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Alan Camp Architects LLP  
 88 Union Street  
 London  
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**Date:** 22/01/2016

Dear Mr Camp

**RE: PRE-APPLICATION ADVICE****At:** COPELAND ROAD CAR PARK, PECKHAM, LONDON, SE15 4TP

**Proposal:** Erection of a 3/4/5/7 storey development to provide 67 new dwellings with associated access, disabled persons parking, landscaped and storage areas and re-provision of ball court

I write in connection with your pre-application enquiry regarding a residential scheme to redevelop the site above. The site has been put forward for redevelopment to deliver more housing in the borough as part of Southwark Regeneration in Partnership Programme. This letter summarises the Council's written advice on your proposal and whether, based on the details submitted, it meets local planning requirements.

**Planning Policy**

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

The site is identified as part of Proposal Site 7 in the Peckham and Nunhead Action Area.

It is within an Air Quality Management Area, Urban Density Zone and Major Town Centre and it abuts the Rye Lane Conservation Area which includes the adjoining site to the south. There are no Listed Buildings at or in the vicinity of the site.

**Other key material considerations**

Gateway 1 - Southwark Regeneration in Partnership Programme Procurement Approval  
 The National Planning Policy Framework

## **Land Use**

The site lies within Proposal Site 7 in the Peckham and Nunhead Action Area Plan (PNAAP). The PNAAP indicates that the car park can be developed and appropriate uses are indicated as residential and retail. (Student accommodation and business use are also indicated as uses which would be acceptable). It will be necessary for you to demonstrate the need for a 100% residential scheme in your application submission and why the retail element is not being pursued.

## **Access and site layout**

The proposal faces mainly onto Copeland Road and returns along the northern boundary where it faces onto Hazel Close. It is arranged in three blocks with the only vehicular access into the site is via a shared access road on the south side of the development. This road is not public highway. Clarification is required as to how this space will be managed and maintained. Space is not available for large vehicles to turn in this area and it appears that vehicles are therefore reversing in this space which is proposed as a shared space/surface providing access to dwellings. The extent to which the proposals can adequately accommodate and control vehicle movements in this area will need to be clearly set out in the planning application. If this cannot be assured then this route into the site may not be viable.

Pedestrian routes open to the public are proposed along the edge and through the site. Bournemouth Close provides a pedestrian link to Rye Lane.

Some dwellings open directly into public space with no buffer zone. This should be reviewed.

Public access to the ball-court needs to be maintained, including step free access.

## **Tall buildings/Scale, height and massing**

The proposed site layout is logical. Block A is proposed at 7-storeys with a set-back eighth floor. Block B is proposed at 3 storeys with a partly set-back fourth floor with a gridded brick screen. Block C is proposed at 5-storeys in height rising sheer from the edge of Hazel Close. The general distribution of mass on the site is appropriate and is consistent with the surrounding context.

The site is located outside a Conservation Area but it is adjoined by the Rye Lane Peckham Conservation Area on its southern side. This proposal will have no impact on listed buildings and undesignated heritage assets or their settings. This proposal responds to the recently consented scheme to the south which rises to 7-storeys in height and, at the time of writing, is in the process of being implemented.

However, there are a number of concerns regarding:

- The massing of Block A to the rear
- The height of Block B
- The height of Block C onto Hazel Close Green
- The size of the central communal amenity which is incredibly narrow and largely overshadowed by Block A which also oversails a significant portion of the area.
- Lack of transition space to the ground floor units in Block C

To address these concerns it is recommended that:

- The massing of Block A should be adjusted to remove the part of the building that oversails the landscaped communal court to the rear
- Block B on Copeland Road lacks the civic scale that is appropriate for this important street

and could rise to 5-storeys in height.

- Block C in contrast should be reduced in height to reduce its impact on the intimate setting of Hazel Close and the 2-storey properties that front onto it. Officers suggest that, subject to a further assessment of overshadowing and the sunlight/daylight effects on neighbouring properties, this block should be reduced to 3-storeys in height or 3 storeys with a set-back fourth floor.
- The central amenity area should be more generous and Block A should not oversail it.
- The red line should be extended to include Hazel Close which would allow for the provision of transition space to the ground floor units in Block C.

### **Detailed design**

The elevation treatment is proposed as a mid-tone red/brown facing brick with large full-height windows with accent panels in ribbed brick design and a strong geometric 'screen' on Copeland Road with contrasting stone reveals. Linking buildings and where accommodation is set back from the façade the brick cladding is proposed in a contrasting darker brick colour. The choice of cladding materials and the proposed design appears very promising at this stage.

The quality of the design will rely to a large degree on the quality of the materials chosen in particular the brick/s, the stone reveals and the window frames. At this stage, Officers would suggest a bay study to 1:20 scale of the typical window and feature panels on Blocks A, B and C are submitted with the planning application.

There are some concerns regarding:

- Access to the ball court from the centre of the site which blurs the distinction between public/private parts of the site and the implications of this access on the amenity of future occupiers. The current arrangement requires all users of the court to access it from the centre of the site from the communal courtyard and is a significant concern.
- The colonnaded transition space on Copeland Road
- Affordable wheelchair units should comply with the SEHLP standards set out in the adopted Residential Design Standards SPD (2011)

To address these concerns it is recommended that:

- Public access to the ball court should be limited to stepped access from Hazel Close. This could be enhanced by providing ramped access for wheel-chair users only from the communal courtyard.
- The colonnaded transition space on Copeland Road screens the living rooms and bedrooms which are set-back from the street. This should be adjusted to retain columns only on the 'party' walls between units and to omit the intermediate columns.
- A Sunlight/Daylight report to be submitted to the Council prior to application. (Note: A report has been submitted but this will need to be updated if the amendments to the height and massing of Block C and the removal of part of Block A are undertaken).
- 1:50 scale plans of the affordable wheelchair units to be submitted with the application demonstrating how they will comply with the revised Part M of the Building regulations and the SEHLP standards

### **Public realm**

At this point there is little detailed design to comment upon in respect of landscape and public realm. Particular consideration should be given to the quality of the public realm and the landscaping of the site. To address these concerns it is recommended that a landscape proposal which includes door-step play area/s and planting (including trees) as well as associated seating and lighting for the

communal garden, Hazel Close as well as visitor cycle storage spaces and parking spaces located around the site.

### **Density**

The area of the site has been measured at 0.245 hectares on the Council's GIS mapping system and the proposal, which would comprise 216 habitable rooms, is calculated to have a density of 882 habitable rooms per hectare. This would exceed the recommended density range for the Urban Zone in the LB Southwark Core Strategy Policy 5 (i.e. 200 – 700 habitable rooms per hectare). However, given the Major Town Centre location, and scale and quantum of development on neighbouring sites, the proposed density is not considered to be acceptable per se. The text to Proposal Site 7 in the PNAAP advises that 75 units can be provided (67 units are proposed). Further comments in relation to the amount, form and layout of the development are included in the section above on Scale/Height/Massing.

### **Housing Mix**

The proposed dwelling mix would include 24 x 1 bed units (36%), 27 x 2 bed units (40%), 16 x 3 bed units (24%). As the combined total of the two and three bed units would exceed the minimum requirement of 60% as set out under Core Strategy Policy 7 the proposed dwelling mix is considered to be acceptable.

### **Housing tenure**

The proposed tenure (by habitable rooms) is 37.5% social rented, 25% shared ownership and 37.5% private. Comprising 62.5% affordable housing the proposal would more meet Core Strategy Policy 6 which requires a minimum 35% affordable housing on site.

Policy 17 of the Peckham and Nunhead Action Area Plan requires new affordable housing to be split 50:50 between social rented and intermediate (shared ownership). This balance would not be provided but given that 62.5% of the development would be affordable it is considered that an adequate number of social rented and intermediate units would be included.

### **Housing Quality**

While the individual unit sizes would appear to comply with the National Housing Standards which are set out in the Technical Update to the Council's Residential Design Standards (2011) it will be necessary to demonstrate that the individual rooms comply with the room size requirements.

The siting and configuration of the units would appear to provide adequate levels of privacy and security but the siting of the 5 storey element hard up against the paved public footway along Hazel Close would fail to provide adequate 'defensible space' for the occupiers of the ground floor units and an inadequate level of security/privacy would be provided here (please also see comments in relation to the amenity of surrounding occupiers and townscape quality as a result of the building abutting the footway along Hazel Close).

The Residential Design Standards indicate that residential units should be 'dual aspect'. I see that there are single aspect units within the seven storey element of the proposal. I would advise you to make these units dual aspect if possible.

A total of 7 wheelchair units are proposed. The number of units proposed would satisfy the 10% required in accordance saved policy 4.3 of the Southwark Plan.

All wheelchair units should be designed to meet the South East London Housing Partnership Wheelchair Housing Design Guide space standards. Technical Guidance on these standards is set

out in the Technical Update to the Residential Design Standards SPD on the Council's website dated October 2015.

[http://www.southwark.gov.uk/downloads/download/2257/residential\\_design\\_standards\\_spd](http://www.southwark.gov.uk/downloads/download/2257/residential_design_standards_spd)

The dwellings are shown as having some integral storage facilities and they would have a mix of open plan living-kitchen-diners and units with separate kitchen diners to offer choice to potential occupiers. The three bed dwellings are shown as having separated, self-contained kitchens in accordance with guidance in the Residential Design Standards SPD (2015).

All of the flats would have a private balcony or a terrace with the balconies ranging from 5 sq m to 20 sq m and the terraces from 35 sq m to 70 sq m. The level of private amenity space provision is considered to be appropriate and in accordance with Southwark's Residential Design Standards SPD 2011. The level of communal amenity space proposed (108 sq m) is considered to accord with the Residential Design Standards.

### **Amenity impacts**

The siting and scale of the proposals raise some concerns in relation to the amenity of the occupiers of neighbouring dwellings.

The new building would be sited 20m from the front elevations of the Hazel Close dwellings. There is a requirement in the Residential Design Standards for a 'front-to-front' separation of at least 12m between residential buildings and the proposed 20m separation should prevent undue overlooking of the Hazel Close dwellings.

However, at five storeys in height, and immediately across from the Hazel Close dwellings there is concern in relation to impacts on outlook. Added to the townscape concerns set out above, the 5 storey element hard up on the paved access along Hazel Close would represent an overbearing form of development which would harm the outlook of the occupiers of the Hazel Close dwellings.

We would therefore advise you to reduce the height of the element on Hazel Close.

In its north east corner the new building (which would be four storeys in height) would sit 5.35m from the boundary (and the garden) with the nearest dwelling, 53 Copeland Road. It would be preferable if the new building could be set back further here to prevent the potential for unacceptable overlooking of this property.

There would be a gap of at least 23m between the proposed building and the site to the west at the end of Bournemouth Close. Your proposal for a separation of 23m to this site should serve to protect the development potential and amenity of future occupiers of this site.

There are no windows on the ground to third floors of the approved building to the south (237-247 Rye Lane) and the facing windows on the fourth to seventh floors at this site would be set back a minimum of 2m. I note that your proposal would be set back 10m from the boundary with this site (where the vehicular access would be formed) and given that screens could be installed to the terraces at the sides of the flats on the fourth to seventh floors at 237-247 Rye Lane I do not consider that there would be any undue overlooking from the proposal.

The Daylight/Sunlight Report which you submitted with your enquiry indicates that a number of the windows within the proposal and at neighbouring properties would have a reduced Vertical Sky Component in excess of BRE guidelines. However you note that the reduced levels, which would be no less than 58% of existing values, in the worst case, would be acceptable in this town centre location. The report comes to a similar conclusion on the Annual Probable Sunlight Hours. Some 14 out of 60 windows would fall short of BRE guidelines but the proposed levels are not considered to

be unacceptable in the context of the urban setting. All the windows were assessed to meet the Average Daylight Factor requirements. The reductions in scale in certain areas of the scheme, recommended above, should help to improve some of these results.

In terms of noise and disturbance there should be no significant objections to the proposal as the proposed use and scale of development would not be considered to be inappropriate given the town centre location and the proposed siting which would involve the front/side elevations of the development facing the neighbouring dwellings and the external community space 'enclosed' by the development at the rear of the site. The re-location of the basketball court per se would not necessarily result in increased noise and disturbance however as this may be used more intensively and it would be sited in close proximity to the new buildings, high level acoustic screening would be required.

### **Trees**

There are no trees on the site so there would be no objections in terms of loss of existing landscape value. The provision of new landscaping would be required for the new development. This should be shown in the application proposals and details can be agreed as a planning condition.

### **Transport and servicing issues**

#### **Car parking**

The proposal would provide no general car parking spaces which is acceptable within this location due to excellent access to public transport.

Future occupants of the site would be excluded from being eligible for on-street parking permits (except for blue badge holders to avoid additional parking pressure on surrounding streets).

3 disabled parking spaces are proposed to serve 7 accessible units. This is considered acceptable due to the excellent, accessible public transport. Access to the proposed spaces depends on shared service road and this issue needs to be resolved as discussed above.

#### **Cycle parking**

Details have not been provided, but commitment to London Plan standards. Cycle parking is located near to entrances which is acceptable. Sole reliance on 'stacker' cycle parking is not desirable and other options e.g. Sheffield stands preferred or 'walk in' vertical system, should be explored. Visitor cycle parking should be spread around the perimeter of the site. Parking should also be provided for the ball court use.

#### **Servicing**

Servicing should be provided off street wherever possible. The shared access road as proposed is not suitable for servicing activity. Servicing from the carriageway on Copeland Road is not acceptable due to high traffic flows. Unless the site is substantially reconfigured, the remaining option is to explore the provision of an inset loading area adjacent to Copeland Road. Acceptable, publicly accessible (adopted) footway widths must be maintained. Highways can provide further comments in this respect.

A servicing strategy and tracking drawings will need to be provided with any submission detailing what provision will be made to ensure servicing would be safe and would not have harmful impacts on either vehicle or pedestrian safety. The tracking drawings should illustrate a worst case scenario i.e. for the largest delivery vehicle that could be used by a refuse vehicle. The servicing strategy should include the predicted number of vehicles to and from the site and the nature of those vehicles.

The document should be prepared in accordance with Transport for London document “London Freight distribution plan: A Plan for London” and “Managing Freight Effectively: Delivering and Servicing Plans”.

## **Sustainable development implications**

### **Energy**

London Plan Policy 5.2 requires a reduction in carbon emissions of 35% below Part L 2013 target. I note that panels would be provided on the roofs of the new building. A detailed energy assessment to demonstrate how the targets for carbon dioxide emissions reduction outlined are to be met within the framework of the energy hierarchy should be provided.

### **Air Quality**

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

### **Ground contamination**

Based on the site's historic uses there is a risk of exposure to potential contaminants during construction and in the completed development to construction workers, future occupiers, ground water and surface water. For these reasons a full land contamination exploration and assessment will be required.

### **Planning obligations (S.106 undertaking or agreement)**

The provision and future use of the affordable units would be required to be the subject of a S106 agreement. The proposal may trigger the need for site specific planning obligations (in addition to CIL below). Planning obligations may be required to provide for items of social infrastructure in the area associated with the development, e.g. transport, social services, public realm improvements. The Council's SPD on S106 Planning Obligations (2015) sets out the general expectations in relation to the type of obligations that will be sought. It will be necessary to provide Draft Heads of Terms once an application has been submitted and consultation has been undertaken with the relevant statutory consultees.

### **Community Infrastructure Levy**

The Mayoral Community Infrastructure Levy has not been taken into account within the submission.

This development will be subject to the Mayoral CIL and Southwark CIL even though it is an LB Southwark site. The charge will be calculated according to the amount of new floor space the development will provide. The chargeable rate for Southwark is £35 per square metre under MCIL and £50 per square metre for residential floorspace. However relief is given for affordable housing.

You should submit a 'Planning Application Additional Information Requirement Form' to determine the amount of chargeable floorspace on the site and submit this with any formal planning application on the site.

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

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

## **Other matters**

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

## **Conclusion**

The proposal would provide 67 units of housing in accordance with strategic objectives to deliver more housing in the Borough. The proposed number and mix of dwellings would be appropriate and in accordance with the recommendation in the Peckham and Nunhead Action Area Plan and policy SP7 of the LB Southwark Core Strategy, although a 100% residential scheme on the site, with no retail element, should be justified. The proposal for 62% affordable housing (by habitable rooms) would meet LB Southwark and London Plan policies.

The layout of the development would broadly be appropriate for the site and the surrounding area however we would recommend that Block C is reduced in height in the interests of the scale and amenity of the two storey dwellings in Hazel Close, that Block B is increased to five storeys in height to improve the rhythm of the Copeland Road streetscene and that the building is set back along Hazel Close and at the rear over the proposed communal area. An amended Sunlight and Daylight Report will be required if the proposal is increased.

The vehicular access at the southern end of the site would be inadequate for servicing vehicles and it will be necessary for you to show turning areas for service vehicles and/or a designated on-site servicing bay. Further details of resident and visitor cycle parking facilities will be required.

A Ground Contamination Survey, Air Quality Assessment and Energy Assessment will be required.

A S106 agreement will be required in respect of the provision and use of the affordable units and if any site specific planning obligations are required further to consultation with statutory consultees then these would also need to be included in the S106 agreement.

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

Please accept this letter as the closure of your current enquiry. A copy of this letter will be available to view on the council's website under reference 15/EQ/0356.

Your sincerely,

Simon Bevan  
Director of Planning