

<b>Item No.</b>	<b>Classification:</b>	<b>Date:</b>	<b>Meeting Name:</b>
6.4	Open	14 July 2015	Planning Committee
<b>Report title:</b>	<b>Development Management planning application:</b> Application 14/AP/4580 for: Full Planning Permission  <b>Address:</b> 173 LORDSHIP LANE, LONDON SE22 8HA  <b>Proposal:</b> The demolition of all existing buildings on the site and the erection of a new two form entry primary school (Harris Primary Academy East Dulwich) in a part two, part three and part four storey building; with associated new cycle and pedestrian access from Landcroft Road.		
<b>Ward(s) or groups affected:</b>	East Dulwich		
<b>From:</b>	Head of Development Management		
<b>Application Start Date</b> 17/12/2014		<b>Application Expiry Date</b> 18/03/2015	
<b>Earliest Decision Date</b> 08/02/2015			

## RECOMMENDATION

1. That the Planning Committee grant full planning permission subject to conditions and the applicant entering into an appropriate legal agreement by no later than 31 August 2015, and in the event that the legal agreement is not entered into by 31 August 2015 that the Director of Planning be authorised to refuse planning permission, if appropriate, for the reasons set out under paragraph 80 below.

## BACKGROUND INFORMATION

### Site location and description

2. The site comprises a purpose built 1970s part three, part four storey building previously occupied as the East Dulwich Police Station but is now vacant. The site is rectangular shaped and bound by Whateley Road to the north, Landcroft Road to the east and Lordship Lane to the west. To the south of the site are the rear gardens of residential properties which front both Landcroft Road and Lordship Lane. The site is well served by local bus routes and there are bus stops immediately outside the Whateley Road and Lordship Lane frontages.
3. The surrounding area is a mixture of commercial and residential uses along Lordship Lane and residential terraced housing on both Whateley Road and Landcroft Road. The nearest stations are East Dulwich and North Dulwich.

### Details of proposal

4. The proposal is for the demolition of all of the existing buildings to allow for the provision of a new two form entry primary school known as the "Harris Primary Academy East Dulwich". The school has already opened in temporary premises in Peckham Rye, having secured temporary planning permission in July 2014. It currently provides 60 places. Upon full capacity, the school would provide up to 420

places for ages four to eleven, and 49 staff. The school would grow gradually over the following eight years until it reaches full capacity.

5. The building would be predominantly four storeys high, with some two and three storey elements along Whateley Road. The ground floor would comprise of the main entrances, administration and office areas, teaching areas, a hall, kitchen and plant areas and toilet space. The teaching space at ground floor would be for the reception class and it would have direct access to the reception playspace. The first, second and third floors would provide further classrooms with plant space and extra toilet provision.
6. The playground would front onto both Whateley Road and Landcroft Road. A separate play area for the reception class would also be provided which would be partially covered.
7. Deliveries are proposed to take place directly from Whateley Road using the existing loading bay outside the site. The proposal does not include any car parking. Space has been allocated for cycles and scooters towards the south of the site, accessed from Lordship Lane. Further, uncovered visitor spaces are located adjacent to the visitor entrance on Lordship Lane.
8. A ramp is proposed to the Lordship Lane elevation to address a level change across the site from east to west. The existing trees on the pavement to Lordship Lane and Landcroft Road would be retained under the proposals.
9. Revised drawings were submitted on 4 June 2015 to amend the external materials, including introducing brick slips in lieu of render on the Lordship Lane and Whateley Road elevations. The revised drawings also show provision for a sole entrance into the school from Landcroft Road and for a widened pavement outside it, extending its width from 2.1m to 2.5m. The widened pavement would be provided from reducing the width of the carriageway and would in the loss of ten parking spaces on Landcroft Road. All pupils would use the entrance, apart from visitors who would use the Lordship Lane entrance. A Road Safety Audit and School Management Plan were also later submitted. The School Management Plan sets out the staging of start, finish and break times. The school day would start at 8:40am for Years 1 and 2 and 8:55am for Years 3 to 6. Break times would also be staggered with two separate break times from 10:30am to 10:45am and 10:45am to 11.00am. The revised drawings were subject to a 14 day re-consultation.

### **Planning history**

10. 14/EQ/0114 Application type: Pre-Application Enquiry (ENQ)  
Demolition of existing buildings and redevelopment of the site to provide a two form entry primary school  
Decision date 01/10/2014 Decision: Pre-application enquiry closed (EQC)

### **Planning history of adjoining sites**

11. 14/AP/1655 At Harris Girls Academy East Dulwich, Homestall Road  
Planning permission was granted for the provision of two single storey temporary modular buildings and one administrative block for education use as associated primary school (Class D1) until 30 September 2016.  
Decision date 27/07/2014

## KEY ISSUES FOR CONSIDERATION

### Summary of main issues

12. The main issues to be considered in respect of this application are:
- a) the principle of the development in terms of land use and conformity with strategic policies;
  - b) the impact of the proposed development upon the amenity of adjoining occupiers;
  - c) transport and access issues;
  - d) height, scale and detailed design;
  - e) landscaping and trees;
  - f) planning obligations; and
  - g) sustainable development implications.

### Planning policy

13. The site lies within the Air Quality Management Area and is within Flood Zone 1. This application should be determined in accordance with the development plan unless material considerations indicate otherwise; and the following national framework, regional and local policy and guidance are particularly relevant:

#### National Planning Policy Framework (the Framework)

Section 4 Promoting sustainable transport  
Section 7 Requiring good design  
Section 8 Promoting healthy communities  
Section 10 Meeting the challenge of climate change  
Section 11 Conserving and enhancing the natural environment

#### London Plan July 2015 consolidated with alterations

Policy 3.16 Protection and enhancement of social infrastructure  
Policy 3.18 Education facilities  
Policy 5.1 Climate change mitigation  
Policy 5.2 Minimising Carbon Dioxide Emissions  
Policy 5.3 Sustainable Design and Construction  
Policy 5.7 Renewable Energy  
Policy 5.9 Overheating and Cooling  
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 6.1 Strategic Approach  
Policy 6.9 Cycling  
Policy 6.10 Walking  
Policy 6.13 Parking  
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 7.14 Improving Air Quality  
Policy 7.21 Trees and Woodland  
Policy 8.2 Planning Obligations

#### Core Strategy 2011

Strategic Policy 1 – Sustainable development  
Strategic Policy 2 – Sustainable transport

Strategic Policy 4 - Places to learn and enjoy  
Strategic Policy 12 – Design and conservation  
Strategic Policy 13 – High environmental standards  
Strategic Policy 14 – Implementation and delivery

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 2.2 Provision of new community facilities  
Policy 2.4 Educational deficiency – Provision of new Educational Establishments;  
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 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

Southwark Supplementary Planning Documents (SPDs)

Sustainability Assessment (2009)  
Design and Access Statements (2007)  
Section 106 Planning Obligations (2015)  
Sustainable Transport (2008)  
Sustainable Design and Construction (2009)

**Principle of development**

14. The National Planning Policy Framework (NPPF) was published on 27 March 2012. At the heart of the NPPF is a presumption in favour of sustainable development.
15. Paragraph 72 of the NPPF states that the Government attaches great weight to ensuring a sufficient choice of school places and states that local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement. It advises that great weight should be attached to the need to create, expand or alter schools.
16. Policy 3.18 - Education facilities of London Plan confirms the Mayor would strongly support the provision of new schools. It states that proposals for new schools should be given positive consideration and should only be refused where there are demonstrable negative local impacts which substantially outweigh the desirability of establishing a new school and which cannot be addressed through appropriate use of

planning conditions or obligations. Strategic policy 4 – ‘Places to learn and enjoy’ of the Core Strategy, supports the building of new schools and improving of existing schools to provide improved education opportunities, and states that schools will be protected where there is a long-term need. Saved policies 2.2 ‘Provision of new community facilities’ and 2.4 ‘Educational deficiency – provision of new educational establishments’ of the Southwark Plan 2007 support the provision of new and improved educational and community facilities.

17. In addition to the guidance contained in the NPPF, the Governments 2011 Policy Statement (Planning for Schools development) states that there should be a presumption in favour of the development of state funded schools. It also states that any refusal for a state-funded school would have to be clearly justified by the local planning authority.
18. A report to Cabinet in 2014 ‘School Places Strategy Update’ forecasted continued demand for primary school places despite the considerable progress made in recent years to provide more places. There is a continuing investment programme to help meet the demand, including proposals for new build schools as well as school expansion. The provision of a permanent site for the school would contribute to help meeting the forecast demand.
19. The existing site was last in use as a station for the Metropolitan Police. The police vacated the site in 2013 as it was identified as being surplus to operational requirements. The police station use falls into a ‘sui generis’ use class (a class of its own) and there are no policies to protect the loss of such a use. Given the policy support for the provision of new schools, together with the forecast demand, there are no objections to the principle of constructing a new school on the site. However, this is subject to compliance with all other relevant policies of the Core Strategy and Southwark Plan, including an assessment of its scale and design and impacts upon transport conditions and residential amenity.
20. The school is currently operating in temporary premises in Peckham Rye, having obtained planning permission on 27 July 2014. It opened in September 2014 with 60 reception places and plans to provide a further 60 places in September 2015. The permission was granted for 1 year [i.e. until July 2015] with a further 14 months subject to planning permission being obtained for a permanent school by 31 July 2015 [i.e. until September 2016]. If permission is granted, the school would have a permanent home and could relocate from their current temporary premises.
21. In line with saved policy 2.2 of the Southwark Plan which requires that provision is made to enable new facilities to be used by all members of the community, the school has indicated that it could make the school available to the community in the evenings but has not yet provided any detail of which facilities they would be, and so further details would be required by condition.

### **Environmental impact assessment**

22. The site is not located within a ‘sensitive area’ as defined by the Regulations. According to Column 1 of the table in Schedule 2, Category 10 (b) of the Regulations, the development could be classified as a Schedule 2 ‘urban development project’. However, it would not meet or exceed the corresponding thresholds in Column 2 of the table in Schedule 2 and as such the development is not considered to constitute EIA development.

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

23. Policy 3.2 Protection of Amenity of the Southwark Plan seeks to protect the amenity of existing and future occupiers in the surrounding area.

### *Daylight and Sunlight*

24. A daylight and sunlight assessment was submitted with the application. The report assesses the scheme based on the Building Research Establishments (BRE) guidelines on daylight and sunlight.
25. The BRE sets out a number of detailed daylight tests. The first is the Vertical Sky Component test (VSC), which is the most readily adopted, and is the one used in the submitted report. The test considers the potential for daylight by calculating the angle of vertical sky at the centre of each of the windows serving the buildings which look towards the site. The target figure for VSC recommended by the BRE is 27 per cent which is considered to be a good level of daylight and the level recommended for habitable rooms with windows on principal elevations. The BRE have determined that the daylight can be reduced by about 20 per cent of their original value before the loss is noticeable.
26. In relation to sunlight, the test is to calculate the annual probable sunlight hours (APSH) taking into account the amount of sun available in both the summer and winter for each given window which faces within 90 degrees of due south. The assessment requires that a window should receive a quarter of annual probable sunlight hours in the summer (25 per cent) and at least 5 per cent of sunlight hours during the winter months.
27. The submitted report measures impacts currently experienced by surrounding residential properties and how these impacts would alter following construction of the proposed development. As referred to above, the daylight test undertaken is the VSC test, which is the main daylight test in the BRE guide. The submitted report has considered the following properties: 136 to 156 Lordship Lane, 146 Melbourne Grove, 74 to 84 Whateley Road, 171 Lordship Lane, 1 to 13 Landcroft Road, 185 to 189 Lordship Lane and 2 to 8 Landcroft Road.
28. In relation to sunlight, the results show that the windows would continue to receive good levels of sunlight; where there would be losses they would be very small and no greater than 3 per cent. It is therefore not expected that such minor reductions would be noticeable.

### 74 to 86 Whateley Road (even), 171 Lordship Lane

29. These properties lie opposite the site across Whateley Road to the north. Properties 74 to 84 Whateley Road are in residential use. 86 Whateley Road is a MOT test centre and 171 Lordship Lane is in use as a kitchen and bathroom shop. Some of the windows in these properties experience no reduction in their daylight values and some would experience small improvements; this is because the form and massing of the existing building is comparable with the proposed. The remainder of windows would experience very minor losses up to 3.2 per cent which is well within the 20 per cent reduction accepted by the BRE. These properties would therefore continue to have acceptable levels of daylight.
30. The results are similar in terms of sunlight, with all windows continuing to receive considerably more than the BRE targets as the windows are south facing. The impact on sunlight is therefore acceptable.

#### 1 to 13 Landcroft Road (odd)

31. These properties lie to the east of the site and apart from the ground floor of 1 Landcroft Road which is a shop, the remainder are in residential use. The results of the daylight analysis are clear in that none of these properties would experience any harmful reduction in their daylight levels. Whilst there would be some small losses, again they are well within the 20 per cent tolerance with no window experiencing a reduction in more than 1.8 per cent. Accordingly, there would be no harmful impact to these properties.
32. There are some small bay ground floor windows on 9 to 13 Landcroft Road which have been tested for sunlight. The results confirm that the windows would continue to receive 25 per cent sunlight in the summer and 5 per cent in the winter. 1 to 7 Landcroft Road do not need to be tested for sunlight as their windows do not fall within 90 degrees of due south.

#### 185 to 189 Lordship Lane (odd) and 2 to 8 Landcroft Road (even)

33. These properties lie to the south of the site, with their windows orientated to face east west rather than directly onto the site. Out of these buildings, only 2 Landcroft Road, which adjoins the site to the south, has windows which face directly onto the site. The other windows look out onto their own rear gardens. The results confirm that these properties would maintain good daylight levels. Given their orientation, many of the windows would not have any daylight reduction at all, with the other windows experiencing no more than 6.3 per cent reduction. The only exception is a roof window at 2 Landcroft Road which adjoins the site to the south which would experience a reduction of 11.1 per cent as a result of the proposals, but this is still under the 20 per cent allowed by the BRE guide.
34. Only 185 to 189 Lordship Lane and 2 Landcroft Road need to be considered for sunlight; this is because the windows on 4 to 8 Landcroft Road do not face onto the site. Again, these properties would maintain very good levels of sunlight, with the minimum daylight levels of the BRE being considerably exceeded.

#### *Conclusion on daylight and sunlight*

35. The results of the daylight and sunlight analysis are clear in that none of the surrounding properties would experience any reduction in their amenity; this is mainly because the height and massing of the proposed building is similar to the existing. The reductions in daylight are very minor and would be within the accepted tolerances and so would not be noticeable to occupiers. In terms of sunlight, all properties would retain total and winter sunlight in excess of the BRE guidelines.

#### *Overlooking/Outlook*

36. In order to prevent against harmful overlooking, the Residential Design Standards SPD 2011 requires developments to achieve a distance of 12m at the front of the building and any elevation that fronts a highway and a minimum of 21m at the rear. These distances are of most relevance between habitable room windows of different units but have nonetheless been considered here.
37. To the north across Whateley Road, there would be a distance of 14m, exceeding the 12m distance required by the SPD. To the east, there would be a distance of 34m to properties on Landcroft Road exceeding the required minimum of 12m. To the west, there would be a distance of 22m across Lordship Lane. Whilst there would be no overlooking into neighbouring habitable windows to the south (due to the absence of

facing windows), there would be some overlooking from the new school classroom windows (first to third floor) towards the rear gardens of Landcroft Road and Lordship Lane. However, given the distance to the nearest gardens at 2 Landcroft Road and 185 Lordship Lane [12m], it is not considered that the overlooking would be overbearing or harmful, particularly as the gardens to these residential properties are most likely to be used outside of weekday daytime hours when the school would be occupied.

38. In conclusion, the development would protect the privacy of neighbouring residential properties by virtue of the minimum overlooking distances being exceeded. Given the distances, it is not considered that any harm by way of loss of outlook or sense of enclosure can be demonstrated, particularly when compared to the existing building.

#### *Noise*

39. A noise report has been submitted with the application to assess the impact of noise from playground activities. The closest residential occupiers to the playground are 2 Landcroft Road and 175 Lordship Lane which adjoin the playground to the south. It is accepted that noise from the use of the playground would be audible to the surrounding properties and accordingly, mitigation has been suggested in the form of an acoustic boundary comprising timber screening. Given the close proximity of the playground to these neighbours, it is recommended that further details of this boundary be submitted and approved. An adjoining neighbour has also requested these details due to the lack of detailed information.

#### **Transport issues**

40. Saved policies 5.2 'Transport impacts' and 5.3 'Walking and cycling' state that considerations must be had to transport infrastructure on and off an application site as a result of the development, with adequate provision for pedestrians and cyclists being a key consideration. The site is not located in a controlled parking zone (CPZ) and has public transport accessibility level (PTAL) of four (rated on a scale of 1 to 6 where 1 represents the lowest accessibility to public transport and 6 the highest).

#### *Access*

41. The main entrance into the school would be from the openable gates on Landcroft Road. Upon full occupancy (likely 2020) the school could accommodate up to 420 pupils. At drop off and pick up times, there would also be parents and other small children arriving and this could result in congestion on the highway and pedestrian environment. A widened pavement has been proposed outside the school entrance, enlarging the current pavement width from 2.1m to 2.5m by reducing the width of the carriageway. The submitted Road Safety Audit goes further, by recommending the pavement be extended further still, to 3.5m. This measure would help to alleviate some of the crowding at the school gates and should also address comments made by Transport for London regarding congestion around the entrance.
42. In addition, the applicant has set out, in the submitted School Management Plan, that there would be some phasing of the start and finish times of the school day, as follows.

Year	Start time	Finish time
1 & 2	8:40am	3.10pm
3 to 6	8:55am	3:20pm

43. The phasing would further ease some of the pressures at the start and finish of the school day and further addresses comments made by Transport for London regarding



managing safety around the entrance. The school would also be providing breakfast club at 7:45am and would offer after school care until 6pm but these would not be mandatory for pupils.

44. Some residents have raised concern over the Landcroft Road school entrance, on the basis that it is a quiet residential street. However, given the bus stops outside both the Lordship Lane and Whateley Road frontages, and also the loading bay on the Whateley Road frontage, the safest entrance point would be from Landcroft Road, so as to avoid potential conflicts with buses and other visibility concerns. Concern has also been raised to the loss of residents car parking that would result; this is considered below at paragraph 58.

#### *Road safety audit*

45. The applicant submitted a Road Safety Audit upon request from officers. The audit was reviewed by Southwark's road safety auditors.
46. As referred to above, in paragraph 47, the audit refers to how the pavement outside the Landcroft Road school entrance could be extended to 3.5m to more generously accommodate higher levels of pedestrians. It is therefore recommended that the advice of the audit be followed and that revised drawings be submitted by condition showing the footway extension to 3.5m, through a reduction in the width of the carriageway. The number of car parking spaces lost would remain at ten.
47. The audit reiterates the comparatively low vehicle flow levels on both Whateley and Landcroft Road which would reduce the conflict and likelihood of accidents at school start and finish times.
48. The school has also submitted a management plan which proposes to stagger the drop off and collection times of the years in the school. This is believed to further reduce the likelihood of pedestrians stepping into the carriageway.

#### *Servicing*

49. Servicing and deliveries would take place on street, utilising the existing loading bay on Whateley Road. If the bay is already in use, additional loading space is available from the single yellow line on the opposite of Whateley Road. Servicing from the street would not normally be considered acceptable, but, given the existing loading bay directly outside and the fact that this would in effect be a secondary servicing bay it is considered acceptable in this instance. The deliveries would be undertaken outside school peak periods (i.e. outside of 08:00 to 09:30, 14:30 to 16:00 and 17:00 to 18:00). Concern has been expressed by a local business that should any loading or waiting restrictions be placed on the loading bay, it could have a detrimental impact on the business. No such restrictions are currently planned for the bay. However, it is a possibility that construction vehicles would use the bay for deliveries; but this would be for a temporary period during the building works only.

#### *Parking*

50. The site, nor its surrounding roads, are within a controlled parking zone (CPZ) and so permits are not required for car parking. No provision has been made for staff car parking on site owing to the constraints of the site. A parking survey has been undertaken as part of the Transport Assessment, the results of which show that at peak times of demand for staff parking (07:00 to 08:00) parking stress is 24 per cent within the survey area (141 vehicles occupying a possible 540 spaces). The survey area is a 200m radius from the site. The impact of parked vehicles generated by staff should therefore not have a perceived impact given the available capacity. At peak

times of parental demand (08:30 to 09:00) on street parking stress is 30 per cent within the survey area, with near identical figures at times of collection. It is noted that the highway which immediately surrounds the school on Whateley Road and Landcroft Road does have higher levels of on street parking stress and so it would be more difficult to park on these roads. As there is available parking space within the survey area, the loss of residents parking together with staff parking, could satisfactorily be accommodated, but it is accepted that residents are likely to have to travel a greater distance to find a parking place.

51. A resident has commented on whether parking could be allowed on the double yellow lines outside of school start and finish times. There may be scope to allow for this, but it would be subject to the s.278 Highways Agreement.
52. Residents have also raised objections to the loss of residents parking on Landcroft Road which would result from the widened pavement outside the school entrance. Landcroft Road does not lie within a controlled parking zone, and already suffers from some parking stress with residents noting the difficulty of being able to park their cars. With the loss of ten parking spaces, it is accepted that parking would become even more difficult with residents having to park their cars further away from their homes. This could be worsened further still if teachers drive and park their cars near the school. However, the results of the parking survey show that spaces are available in the 200m survey area surrounding the site and therefore residents would still be able to park. It should however be noted that the works would be subject to a s.278 Highways Agreement with the council and would not be confirmed until that agreement is entered into. A resident has queried whether additional pavement width could be taken from the school site rather than from the road, but the site is already heavily constrained and doing so would mean a reduction in the already size limited playground.

### *Cycling*

53. A new covered cycle storage area is proposed, accessed from Lordship Lane, providing storage for cycles and scooters. Storage for 40 cycles has been proposed. The number of cycle spaces is short of that required under TfL's minimum standards which state one space for ten students and staff, with an under provision of seven spaces. Given the medium PTAL and location outside a CPZ, teacher cycle parking facilities are an effective tool to reduce the trip generation and parking stress associated with teacher vehicles. The school's current travel plan suggests that bike loans would be provided to teachers to promote cycling. The school should monitor the demand for cycle parking from both pupils and staff via the travel plan and implement further cycle parking in line with recognised demand.
54. 54 scooter parking places have also been provided. There is no guidance on acceptable levels of scooter parking, but it is accepted that their use provides a shift towards sustainable modes. Therefore the shortfall in cycle parking is acceptable in this instance. Detailed layouts on the cycle and scooter parking should be required by condition. The details should confirm that the cycle stands would comprise 'Sheffield' stands, and so would be convenient for use. A condition is also recommended to ensure that the stands are made available and permanently retained.

### *Travel plan*

55. A robust and ambitious travel plan should be submitted by condition to encourage a shift towards sustainable patterns of travel for both staff and pupils; this is vital to the successful operation of the school. The travel plan would need to include clear objectives to encourage sustainable travel to the school and to avoid drop off and pick up by car. This is all the more important given the location of the current temporary

school accommodation some 2500m distance from this site which could result in a slightly wider catchment area than normal and potentially greater car usage.

#### *Conclusion on transport*

56. Subject to the securing of an extended 3.5m pavement outside of the school entrance on Landcroft Road, it is felt that pedestrians arriving at the school could be accommodated safely. This would involve a reduction in the width of the carriageway and resultant loss of on street parking spaces. Given the lack of any form of on site parking, teaching staff would also be likely to park on the surrounding roads. However, the results of the parking survey, which show the availability of on street parking spaces, it is considered that the additional demands could be accommodated. Ultimately, the changes would need to be secured by a s.278 Highways Agreement. Further details would be required by condition in respect of the extended pavement, cycle parking layouts, servicing and a travel plan.

#### **Height, scale and detailed design**

57. The existing building is a 1970s police station which is in a relatively poor state of repair. Its design, appearance and materials do not contribute positively to the local environment and as such, there are no concerns over its demolition. Some consideration was given to retaining the building, but the size and form of the resultant spaces would be unsuitable for primary school use. Therefore, it has been proposed to demolish the existing structure and construct a new purpose made school building.

#### *Height and scale*

58. The surrounding streets have a strong residential 19<sup>th</sup> century character with some retail use on the ground floors of the three storey Lordship Lane and Whateley Road buildings. Any new build should successfully relate to the heights and character of these buildings.
59. The height of the new school building, at four storeys, is broadly comparable to the existing building, but is approximately 2m taller on the Lordship Lane and Landcroft Road frontages. Given this is a proposal for a new building, it is considered that it does not provide an opportunity to consider the adjoining three storey terraces more carefully, through for a example a height reduction or set back of the top storey that may have produced a more comfortable relationship to the local townscape. It does, however, have an acceptable scale along Whateley Road where it steps down to two storeys.

#### *Detailed design and materials*

60. It is considered that the scale of the building is not mitigated by its detailed design. The lack of rhythm to the elevations, the materiality, and the monotonous repetitive window treatment relate poorly to the local context of urban terraced houses. The window pattern on the Lordship Lane frontage lacks any coherent pattern and fails to make a suitable response to the terrace it adjoins. The elevations on the other frontages of Landcroft Road and Whateley Road raise some concern, as it is felt that they do not properly address the street or provide sufficient articulation or activity to provide interest. The Landcroft Road elevation (which faces the playground) is especially poor, providing areas of blank frontage with limited opportunities for natural surveillance of the external space.
61. Further, it is felt that the building does not look like a school and lacks the large classroom windows normally associated with school buildings. The only features indicating its use as a school are the logo and signage. The Design Review Panel

considered that the aesthetic was not appropriate for a place of learning. Taking into account the submitted amendments, this concern still stands.

62. As noted above, the whole of the ground floor is weak with the fenestration particularly without interest and the playground is enclosed by wire mesh fencing that would present an unsuitable frontage for pedestrians. A more acceptable boundary would have been a low brick wall with railings, but the applicant has not chosen to make any changes here.
63. The building is finished in brick slips and large areas of render with the brick slips concentrated on the Lordship Lane and Whateley Road elevations. The use of these materials raises questions over the durability and life span of the building, and accordingly, samples would need to be submitted to the authority for approval. This is recommended to be addressed by condition. A better solution here would have been for a building of a predominantly brick character, using whole bricks rather than slips, allowing for a greater depth of window reveal. However, the applicant is constrained by budget.

#### *Internal layout*

64. The internal floor plan is an area of concern. It is dominated by long, narrow, functional corridors with no daylight. Although not strictly a matter relevant to planning, it is considered that the layout would not allow for any social interaction between children, which is a missed opportunity. Further, no provision has been made for a library or any other form of break out space. This could become an issue when the school reaches full capacity.

#### *Design Review Panel*

65. The original scheme was presented to the Design Review Panel at its meeting in January 2015. A summary of the comments made have been provided below. As referred to above in paragraph 9, some changes were made to the design and appearance of the school in order to address the panel's comments. These include the introduction of brick slips in lieu of render, removal of some rain water goods from the street elevations and the introduction of some soft landscaping into the playground.
66. The panel raised a number of very significant issues with the current scheme and agreed that the design required fundamental changes to address their concerns. It was agreed unanimously by the panel that the scheme lacks architectural quality or ambition and that on a purely functional level it raises a number of concerns.
67. The panel felt that the proposals completely fail to engage with the surrounding context. In relation to architectural expression, The panel considered that the design lacked any reference to the recognised typology of school. It was noted that the logos and signage shown on the elevations were the only elements of the design to signify the use of this building as a school. The aesthetic was described as that of a 'factory' or 'bunker', neither of which were considered appropriate for a place of learning.
68. The panel considered the architectural expression proposed to be both bland and monolithic. The exclusive use of render was criticised not only because of its poor aesthetic value and the lack of an appropriate contextual response, but also because it was considered that it would be an unsustainable solution for the anticipated 50 year design lifespan for the building. The panel were unconvinced by the unrelenting flat roof and queried whether this is an appropriate response given the site context. Concern was also expressed in relation to the quantum of ill-considered down pipes shown on the elevations.

69. Functionally, the panel felt that the internal layout of the building was uninspiring and inefficient. The predominance of long, functional corridors with no daylight was of particular concern. It was also felt that the layout would not allow for social interaction between children, which was considered a significant missed opportunity.
70. The panel queried whether the amenity/playground space shown would be sufficient for a two form entry primary school with over 400 pupils. It was also noted that the playground was completely devoid of greenery and strongly suggested that it would benefit from some soft landscaping and tree planting.
71. The gap between the building and its immediate neighbour on Lordship Lane was also queried and it was suggested that this should be re-thought. It was not only considered that this represented inefficient use of land, but also that it was a poor contextual response given the terraced nature of the street context.
72. Whilst there has been some response to these comments by the introduction of brick slips and marginal landscaping to the playground, overall the design remains substantially unaltered and does not address many of the concerns raised by the DRP.

#### *Conclusion on design*

73. Overall, the design and appearance of the school building falls short of what would be considered an acceptable design, and together with the use of materials represents a low quality of design. However, regard has been attached to the policy support for new schools, in particular the NPPF which states that strong policy support should be attached to new schools and London Plan Policy 3.18 which states that proposals for new schools should be given positive consideration and should only be refused where there are demonstrable negative local impacts which substantially outweigh the desirability of establishing a new school. It is acknowledged that there is a need for school places in this part of the borough. Officers were able to secure some amendments which have improved the standard of design to some degree but largely due to financial constraints the applicant has declined to make any further changes. The proposal has to be determined on its merits and taking into account all these factors, it is considered that, on balance, a refusal on the grounds of design would not be sustainable at an appeal.

#### **Landscaping and trees**

74. The school playground would be comprised of a tarmac surface with some perimeter hedgerow planting along the Whateley Road and Landcroft Road boundaries. Two trees are shown on the plans, but no details of the species or trunk girth/height have been provided. The overall playground design is considered unimaginative and substandard, and together with the proposals for a 2m high welded metal fence is less than ideal. Further, there are concerns that it is of a limited size, but this could be mitigated by the staging of break and lunch times. Reception play has however been kept separate and part of this would be covered to provide some shelter for the children.
75. There are no trees within the site boundary, but there are two street trees located on Lordship Lane (an Ash and a London Plane) and also a small Alder on Landcroft Road. All three trees would be retained under the proposals and the demolition and construction works would need to be carried out to ensure that they are adequately protected. It is therefore recommended that tree protection conditions are attached in the event that permission is granted.

76. A neighbour has queried whether the new tree planting would impact on the foundations of nearby properties. The trees would be planted with a root barrier and so should not cause any disturbance.

### **Planning obligations S106 and Community Infrastructure Levy (CIL)**

77. Saved Policy 2.5 of the Southwark Plan and Policy 8.2 of the London Plan advise that planning obligations can be secured to overcome the negative impacts of a generally acceptable proposal. Saved Policy 2.5 of the Southwark Plan is reinforced by the recently adopted Section 106 Planning Obligations 2015 SPD, which sets out in detail the type of development that qualifies for planning obligations. Strategic Policy 14 – Implementation and Delivery of the Core Strategy states that planning obligations will be sought to reduce or mitigate the impact of developments. The NPPF echoes the Community Infrastructure Levy Regulation 122 which requires obligations be:

- necessary to make the development acceptable in planning terms;
- directly related to the development; and
- fairly and reasonably related in scale and kind to the development.

78. Education (D1) use is not subject to the standard charge planning obligations listed in the SPD on Section 106 Planning Obligations. Despite this, planning obligations can still be necessary if a development, when considered on its merits, would result in negative impacts. In this case, a legal agreement would need to be secured to require the applicant to enter into a s278 highways agreement with the council for the delivery of the widened pavement outside the school entrance on Landcroft Road. It is only until the delivery of the widened pavement is secured that works on site should be allowed to commence.

79. Section 143 of the Localism Act states that any financial contribution received in terms of community infrastructure levy (CIL) is a material "local financial consideration" in planning decisions. The requirement for payment of the Mayoral or Southwark CIL is therefore a material consideration; however the weight attached is determined by the decision maker. The Mayoral CIL is required to contribute towards strategic transport investments in London as a whole, primarily Crossrail, while Southwark's CIL will provide for infrastructure that supports growth in Southwark. In this case however, neither Mayoral CIL nor Southwark CIL is triggered as education uses are exempt from the charging schedule.

80. In the event that an agreement has not been completed by 31 August 2015, the Committee is asked to authorise the Head of Development Management to refuse permission, if appropriate, for the following reason:

"In the absence of a signed Section 106 Agreement, there is no mechanism in place to secure the widened footway on Landcroft Road, contrary to the safety of the users of the proposed school and the proposal would therefore be contrary to Policy 2.5 'Planning Obligations' of the Southwark Plan and Policy 14 - 'Implementation and delivery' of the Southwark Core Strategy, the Southwark Supplementary Planning Document 'Section 106 Planning Obligations' 2015, and Policy 8.2 Planning obligations of the London Plan."

### **Sustainable development implications**

81. Strategic policy 13 'High environmental standards' of the Core Strategy gives targets that developments must meet. It requires that community facilities, including schools, achieve a minimum BREEAM rating of 'very good'. Major development is also required to achieve a reduction in carbon dioxide of at least 20 per cent from the use of on-site or local low and zero carbon sources of energy.

82. A BREEAM Pre-assessment report has been submitted with the application. It states that the predicted rating for the school would be 'very good' with a score of 65 per cent. This meets the minimum policy requirement and is therefore acceptable.
83. In terms of renewable energy, a series of photovoltaic panels covering 150sqm are proposed on the roof of the school, however the submitted energy report states that the exact amount would be subject to final specification and optimum orientation being achieved. These panels would achieve a 40 per cent reduction in carbon emissions over the 2010 Building Regulations, which exceeds the policy requirement and is therefore acceptable. A condition should be attached requiring further details to be submitted and approved, particularly since the report advises that a specialist contractor would need to confirm the detailed layout.
84. A condition to secure swift nesting boxes/bricks is recommended following the advice of the council's ecologist.

#### **Other issues**

85. A resident has commented that the proposal would result in an increase in light and litter pollution. Details of an external lighting scheme are requested by condition and any such details should be designed so as to reduce light spillage with the lighting directed to face onto the ground. With respect to litter, the school may decide to make provision for litter bins within the playground.

#### **Conclusion on planning issues**

86. The principle for the redevelopment of this site for educational uses is accepted and in line with Southwark and London Plan policies. The height and massing of the building is considered acceptable but only on the basis of the regard attached to the existing buildings. The elevational treatment and materials are very disappointing and poor, despite revisions being secured during the course of the application to address some of the concerns raised, including those raised by the Design Review Panel.
87. The impact of the scheme on daylight and sunlight has been considered with respect to the tests contained within the BRE guide, and the results show that surrounding properties should continue to receive good daylight and sunlight. Separation distances between residential windows and proposed windows should ensure that there is no direct overlooking.
88. In terms of trees, the existing street trees should be adequately protected during the construction process and further details of the soft landscaping to the playground would be sought by condition.
89. The widened pavement on Landcroft Road would help to alleviate some of pedestrian congestion at drop off and pick up times. The legal agreement would require the applicant to enter into a s.278 Highways Agreement with the council to secure the widening and this would need to be agreed before any works on site commence. Residents have raised concerns regarding the loss of parking that would result, but the parking survey clearly shows the availability of spaces, albeit in a wider area.
90. The NPPF, together with policies of the London Plan, Southwark Plan and Core Strategy, strongly support the provision of new schools. It is clear from the above assessment that there would be some impacts upon the local area, specifically in relation to the loss of parking and the poor standard of design. However, on balance, it is not considered that these impacts outweigh the benefits associated with the provision of a free school, especially when taking into account the demand for primary

school places. The school is currently operating in temporary premises and if granted, the proposal would secure a permanent home.

91. It is therefore considered, having finely balanced all relevant considerations, that planning permission be granted subject to conditions and the completion of a legal agreement.

### **Community impact statement**

92. 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. In addition, the applicant carried out some consultation with the local community prior to the application being submitted to the council. A public exhibition took place on 22 October 2014 and in addition, comments were invited via an online questionnaire. Around 40 people attended the exhibition and those that provided written comments expressed support for the new school but raised concerns over traffic and residents parking.

### **Consultations**

93. Formal consultation on the application was carried out by press notice, site notice and individual letters. Letters notifying neighbours of the application were sent to 172 addresses. A 14 day re-consultation exercise was also carried out following receipt of revised plans.

### **Consultation replies**

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

### **Summary of consultation responses**

#### *Neighbour responses – original submission*

95. 10 responses were received on the original submission, three objections, three comments and four supports. The main points made in the responses has been summarised below.

#### Objections:

- noise from playground;
- impact on parking – parking survey indicates 160 spaces are available but it is unclear where they are;
- there are more appropriate sites elsewhere in the borough that could accommodate the school;
- the external render appearance would not achieve appropriate quality and has no precedent, brick should be considered;
- the school has a brutal, unsophisticated design, the materials are harsh and unfriendly.

#### Supports:

- parent of a child who attends the school at the temporary site; the new school would be an asset to the local community;
- there is a clear need for primary school places;
- support the permanent site as the temporary premises are not sufficient in the long term.



Comments:

- further details of the acoustic boundary to the playground are required;
- support new school but query whether the Lordship Lane and Whateley bus stops would need to be removed as the buses obstruct traffic and create blind spots;
- our local business uses the servicing bay on Whateley Road and if any restrictions or suspensions are added to it, both during construction and during operation of the school then it would impact on the business.

*Neighbour responses – revised submission*

96. 19 responses were received on the revised submission, ten objections (all of which objecting to the loss of residents parking), eight supports and one comment. The main points made in the responses has been summarised below.

Objections:

- removal of parking is objected to and would make parking in this busy road even more difficult, spaces are full 90 per cent of the time;
- the double yellow lines would present attractive, illegal places to park and it is suggested that instead they should be retained and made controlled spaces;
- object to the change in the entrance to Landcroft Road, due to congestion from cars, cycles, traffic and parent drop off;
- instead of removing the parking altogether, could parking be allowed between 10am and 2pm and then 4pm to 8pm?
- the new tree in the playground could cause damage to foundations of properties;
- Appendix F of the Transport Assessment which refers to the scope and results of the parking survey has not been submitted and so the methodology cannot be suitably considered;
- the parking survey has been undertaken between 8 to 9am and 3 to 4pm but parents and teachers often arrive outside of these times;
- need more measures to protect residents from playground noise;
- the additional pavement width should be taken from the school site rather than from the road;
- walking, cycling and using public transport are well intentioned but when the weather is bad, parents will drive;
- the 'school keep clear' signs outside the entrance will become a drop off area for cars;
- there has been a weak attempt at addressing the design concerns; the design represents a blank, overbearing, menacing face;
- where would the fire assembly points be located?
- increase in noise, light and litter pollution.

Supports:

- the area is in need of another school with more primary places and it would unite the community;
- the temporary site will soon be too small and the application should be fast tracked;
- the existing building is an eye sore and the new building would be an enormous improvement;
- it is unlikely that the proposal would create traffic issues.

Comment:

- the acoustic boundary treatment abutting 2 Landcroft Road has been changed to

comprise an acoustic boundary fence. The fence should be set back from the existing masonry wall for reasons of access and disturbance.

97. A letter of support has been received from Councillor Barber on the basis that the revised plans are an improvement over the original proposal and that the school is needed to avoid a primary places shortage. This is the only practical site in the area for a new primary school in the timescales needed.

*Statutory and non-statutory consultation responses*

98. Environment Agency: The Environment Agency has advised that the proposal would have a low environmental risk, and therefore have no comments to make.
99. Transport for London: This proposal is located on the A2216 Lordship Lane which forms part of the Strategic Road Network (SRN). TfL are therefore at a duty, under the Traffic and Management Act (2004) to advise on this scheme. TfL does not object but has reviewed the application and has the following comments to make:
- TfL requires further clarification on the provision of cycle parking. While TfL is willing to accept a small reduction in the student's cycle parking to substitute for scooter parking; separate cycle parking should be provided for staff and visitors in line with the 2014 Further Alterations to the London Plan.
  - TfL is concerned about the access arrangements to the front of the site. This section of the footway may become congested during the schools peak hours and would affect the safety and operation of the bus shelter as it is in front of the school's entrance. Relocating the bus stop may help to alleviate the potential issue, however more information should be provided by the applicant in regards to width of the footway in the scenario that permission granted. A Management Plan should be developed by the school in order to avoid any dropping off/picking up taking place where the bus stops may be affected. And also to manage the front of the site during the peak hours of the school in regards to safety around the bus stop and allowing the pedestrian flow to continue along Lordship Lane.
  - It is stated that 1 disabled parking bay is provided on street however the location of this is unclear in this application, this space should be identified in a location convenient for accessing the school building.
  - The Construction Logistics Plan, Delivery and Service Plan, and Travel Plan should all be secured, enforced, monitored and reviewed by the borough.

*Internal consultation responses*

100. Flood and drainage Team: No comments on the submitted Flood Risk Assessment, but it should be made clear to the applicant that if Southwark Council is to expected to assume responsibility for drainage, then the overall design will need to be approved by the relevant department.
101. Environmental protection: Recommend conditions in respect of plant noise, site contamination, construction environmental management plan and external lighting.
102. Ecology: The site could be enhanced by installing a brown or green roof under the photovoltaic panels. The external lighting should be installed to prevent light pollution. Recommend condition to require swift nesting boxes/bricks to be installed.
103. Regeneration – Capital Works Team: Concern over the lack of a library or alternatively any form of breakout or small group rooms. This could lead to the school becoming difficult to manage when full.

### **Human rights implications**

104. 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.
105. This application has the legitimate aim of providing a new two form entry primary school, following demolition of the existing building. 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**

106. None.

## BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
Site history file: TP/2315-173  Application file: 14/AP/4580  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 5513 Council website: www.southwark.gov.uk

## APPENDICES

No.	Title
Appendix 1	Consultation undertaken
Appendix 2	Consultation responses received
Appendix 3	Proposed Site Plan
Appendix 4	Proposed Ground Floor Plan
Appendix 5	Additional Image 1
Appendix 6	Additional Image 2
Appendix 7	Recommendation

## AUDIT TRAIL

<b>Lead Officer</b>	Gary Rice, Head of Development Management	
<b>Report Author</b>	Kiran Chauhan, Team Leader Majors	
<b>Version</b>	Final	
<b>Dated</b>	2 July 2015	
<b>Key Decision</b>	No	
Strategic director, finance & corporate services	No	No
Strategic director, environment and leisure	Yes	Yes
Strategic director, housing and community services	No	No
Director of regeneration	Yes	Yes
<b>Date final report sent to Constitutional Team</b>	2 July 2015	

## Consultation undertaken

**Site notice date:** 16/01/2015

**Press notice date:** 01/01/2015

**Case officer site visit date:** n/a

**Neighbour consultation letters sent:** 12/01/2015

### Internal services consulted:

Ecology Officer  
 Environmental Protection Team Formal Consultation [Noise / Air Quality / Land Contamination / Ventilation]  
 Flood and Drainage Team  
 Highway Development Management  
 Waste Management

### Statutory and non-statutory organisations consulted:

Environment Agency  
 Metropolitan Police Service (Designing out Crime)  
 Transport for London (referable & non-referable app notifications and pre-apps)

### Neighbour and local groups consulted:

21b Landcroft Road London SE22 9LG	191b Lordship Lane London SE22 8HA
21a Landcroft Road London SE22 9LG	191a Lordship Lane London SE22 8HA
69b Whateley Road London SE22 9DE	162b Lordship Lane London SE22 8HB
27a Landcroft Road London SE22 9LG	162a Lordship Lane London SE22 8HB
23b Landcroft Road London SE22 9LG	191d Lordship Lane London SE22 8HA
23a Landcroft Road London SE22 9LG	128-130 Lordship Lane London SE22 8HD
Flat A 67 Whateley Road SE22 9DE	160 Lordship Lane London SE22 8HB
Flat 1 55 Whateley Road SE22 9DE	156 Lordship Lane London SE22 8HB
69a Whateley Road London SE22 9DE	138 Lordship Lane London SE22 8HD
Flat B 67 Whateley Road SE22 9DE	134 Lordship Lane London SE22 8HD
Flat 2 55 Whateley Road SE22 9DE	195b Lordship Lane London SE22 8HA
Flat 4 Landcroft Court SE22 9LJ	169a Lordship Lane London SE22 8HX
Flat 3 Landcroft Court SE22 9LJ	144b Lordship Lane London SE22 8HD
Flat 2 Landcroft Court SE22 9LJ	157 Lordship Lane London SE22 8HX
39 Whateley Road London SE22 9DE	132a Lordship Lane London SE22 8HD
Flat 6 Landcroft Court SE22 9LJ	130a Lordship Lane London SE22 8HD
Flat 5 Landcroft Court SE22 9LJ	140c Lordship Lane London SE22 8HD
29b Landcroft Road London SE22 9LG	140b Lordship Lane London SE22 8HD
29a Landcroft Road London SE22 9LG	140a Lordship Lane London SE22 8HD
27b Landcroft Road London SE22 9LG	142b Lordship Lane London SE22 8HD
Flat 1 Landcroft Court SE22 9LJ	142a Lordship Lane London SE22 8HD
Flat B 22 Landcroft Road SE22 9LH	140d Lordship Lane London SE22 8HD
Flat A 22 Landcroft Road SE22 9LH	154 Lordship Lane London SE22 8HB
7 Landcroft Road London SE22 9LQ	Ground Floor Flat 158 Lordship Lane SE22 8HB
24 Landcroft Road London SE22 9LH	Ground Floor Flat 54 Whateley Road SE22 9DD
20 Landcroft Road London SE22 9LH	2a Bawdale Road London SE22 9DN
2 Landcroft Road London SE22 9LH	Rear Of 2 Bawdale Road SE22 9DN
30 Landcroft Road London SE22 9LH	Flat 1 128 Lordship Lane SE22 8HD
28 Landcroft Road London SE22 9LH	136c Lordship Lane London SE22 8HD
26 Landcroft Road London SE22 9LH	159a Lordship Lane London SE22 8HX
10 Landcroft Road London SE22 9LH	Flat 2 128 Lordship Lane SE22 8HD
25 Landcroft Road London SE22 9LG	136b Lordship Lane London SE22 8HD
19 Landcroft Road London SE22 9LG	195a Lordship Lane London SE22 8HA
18 Landcroft Road London SE22 9LH	193 Lordship Lane London SE22 8HA
16 Landcroft Road London SE22 9LH	Flat 2 187 Lordship Lane SE22 8HA

14 Landcroft Road London SE22 9LH  
15 Landcroft Road London SE22 9LQ  
13 Landcroft Road London SE22 9LQ  
5 Landcroft Road London SE22 9LQ  
3 Landcroft Road London SE22 9LQ  
17 Landcroft Road London SE22 9LQ  
4 Landcroft Road London SE22 9LH  
34 Landcroft Road London SE22 9LH  
Flat A 32 Landcroft Road SE22 9LH  
1 Landcroft Road London SE22 9LQ  
8 Landcroft Road London SE22 9LH  
6 Landcroft Road London SE22 9LH  
41 Whateley Road London SE22 9DE  
First Floor Flat 54 Whateley Road SE22 9DD  
First Floor Flat 52 Whateley Road SE22 9DD  
First Floor Flat 48 Whateley Road SE22 9DD  
Ground Floor Flat 48 Whateley Road SE22 9DD  
First Floor Flat 158 Lordship Lane SE22 8HB  
First Floor Flat 152 Lordship Lane SE22 8HB  
Basement And Ground Floor Flat 189 Lordship Lane SE22 8HA  
27 Landcroft Road London SE22 9LG  
185b Lordship Lane London SE22 8HA  
First Floor And Second Floor Flat 189 Lordship Lane SE22 8HA  
First Floor And Second Floor Flat 163 Lordship Lane SE22 8HX  
First Floor And Second Floor Flat 161 Lordship Lane SE22 8HX  
132 Lordship Lane London SE22 8HD  
Ground Floor Flat 152 Lordship Lane SE22 8HB  
Ground Floor Flat 52 Whateley Road SE22 9DD  
Basement And Ground Floor 157 Lordship Lane SE22 8HX  
Ground To Second Floors 134 Lordship Lane SE22 8HD  
185a Lordship Lane London SE22 8HA  
Flat B 56 Whateley Road SE22 9DD  
Flat A 56 Whateley Road SE22 9DD  
11b Landcroft Road London SE22 9LQ  
Flat A 42 Whateley Road SE22 9DD  
34a Whateley Road London SE22 9DD  
86 Whateley Road London SE22 9DD  
71b Whateley Road London SE22 9DE  
45 Whateley Road London SE22 9DE  
43 Whateley Road London SE22 9DE  
11a Landcroft Road London SE22 9LQ  
9b Landcroft Road London SE22 9LQ  
9a Landcroft Road London SE22 9LQ  
132b Lordship Lane London SE22 8HD  
37 Whateley Road London SE22 9DE  
146c Lordship Lane London SE22 8HD  
146b Lordship Lane London SE22 8HD  
146a Lordship Lane London SE22 8HD  
Flat B 40 Whateley Road SE22 9DD  
Flat A 40 Whateley Road SE22 9DD  
Flat B 42 Whateley Road SE22 9DD  
32 Landcroft Road London SE22 9LH  
Flat B 38 Whateley Road SE22 9DD  
Flat A 38 Whateley Road SE22 9DD  
191c Lordship Lane London SE22 8HA

Flat 1 187 Lordship Lane SE22 8HA  
169-171 Lordship Lane London SE22 8HY  
Flat 4 187 Lordship Lane SE22 8HA  
Flat 3 187 Lordship Lane SE22 8HA  
165a Lordship Lane London SE22 8HX  
78 Whateley Road London SE22 9DD  
76 Whateley Road London SE22 9DD  
74 Whateley Road London SE22 9DD  
84 Whateley Road London SE22 9DD  
82 Whateley Road London SE22 9DD  
80 Whateley Road London SE22 9DD  
66 Whateley Road London SE22 9DD  
64 Whateley Road London SE22 9DD  
62 Whateley Road London SE22 9DD  
72 Whateley Road London SE22 9DD  
70 Whateley Road London SE22 9DD  
68 Whateley Road London SE22 9DD  
65 Whateley Road London SE22 9DE  
63 Whateley Road London SE22 9DE  
61 Whateley Road London SE22 9DE  
73 Whateley Road London SE22 9DE  
71a Whateley Road London SE22 9DE  
51 Whateley Road London SE22 9DE  
49 Whateley Road London SE22 9DE  
47 Whateley Road London SE22 9DE  
59 Whateley Road London SE22 9DE  
57 Whateley Road London SE22 9DE  
53 Whateley Road London SE22 9DE  
60 Whateley Road London SE22 9DD  
163 Lordship Lane London SE22 8HX  
161 Lordship Lane London SE22 8HX  
148 Lordship Lane London SE22 8HB  
167a Lordship Lane London SE22 8HX  
136a Lordship Lane London SE22 8HD  
150 Lordship Lane London SE22 8HB  
165 Lordship Lane London SE22 8HX  
144a Lordship Lane London SE22 8HD  
173 Lordship Lane London SE22 8HA  
159 Lordship Lane London SE22 8HX  
154 Melbourne Grove London SE22 8SA  
167 Lordship Lane London SE22 8HX  
50 Whateley Road London SE22 9DD  
46 Whateley Road London SE22 9DD  
58 Whateley Road London SE22 9DD  
36 Whateley Road London SE22 9DD  
34 Whateley Road London SE22 9DD  
44 Whateley Road London SE22 9DD  
Savills 33 Margaret Street W1G 0JD  
67 Melbourne Grove London SE22 8RJ  
37 Crystal Palace Road London SE22 9EX  
38 Priory Court 1 Cheltenham Road se15 3bg  
71 Friern Road East Dulwich SE22 0AU  
38 Priory Court 1 Cheltenham Road se15 3bg  
Flat 3, 33 Blakes Road Peckham Se156hy  
Tooley Street London  
33 Margaret Street London W1G 0JD

**Re-consultation: 12/06/2015**

**Consultation responses received**

**Internal services**

Ecology Officer  
Environmental Protection Team Formal Consultation [Noise / Air Quality / Land Contamination / Ventilation]  
Flood and Drainage Team

**Statutory and non-statutory organisations**

Environment Agency  
Transport for London (referable & non-referable app notifications and pre-apps)

**Neighbours and local groups**

Email representation  
Email representation  
Email representation  
Email representation  
Email representation  
Email representation  
Email representation  
Email representation  
Email representation  
Email representation  
Flat 3, 33 Blakes Road Peckham Se156hy  
Savills 33 Margaret Street W1G 0JD  
Savills 33 Margaret Street W1G 0JD  
13 Landcroft Road London SE22 9LQ  
144a Lordship Lane London SE22 8HD  
15 Landcroft Road London SE22 9LQ  
169-171 Lordship Lane London SE22 8HY  
17 Landcroft Road London SE22 9LQ  
2 Landcroft Road London SE22 9LH  
21b Landcroft Road London SE22 9LG  
3 Landcroft Road London SE22 9LQ  
33 Margaret Street London W1G 0JD  
37 Crystal Palace Road London SE22 9EX  
37 Crystal Palace Road London37 Crystal Palace Road SE22 9EX  
38 Priory Court 1 Cheltenham Road se15 3bg  
38 Priory Court 1 Cheltenham Road se15 3bg  
4 Landcroft Road London SE22 9LH  
5 Landcroft Road London SE22 9LQ  
5 Sage Mews SE22 8EZ  
5 Sage Mews SE22 8EZ  
67 Melbourne Grove London SE22 8RJ  
7 Landcroft Road London SE22 9LQ  
71 Friern Road East Dulwich SE22 0AU  
76 Whateley Road London SE22 9DD  
80 Whateley Road London SE22 9DD