local and regional planning policy advise that planning obligations can be used to overcome some of the impacts of an otherwise acceptable proposal. Saved Policy 2.5 of the Southwark Plan is reinforced by the Supplementary Planning Document (SPD) on Section 106 Planning Obligations. The applicant has committed to contributing for the following matters in accordance with the Council's S106 toolkit requirements:

Employment during construction
Employment during construction management fee
Open space, children's play and sports development
Transport strategic
Transport Site Specific
Public Realm
Archaeology
Health
Education
Administration charge

In the event that an appropriate s106 agreement is not completed by 1 May 2014, the Head of Development Management be authorised to refuse planning permission as no provision would be in place to avoid or mitigate the impacts of the proposed development.

Environmental sustainability

- 43 Reductions over baseline CO2 emissions from the completed development are predicted at 24%. This would be achieved by the installation of a 16.25Kwp array of 65 solar panels. Further reductions through the implementation of measures such the use of efficient boilers and insulation have resulted in a predicted reduction in emissions of just over 45%. This, in addition to the design target of meeting Code for Sustainable Homes Level 4 means that the development would generally comply with Strategic Policy 13 - High Environmental Standards of the Core Strategy 2011.

Community Infrastructure Levy

- 44 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.

A contribution of £42 383.25 is required in accordance with the CIL regulations.

Conclusion on planning issues

- 45 The development would provide much needed affordable housing within the borough in a location that has good transport links and access to local amenities. The design of the proposal would be sympathetic to the existing buildings and would not result in any detrimental impacts upon the general character and visual amenities of the surrounding area. The impacts on the daylight and sunlight of existing residential properties are mostly within established guidelines and would not result in significant impacts upon the living conditions of neighbouring residential properties. Importantly it provides good quality accommodation and sustainable development in line with the NPPF.

Community impact statement

- 46 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. No adverse impact on any group with the above protected characteristics is envisaged

Consultations

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

Consultation replies

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

Summary of consultation responses

Neighbour responses:

- 49 Objections from three local residents regarding the impact on their view, noise and loss of privacy and the impact from construction. One respondent also queries whether the garages to the rear of the site are to be demolished.

Officer response:

While some views might be restricted, the impact on sunlight and daylight is considered to be acceptable as the vast majority of existing windows would have provision in accordance with BRE guidelines. By adding an additional 13 dwellings to a site containing 65 dwellings, no significant increase in noise is likely to occur. There are provisions under the Environmental Protection Act 1990 and the Control of Pollution Act 1974 for the council to take action for any noise and dust problems cause by construction and noise from events such as parties. The garages to the rear of the site would not be demolished.

One letter of support has been received from a resident of Eric Wilkins House detailing the benefit for her and other leaseholders who would not have to pay money for repairs to the site would be covered by this development.

Statutory consultees:

- 50 Response from TfL advising that the scale of the development and its location is not likely to give rise to any adverse impact on the TLRN

Internal responses

- 51 The council's flood and drainage team have recommended that a drainage strategy be prepared. This matter is the subject of a recommended condition.

Human rights implications

- 52 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.
- 53 This application has the legitimate aim of providing 13 residential dwellings. 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.

SUPPLEMENTARY ADVICE FROM OTHER OFFICERS

- 54 None.

BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
Site history file: TP/2168-F Application file: 13/AP/4420 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 1778 Council website: www.southwark.gov.uk

APPENDICES

No.	Title
Appendix 1	Consultation undertaken
Appendix 2	Consultation responses received
Appendix 3	Pre-application advice
Appendix 4	Recommendation

AUDIT TRAIL

Lead Officer	Gary Rice, Head of Development Management	
Report Author	Dipesh Patel, Team Leader Major Applications Team	
Version	Final	
Dated	18 March 2014	
Key Decision	No	
CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER		
Officer Title	Comments Sought	Comments included
Strategic Director, Finance & Corporate Services	No	No
Strategic Director, Environment and Leisure	Yes	No
Strategic Director, Housing and Community Services	No	No
Director of Regeneration	No	No
Date final report sent to Constitutional Team		21 March 2014

Consultation undertaken

Site notice date: 09/01/2014

Press notice date: 16/01/14

Case officer site visit date: 05/02/14

Neighbour consultation letters sent: 13/01/14

Internal services consulted:

Design and Conservation Team
Environmental Protection Team
Transport Planning Team

Statutory and non-statutory organisations consulted:

Transport for London

Neighbours and local groups consulted:

JOHN PENRY HOUSE 1 MARLBOROUGH GROVE LONDON SE1 5JS
FLAT 11 COLECHURCH HOUSE AVONDALE SQUARE LONDON SE1 5EU
FLAT 10 COLECHURCH HOUSE AVONDALE SQUARE LONDON SE1 5EU
FLAT 22 COLECHURCH HOUSE AVONDALE SQUARE LONDON SE1 5EU
FLAT 21 COLECHURCH HOUSE AVONDALE SQUARE LONDON SE1 5EU
FLAT 24 COLECHURCH HOUSE AVONDALE SQUARE LONDON SE1 5EU
FLAT 23 COLECHURCH HOUSE AVONDALE SQUARE LONDON SE1 5EU
FLAT 20 COLECHURCH HOUSE AVONDALE SQUARE LONDON SE1 5EU
FLAT 18 COLECHURCH HOUSE AVONDALE SQUARE LONDON SE1 5EU
FLAT 17 COLECHURCH HOUSE AVONDALE SQUARE LONDON SE1 5EU
FLAT 2 COLECHURCH HOUSE AVONDALE SQUARE LONDON SE1 5EU
FLAT 19 COLECHURCH HOUSE AVONDALE SQUARE LONDON SE1 5EU
FLAT 7 ERIC WILKINS HOUSE OLD KENT ROAD LONDON SE1 5ES
FLAT 6 ERIC WILKINS HOUSE OLD KENT ROAD LONDON SE1 5ES
FLAT 9 ERIC WILKINS HOUSE OLD KENT ROAD LONDON SE1 5ES
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FLAT 5 ERIC WILKINS HOUSE OLD KENT ROAD LONDON SE1 5ES
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FLAT 4 ERIC WILKINS HOUSE OLD KENT ROAD LONDON SE1 5ES
FLAT 3 ERIC WILKINS HOUSE OLD KENT ROAD LONDON SE1 5ES
FLAT 15 GEORGE ELLISTON HOUSE OLD KENT ROAD LONDON SE1 5ET
FLAT 14 GEORGE ELLISTON HOUSE OLD KENT ROAD LONDON SE1 5ET
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FLAT 11 GEORGE ELLISTON HOUSE OLD KENT ROAD LONDON SE1 5ET
FLAT 19 ERIC WILKINS HOUSE OLD KENT ROAD LONDON SE1 5ES
FLAT 8 COLECHURCH HOUSE AVONDALE SQUARE LONDON SE1 5EU
FLAT 7 COLECHURCH HOUSE AVONDALE SQUARE LONDON SE1 5EU
FLAT 1 ERIC WILKINS HOUSE OLD KENT ROAD LONDON SE1 5ES
FLAT 9 COLECHURCH HOUSE AVONDALE SQUARE LONDON SE1 5EU
FLAT 6 COLECHURCH HOUSE AVONDALE SQUARE LONDON SE1 5EU
FLAT 43 COLECHURCH HOUSE AVONDALE SQUARE LONDON SE1 5EU
FLAT 42 COLECHURCH HOUSE AVONDALE SQUARE LONDON SE1 5EU
FLAT 5 COLECHURCH HOUSE AVONDALE SQUARE LONDON SE1 5EU
FLAT 44 COLECHURCH HOUSE AVONDALE SQUARE LONDON SE1 5EU
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FLAT 12 ERIC WILKINS HOUSE OLD KENT ROAD LONDON SE1 5ES

Re-consultation:

None

APPENDIX 2

Consultation responses received

Internal services

Design and Conservation Team- No comments

Environmental Protection Team- No Comments

Transport Planning Team- No comments

Flood and Drainage Team- recommended a site drainage strategy

Statutory and non-statutory organisations

TfL- no objections

Neighbours and local groups

Objections from three residents, discussed above; support from one.



Chief executive's department
Planning division
Development management (5th floor - hub 2)
PO Box 64529
LONDON SE1P 5LX

Ms S Ungerer
Space Craft Architects
c/o
XXXXXXXXXXXXXXXXXX

Your Ref:
Our Ref: 13/EQ/0161
Contact: Dipesh Patel
Telephone: 020 7525 1778
E-Mail: dipesh.patel@southwark.gov.uk
Web Site: <http://www.southwark.gov.uk>

Date: 25/09/2013

Dear Ms Ungerer

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

At: GEORGE ELLISTON HOUSE, OLD KENT ROAD & ERIC WILKINS HOUSE OLD KENT ROAD.
Proposal: Roof top extensions (single storey) and construction of a 6 storey infill building resulting in the creation of 13 new dwellings: 4 x 1 bed 7 x 2 bed and 2 x 3 bed units along with cycle and bin stores and a new lift.

I write further to your pre-application enquiry received on 19 August 2013 and your meeting with Dipesh Patel and I on 12 September 2013. The following documents and drawings were submitted:

Pre-application submission package dated 6 August 2013 including the following:

- Site analysis
- The proposal
- Materials
- Environmental Approach
- Structure
- Consultation
- Summary
- Appendix A: Existing and Proposed Drawings.

and covering letter dated 15 august 2013.

Summary

The scheme is broadly acceptable and the provision of good quality affordable housing within this part of the borough is welcomed, however, a robust justification for the selected mix proposed will be required. Other issues centre on the choice of the finishing materials for the infill extension and the

roof extensions, the latter being of grater concern with a rain screen unlikely to be acceptable. The mass and bulk of the proposal is acceptable.

The potential for harm to existing residents, both off and on site is likely to be limited to a potential for loss of sunlight and daylight. However the aspect of the site means that this effect will be limited. Nonetheless, this should be justified through a full daylight and sunlight assessment in accordance with BRE guidance.

Exceeding minimum dwelling size requirements, the proposal would provide a good quality of residential accommodation and while some balconies may be smaller than is preferred, a good existing provision of outdoor amenity space means that the outdoor amenity spaces proposed for the development would be acceptable.

Description of proposal

Consisting of two elements, the proposals are for single storey extensions to George Elliston House and Eric Wilkins House in addition to an infill building that would fill the gap between the two buildings to create a total of 13 new dwellings with the following mix:

4 x 1 bedroom (30%)
7 x 2 bed units (54 %)
2 x 3 bed units (16%)

A two bedroom unit located at first floor would be wheelchair accessible.

The form of the proposal would include roof extensions and balconies for the infill extension. Materials proposed are grey brick work for the infill building (which you advised is likely to change) and a horizontally structured laminate cladding of red and brown.

Documents submitted

Pre-application submission package dated 6 August 2013 including

- Site analysis
- Details of the proposal
- Materials
- Environmental Approach
- Structure
- Consultation
- Summary and
- Existing and proposed drawings

Site Description

The site is part of the Avondale Square Estate which is located off the A2 Old Kent Road - a classified road. The estate benefits from generous communal outdoor amenity space including play areas, there is also a community centre.

The site in particular consists of George Elliston and Eric Wilkins houses which are on the south-eastern part of the estate, adjacent to Old Kent Road. Both buildings are 5 storeys with flat roofs and cantilevered access decks. It is subject to the following designations:

- Air Quality Management Area
- Archaeological Priority Zone
- Urban Density Zone
- Old Kent Road Action Area
- PTAL- 4
- Flood Risk Zone 3a

It is also within a controlled parking zone (CPZ).

Planning History

There is no planning history at the site except for a request for pre-application advice in 2010 (reference 10-EQ-0190). This request for advice concerned a proposal for a single storey extension to the existing 5 storey residential blocks comprising 3x2 bed units and 10x1 bed units.

The written response to this enquiry stated that there were no objections to the extension of the buildings at roof level in principle but that the mix units, massing of the built form and the principle of the cantilevered walkways would be reasons for objection.

Policies

The Development Plan is made up of the London Plan 2011, Core Strategy 2011 and Southwark Unitary Development Plan 2007 saved policies, along with Supplementary Planning Documents. The National Planning Policy Framework is a material consideration.

The proposal would be considered with regard to various policies including, but not exclusively:

National Planning Policy Framework (2012)

- 4. Promoting sustainable transport
- 6. Delivering a wide choice of high quality homes
- 7. Requiring good design.
- 10. Meeting the challenge of climate change, flooding and coastal change

London Plan (2011)

- Policy 3.3 - Increasing housing supply
- Policy 3.4 - Optimising housing potential
- Policy 3.5 - Quality and design of housing developments
- Policy 3.8 - Housing choice
- Policy 3.10 - Definition of affordable housing
- Policy 3.11 - Affordable housing targets
- Policy 3.12 - Negotiating affordable housing on individual private residential and mixed use schemes
- Policy 3.13 - Affordable housing thresholds
- Policy 5.2 - Minimising carbon dioxide emissions
- Policy 5.3 - Sustainable design and construction
- Policy 5.7 - Renewable energy
- Policy 5.12 - Flood risk management
- Policy 6.5 - Funding Crossrail and other strategically important transport infrastructure
- Policy 6.9 - Cycling
- Policy 6.10 - Walking
- Policy 8.2 - Planning obligations
- Policy 8.3 - Community infrastructure levy

Core Strategy (2011)

- SP1 - Sustainable development
- SP2 - Sustainable transport
- SP5 - Providing new homes
- SP6 - Homes for people on different incomes
- SP7 - Family homes
- SP12 - Design and conservation

SP13 - High Environmental standards
SP14 - Implementation and delivery

Southwark Plan (2007) - saved policies

Policy 2.5 – Planning obligations
Policy 3.1 – Environmental effects
Policy 3.2 – Protection of amenity
Policy 3.4 – Energy efficiency
Policy 3.6 – Air quality
Policy 3.7 – Waste management
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 3.19 - Archaeology
Policy 3.31 - Flood defences
Policy 4.2 – Quality of residential accommodation
Policy 4.3 – Mix of dwellings
Policy 4.4 – Affordable housing
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

Supplementary Planning Documents

Affordable Housing
Residential Design Standards
Section 106 Agreements
Sustainable Design and Construction

Key issues

- Principle
- Housing tenure and mix
- Quality of residential accommodation
- Impact of proposed development on amenity of adjoining occupiers and surrounding area
- Transport
- Design
- Archaeology
- Planning obligations (S.106 undertaking or agreement)
- Mayoral Community Infrastructure levy
- Sustainable development implications
- Flood risk
- Other matters

Principle

The principle of residential accommodation at this site is established. An increase of 13 units at the site will add to the housing provision of the borough and aid the delivery of Strategic Policy 5 of the Core Strategy- Providing New Homes, which seeks to provide 24 450 new homes between 2011 and 2026. Issues of housing mix and tenure are discussed below.

Housing tenure and mix

Strategic Policy 6- Homes for people on different incomes requires at least 35% of new units for developments of 10 or more units to be private and 35% to be affordable. With 100% affordable housing proposed, this policy will be contravened. However, it is likely that site constraints, due to management and access arrangements will make provision of private accommodation difficult. It is understood that the funding for the scheme is drawn from s106 money which cannot be used for private housing, however this alone should not prevent a mix of tenures at the site. The reason for the tenure proposed should be expanded upon.

Strategic policy 7- Family homes requires the following mix for developments of 10 or more units in this area:

At least 20% 3, 4 or 5 bedroom units

At least 60% 2 bedroom units

The mix proposed is below these minimum requirements; one reason for this is that the development has been informed by the City of London's waiting list with respect to the dwelling mix. Robust justification will be required for this departure.

Quality of residential accommodation

The dwelling sizes all exceed the minimum size requirements in the Sustainable Design and Construction SPD and this element of the proposal is welcomed. You should note that individual room sizes should also comply with the minimum room sizes presented in table 3 of the SPD.

Balconies are provided for all proposed dwellings. While the 3 bedroom units would benefit from balconies of more than 10m², this is not the case some of the smaller units. While normally the shortfall would need to be added to the minimum communal space of 50m², there is already generous provision of outdoor amenity space within the wider estate meaning that this particular requirement (communal amenity space) can be met by existing provision.

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

As the application documentation identifies, there is the potential for an impact on the existing residential dwellings from loss of sunlight, daylight and outlook. The impact of the infill building will be most prevalent on the existing occupiers of George Elliston and Eric Wilkins houses while the roof extension may affect these residents plus residents of neighbouring properties. The sunlight any daylight assessment, will I understand, cover the impact on both on site and off site receptors. This should be a full assessment in accordance with BRE guidance.

Transport

Car parking

No off street car parking is proposed and you have advised that there is adequate provision within the estate for off street parking. This will need to be elaborated upon in the Transport Assessment. The site has a medium PTAL and is within a controlled parking zone; it is important that overspill parking from the development is restricted. A condition prohibiting future occupiers of the site from applying for a parking permit for use on non-estate roads should be expected if planning permission is granted. Provision will also need to be made, on site, for at least one disabled parking bay.

Cycling Parking

A provision of 1.1 secure cycle storage spaces per unit is required and the proposal for 20 spaces is welcomed. The council's Sustainable Transport SPD states that a travel plan (forming part of the

Transport Assessment) is required for developments comprising 10 or more residential units.

Design

The bulk and massing of the proposed development is acceptable. The site, located close to the Old Kent Road can accommodate the additional height while the infill extension would be seen to 'complete' the two presently separate houses.

Materials proposed are however a concern. The grey brick proposed for the infill extension would sit poorly against the existing finish of George Elliston and Eric Wilkins houses which have interest with the red and brown palette of bricks. We feel that this existing material should be referenced in the proposed infill better while maintaining the proposed building's clean and modern appearance. A suitable hue of brick should be chosen.

Against the more traditional materials proposed and in place at the site, the selection of a rain screen for the finish of the roof extensions seems unusual. This would sit awkwardly atop the existing buildings and visually be unappealing. Again, by referencing the more traditional materials, for example by use of a terracotta veneer, the extensions would provide a more acceptable addition.

Archaeology

The site forms part of an archaeological priority zone, and saved policy 3.19 of the Southwark Plan requires planning applications in these locations to be accompanied by an archaeological assessment and evaluation of the site, which must consider the impact of the proposed development on any archaeological remains.

Planning obligations (S.106 undertaking or agreement)

Contributions to for the development through s106 should be calculated using the s106 Toolkit. Draft Heads of Terms should be submitted.

Mayoral Community Infrastructure levy

With a number of new residential dwellings and new floorspace, the development would be subject to a financial contribution under the Community Infrastructure Levy, presently £35 per m² of new floorspace.

Sustainable development implications (environmental)

Strategic policy 13 'High environmental standards' of the Core Strategy expects development will help us live and work in a way that respects the limits of the planet's natural resources, reduces pollution and damage to the environment and helps us adapt to climate change. The Core Strategy requires all residential developments to achieve Code for Sustainable Homes level 4 and a pre-assessment indicator would be required with any planning application. Major developments must achieve the following:

- A 44% saving in carbon dioxide emissions above the building regulations from energy efficiency, efficient energy supply and renewable energy. An energy statement would be required to demonstrate how this would be achieved;
- A reduction in carbon dioxide of 20% from using on-site or local low and carbon zero sources of energy;
- A 50% reduction in surface water run-off.

A sustainability assessment would be required, as you have identified.

Flood Risk

The site falls within a flood risk zone (3a) and as such a Flood Risk Assessment should be prepared and submitted with any forthcoming application. However as there are no new habitable rooms proposed at ground floor, it is likely that the scheme will not require alteration.

Other Matters

As with other affordable housing within the borough, the council will require nomination rights for a number of the units, details of which can be arranged with colleagues in Housing Strategy.

List of documents required at application stage

The list of documents that you have proposed to submit is acceptable.

Conclusion

The scheme proposed is broadly acceptable and the addition of affordable housing of a good quality would be welcomed into this part of the borough. Some concerns remain about the materials proposed for the roof extension and the mix of residential accommodation which needs to be justified.

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

Yours sincerely

Rob Bristow
Group Manager- Major Applications.