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| Item No: 7. | Classification: Open | Date: 19 July 2016 | Meeting Name: Planning Sub-Committee A |
| Report title: | | Addendum Late observations, consultation responses, and further information. | |
| Ward(s) or groups affected: | | Chaucer, Peckham, The Lane | |
| From: | | Director of Planning | |

PURPOSE

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

RECOMMENDATION

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

FACTORS FOR CONSIDERATION

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

Item 7.1 – Application 15/AP/4980 for: Full Planning Permission – 153-159 Borough High Street, London, SE1 1HR

Additional Neighbour Consultation Responses

- 3.1 Members are asked to note that a further 4 neighbour consultation responses have been received following the publication of the committee report. They do not raise any new issues but for transparency they are set out below. For the avoidance of any doubt the summary of neighbour responses received to date is now as follows:

| | | | | | |
|----------------------------------|----|----------|--------------------|----------|---|
| Total number of representations: | 55 | | | | |
| In favour: | 1 | Against: | 54 | Neutral: | 0 |
| Petitions in favour: | 0 | | Petitions against: | 0 | |

- 3.2 125 Guinness Court, Snowfields

'The building is an excellent example of high street architecture and should not be demolished, if anything, the existing shops should be encouraged to make their fronts look more in keeping with the beautiful building they are in.'

- 3.3 Flat 14, 51-53 Leroy Street

'The existing building needs some TLC but we should not destroy the historical significance of our neighbourhood for an architecturally insignificant structure when there are clearly other sites that have less historical significance or actually need proper development. Let's not make Borough/ Bermondsey just a place for short-term visitors/ tourists at the cost of the neighbourhood for people who are invested in the community (like myself). Be bold and creative with redevelopment so that it fits the existing neighbourhood and is an asset to the area for the long-term not just the next ten years.'

3.4 6 Cranes Park, Surbiton

'The proposed demolition of the existing multi-use building and its replacement by a hotel (with ground floor fast food outlets) would be detrimental to its setting and to the wider area. Demolition would involve the loss of a modest but architecturally and culturally interesting facade on Borough High Street. The design of the proposed replacement is bland, generic and without any design merit. At seven storeys the proposed replacement is over-large for its setting and ignores the scale of its neighbouring buildings and that side of the street more generally. The loss of small commercial premises and their users, and their contribution to the local community, will not be compensated by the creation of a generic chain hotel whose profits will not remain in the borough. The demolition and replacement proposed therefore does not accord with either the relevant London Plan or Borough planning policies and permission should be refused.'

3.5 5 Hatters Court, 99 Redcross Way

'Borough High Street undoubtedly needs some redevelopment, but demolishing an old building with character and losing local shops is not the way to proceed. New hotels do nothing for the local community. The proposed building is also unattractive and makes no attempt to fit with the traditional character of the area (like so many of the new developments, unfortunately). Southwark Council should develop a plan for how Borough High street is developed, and open this to consultation, rather than approving, piecemeal, unsuitable and frankly hideous buildings with no benefit to residents.'

Further Officer comments on issues raised by objectors

3.6 Members are also asked to note the further Officer comments which address the following issues that have been raised by objectors, but which were not adequately covered in the main report:

3.7 The daylight and sunlight impact on adjacent offices

An objection on the grounds of loss of daylight has been received from the commercial occupier of the adjoining building at No.151 which states that the development will result in a significant reduction in daylight within the business' office. This concern appears to specifically relate to a modern, south-facing window located toward the rear of No.151 within a later extension to this original listed building. The south-facing flank wall in which the window sits abuts the boundary of the application site and therefore directly overlooks it. However, it is not clear whether it is clear-glazed or obscure-glazed. In any case Officers have ascertained that it serves a very modest staff room/kitchenette of about 4sqm and a WC of approximately 2sqm. The actual main office rooms at first floor level in the building (of which there are two) would not be affected in any way. While the proposed development would result in a loss of daylight to the staff room/kitchenette and WC these are not rooms which require a good level of daylight to be maintained, and it is unreasonable not to expect this window to be impacted given that it is already quite unreasonably and inappropriately sited on the party boundary with the application site. It is also observed that a much more modest

redevelopment of the application site up to even only two storeys would have no less of an impact than the proposed development because of the position of the window on the boundary.

Noise from the hotel use

- 3.8 A neighbouring occupier has raised a concern that the proposed development will cause an adverse noise and disturbance impact. In terms of the existing buildings on either side to which it would immediately adjoin there would, of course, be an increase in the adjoining party wall surfaces. However, this will be an entirely new modern building built to at least meet, if not exceed, both the thermal and noise insulation requirements of the current building regulations. The current thermal insulation requirements along with modern cavity wall construction are such that it is highly unlikely that, if there is any noise transference at all, that it would be to such a level as to cause significant harm to the amenity of adjoining residential or commercial occupiers. As regards any noise and disturbance directed outwards toward Borough High Street from the proposed development it is noted that the hotel windows would be fixed shut (so as to maximise the energy efficiency of the intended heating/cooling system and to avoid immediate exposure of the hotel residents to traffic-generated air pollution in Borough High Street). This will have the further beneficial effect of reducing noise 'leakage' from the site. Mechanical plant (heating/cooling, extraction and ventilation) for the hotel would be located on the roof and notwithstanding this a condition has been recommended requiring the plant noise emissions to remain with an acceptable level and for a sound test to be undertaken and the results submitted to the LPA for approval to demonstrate that this would be achieved.
- 3.9 The hotel will have servicing needs, however these are not anticipated to be significantly greater or more frequent than those of the existing commercial premises on the site and servicing would be done from Borough High Street. The background noise levels in Borough High Street are generally quite high so again it is considered that any noise and disturbance created as a result of servicing and the arrival/departure of visitors is unlikely to be especially discernible and therefore not significantly harmful to the amenity of the immediate environment. Any other potential noise from patrons using the proposed ground-floor bar and restaurant can be satisfactorily addressed through the process of applying to the Council for a premises licence, which will be required.

The loss of the existing Class A and Class B floorspace

- 3.10 A number of objectors have raised the issue of the loss of creative business space (the first-floor photography studio) and the existing shops. This issue has been addressed to an extent at paragraphs 18, 19, 24, 25 and 72 of the main committee report but it is considered that it may be helpful to provide a more thorough response.
- 3.11 The loss of the existing first-floor photography studio (a B Class use) is considered to be acceptable in principle because the replacement floorspace, i.e., a hotel is defined a 'main town centre use' in the glossary of the Government's National Planning Policy Framework, therefore it would comply with saved policy of 1.4 of the Southwark Plan (2007), in particular the part which states that its loss will be acceptable providing that the site is located within a town or local centre, in which case in accordance with policy 1.7, suitable Class A or other town centre uses (Officers' own emphasis) will be permitted in place of Class B uses.
- 3.12 In terms of the loss of the existing shops (A Class uses), on balance, this is considered to be acceptable because their floorspace would effectively be replaced by a bar and

café/restaurant that would provide a service to the general public thus meeting the requirement of criterion (iv) of saved policy 1.7 (Development within town and local centres) of the Southwark Plan (2007). Officers also note that the proposal would still be policy-compliant in this respect even if it subsequently becomes apparent that the proposed basement needs to be significantly reduced or even omitted from the proposal due to archaeological reasons.

3.13 Impact on Axe and Bottle Court

Some objectors have raised a concern about the impact of the proposal on Axe and Bottle Court which is a small alleyway that runs parallel to Borough High Street at the rear of the site with pedestrian-only access from Newcomen Street. It is worth clarifying that the application site does not directly abut the alleyway as there is an existing two-storey building with a pitched roof which intervenes. The ground floor of the proposed hotel, which would cover the whole site, would therefore come within 6.2m of the alleyway. However, above this the rear of the first and second floors would be set in from the east boundary on the north side by over half the width of the site, thereby ensuring that the gap between this part of the rear elevation and the alleyway would increase to approximately 10.35m and from the third floor upwards the entire rear elevation of the hotel would be so recessed. As such, Officers are satisfied that there would be no significant detrimental impact on the character of the alleyway or on the amenity of the commercial buildings to which it gives access.

Extension of target date for completion of the S.106 agreement

- 3.14 Members are asked to note that it has since been agreed with the applicant that the target decision date (by which the s.106 agreement should be completed) will be September 30th rather than August 31st.

Community Infrastructure Levy (CIL) contributions

- 3.15 Members are asked to note that the following CIL contributions would be payable on commencement of the development:

Mayoral CIL = £62,455

Southwark CIL = £191,310

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.

Changes to the conditions set out in the draft Officer recommendation

3.16 Conditions 3, 4, 5, 6 now omitted from the list of conditions

Since the agenda was finalised and published advice from the Council's Senior Planning Lawyer (who is attending this meeting) was received to the effect that it would be more appropriate for the Council to seek to secure the terms for dealing with archaeology on the site through the S.106 legal agreement rather than by conditions as a S.106 agreement affords better protection in a situation like this both in terms of ensuring implementation of the measures and enforcing them. As such Members are asked to note that conditions 3, 4, 5 and 6 (all concerning archaeology) no longer form part of the officer recommendation (Appendix 3, page 43 of the agenda). The same

requirements as were contained in these four conditions are now recommended to be incorporated into S.106 (the other details of which are reported at paragraph 66, page 28 of the agenda).

3.17 Revised conditions

Condition 2 (Approved Plans)

The following plan ref. no has been removed from this condition as this drawing has been superseded.

14069_G100_P_AL_001 Rev.A (Proposed Location Plan)

Condition 17 (Attenuation of noise generated by M&E plant)

The requirement for a validation test to be carried out and the results to be submitted to the LPA for approval has been removed from the wording of this condition. This condition is now simply a compliance condition.

Condition 20 (Kitchen extract system details)

The wording to be amended to state,

'Prior to the commencement of above grade works, details of the kitchen exhaust system (including means of noise and odour control) shall be submitted for approval to the local planning authority, and the development shall not be carried out otherwise than in accordance with any approval given. The exhaust system shall be designed to terminate at roof level and at least 1m above any open-able windows and eaves of neighbouring buildings within 20m of its location.'

Additional condition

- 3.18 With regard to the recommendation of the Council's Flood and Drainage Team as reported in paragraph 80 of the main report Members are asked to note the following additional condition is now recommended below – conditions in the main recommendation remain except where clearly amended below:

'The development shall only be undertaken in accordance with the recommendations of the Revised Flood Risk Assessment (developed by AKT II Ltd, dated 22 February 2016, in particular with regard to the provision of a Sustainable Drainage System (SuDS) and the proposed surface water runoff rates.

Reason:

To minimise the potential for the site to contribute to surface water flooding in accordance with policies 5.12 (Flood risk management) and 5.13 (Sustainable drainage) of the London Plan (2015), strategic policy 13 (High environmental standards) of the Southwark Core Strategy (2011), saved policy 3.9 (Water) of the Southwark Unitary Development Plan (2007) and guidance in the Sustainable Design and Construction SPD (2009).'

Additional informative recommended

- 3.19 Members are asked to note the following recommended additional Informative:

The applicant is advised that the provision of external facade lighting (which would require a further application for planning permission) is not considered to be appropriate having regard to the special character and appearance of Borough High Street Conservation Area.

Errata

3.20 Paragraph 18 – Correction

This should read 'photography studio' rather than 'office'.

Pre-application enquiry

- 3.21 A pre-application enquiry was submitted in advance of the planning application. The planning advice that was issued is attached below as appendix A and a response from the applicant as appendix B.

Item 7.2 – Application 16/AP/1393 for: Full Planning Permission – 95 PECKHAM ROAD, LONDON, SE15 5LJ

Amendments To Officer Report

3.22 Correction to paragraph 26

The number and mix of the affordable units is confirmed in paragraph 26. An error was made to this paragraph. The number of affordable habitable rooms is 35 not **30** as specified in the main report. This equates to 35% of habitable rooms of the scheme. The mix does not change.

3.23 Correction to paragraph 58

There is an error in paragraph 58. The minimum of cycle spaces for the 33 dwellings should be 52 long stay and 1 short stay (visitor) and not the 59 specified in the main report. The proposal would provide for a total number of 57 including the 5 visitor spaces (46 of which are within the Two Tier system, 11 of which are as Sheffield stands). The over provision is welcomed.

3.24 Correction to paragraph 68

This paragraph should read as follows:

The buildings surrounding the courtyard garden generally alternate between 1 and 2 storeys and have been designed to be no higher than the existing brick wall that currently forms the boundaries.

3.25 Further clarification to paragraph 106 of the main report

An objection raised by a resident at 92 Peckham Road was that an error has been in the daylight and sunlight assessment. The resident notes that the assessment assumes the building is residential from the third floor where in fact it is residential from the first floor.

Officers can confirm that whilst the commentary in the daylight and sunlight assessment mentions the third floor accommodation, the other floors have also been assessed and are not significantly affected.

Further evidence from an objector has also been submitted in respect of overshadowing of Wodehouse Avenue properties. The applicant has carried out an overshadowing analysis and the result is that there would not be significant overshadowing of gardens at adjoining properties.

Amendments to conditions

3.26 Amend condition 2

The applicant has submitted amended drawings for the floorplans to omit the partitions that may have allowed some of the areas marked as studies to function as bedrooms. It is recommended that condition 2 be amended to reference the amended drawings to read:

The development hereby permitted shall not be carried out otherwise than in accordance with the following approved plans:

141_P_100 P11, 141_P_101 P07, 141_P_102 P07, 141_P_103 P07, 141_P_104 P07, 141_P_105 P07, 141_P_106 P06, 141_P_200 P05, 141_P_201 P04, BXMW/HI-RISE (E)

Reason:

For the avoidance of doubt and in the interests of proper planning.

3.27 Delete condition 4

This condition required the applicant to submit a piling method statement to the Local Planning Authority (in consultation with Thames Water).

Officers have reconsidered this condition and suggest that this be deleted. It is a condition that Thames Water recommends to protect their own assets, something that is not a planning matter but a matter between the two owners of the property/asset. They have power under other legislation to take action on any damage to their infrastructure.

3.28 Delete Condition 5

This condition required full details of all proposed planting of four trees on Peckham Road to be submitted to and approved in writing by the Local Planning Authority. However, the highway is outside of the applicant's red line and they are not in control of it. Officers now consider this to be unreasonable condition. It is to be addressed in the legal agreement and this should suffice to secure the street trees.

3.29 Amend wording of Condition 14

Prior to occupation of the unit/s hereby approved, 1 No. disabled parking space, as shown on the south-western part of the site in drawing 141_P_100 P11 hereby approved, shall be made available, and retained for the purposes of car parking for the disabled for as long as the development is occupied.

Reason:

To ensure that the parking spaces for disabled people are provided and retained in accordance with The National Planning Policy Framework 2012, Strategic Policy 2 - Sustainable Transport of The Core Strategy 2011 and Saved Policy 5.7 Parking standards for disabled people and the mobility impaired of the Southwark Plan 2007.

3.30 Amend wording of Condition 15

Before the first occupation of the building the cycle storage facilities as shown on the approved drawing 141_P_100 P11 shall be provided and thereafter such facilities shall be retained and the space used for no other purpose and the development shall not be carried out otherwise than in accordance with any such approval given.

Reason:

To ensure that satisfactory safe and secure bicycle parking is provided and retained for the benefit of the users and occupiers of the building in order to encourage the use of alternative means of transport and to reduce reliance on the use of the private car in accordance with The National Planning Policy Framework 2012, Strategic Policy 2 - Sustainable Transport of The Core Strategy and Saved Policy 5.3 Walking and Cycling of the Southwark Plan 2007.

Amendments to the Recommendation

- 3.31 The recommendation remains that planning permission be granted with conditions and subject to completion of a s106 agreement.

Item 7.3 – Application 15/AP/1991 for: Full Planning Permission – BOURNEMOUTH CLOSE (LAND AT THE REAR OF 177-207 RYE LANE), LONDON SE15 4TP

Late representations

- 3.32 Members are asked to note that a further consultation response has been received following the publication of the committee report from a local residents' network. These do not raise any new issues but for transparency they are included below:

The impact of crime and anti-social behaviour has not been considered properly and there has been a lack of consultation with the local police force.

Secondly the operating hours could cause problems for residents.

- 3.33 The Metropolitan Police were consulted and did not comment on the application as it does not meet their threshold criteria. The scheme would improve security locally as it would encourage people to use the area, increasing surveillance. In addition there would be a security/management company on site to monitor the site and report any anti-social behaviour.
- 3.34 The operating hours have been considered appropriate given the town centre location. However, additional measures have been put in place to protect the amenity of neighbouring residential occupiers.
- 3.35 Comments have been received from the council's Environmental Protection Team. Following review of these comments, additional conditions are recommended as below:

Condition - Plant Noise

The rated noise level from any plant, together with any associated ducting shall be 10dB(A) or more below the lowest relevant measured LA90 (15min) at the nearest noise sensitive premises.

Reason:

To ensure that occupiers of neighbouring premises do not suffer a loss of amenity by reason of noise nuisance or the local environment from noise in accordance with the National Planning Policy Framework 2012, Strategic Policy 13 High Environmental Standards of the Core Strategy 2011 and Saved Policy 3.2 Protection of Amenity of the Southwark Plan (2007).

Condition – Noise and Use Class

Any unit proposed as an A3 or A4 Class Use (as defined within the Use Class Order) shall not play music or any amplified sound that would be defined as regulated entertainment.

Reason:

To ensure that occupiers of neighbouring premises do not suffer a loss of amenity by reason of noise nuisance or the local environment from noise in accordance with the National Planning Policy Framework 2012, Strategic Policy 13 High Environmental Standards of the Core Strategy 2011 and Saved Policy 3.2 Protection of Amenity of the Southwark Plan (2007).

Condition - Servicing Hours

Any deliveries or collections to the commercial units shall only be between the following hours: 08.00 – 20.00hrs Mon – Sat and 10.00 – 16.00hrs Sundays and Bank Holidays.

Reason:

To ensure that occupiers of the development and occupiers of neighbouring premises do not suffer a loss of amenity by reason of noise nuisance in accordance with The National Planning Policy Framework 2012, Strategic Policy 13 High Environmental Standards of the Core Strategy 2011 and Saved Policies 3.2 Protection of Amenity of The Southwark Plan 2007.

Amendments to conditions

- 3.36 It is recommended that condition 11 be deleted and replaced with the condition below:

Proposed: Prior to the commencement of use full particulars and details of a ventilation system for the premises that achieves the appropriate outlet level, including details of sound attenuation for any necessary plant and the standard of dilution expected, has been submitted to and approved by the Local Planning Authority and the development shall not be carried out otherwise than in accordance with any approval given.

Reason:

In order to ensure that that the ventilation ducting and ancillary equipment will not result in an odour, fume or noise nuisance and will not detract from the appearance of the building in the interests of amenity in accordance with The National Planning Policy Framework 2012, Strategic Policy 13 - High Environmental Standards of The Core Strategy 2011 and Saved Policy 3.2 Protection of Amenity of The Southwark Plan 2007.

- 3.37 It is recommended that part a of condition 4a be amended to read:

Proposed: a) Should any works for soft landscaping require works in the ground, before the works take place, a site investigation and risk assessment shall be

completed in accordance with a scheme to assess the nature and extent of any contamination on the site, whether or not it originates on the site. The phase 1 site investigation (desk study, site categorisation; sampling strategy etc.) shall be submitted to the Local Planning Authority for approval before the commencement of any intrusive investigations. The subsequent Phase 2 site investigation and risk assessment shall be conducted in accordance with any approved scheme and submitted to the Local Planning Authority for approval prior to the commencement of any remediation that might be required.

3.38 Condition - Drainage of Commercial Food Premises

All drainage systems serving commercial food premises within the development shall be fitted with a fat-trap of appropriate size determined by the maximum potential demand that will be created by the commercial kitchen.

Reason:

The development may lead to sewer blockage and sewage flooding. This is in order to avoid adverse environmental impact upon the community in accordance with The National Planning Policy Framework 2012, Strategic Policy 13 High Environmental Standards of the Core Strategy 2011 and Saved Policies 3.1 Environmental Effects and 3.9 Water of the Southwark Plan 2007.

3.39 Proposed: A1, A3 & A4 Class Use Restricted Use Condition

No more than three of the 10 units with flexible A1, A3 & A4 Class Use (highlighted Pink in drawing A-628-GA-001) within the site shall be used within use classes A3 (Food and Drink) and/or A4 (Drinking Establishments).

Reason:

In granting this permission the Local Planning Authority has had regard to the special circumstances of this case and wishes to have the opportunity of exercising control over any subsequent alternative use in accordance with Strategic Policy 13 - High environmental standards of The Core Strategy 2011 and Saved Policy 3.2 Protection of Amenity of the Southwark Plan 2007 and the National Planning Policy Framework 2012.

Amendments to the Report

3.40 Paragraph 5 of the report states that the site is within the Rye Lane conservation area. This is not correct, the site is not within the conservation area but adjacent to it, the conservation area being to the west of the site.

3.41 Paragraph 30: To the west of the site there is one residential building in close proximity. This is a backland development of 195-197 Rye Lane. The living accommodation of this unit starts at first floor and therefore there is no impact on daylight/sunlight or vertical sunlight component.

Revised to:

To the west of the site there is one residential building in close proximity. This is a backland development of 195-197 Rye Lane. The living accommodation of this unit starts at first floor and is set back by 8.3m and elevated by 3.6m. There is no impact on the daylight/sunlight or vertical sunlight component. Further, given the set back and height of the residential building the occupant's amenity and privacy is protected.

Item 7.4 – Application 16/AP/0631 for: Full Planning Permission – MORLEY COLLEGE, KING EDWARD WALK, LONDON, SE1 7HT

Late representations

- 3.42 A further email of enquiry was received on 19 July 2016 seeking details of the press notice and site notice for the application. Officers advised that the press notice was posted on the 10th March 2016 and the Site Notice was posted on the 9th March 2016 as opposed to the 7th March 2016 as noted in the Case Officers Report. Officers advised on where the notice was posted and confirmed that a photo was unavailable due to technical issues.

Pre-application enquiry

- 3.43 A pre-application enquiry was submitted in advance of the planning application. The planning advice that was issued is attached below as appendix C.

REASON FOR URGENCY

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

REASON FOR LATENESS

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

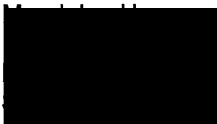
BACKGROUND DOCUMENTS

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



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

Ms Alice Brighton
Planning Potential



Your Ref:
Our Ref: 15/EQ/0175
Contact: Ciaran Regan
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Web Site: <http://www.southwark.gov.uk>

Date: 16/10/2015

Dear Ms Brighton

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

At: 153-159 BOROUGH HIGH STREET, LONDON, SE1 1HR
Proposal: Demolition of existing building and erection of new 10-storey building comprising hotel and commercial floorspace. Please see cover letter for more detail.

I write further to your pre-application advice enquiry and plans that were received by the Council on 8th July 2015 and our meeting which followed on 11th August 2015.

EXECUTIVE SUMMARY

The proposal has yet to provide any evidence to demonstrate that a hotel use on this site would be appropriate in principle, i.e., in terms of the requirements of saved policies 1.4, 1.7, 1.9 and 1.12 and in the context of the site's conservation area location no evidence to justify the proposed demolition of the existing building has yet been provided.

However, even if such evidence could be provided, from the drawings and other information already submitted it is immediately evident that the proposal, by reason of its excessive height, bulk and mass and its inappropriate design, would constitute an extremely incongruous addition to the streetscene in Borough High Street and an unjustified and harmful over-development of the site contrary to saved policies 3.11, 3.12, 3.13, 3.15, 3.16, 3.18 and 3.20.

Furthermore, given the small size of the site (relative to the height and scale of the proposed development) it is also likely that it would result in harmful impacts to the amenity of users/occupiers of adjoining land/buildings contrary to saved policy 3.2 and it is also highly doubtful that the servicing needs of a development of this scale and nature could be successfully reconciled with the essential functions of the surrounding street network given the constraints of the site, contrary to saved policy 5.2.

Further evidence would also be required to demonstrate compliance with saved policies 3.19 and 3.21.

For all of these reasons any future application based on these plans would be very likely to be **refused**.

Site Description

The application site is located on the east side of Borough High Street just south of the junction with Newcomen Street (a narrow one-way street (east-west) with a traffic-controlled junction). The site lies immediately to the south side of No.151 Borough High Street, a Grade II listed building. As you have noted in your covering letter the building comprises four small commercial units on the ground-floor with self-contained offices on the first floor.

The Proposal

The proposal is for the demolition of the existing building and the redevelopment of the site to provide a 10-storey (11-storeys including basement), 54-room hotel (Use Class C1).

Submitted Drawings / Information:

Heritage Assessment

Design presentation pre-application brochure

Relevant planning history

None

The principle, in land-use terms, of redevelopment to provide a hotel

The acceptability in principle of the proposed development would be assessed in relation to saved policies 1.4 (Employment sites outside of the Preferred Industrial Locations), 1.7 (Development within town and local centres), 1.9 (Changes of use within protected shopping frontages) and 1.12 (Hotels and visitor accommodation) of the Southwark Plan (2007).

Policy 1.4 seeks to protect, within reason, employment-generating uses (B1 Class uses) from being lost in important strategic locations in the borough. Policy 1.7 seeks to preserve and enhance the quality and quantity of retail and other service provision within accessible town and local centres for their surrounding catchment areas in order so as to safeguard their vitality and viability and discourage car use. Policy 1.9 seeks to ensure the continued viability and vitality of protected shopping frontages in the borough. Policy 1.12 allows for the provision of hotels and other forms of visitor accommodation in areas with good access to public transport and where the proposal is appropriate to the context and location. However, it also states that such uses will not be permitted where they would result in the loss of residential accommodation or result in an over-dominance of visitor accommodation in the locality.

In terms of policy 1.4, while the proposal would result in the loss of the existing office/employment floorspace on the site, it is acknowledged that (subject to the demonstration of the acceptability of any demolition against the tests set out in saved policy 3.16) there is scope to provide a more intensive use of the site and hence there is potential to off-set this loss with a use which while not a B1 class use would nonetheless provide at least an equivalent, if not greater, source of employment.

In terms of policy 1.7, a hotel is in principle a town centre-compatible use however while the proposal would comply with some of this policy's criteria, it would fail to comply with criterion (i) in respect of its excessive height, scale and massing and for the same reasons is unlikely to comply with criterion (v). Also, due to the constraints of the site and the excessive quantum of development proposed it is also likely that it would also fail to comply with criterion (vii) in terms of transport impacts, most notably servicing impacts.

In terms of policy 1.9, the loss of the two existing retail units (No. 153 – Opticians and No. 157 – Jewellers) within this four-unit frontage in the protected shopping frontage would need to be justified but notwithstanding this there is no evidence that these premises have been vacant for a period of at least 12 months with demonstration of a sufficient effort to let or have not made a profit over a 2 year period (as they are still occupied and operational). As such, the proposal would fail to comply with this policy.

In terms of policy 1.12, it would be expected that any application would be accompanied by evidence to demonstrate that the proposed hotel would be meeting a demand for such visitor accommodation in this area and would not result in an over-proliferation of hotels and the like in the locality.

In summary, the proposal in terms of the land-use it would represent has the potential to be acceptable but there is a lack of evidence in response to the specific requirements of the above-mentioned key policies to demonstrate that it would indeed be acceptable.

Site Observations

The application site at 153-159 Borough High Street is currently occupied by a two-storey building. It was once divided into four plots, but now operates as a single building. It is located in the Borough High Street Conservation Area and is identified in the adopted Conservation Area Character Appraisal Statement (CACAS) as a positive contributor. As a result, there will be a presumption against demolition unless all of the tests set out in saved policy 3.16 (Conservation Areas) can be shown to be met. The site is immediately adjacent to a Grade II Listed, early 19th Century building at 151 Borough High Street.

Although it is stated in the submitted material that it is outside strategic viewing corridors, according to our mapping, the south western corner of the site appears to be within the background assessment area of View 1A.2 from the London View Management Framework (LVMF).

Consideration against saved policy 3.20 (Tall Buildings) of the Southwark Plan (2007)

The proposed tower would be 34.8m in height. As such, it would be considered a tall building according to the

definitions established in the adopted Southwark Core Strategy (2011) and saved Southwark Plan (2007).

Strategic Policy 12 of the Southwark Core Strategy identifies suitable locations for tall buildings at the northern end of Blackfriars Road, around London Bridge, Elephant and Castle and the action area cores (Canada Water, Aylesbury and Peckham). The site under consideration here is not identified as being appropriate for a tall building. The Core Strategy goes on to state that "in other areas tall buildings are not appropriate because they are not very built up... and are covered by conservation areas or have other heritage implications". This site is considered particularly sensitive in relation to heritage assets, and therefore inappropriate for tall buildings. There is also a very clear range of heights established within this block of buildings, generally from two to five storeys. As set out in the adopted Conservation Area Character Appraisal Statement, any application on this site would be expected to sit appropriately within this range of heights.

In terms of the Southwark Plan, saved policy 3.20 states that any building over 30 metres tall should:

- i. Make a positive contribution to the landscape; and,
- ii. Be located at a point of landmark significance; and,
- iii. Be of the highest architectural standard; and,
- iv. Relate well to its surroundings, particularly at street level; and,
- v. Contribute positively to the London skyline as a whole consolidating a cluster within that skyline or providing key focus within views.

It is worth noting that in order to comply with this policy, all of these tests must be met. It is not considered that the proposals under consideration meet any of them, as set out in the following paragraphs.

i. Make a positive contribution to the landscape; _

The proposed tower would fill the footprint available on this site. This leaves no room for any meaningful contribution to the public realm or local landscape. Whilst it is noted that the proposals would include a public space gallery/ event space at fifth floor level, this gesture is not considered sufficient to meet the requirements of this test for a tall building. It would not form part of the public realm, would have little or no visual presence from the street and would only be beneficial to those who know it is there. It is also inferred that it would only be accessible to those using the gallery or event space. It would not contribute to the setting of the tall building, which would be positioned on the back edge of the pavement. Whilst this could be appropriate for a building of a scale more akin to its neighbours, it would not be appropriate for a tall building.

ii. Be located at a point of landmark significance;

This site is not considered to be of landmark significance. Whilst it does mark a junction on Borough High Street, this is not considered to be of the magnitude of importance necessary to define a landmark location. Furthermore, the hotel use proposed is not considered to require a landmark building as it is not of particular civic importance.

iii. Be of the highest architectural standard;

Whilst it is recognised that a great deal of thought and passion has been given to the design of this project to date, and that the well-renowned architects engaged could deliver a building of the highest architectural quality, the proposals under consideration raise a number of concerns. These are set out in more detail in the paragraphs below.

iv. Relate well to its surroundings, particularly at street level; _

This is clearly one of the major concerns in relation to a proposal for a tall building on this site. As established in the CACAS, there is a clear range of heights within this block of buildings that any development here would be expected to fall within. At 10 storeys, the proposed development would more than double the height that would be considered to relate well to its surroundings. Although it is noted that the conservation area appraisal identifies the variation in heights and roofscape as an important characteristic of the conservation area, this exists within a fairly limited range. It is not considered to present any opportunity to build to excessive heights. Furthermore, Officers are concerned that the proposal would dominate the neighbouring listed building, when a subordinate relationship would normally be expected. Officers' preference would therefore be for a four-storey building on this site where it meets the listed building, possibly stepping up to five-storeys where it meets No. 161.

At street level, the creation of an active frontage at ground-floor level is welcomed (although concerns about the detailed design are set out in further detail below). However, this is considered the minimum expected in terms of the relationship of this building to the street, and would equally be expected of a lower proposal of the height that would be expected in this context. In order to comply with saved policy 3.20, a tall building would be

expected not only to deliver this, but also to create an appropriately proportioned public realm setting. Given the existing street scene and historic context of the site, this clearly would not be appropriate here and therefore reinforces officers' views that this is not an appropriate site for a tall building.

v. Contribute positively to the London skyline as a whole consolidating a cluster within that skyline or providing key focus within views.

A tall building on this site would have no role to play in consolidating a cluster. Whilst it could be argued to provide a key focus within views, it is not considered that there is a requirement or justification to provide such a focus in this location.

Furthermore, the design proposed, particularly at the upper levels that would be visible on the skyline, lacks the articulation, imagination and attention to detail that would be expected of a tall building. It is currently shown as an extension of the massing of the lower floors with a glass box on top. As a result it fails to achieve a sense of slender proportions or of the mass diminishing towards the sky.

Consideration against saved policies 3.15 (Conservation of the historic environment), 3.16 (Conservation areas), 3.13 (Urban design) and 3.12 (Quality in design) of the Southwark Plan (2007)

Saved policies 3.15 and 3.16 both state that development should preserve or enhance the special interest or historic character or appearance of buildings or areas of historical or architectural significance. Saved policy 3.16 also states that there will be a general presumption in favour of retaining buildings that contribute positively to the character or appearance of the conservation area. Planning permission will not be granted for proposals that involve the demolition or substantial demolition of a building that contributes positively to the character or appearance of the conservation area, unless it can be demonstrated that:

- i. Costs of repairs and maintenance would not be justified, when assessed against the importance of the building and the value derived from its continued use, providing that the building has not been deliberately neglected; and
- ii. Real efforts have been made to continue the current use or find a viable alternative use for the building; and
- iii. There will be substantial planning benefits for the community from redevelopment which would decisively outweigh loss from the resulting demolition; and
- iv. The replacement development will preserve or enhance the character or appearance of the conservation area and has been granted planning permission.

The existing building on this site has been identified in the CACAS as being an unlisted building that makes a positive contribution. As such, in line with saved policy 3.16 there is a presumption in favour of retaining the existing building unless all of the tests can be met. Whilst the information submitted to date includes a well-reasoned assessment of the significance of the existing building on the site, it does not demonstrate compliance with these requirements. As such, demolition cannot be supported. It is also worth noting that Officers do not consider that the replacement development would preserve or enhance the character or appearance of the conservation area, primarily because of the excessive and incongruous height, scale and massing proposed, but also because of concerns about the detailed design, set out in further detail below.

Notwithstanding the above, saved policy 3.16 goes on to state that new development, within conservation areas is expected to:

- i. Respect the context of the conservation area, having regard to the content of Conservation Area Appraisals and other adopted Supplementary Planning Guidance / Documents; and
- ii. Use high quality materials that complement and enhance the conservation area; and
- iii. Do not involve the loss of existing traditional features of interest which make a positive contribution to the character or appearance of the Conservation Area; and
- iv. Do not introduce design details or features that are out of character with the area, such as the use of windows and doors made of aluminium, uPVC or other non-traditional materials.

It is not considered that the proposals under consideration would meet these requirements. As noted, this is primarily a result of the incongruous height proposed, but Officers are also concerned about the materials proposed, the order of the fenestration and the proportions and articulation of the elevations.

In terms of materials, on the whole a material palette of brick, with some metal details inspired by the industrial heritage of the area is acceptable in principle. However, the current scheme is shown predominantly finished with a very dark, glazed brick. This is not considered characteristic of the area, and may appear incongruous, particularly over such a large building. Similarly, the design concept based on the integration of a pattern within the brickwork 'to remember' the existing ghost sign at the side of the site raises concerns. Whilst this is an interesting concept, it is limited in terms of its integrity because the pattern proposed would be abstracted and therefore bear little resemblance to the ghost sign and the existing sign itself would, regrettably (as a feature of

interest in the conservation area), be obscured. Officers are concerned that the resultant façade would appear to have little regard to the historic context.

Furthermore, although the material submitted includes a study of the neighbouring elevations, it is not considered that this has informed the proposed elevations sufficiently. For example, the alternating or 'hit and miss' placement of the windows and changing window sizes fails to respond to the regular order that is characteristic of the area and exemplified in the neighbouring building at No. 161. Indeed, save for deep reveals, this would be a very flush façade that would appear incongruous next to its richly-detailed neighbours. It is also noted that the windows in the visualisations do not appear to match the proposed floor plans.

The unbroken horizontal elevation proposed facing onto Borough High Street is also of concern. In general, the characteristic narrow 'burgage' plots along Borough High Street (and as in evidence at No. 151) are considered an important contributor to its heritage significance and proposed development in this area is encouraged to continue this rhythm. The single unbroken façade proposed across this plot is therefore not considered to respect the context of the conservation area or pay due regard to the adopted appraisal statement.

The 'shop front' design proposed also raises concerns in relation to the response of the scheme to the wider conservation area. It is considered that both the proportions and the design of the ground floor should more directly relate to those of the neighbouring buildings. For example, both No.s 151 and 161 have deep fascias, giving a grander sense of proportion to the ground floor. This has not been responded to at all in the current proposals. As a result, the ground floor feels squat and poorly articulated. Whilst a pastiche copy of historic shop fronts is not required, a well-articulated design that picks up on the historic language that is characteristic of the more successful shop-fronts in the area is.

For the reasons set out above, it is not only considered that the proposed scheme would fail to comply with policies relating to tall buildings and conservation areas, but also 3.13 (Urban Design) and 3.12 (Quality in Design). Saved policy 3.13 asserts that the principles of good urban design must be taken into account in all developments. This includes height, scale and massing of buildings, consideration of the local context, its character and townscape as well as the local views and resultant streetscape. Saved policy 3.12 asserts that developments "should achieve a high quality of both architectural and urban design, enhancing the quality of the built environment in order to create attractive, high amenity environments people will choose to live in, work in and visit." When we review the quality of a design we consider the appropriateness of the fabric, geometry and function as well as the overall concept for the design relative to the site.

Consideration against saved policy 3.18 (Setting of listed buildings, conservation areas and world heritage sites)

The application site is directly adjacent to a Grade II listed building at No.151 Borough High Street. Policy 3.18 states that permission will not be granted for developments that would not preserve or enhance the immediate or wider setting of a listed building. It is not considered that the proposals under consideration would pay sufficient regard to the setting of the listed building.

No.151 Borough High Street is an early 19th Century, three storey building. It is handsome, ornately decorated and features a distinctive curve on the corner with Newcomen Street.

As stated above, the height of the proposed building is considered to completely overwhelm the listed building and to have an unacceptable overbearing impact / lack of subservience. It is also noted that the proposed building appears to rather crudely abut the listed building. Although it is acknowledged that no detailed design work has yet been undertaken, it does not appear that the proposals have paid sufficient regard to the junction with the listed building, or indeed the potential to respond to the architecture of the listed building in the new proposals. The harm on the setting of this listed building is therefore considered unjustifiable and cannot be supported.

Consideration against saved policy 3.11 (Efficient use of land)

Policy 3.11 states that all developments should ensure that they maximise the efficient use of land, whilst ensuring that, among other things that the proposal does not unreasonably compromise the development potential of, or legitimate activities on, neighbouring sites. And goes on to state that the LPA will not grant permission for development that is considered to be an unjustified underdevelopment or over-development of a site.

Notwithstanding the concerns set out above in relation to the heritage sensitivities of this site, it is recognised that, at two storeys in height, the existing building does not represent the most efficient use of this land. However, if this site is to be intensified, any proposals would be expected to positively respond to the local context and comply with all policies relating to design. The proposals currently under consideration are not

considered to achieve this for the reasons set out above and are therefore considered to be an unjustified and harmful over-development of the site.

Consideration against saved policy 3.19 (Archaeology)

The proposal submission contains no archaeological information but does recognise that the site is located within the Borough, Bermondsey and Rivers Archaeological Priority Zone. The site is located within the historic core of Borough High Street in a key area of the Roman, Medieval and post-Medieval town. Excavations in adjacent properties in Mermaid Court have revealed significant Roman archaeology and post-medieval remains.

Specifically the proposal site is on, or immediately adjacent to the site of the medieval and early post-medieval Marshalsea Prison. Post-medieval maps appear to show the Marshalsea occupying a plot back from the street frontage, however it is not known whether the medieval prison fronted onto the high street. There is therefore a potential for remains of the prison to be present on site. Medieval and early post-medieval prisons are rare survivals and the remains of any elements of the prison would be worthy of preservation in situ.

The applicants are strongly advised to commission an archaeological desk-based assessment to inform their proposals at the earliest stage. If the proposals include a basement level it will be necessary for the applicants to commission an archaeological trench-based evaluation to determine the significance of any archaeological remains present on site.

Consideration against saved policy 3.21 (Strategic views)

As noted above, we consider the south western corner of the site to fall within the background assessment area of View 1A.2 from the London View Management Framework. The LVMF and London Plan policy 7.12 are explicit that "where there is a Protected Vista: a development that exceeds the threshold height of a Landmark Viewing Corridor should be refused". The threshold height established for protected vista 1A.2 is 52.1m AOD in the Background Wider Setting Consultation Area. At 34.8m, the tower proposed would fall below this. However, that is not considered to negate the need for full assessment of the development on the protected view. As required in the LVMF, "A planning application for a proposal that could affect a Designated View should be accompanied by an analysis that explains, evaluates and justifies any visual impact on the view. The analysis will demonstrate that the proposal is consistent with the relevant London Plan policies, including 7.10 (World Heritage Sites), 7.11 (London View Management Framework) and 7.12 (Implementing London View Management Framework)." This has not yet been submitted, so it is not possible to comment further.

Consideration against saved policy 5.3 (Cycle Storage)

The proposed hotel would be expected to provide cycle parking which at least meets the minimum standards in the London Plan (2015) (Short-stay parking: 1 space per 20 bedrooms and Long-stay parking: 1 space per 50 bedrooms) and the cycle parking provided should be secure, convenient and weather proof. 'Sheffield' stands are the preferred means of cycle parking and every effort should be made to incorporate these within the design.

Two-tiered or vertical (and semi-vertical) storage systems are not recommended; although manufacturers will often state the ease of use of such systems, it is known that the elderly, children and the mobility-impaired often have difficulty in using them.

Storage should be located in such places that residents are not required to lift their cycles and unless there are suitably sized lifts or ramps provided, storage must be located on the ground floor. The council will not accept cycle storage in back gardens unless there is a form of direct access via a gate; nor will internal storage spaces be acceptable where residents are required to wheel or lift cycles through the building.

Consideration against saved policy 5.2 (Transport Impacts)

Policy 5.2 of the Southwark Plan states that, "Planning permission will be granted for development unless:

- i. There is an adverse impact on transport networks for example through significant increases in traffic or pollution; and/or
- ii. Adequate provision has not been made for servicing, circulation and access to, from and through the site; and/or
- iii. Consideration has not been given to impacts of development on the Bus Priority Network and the Transport for London Road Network.

Where a development proposal is likely to have significant transport implications applicants will be asked to submit a Transport Assessment (TA), which includes a Travel Plan with their application. A Transport Assessment will form part of the Sustainability Assessment.

Trip Generation/Highway impacts

The London Plan advises that in locations with a PTAL of 4-6, on-site provision should be limited to operational needs, parking for disabled people and that required for taxis, coaches and deliveries/servicing.

Service parking and access

The applicant should provide details of servicing and deliveries. This should include the forecast number of delivery vehicles, the nature of vehicles and where the applicant intends delivery vehicles to load/un-load from. Servicing for new developments is usually required to take place off-street.

In addition the applicant needs to keep all bins within the site and provide a dwell point until the moment of collection. Newcomen Street would not be suitable to serve the site as it would block the road.

Transport Assessment

In recognition of all of the above issues a Transport Assessment would be required for this proposal which sets out the transport impacts of the development and provides mitigation for dealing with issues that arise. Detailed guidance for producing Transport Assessments can be found in TfL's Transport Assessment best practice guidance document (April 2010). In particular the applicant should address how taxis will be accommodated at the site without impacting on the free-flow of traffic. It is expected they will use the existing loading bay. The Transport Assessment should also contain a Travel Plan which sets out how the applicant intends to promote sustainable forms of travel and what hard measures it can implement.

Construction Management Plan (CMP)

A draft Construction Management Plan would also be required to support any future application for this proposal. Included in the CMP should be a commitment for all companies involved to be members of TfL's Freight Operators Recognition Scheme and for all drivers of HGVs related to the construction to have completed an accredited Certificate of Professional Competence course on Urban (or London) Driving including a section on cyclist awareness and safety, in advance of (but no more than two years before) the start of works. Records of drivers accessing the site will be held as a matter of course, and this should be supplemented by records of each driver's training in this respect. These records should be provided to the Council (transport@southwark.gov.uk) within one month of the start on site and made available to view on request thereafter. These courses are free for FORS members.

Other issues – CIL

Please also note that the development would attract contributions to both the local Southwark Community Infrastructure Levy and the Mayor of London's Community Infrastructure Levy. Full details on the levies can be found at www.southwark.gov.uk. S106 contributions may be required if particular site specific mitigation is deemed necessary at application stage.

Conclusion

The proposal has yet to provide any evidence to demonstrate that a hotel use on this site would be appropriate in principle, i.e., in terms of the requirements of saved policies 1.4, 1.7, 1.9 and 1.12 and in the context of the site's conservation area location no evidence to justify the proposed demolition of the existing building has yet been provided.

However, even if such evidence could be provided, from the drawings and other information already submitted it is immediately evident that the proposal, by reason of its excessive height, bulk and mass and its inappropriate design, would constitute an extremely incongruous addition to the streetscene in Borough High Street and an unjustified and harmful over-development of the site contrary to saved policies 3.11, 3.12, 3.13, 3.15, 3.16, 3.18 and 3.20.

Furthermore, given the small size of the site (relative to the height and scale of the proposed development) it is also likely that it would result in harmful impacts to the amenity of users/occupiers of adjoining land/buildings contrary to saved policy 3.2 and it is also highly doubtful that the servicing needs of a development of this scale and nature could be successfully reconciled with the essential functions of the surrounding street network given the constraints of the site contrary to saved policy 5.2.

Further evidence would also be required to demonstrate compliance with saved policies 3.19 and 3.21.

For all of these reasons any future application based on these plans would be very likely to be **refused**.

Please note that this advice is given to assist you but is not a decision of the Council. As an officer view, it is not binding on any future decision of the Planning Committee. Further issues may arise following a formal planning application, where public consultation and consultation with statutory consultees would be undertaken.

Yours sincerely,

Ciaran Regan
Planning Officer - Major Applications Team
Planning - Development Management
Chief Executive's Department
Southwark Council
PO Box 64529
London
SE1P 5LX

Yours sincerely

Ciaran Regan

Planning Officer

Our Ref: WT/nl
[REDACTED]

13th April 2016

By email: [REDACTED]

Mr Jeff Shapiro
Raykor Ltd
C/o Planning Potential
[REDACTED]

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London WC1N 2JX

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Regulated by RICS

Dear Jeff,

New Boutique Hotel Opportunity, 153 – 159 Borough High Street, London, SE1

As discussed, I fear if we were looking at a reduced scheme by way of room numbers we will have a problem. Based upon the marketing efforts to date, we have only been left with a couple of parties anyway, and the current party stands out as they were the only one looking to operate a hotel scheme that wasn't a budget operation.

If we loose the existing room numbers, I would go as far as to say that we may even loose the budget operators.

Kind regards.

Yours sincerely

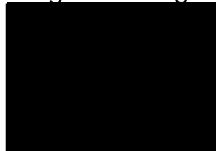
[REDACTED]

Will Thomas
Senior Associate



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

Mr Aaron Peate
Indigo Planning Ltd



Your Ref: PV/KP/1196001
Our Ref: 14/EQ/0087
Contact: Terence McLellan
Telephone: 020 7525 5365
E-Mail: planning.applications@southwark.gov.uk
Web Site: <http://www.southwark.gov.uk>

Date: 16/07/2014

Dear Mr. Peate

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

At: MORLEY COLLEGE JUNCTION OF 147 ST GEORGES ROAD, AND KING EDWARD WALK,
LONDON, SE1 6HY

Proposal: Alterations to College buildings including construction of an elevated walkway linking the buildings to improve usability and accessibility

I write in connection with your pre-application enquiry received on 16th May 2014, and further to the site meeting with Council Officer Terence McLellan (Team Leader- Development Management) on 4th June 2014.

Summary

The proposed bridge link between the main Morley College building and the Morley Gallery is acceptable in principle. No details of design or scaled drawings showing the headroom below the bridge have been provided however the design will need to be of the highest standard in order to justify the impact of an elevated walkway on both the streetscene and the West Square Conservation Area. Sufficient headroom will need to be provided under the bridge in order to allow servicing vehicles and waste collection services to continue unhindered. No details have been provided with regards to the proposed improvements to the elevated walkway between the Morley Gallery and the Nancy Sears building however these are considered to have a minimal impact on amenity. In terms of the new entrance to the Morley Gallery on Westminster Bridge Road the improvement of disabled access and clarity of the entrance is welcomed however it is considered that a revolving door would be a bulky addition to the building and would interrupt both the front elevation of the building and the public highway and would not be considered an acceptable addition in its current form.

Site description

The pre-application site refers to Morley College which is located on the southern side of Westminster Bridge Road approximately 150 metres from Lambeth North Underground Station. The main campus of Morley College lies to the west of King Edward Walk within the administrative boundary of the London Borough of Lambeth whilst the satellite buildings at the Morley Gallery and Nancy Sear Buildings lies to the east of King Edward Walk within the London Borough of Southwark. The surrounding area is characterised by mixed use residential, commercial and educational use with building heights in the immediate locality around three to four storeys. The portion of the site within Southwark lies within the West Square Conservation Area and there are nearby listed buildings at 105-145 St George's Road (Grade II), telephone kiosk on Westminster Bridge Road (Grade II) and 15-31 King Edward Walk (Grade II).

Planning policy designations (Proposals Map)

Air Quality Management Area
Bankside and Borough District Town Centre

APPENDIX C

Bankside, Borough and London Bridge Opportunity Area
Central Activities Zone
West Square Conservation Area

The proposals

Pre-application advice is sought for improvements to Morley College including small scale extensions, access improvements, internal alterations and a bridge link from the main campus building to the Morley Gallery. The bridge link between the main campus building and the Morley Gallery which would span King Edward Walk is the only part of the proposal that lies within Southwark. As such this pre-application response will focus solely on the bridge link with the remaining pre-application advice being issued by Lambeth for works within their administrative control. As it stands no detailed drawings or plans have been submitted however an indicative drawing showing the location of the proposed bridge link has been provided. The bridge link would form a connection between the first floor of the main Morley College building and the first floor of the Morley Gallery in order to improve access for students and staff. Additional improvements are planned for the existing elevated walkway between the Morley Gallery and the Nancy Sears building however no details have been provided for this part of the proposal. A new entrance is proposed to the front elevation of the Morley Gallery facing onto Westminster Bridge Road, again no details have been provided however the floor plan shown on page 29 of the headline report appears to show an external revolving door set on the highway.

Relevant planning history

None of immediate relevance.

Relevant planning history of adjoining sites

None of immediate relevance.

Key issues

- Principle of development and land use;
- Design quality;
- Heritage impacts;
- Access and transport.

Policies

The Development Plan is made up of the National Planning Policy Framework 2012, London Plan 2014, Core Strategy 2011 and Southwark Unitary Development Plan 2007 saved policies, along with Supplementary Planning Documents.

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

National Planning Policy Framework (2012)

Section 7 - Requiring good design

Section 8 - Promoting healthy communities

Section 12 - Conserving and enhancing the historic environment

London Plan (2014)

Policy 3.18 Education facilities

Policy 7.4 Local character

Policy 7.5 Public realm

Policy 7.6 Architecture

Policy 7.8 Heritage assets and archaeology

Policy 8.3 - Community infrastructure levy

Core Strategy (2011)

Strategic policy 1 - Sustainable development

Strategic Policy 4 Places for learning, enjoyment and healthy lifestyles

Strategic policy 12 - Design and conservation

Strategic policy 13 - High environmental standards

Southwark Plan (2007) - saved policies

APPENDIX C

The Council's cabinet on 19th March 2013, as required by para 215 of the NPPF, considered the issue of compliance of Southwark Planning Policy with the National Planning Policy Framework. All policies and proposals were reviewed and the Council satisfied itself that the policies and proposals in use were in conformity with the NPPF. The resolution was that with the exception of Policy 1.8 (location of retail outside town centres) in the Southwark Plan all Southwark Plan policies are saved. Therefore due weight should be given to relevant policies in existing plans in accordance to their degree of consistency with the NPPF.

Policy 2.3 – Enhancement of educational establishments

Policy 3.2 – Protection of amenity

Policy 3.12 – Quality in design

Policy 3.13 – Urban design

Policy 3.14 – Designing out crime

Policy 3.15 - Conservation of the historic environment

Policy 3.16 - Conservation areas

Policy 3.17 - Listed buildings

Policy 3.18 – Setting of listed buildings, conservation areas and world heritage sites

Policy 5.2 – Transport Impacts

Supplementary Planning Documents

Design and Access Statements SPD (2007)

West Square Conservation Area Appraisal

Principle

In land use terms there are no objections to the provision of a link bridge or the additional improvement works to the Morley Gallery entrance and elevated walkway to the Nancy Sears building and there will be no conflict of use. The improved access between the Morley Gallery and the main Morley College building is welcomed and access improvements to the Morley Gallery at street level are welcomed. The main issues in the case will be design, heritage and transport impacts.

Amenity impacts

No detailed plans/elevations have been provided at this stage and a full assessment of any potential amenity impacts cannot be completed in the absence of this information. In general terms the main impact of the proposals will be on the visual amenity of the area which potentially could be compromised by the addition of a bridge link and new entrance. These issues will be discussed further in the design section below.

Transport

No detailed plans of the bridge link over King Edward Walk have been provided and whilst the bridge will be linked to the first floor level of the Morley Gallery the exact headroom under the proposed bridge cannot be determined at this time. Any elevated walkway spanning King Edward Walk will need to have sufficient headroom to allow full servicing of Morley College to continue and for waste collection vehicles to service King Edward Walk unhindered.

Design and impact on character and appearance of the conservation area and setting of adjacent listed buildings

Saved policies 3.12 and 3.13 of the Southwark Plan seek to ensure that developments are of a high standard of architectural and urban design; 3.16 requires the character and appearance of designated conservation areas to be preserved or enhanced and 3.18 affords protection to the setting of listed buildings, conservation areas and world heritage sites. At present no elevational details or massing diagrams have been submitted and as such no detailed advice can be given in terms of design. In general terms, access bridges between buildings are fairly obtrusive within the streetscape, blocking views along streets and interrupting the established townscape pattern and this is particularly relevant on this site which sits within the West Square Conservation Area and has adjacent Grade II listed buildings to the north, east and south. In the absence of detailed drawings it is not clear how the bridge will link to the Morley Gallery, particularly if there will be the need for an extension at first floor to accommodate the bridge and any required circulation and access space. It is accepted that the bridge link will be a positive addition in terms of improving access and in order to justify any potential harm on the townscape, any elevated walkway spanning King Edward Walk will have to be of the highest standard of design with high quality materials and an almost sculptural appearance.

APPENDIX C

The headline report document states that improvement works are planned for the existing elevated walkway between the Morley Gallery and the Nancy Sears building however no detailed drawings or even a detailed description of the proposed works has been provided and as such the Council can offer no advice on this aspect of the proposal at present however improving access between these buildings is welcomed and it is accepted that amenity impacts will be limited given the existing walkway and its fairly concealed location. Additionally, the headline report states that a new entrance lobby will be provided for the Morley Gallery and page 29 of the headline report has an indicative floor plan of the Morley Gallery which appears to show an external revolving door. The Morley Gallery, whilst not listed, forms an important heritage asset within the West Square Conservation area and lies immediately adjacent to Grade II listed buildings and as such the external appearance of this building is of particular significance within the streetscene. Whilst an improved entrance is welcomed, a revolving door would be considered a bulky addition to the building, interrupting both the front elevation of the building and the public highway and would not be considered an acceptable addition to the existing building. As such further investigation on other potential entrance design is required. It is noted in the headline report that the new entrance would be located within the demise of the existing pavement lights however this may not be within your clients full ownership and as such this will need to be confirmed as part of any future application.

Planning obligations (S.106 undertaking or agreement) and Southwark CIL

Saved policy 2.5 'Planning obligations' states that the Local Planning Authority will seek to enter into planning obligations to avoid or mitigate the adverse impacts of developments which cannot otherwise be adequately addressed through conditions, to secure or contribute towards the infrastructure, environment or site management necessary to support the development, or to secure an appropriate mix of uses within the development. Further information is contained within the Council's Planning Obligations Supplementary Planning Document. For a small development of this nature it is not anticipated that there will be a requirement for a S106 Agreement. You are however advised that the bridge link will span the highway and as such will oversail land that is not within your clients control/ownership. As such it is likely that the Council will seek an easement alongside a financial contribution in order to allow the bridge to oversail Council owned land. Whilst this is not a planning issue it is likely to come up during the course of any development and as such you are advised to contact the Council's Property Team.

Mayoral Community Infrastructure levy

The Mayor has brought in a charge to fund crossrail that will be paid by most new developments, the Mayoral Community Infrastructure Levy (CIL). The levy will be calculated according to the amount of additional floor space a new development will produce. Please therefore ensure that any forthcoming planning application includes details of the amount of floor space, on the requisite form. The planning portal website (link below) contains further information and has all the forms you will need.

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

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

Procedural issues

As the full development proposal spans the boundary between the London Boroughs of Lambeth and Southwark you are advised that an application will need to be submitted to each borough. The applications should only detail the works taking place within the respective administrative boundaries of each borough. Each borough will be a statutory consultee on the neighbouring application in order to ensure a consistent approach to the overall development.

List of documents required at application stage

- Completed planning application form
- Planning application fee
- Site location plan
- Existing and proposed plans, elevations and sections to a stated metric scale; each drawing must include a scale bar and annotated dimensions;
- Transport statement including details of how servicing and refuse collection will continue;
- Completed CIL form;
- Flood risk assessment

It is recommended that as much detailed information as possible (including samples and specifications) be

APPENDIX C

submitted at application stage with regard to materials. Should the application then proceed to a positive recommendation this will reduce the need for extensive conditions which need to be discharged.

Conclusion

Based on the information provided it is considered that the proposed bridge link between the main Morley College building and the Morley Gallery and the access improvements are welcomed. No details of design or scaled drawings showing the headroom below the bridge have been provided however the design and materials will need to be of the highest standard in order to justify the impact of an elevated walkway on both the streetscene and the West Square Conservation Area. Sufficient headroom will need to be provided under the bridge in order to allow servicing vehicles and waste collection services to continue unhindered. In terms of the new entrance to the Morley Gallery on Westminster Bridge Road it is considered that a revolving door would be a bulky addition to the building and would interrupt both the front elevation of the building and the public highway and would not be considered an acceptable addition in its current form. Given that this is a sensitive site, you are encouraged to provide full details of the bridge link and all other associated works prior to submitting a formal application.

Please accept this letter as the closure of your current enquiry. Amendments can be submitted within 3 months of the date of this letter and should be submitted in line with the Council's formal pre-application procedure, details of which can be found on the Council's website. 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

Gary Rice
Head of Development Management

