

## Chief executive's department

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Dear Mr. Harrison

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

At: 18 AMELIA STREET, LONDON, SE17 3PY

**Proposal:** Demolition of existing building and construction of a 6-storey hotel (Use Class C1).

I am writing further to the follow-up pre-application advice meeting held at the Council offices on 15<sup>th</sup> December 2015 following your request for pre-application planning advice (enguiry ref. 15/EQ/0341).

This follows on from an earlier pre-application submission dated 21<sup>st</sup> July 2015 and a subsequent meeting with officers on 10<sup>th</sup> August 2015 and, in turn, all of the above were preceded by a first pre-application proposal for the re-development site that was discussed at a meeting on 1<sup>st</sup> May 2015.

The advice which follows should be read in conjunction to that which was provided in the more comprehensive advice letter dated 17/08/2015 under enquiry ref. 15/AP/0069. It is intended to be supplemental in that respect, updating the advice only on the matters discussed below.

The scheme has continued to evolve in response to the advice provided to date. In particular the maximum height of the proposed new hotel has been reduced from an initial nine storeys to eight storeys and now to six-storeys. The number of guest rooms provided has been accordingly been reduced from 72 within the previous 8-storey scheme to 63 within the new 6-storey scheme. A small (22sqm) commercial unit has also been introduced at the front of the building (replacing the breakfast/lounge area previously shown here) with a frontage onto Amelia Street.

#### Principle of development

The principle of the proposed development in strategic planning and land use terms (a new hotel) has always been accepted and therefore the key issues which still need to be satisfactorily addressed are the impact of the new building on the character and appearance of the surrounding area, the streetscene along Amelia Street in particular, and the need to ensure that the new building will have an acceptable impact on the amenity of occupiers of existing and planned residential dwellings which neighbour the site.

## The design of the scheme and its impact on the character and appearance of the locality

The advice issued to date in respect of the suggested maximum height for the building has stated that, 'A more suitable development scheme would be five storeys at the front of the site (with recessed top storey) with a further reduced scale at the rear to preserve residential living conditions'.

Having had further regard to the heights of existing buildings and significant planned new developments (those not yet constructed but benefiting from planning permission) in Amelia Street including the extant consent (ref.

14/AP/2709, dated 30<sup>th</sup> March 2015) for a mixed-use scheme immediately to the east of the site at 2-16 Amelia Street (containing 3/4/5/7 storey buildings including 55 residential units, 4 storeys fronting Amelia Street adjacent to the current proposal site), the extant consent (ref. 13/AP/1122, dated 23/12/2015) for a part 4-storey, part 6-storey mixed-use scheme at Chatelain House, 182-202 Walworth Road (south side of Amelia Street) and the existing 9-storey, predominantly-residential development on the site of the former HMSO print works, to the west of the subject site it is considered that the frontage onto Amelia Street should be no higher than five-storeys high as previously advised. However, where this advice and the previous advice differ slightly is that, considering the intended ground-floor-to-first floor height of 4.233m and the intended floor-to-floor heights for the upper floors of 2.825m, it is now accepted that a frontage consisting of five conventional storeys would not be likely to be viewed as unduly excessive or a significant departure from the prevailing building heights within Amelia Street and thus would be acceptable. (For the avoidance of any doubt Officer's still hold strongly to the view, as expressed in the advice letter for enquiry ref. 15/EQ/0069, that the existing mixed-use development at 22 Amelia Street (the 'Printworks' site) should not be interpreted as having set a precedent for height along Amelia Street given its very unique setting immediately adjacent to the railway viaduct.)

## Architectural approach

Officers welcome the architectural approach to the proposed building including the expressive concrete floor slabs, the distinctive brickwork arch patterning in the elevations, the general balance of solid to void throughout and the tones and textures of the proposed facing materials.

#### Overbearing enclosure of neighbouring residential properties

As explained in previous correspondence the appropriate height and massing of the rear portion of the building will be dictated, first and foremost, by the need to ensure that the amenity of future occupiers the consented Family Mosaic HA scheme to the east at 2-16 Amelia Street and as well as the amenity of the existing occupiers of the existing development at 22 Amelia Street (the 'Printworks' site) would be adequately preserved. It has always been understood that this part of the site is more constrained due to the proximity of dwellings within these neighbouring developments and the fact that there are habitable room windows within the flank elevations of both developments that would directly face toward the flank walls of the new hotel building. The issue of impact on neighbouring residential amenity is not just simply a matter of daylight and sunlight impacts or the need to preserve a reasonable degree of privacy for these neighbouring residents and (to a slightly lesser extent) future occupiers of the proposed hotel but also it is a matter of needing to avoid creating an overbearing sense of enclosure around these same neighbouring dwellings.

Having considered the proximity of the proposal to the existing and planned developments immediately adjacent on either side (west and east) and the location of habitable room windows within them it is considered that the rear portion of the hotel would need to be limited to a maximum of 4 storeys in order to avoid creating an overbearing sense of enclosure to neighbouring dwellings. While the maximum height of the scheme has been reduced from 8 to 6 storeys this has been partly offset by extending the footprint of the hotel further northwards by several metres. For clarity the 'rear portion' is taken to constitute the part of the hotel that would extend beyond the rear/north-facing elevation of the front part of the consented Family Mosaic HA scheme to the east at 2-16 Amelia Street. Therefore in order to accommodate the internal stairwell within the suggested massing 'envelope' it will probably be necessary to move it further forward into the 5-storey front part.

#### **Privacy**

The issue of overlooking is considered to be satisfactorily addressed through the use of recessed, predominantly obscure-glazed windows in the flank elevations from the first floor upwards.

#### **Daylight and Sunlight Impact Assessment**

Should the scheme be revised in accordance with the advice above, the Daylight and Sunlight Impact Assessment (V.1, October 2015) should also be revised to show the updated results of the various tests. Any new Assessment should also be updated to include an assessment of the overshadowing impact of the development on the nearby private rear gardens of the ground-floor flats in the adjacent rear wing of the adjacent Family Mosaic HA scheme at 2-16 Amelia Street.

#### Conclusion

As currently proposed the scheme at 6-storeys (18.36m) tall is still considered to constitute excessive height, bulk and massing causing harm to the street scene in Amelia Street and having an unacceptable impact on the amenity of existing and future occupiers of neighbouring dwellings. It is therefore considered to be an inappropriate over-development of the site. However, should a revised proposal be drawn up in line with the advice set out above (and subject to the satisfactory resolution of the other issues discussed in the earlier

advice letter), it is likely that this would receive a favourable consideration.

The advice in this letter is the informal advice of officers based upon the information you have provided and is without prejudice to the Council's formal determination of any future planning application. Following receipt of an application, consultation and publicity will be carried out, which may result in further relevant issues arising.

Should you wish to discuss any matter with regard to this advice please contact me.

Yours sincerely,

## Ciaran Regan

Senior Planning Officer – Validation and Fast-track Team