

Item No. 5.3	Classification: Open	Date: 7 February 2018	Meeting Name: Planning Committee
Report title:	<p>Development Management planning application: Council's own development Application 17/AP/2562 for: Full Planning Application</p> <p>Address: DAMORY HOUSE AND THAXTED COURT, ABBEYFIELD ROAD, LONDON SE16 2BU</p> <p>Proposal: Redevelopment of Thaxted Court, entailing;</p> <ul style="list-style-type: none"> • Conversion of the existing ground floor undercroft/garaging area within the northwest wing into x2 self-contained dwellings; • Construction of a two-storey extension to the roof (i.e. at fourth and fifth floor level) of both wings of the building to facilitate the delivery of x12 self-contained dwellings; • Alterations to the existing building, including: the installation of a new glazed facade; re-cladding of existing elevations; the creation of a new covered entrance at ground floor level; and the provision of dedicated cycle and refuse storage spaces; • Delivery of new public realm, hard and soft landscaping, and associated works <p>Redevelopment of Damory House, entailing;</p> <ul style="list-style-type: none"> • Construction of a two-storey extension to the roof (i.e. at fourth and fifth floor level) across the full length of the building to facilitate the delivery of x14 self-contained dwellings; • Alterations to the existing building, including: the installation of a new glazed facade; re-cladding of existing elevations; the creation of a new covered entrance at ground floor level; and the provision of dedicated cycle and refuse storage spaces; • Delivery of new public realm, hard and soft landscaping, and associated works 		
Ward(s) or groups affected:	Rotherhithe		
From:	Director of Planning		
Application Start Date 23/06/2017		Application Expiry Date 22/09/2017	
Earliest Decision Date 16/07/2017			

RECOMMENDATION

1. a) That planning permission is granted subject to conditions and the applicant entering into an appropriate legal agreement, and receipt of the stage 2 comments from the Mayor of London.
- b) That in the event that the requirements of a) are not met by 31 May 2018, the Director of Planning be authorised to refuse planning permission, if appropriate, for the reasons set out under paragraph 196.

BACKGROUND INFORMATION

2. This application is one of three planning applications on the Abbeyfield Estate at Maydeu House (ref. 17/AP/0527), Bede Centre (17/AP/2908) and Damory House and Thaxted Court (ref. 17/AP/2562). These three applications submitted by the Council seek to extend Maydeu House, Damory House and Thaxted Court to provide additional affordable homes, to redevelop the Bede Centre for affordable housing, and relocate the community centre to Maydeu House. The three applications are to be presented at the same Committee because, together, they would redevelop a significant part of the Abbeyfield Estate.
3. The application forms part of a wider estate regeneration programme to be developed through a masterplan in four phases:

Phase 1 – strip out of Maydeu Tower (already completed)

Phase 2 – Damory House and Thaxted Court (this application)

Phase 3 – Maydeu House, including replacement community facility (17/AP/0527)

Phase 4 – Bede Centre site redevelopment (17/AP/2908).

Site location and description

4. The application site comprises Damory House and Thaxted Court, both of which are four-storey 1960s deck-access housing blocks within the Abbeyfield Estate. Within the wider Estate, there are other multiple-storey housing blocks —namely Maydeu House and Bradley House— as well as a number of low-rise residential terraces and the Bede Centre, a local community centre.
5. Damory House lies adjacent to the northwestern side of Maydeu House, while Thaxted Court is situated to the southeast of Maydeu House and the Bede Centre. Damory House contains twenty-one one-bedroom dwellings and fourteen three-bedroom dwellings, making thirty-five in total. Thaxted Court contains eleven one-bedroom dwellings, eleven three-bedroom dwellings and two four-bedroom dwellings, making twenty-four in total. Directly to the southeast of both Damory House and Thaxted Court is a small area of communal outdoor space, which in each case is laid to lawn and planted with mature trees.

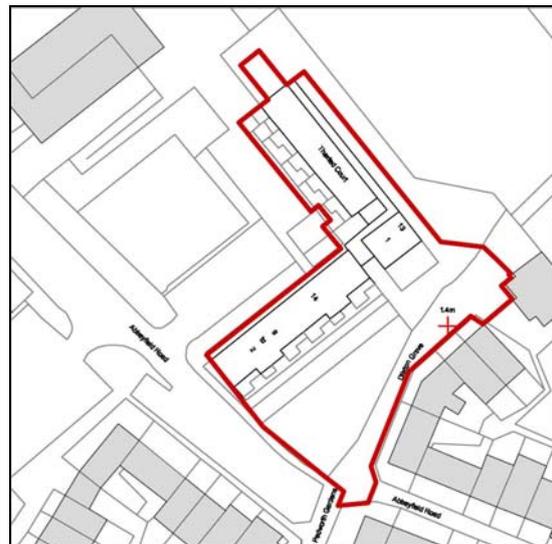
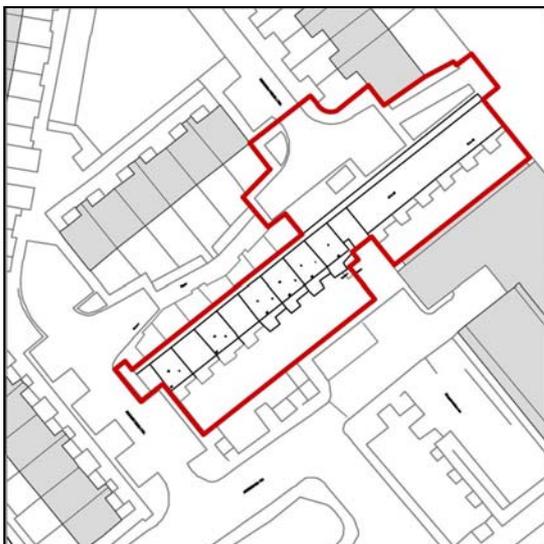


Figure 1: Location Plan for Damory House Figure 2: Location Plan for Thaxted Court

6. Southwark Park lies on the northern side of the application site. It is a registered park and garden (grade II listed), a Site of Importance for Nature Conservation (grade 2) and designated as Metropolitan Open Land. The common boundary between the application site and the Park forms the southwestern extent of the Canada Water Action Area.
7. Dilston Grove (the former Clare College mission church) is the nearest listed building sited approximately 20 metres to the southeast of Thaxted Court. Built in the early 1900s and one of the earliest reinforced concrete churches in London, it is grade II listed.
8. The site is within Flood Zone 3, the Air Quality Management Area and the Urban Density Zone.
9. Damory House and its associated land has a PTAL rating of 3 while Thaxted Court and its associated land has a PTAL rating of 4. South Bermondsey train station is approximately 450 metres to the south, Surrey Quays station is approximately 550 metres to the northeast and Bermondsey tube station is approximately 800 metres to the northwest. Bus services run along Rotherhithe New Road and Southwark Park Road.

Details of proposal

10. This planning application proposes to add two storeys to the top of Damory House and convert an undercroft and add two storeys to the top of Thaxted Court. The developments would deliver twenty-eight new dwellings, fourteen at each block. All new flats would be affordable homes offered on a social rent basis. No changes are proposed to the tenure of any of the fifty-nine existing dwellings within the blocks.
11. The new rooftop storeys would result in each existing four-storeyed block becoming six-storeyed. Damory House, the highest part of which is currently 13.45 metres above ground level, would have a maximum proposed height of 18.50 metres above ground level. Thaxted Court, the highest part of which is currently 13.30 metres above ground level, would have a maximum proposed height of 18.75 metres above ground level.
12. The additional storeys and converted undercroft would be faced in dark brown brick and sand-coloured Marley Eternit fibre cement cladding panels. Window and door frames would be dark aluminium. Green roofs would be incorporated at both blocks.



Figure 3: Visualisation of the proposed southeast elevation of Thaxted Court

13. Together with the extensions and undercroft conversion, it is proposed to refurbish the existing buildings by: re-cladding the existing elevations (to match the cladding of the proposed additional rooftop storeys); enclosing the vertical circulation core and creating a covered ground floor entrance of each block with a facade comprising Reglit glazing and Marley Eternit sand-coloured cladding, and; providing dedicated cycle and refuse storage spaces at ground floor level for the benefit of existing and future residents in areas currently previously used for garaging but which are now vacant.



Figure 4: Elevation of the proposed southeast elevation of Damory House

14. These works would entail the creation of four new parking spaces. The two concurrent applications (17/AP/0527 and 17/AP/2908) propose public realm and hard and soft landscaping works directly adjacent to Damory House and Thaxted Court.

Relevant planning history of the application site

15. The following relevant planning history exists for the application site:

16/AP/0561

Application type: Council's Own Development - Reg. 3 (REG3)

Removal of raised podium section adjacent to Damory House, with works to include the demolition of garages; Removal of raised podium section adjacent to Thaxted Court; Removal of the retaining walls to the raised grass bed to the front of Thaxted Court; Removal of the raised grass bed, spoil, x4 trees and x2 saplings to the front of Maydew House; Re-landscaping of affected areas to include replacement tree planting.

Decision date 04/07/2016

Decision: Granted (GRA)

16/AP/1332

Application type: Council's Own Development - Reg 3 (REG3)

Removal of raised podium section adjacent to Damory House, with works to include the demolition of garages; Removal of raised podium section adjacent to Thaxted Court, with works to include the demolition of garages; Removal of the retaining walls and spoil to the raised grass bed to the front of Thaxted Court; Removal of the raised grass bed, spoil, x4 trees and x2 saplings to the front of Maydew House; Re-landscaping of affected areas; Including the replanting of trees

Decision date: 04/07/2017

<p>Decision: Granted (GRA)</p> <p>Note: This planning application was very similar in nature to 16/AP/0561. The two applications differ only in respect of the parts of the raised podium they proposed to demolish. Two separate permission were sought by the Council to give them the flexibility to implement which they preferred.</p>
<p>16/AP/1361</p> <p>Application type: Council's Own Development - Reg 3 (REG3)</p> <p><i>Construction of a new sub-station adjacent to the North West corner of Thaxted Court; infill the open ended North West Corner of Thaxted Court to house a Heat exchanger sub-station; infill 2No. ground floor garages to Damory House to contain a heat exchanger sub-station</i></p> <p>Decision date: 04/07/2017</p> <p>Decision: Granted (GRA)</p>
<p>16/AP/5001</p> <p>Application type: Certificate of Lawfulness - proposed (CLP)</p> <p><i>Certificate of Lawfulness (Proposed) for: the removal of one tree located on the raised grass bed to the front of Thaxted Court.</i></p> <p>Decision date 01/02/2017</p> <p>Decision: Granted (GRA)</p>
<p>17/EQ/0137</p> <p>Application type: Pre-Application Enquiry (ENQ)</p> <p><i>Redevelopment of Thaxted Court, entailing;</i></p> <ul style="list-style-type: none"> • <i>Conversion of the existing ground floor storage/undercroft/garaging area within the northwest wing into x2 self-contained dwellings;</i> • <i>Construction of a two-storey extension to the roof (i.e. at fourth and fifth floor level) of both wings of the building to facilitate the delivery of x12 self-contained dwellings;</i> • <i>Alterations to the existing building, including: the installation of a new glazed facade; the creation of a new covered entrance at ground floor level; and the provision of dedicated cycle and refuse storage spaces.</i> <p><i>Redevelopment of Damory House, entailing;</i></p> <ul style="list-style-type: none"> • <i>Construction of a two-storey extension to the roof (i.e. at fourth and fifth floor level) across the full length of the building to facilitate the delivery of x14 self-contained dwellings;</i> • <i>Alterations to the existing building, including: the installation of a new glazed facade; the creation of a new covered entrance at ground floor level; and the provision of dedicated cycle and refuse storage spaces.</i> <p>Decision date 01/06/2017</p> <p>Decision: Pre-application enquiry closed (EQC)</p>

Relevant planning history and live planning applications at adjoining sites

16. The following live planning applications are relevant to 17/AP/2562.

Maydew House, Abbeyfield Estate

17. 17/AP/0527
- Application type: Council's Own Development - Reg 3 (REG3)
- Refurbishment of the existing 144 residential units and erection of a 5 storey extension providing 24 additional residential units (Class C3). Landscape improvements to the front of Maydew House, with a new residential entrance at ground floor and residents amenities at first floor together with a new community facility (Class D1) at ground floor. New pedestrian route and gates into Southwark Park and other associated works incidental to the development.
- Decision date: Item 6.1 on this committee agenda

Bede Centre, Abbeyfield Estate

18. 17/AP/2908
Application type: Council's Own Development - Reg 3
Demolition of existing community centre and construction of a part-9, part-6 storey block providing 87 residential units; car parking; landscaping; and highway improvements
Decision date: Item 6.2 on this committee agenda

KEY ISSUES FOR CONSIDERATION

Summary of main issues

19. The main issues to be considered in respect of this application are:
- a) Principle of the development in terms of conformity with strategic land use policies
 - b) Environmental impact assessment
 - c) Density
 - d) Tenure and affordable housing
 - e) Viability
 - f) Mix of dwelling sizes
 - g) Quality of residential accommodation
 - h) Young people's play space
 - i) Impact on the amenity of adjoining occupiers, excluding daylight and sunlight
 - j) Daylight impacts
 - k) Sunlight impacts
 - l) Overshadowing
 - m) Amenity impacts arising from the construction process
 - n) Design quality
 - o) Impact on heritage assets
 - p) Trees, landscaping and biodiversity
 - q) Transport and highway matters, including cycle storage
 - r) Refuse storage
 - s) Environmental matters
 - t) Sustainability
 - u) Community engagement
 - v) Planning obligations and Community Infrastructure Levy

Planning policy

National Planning Policy Framework (the Framework)

20. Section 4: Promoting Sustainable Transport
Section 6: Delivering a Wide Choice of High Quality Homes
Section 7: Requiring Good Design
Section 8: Promoting Healthy Communities
Section 10: Meeting the Challenges of Climate Change, Flooding and Coastal Change
Section 11: Conserving and Enhancing the Natural Environment
Section 12: Conserving and Enhancing the Historic Environment

The London Plan 2016

21. Policy 1.1 - Delivering the Strategic Vision and Objective of London
Policy 2.9 - Inner London
Policy 3.1 - Ensuring Equal Life Chances for All
Policy 3.2 - Improving Health and Assessing Health Opportunities for All

Policy 3.3 - Increasing Housing Supply
 Policy 3.4 - Optimising Housing Potential
 Policy 3.5 - Quality And Design Of Housing Developments
 Policy 3.6 - Children And Young People's Play And Informal Recreation Facilities
 Policy 3.8 - Housing Choice
 Policy 3.9 - Mixed And Balanced Communities
 Policy 3.10 - Definition of Affordable Housing
 Policy 3.11 - Affordable Housing Targets
 Policy 3.13 - Affordable Housing Thresholds
 Policy 5.1 - Climate Change Mitigation
 Policy 5.2 - Minimising Carbon Dioxide Emissions
 Policy 5.3 - Sustainable Design And Construction
 Policy 5.4 - Retrofitting
 Policy 5.5 - Decentralised Energy Networks
 Policy 5.6 - Decentralised Energy in Development Proposals
 Policy 5.7 - Renewable Energy
 Policy 5.9 - Overheating And Cooling
 Policy 5.10 - Urban Greening
 Policy 5.11 - Green Roofs And Development Site Environs
 Policy 5.12 - Flood Risk Management
 Policy 5.13 - Sustainable Drainage
 Policy 5.15 - Water Use and Supplies
 Policy 5.17 - Waste Capacity
 Policy 5.20 - Contaminated Land
 Policy 6.1 - Strategic Approach (Transport)
 Policy 6.3 - Assessing Effects of Development on Transport Capacity
 Policy 6.9 - Cycling
 Policy 6.13 - Parking
 Policy 7.1 - Lifetime Neighbourhoods
 Policy 7.2 - An Inclusive Environment
 Policy 7.3 - Designing Out Crime
 Policy 7.4 - Local Character
 Policy 7.5 - Public Realm
 Policy 7.6 - Architecture
 Policy 7.8 - Heritage Assets and Archaeology
 Policy 7.14 - Improving Air Quality
 Policy 7.15 - Reducing And Managing Noise, Improving And Enhancing The Acoustic Environment And Promoting Appropriate Soundscapes
 Policy 7.19 - Biodiversity and Access to Nature
 Policy 7.21 - Trees and Woodlands
 Policy 8.2 - Planning Obligations
 Policy 8.3 - Community Infrastructure Levy

Relevant Supplementary Planning Documents/Guidance

22.

Mayor of London: Housing (SPG, 2016)
 Mayor of London: Accessible London: Achieving an Inclusive Environment (SPG, 2004)
 Mayor of London: Sustainable Design and Construction (SPG, 2014)
 Mayor of London: Shaping Neighbourhoods - Play and Informal Recreation (SPG, 2012)
 Mayor of London: Homes for Londoners - Affordable Housing and Viability (SPG, 2017)
 Mayor of London: Shaping Neighbourhoods - Character and Context (SPG, 2014)
 Mayor of London: Social Infrastructure (SPG, 2015)
 Mayor of London: Transport Strategy (2010)
 Mayor of London: Climate Change Mitigation and Energy Strategy (2010)

Mayor of London: Climate Change Adaptation Strategy (2011)
Mayor of London: Securing London's Water Future - Water Strategy (2011)

Core Strategy 2011

23.

Strategic Policy 1 - Sustainable Development
Strategic Policy 2 - Sustainable Transport
Strategic Policy 4 - Places for Learning and Enjoyment
Strategic Policy 5 - Providing New Homes
Strategic Policy 6 - Homes for People on Different Incomes
Strategic Policy 7 - Family Homes
Strategic Policy 11 - Open Space and Wildlife
Strategic Policy 12 - Design and Conservation
Strategic Policy 13 - High Environmental Standards
Strategic Policy 14 - Implementation and Delivery

Southwark Plan 2007 (July) - saved policies

24. The council's cabinet on 19 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 2.5 - Planning Obligations
Policy 3.1 - Environmental Effects
Policy 3.2 - Protection of Amenity
Policy 3.3 - Sustainability Assessment
Policy 3.4 - Energy Efficiency
Policy 3.6 - Air Quality
Policy 3.7 - Waste Reduction
Policy 3.9 - Water
Policy 3.11 - Efficient Use of Land
Policy 3.12 - Quality in Design
Policy 3.13 - Urban Design
Policy 3.14 - Designing Out Crime
Policy 3.15 - Conservation of the Historic Environment
Policy 3.18 - Setting of Listed Buildings, Conservation Areas and World Heritage
Policy 3.28 - Biodiversity
Policy 4.1 - Density of Development
Policy 4.2 - Quality of Residential Development
Policy 4.3 - Mix of Dwellings
Policy 4.4 - Affordable Housing
Policy 4.5 - Wheelchair Affordable Housing
Policy 5.1 - Locating Developments
Policy 5.2 - Transport Impacts
Policy 5.3 - Walking and Cycling
Policy 5.6 - Car Parking
Policy 5.7 - Parking Standards for Disabled People and the Mobility Impaired

Relevant Supplementary Planning Documents

25.

Sustainable Design and Construction (SPD, 2009)
Sustainable Transport (SPD, 2010)

Affordable Housing (SPD, 2008)
 Draft Affordable Housing (SPD, 2011)
 Design and Access Statements (SPD, 2007)
 Development Viability (SPD, 2016)
 Section 106 Planning Obligations / Community Infrastructure Levy (SPD, 2015)
 Sustainability Assessment (SPD, 2009)
 2015 Technical Update to the Residential Design Standards (SPD, 2011)

Principle of development

26. The proposed development, which is entirely Class C3 (residential), is compatible with the site's existing residential use. As such, the application presents no land use issues.

Environmental impact assessment

27. The scale of development does not reach the minimum thresholds established in the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 that would trigger the need for an environmental impact assessment. The proposal's location and nature do not give rise to significant environmental impacts in this urban setting, nor does the cumulative development with the proposed Maydew House extension and Bede Centre redevelopment exceed the indicative threshold for an urban development project.

Density

28. The part of the site occupied by Thaxted Court and associated land is approximately 0.193 hectares in area and the part of the site occupied by Damory House and associated land is approximately 0.191 hectares. From this, the existing and proposed site densities have been calculated as follows:

	Damory House	Thaxted Court	Damory House and Thaxted Court
Existing Density	513 hab rooms/ hectare	394 hab rooms/ hectare	453 hab rooms/ hectare
Proposed Density	733 hab rooms/ hectare	627 hab rooms/ hectare	690 hab rooms/ hectare
Acceptable Density Range: 200 to 700 habitable rooms/ hectare			

29. As the figures show, the proposed development as a whole would not exceed the upper density threshold of 700 habitable rooms per hectare acceptable in this Urban Density Zone location. As such, the proposal is compliant with Strategic Policy 5 and not considered to be an overdevelopment of the site.

Tenure and affordable housing

30. The Southwark Plan requires developments such as this to deliver 35% on an affordable basis (which on a scheme of 28 units would be 10 units). Saved Policy 4.4 states that the tenure mix should be 70% social rented and 30% intermediate, which for this development equates to seven social rented properties and three intermediate properties.
31. The proposed development forms part of the Direct Delivery Programme, one part of the council's ambition to deliver 11,000 new council homes over the period up to 2043, with 1,500 by 2018. As such, all of the units proposed by 17/AP/2562 will be provided

as affordable, social rented homes.

32. The application is made in the knowledge that the South East London Strategic Housing Market Assessment (SHMA) 2014 identifies a net affordable housing requirement within Southwark of 1,472-1,824 units per year between 2013 and 2031. The SHMA states that affordable housing represents 48% of Southwark's total annual housing need.
33. In delivering 28 dwellings on a social rent basis, the proposal directly responds to this identified need and is in accordance with the Council Plan commitment to deliver quality affordable homes. While the scheme would not deliver the intermediate properties required by Saved Policy 4.4, this is considered justifiable because all the other properties in Damory House and Thaxted Court under Local Authority control are social rent units; with all existing and proposed dwellings to be of the same tenure, the Local Authority can conduct its long term maintenance programmes in a much more effective and efficient manner than if there was a mix of intermediate and social rent tenures on the site.
34. In the context of the wider Abbeyfield Estate regeneration, set out below is:
- Table 1: the number of habitable rooms and units across the site as existing;
 - Table 2: the number of habitable rooms and units across the site as proposed, including the existing units to be retained.

35. Table 1

Tenure	Social rent habitable rooms (units)	Intermediate rent habitable rooms (units)	Private habitable rooms (units)	Total
Maydew House existing	432 (144)	0 (0)	0 (0)	432 (144)
Bede Centre existing	0 (0)	0 (0)	0 (0)	0 (0)
Thaxted Court and Damory House existing	90 (38)	0 (0)	66 (21)	156 (59)
Total habitable rooms (units)	522 (182)	0 (0)	66 (21)	588 (203)
Percentage of total habitable rooms (units) across all 3 schemes	88.8% (89.7%)	0 (0)	11.2% (10.3%)	100%

Note: as defined in the glossary of the Affordable Housing SPD, a habitable room is a room the main purpose of which is for sleeping, living or dining and any room with a window that could be used to sleep in regardless of what its intended use is. This excludes toilets, bathrooms, kitchens with an overall floor area of less than 11 square metres, landings, halls and lobbies.

Note: as stipulated in the 2015 Technical Residential Design Standards, any room of a floor space of 27 square metres and within an affordable dwelling is to be treated as two habitable rooms.

36. Table 2

Tenure	Social rent habitable rooms (units)	Intermediate rent habitable rooms (units)	Private habitable rooms (units)	Total
Maydew House proposed	336 (112)	0 (0)	156 (56)	492 (168)
Bede Centre proposed	195 (57)	85 (30)	0 (0)	270 (87)
Thaxted Court and Damory House proposed	171 (66)	0 (0)	76 (21)	247 (87)
Total habitable rooms (units)	702 (235)	85 (30)	232 (77)	1009 (342)
Percentage of total habitable rooms (units) across all 3 schemes	68.8% (68.7%)	8.3% (8.8%)	22.8% (22.5%)	100%

Note: as defined in the glossary of the Affordable Housing SPD, a habitable room is a room the main purpose of which is for sleeping, living or dining and any room with a window that could be used to sleep in regardless of what its intended use is. This excludes toilets, bathrooms, kitchens with an overall floor area of less than 11 square metres, landings, halls and lobbies.

Note: as stipulated in the 2015 Technical Residential Design Standards, any room of a floor space of 27 square metres and within an affordable dwelling is to be treated as two habitable rooms.

37. As the above tables demonstrate, nearly three quarters of the proposed dwellings would be affordable. The application site is outside any area where Strategic Policy 6 requires a minimum of 35% private housing units to be delivered, and as such there is no conflict with this policy.

Viability

38. A brief viability report has been provided to address the requirements of the council's Development Viability SPD 2016. This shows that the scheme will use £8.8m of public funding from Right to Buy receipts, section 106 contributions and any HCA funding in order to make the scheme viable and to deliver the fully affordable scheme proposed in this application.

Housing mix

39. Core Strategy Strategic Policy 7 prioritises the development of family homes. New developments of 10 or more units in the Urban Density Zone must provide at least 60% of units with two or more bedrooms, and at least 20% of units with between three and five bedrooms.
40. The existing and proposed dwelling mix of Thaxted Court and Damory House would be as follows:

Unit size	Existing	Proposed	Total
one-bedroom*	32 (54.2%) [21 at Damory, 11 at Thaxted]	0	32 (36.8%)
two-bedroom	0	25 (89.3%) [14 at Damory, 11 at Thaxted]	25 (28.7%)
three-bedroom	25 (42.4%) [14 at Damory, 11 at Thaxted]	3 (10.7%) [All 3 at Thaxted]	28 (32.2%)
four-bedroom	2 (3.4%) [Both at Thaxted]	0	2 (2.3%)
All units	59	28	87 (100%)

*Includes open-plan 'studio' dwellings

41. All proposed dwellings would have two or three bedrooms. While the percentage of proposed units containing three or more bedrooms falls short of the 20% minimum requirement of Strategic Policy 7, Damory House and Thaxted Court presently contain a large proportion of three-bedroom units and so the entire scheme (i.e. new and existing accommodation) would meet the requirement. As such, Damory House and Thaxted Court in their proposed form would provide a good mix of unit sizes, making a valuable contribution towards achieving mixed and balanced communities.
42. In the context of the associated applications for the redevelopment of Maydew House (17/AP/0527) and the Bede Centre (17/AP/2903), together the three developments would deliver the following dwelling mix:

Unit size	Existing	Proposed	Total
one-bedroom*	32 (15.8%)	42 (30.2%)	74 (21.6%)
two-bedroom	144 (70.9%)	68 (48.9%)	212 (62.0%)
three-bedroom	25 (12.3%)	26 (18.7%)	51 (14.9%)
four-bedroom	2 (1.0%)	3 (2.2%)	5 (1.5%)
All units	203	139	342 (100%)

*Includes open-plan 'studio' dwellings

43. The total number of proposed dwellings across all three applications would meet the aims of Strategic Policy 10 in providing at least 60% of dwellings with two or more bedrooms and at least 20% with three or more bedrooms.

Wheelchair accommodation

44. The London Plan Policy 3.8 requires 10% of new housing to be designed to be wheelchair accessible or easily adaptable for residents who are wheelchair users. Saved Policy 4.3 of the Southwark Plan support this, requiring 10% of new dwellings to be suitable for wheelchair users, except where this is not possible due to the physical constraints of the site.

45. The Council's strong preference, where practical and viable, is for new residential development to achieve M4(2) Building Regulations standards for 'Accessible and Adaptable Dwellings' which is akin to the former Lifetime Homes Standard. The proposed flats would comply with M4(1) but not M4(2).
46. It is recognised full compliance with Category M4(2) may not be possible when extending an existing building and in this instance the new flat layouts and vertical circulation are constrained by the existing structural layout of the tower. As such, it is acceptable in this instance for M4(2) not to be achievable. A condition will be imposed to ensure that the new flats achieve at least Category M4(1) 'Visitable Dwellings'.
47. No wheelchair accessible units would be provided. This is due to the constraints of the site whereby, firstly, the ground level is already occupied by the footprint of the existing buildings, and secondly, there is no lift within either Damory House or Thaxted Court nor any feasible way to introduce a new lift due to the very narrow nature of the vertical circulation core. Although there is an existing undercroft space at Thaxted Court, which the application proposes to redevelop for two new dwellings, the site level in this location is below the 2100 year Thames water breach, rendering both dwellings unsuitable for occupation by wheelchair users.
48. The applicant has provided documentation demonstrating that there is no feasible way of delivering new wheelchair units as part of the proposed redevelopment. As such, it is considered appropriate to capture this deficit through a financial contribution. The *Wheelchair accessible housing: Offset fund* requires any shortfall in the required provision of on-site wheelchair housing to be charged at £10,000 per habitable room unit.
49. The 28 new dwellings proposed by this application would comprise a total of 87 habitable rooms. As 10% of the proposed development (equating to 8.7 habitable rooms) would not be wheelchair accommodation, this triggers a contribution of £87,000 (indexed). This will be secured through a Unilateral Undertaking. The monies would contribute towards funding adaptations to existing housing in the borough.

Quality of residential accommodation

50. Saved Policy 4.2 of the Southwark Plan asserts that planning permission will be granted provided the proposal achieves good quality living conditions. This policy is reinforced by the nationally described minimum space standards and the council's *2015 Technical Update to the Residential Design Standards SPD 2011* (incorporating the National Housing Standards).

Flat sizes and room sizes

51. Provided below is the schedule of accommodation for the proposed two-bedroom, three-person, two-storey units at Thaxted Court and Damory House:

Room	Floor area (sq. m)	Min. floor area req'ment (sq. m)	Complies?
Lounge/dining area	17.0	17.0	YES
Kitchen	7.0	7.0	YES
Bedroom 1 (double)	18.5	12.0	YES
Bedroom 2 (single)	14.7	7.0	YES

Bathroom	4.1	3.5	YES
Built-in storage	2.6	2.0	YES
Dwelling			
Gross Internal Floor Area	75.9	70.0	YES
Private outdoor space	7.0	10.0	NO Shortfall: 3.0 sq. m

Note: One of the two 3 bed/4 person/2 storey dwellings has a slightly larger overall floor area than the other. Given above are the figures for the smaller dwelling.

52. Provided below is the schedule of accommodation for the proposed three-bedroom four-person one-storey units at Thaxted Court to be located within the existing undercroft:

Room	Floor area (sq. m)	Min. floor area req'ment (sq. m)	Complies?
Lounge/dining area	30.0 [Complete]	18.0	YES
Kitchen	11.0	8.0	YES
Bedroom 1 (double)	18.5	12.0	YES
Bedroom 2 (single)	9.5	7.0	YES
Bedroom 3 (single)	7.2	7.0	YES
Bathroom	4.7	3.5	YES
Built-in storage	2.7	2.5	YES
Dwelling			
Gross Internal Floor Area	104.2	74.0	YES
Outdoor space	40.2	10.0	YES

53. Provided below is the schedule of accommodation for Unit 25 at Thaxted Court. This is the three-bedroom, five-person, duplex 'corner' dwelling:

Room	Floor area (sq. m)	Min. floor area req'ment (sq. m)	Complies?
Lounge/dining area	21.9	18.0	YES
Kitchen	8.0	8.0	YES

Bedroom 1 (double)	12.8	12.0	YES
Bedroom 2 (single)	9.9	7.0	YES
Bedroom 3 (single)	8.8	7.0	YES
Bathroom	4.3	3.5	YES
Built-in storage	3.1	2.5	YES
Dwelling			
Gross Internal Floor Area	94.6	93.0	YES
Outdoor space	7.0	10.0	NO Shortfall: 3.0 sq. m

54. As the schedules show, all flat types would provide accommodation of a compliant size. Each flat is logically laid out, with the principal living spaces benefiting from access onto a terrace or balcony. All rooms are practically-shaped and each flat incorporates adequate built-in storage.
55. The matter of the shortfalls in outdoor space is dealt with later in this Report.

Daylight and sunlight

56. The applicant has submitted a *Daylight, Sunlight and Overshadowing Report* which assesses the quality of light the proposed dwellings would receive. The tests carried out are the Average Daylight Factor and the No Sky Line assessment.
57. The Average Daylight Factor is a measure of the overall amount of daylight in a space. A well daylit space would have an ADF of 5% and a partly daylit space would have an ADF of 2%. The BRE guidance set outs that the minimum value of ADF is 2% for a kitchen, 1.5% for a living room and 1% for a bedroom
58. The No Sky Line assessment, while most often used to determine the impact of development on existing windows, is useful here in demonstrating the proportion of each habitable room where the sky is visible.
59. For all proposed habitable rooms, the ADF would be within the 2%-5% threshold, while the NSL would be either 99% or 100%. These results show that all dwellings would benefit from very good daylight receipt.

Quality of outlook

60. All proposed dwellings would benefit from dual outlook and all rooms would be served by one or more clear-glazed apertures of a surface area adequate to the size of the room.
61. The rear-facing rooms within the two ground floor units at Thaxted Court would look onto walled courtyards, but these courtyards are to be of a generous depth such that the occupiers of the dwellings would experience no undue sense of enclosure. To the front, these dwellings would have a pleasant quality of outlook across the courtyard enclosed by Thaxted Court and the proposed Abbeyfield House.

62. The other twenty-six proposed dwellings would all be situated at fourth and fifth floor level. As such, they would benefit from largely uninterrupted long-range views across the borough. No concerns remain, therefore, with regard to the matter of quality of outlook.

Inter-dwelling noise disturbance

63. The proposed 'build on top' two-bedroom duplex flats at Damory House and Thaxted Court, the layout of which would comprise the principal living spaces on the entrance level and the sleeping spaces on the floor above, would not achieve vertical stacking with the existing adjoining dwellings below. This because the flats below are duplexes, with the sleeping spaces located on the upper floor. However, the application drawings show that there would be a void between the roof of the existing dwellings and the floor construction of the proposed dwellings, providing a thermal and acoustic break. It is also recommended that conditions be imposed specifying the acoustic performance of sound insulation to eliminate the risk of undue inter-dwelling noise transfer between the new and existing flats.
64. Similarly, it has not been possible to arrange rooms within units H1 and H2 at Thaxted Court so that they vertical align with similar room types in the single-storey dwellings on the level above. Again, it will be necessary to impose acoustic performance conditions to ensure no undue inter-dwelling noise transfer arises.

Outdoor amenity space

65. The Residential Design Standards require at least 10 square metres of private amenity space to accompany all new two-bedroom and three-bedroom flats. Two of the proposed units meet this requirement, while 26 units would have a 7.0 square metre balcony, which is 3.0 square metres below the minimum threshold.
66. Where there is a robust case for being unable to meet the outdoor amenity space requirements of the Residential Design Standards SPD, shortfalls are permitted subject to an equivalent square meterage being delivered as communal amenity space elsewhere within the application site.
67. The failure to provide private amenity spaces of at least 10 square metres for twenty-six of the proposed 28 flats is due the physical constraints presented by the existing building. To meet this requirement, the only solution would be to have balconies projecting beyond the building footprint, which aside from causing an undesirable over-sailing of the properties on the lower floors, would result in the new development appearing visually incoherent and top-heavy in relation to the lower storeys, thereby failing to achieve a good overall quality of design.
68. For the reasons given above, it is considered acceptable for the overall 78.0 square metre shortfall of private outdoor space to be re-provided as communal amenity space.
69. The Local Planning Authority takes the view that the failure to deliver 78.0 square metres of new communal amenity space (beyond that already provided on site for existing residents) can be satisfactorily compensated for by upgrading the amenity areas immediately to the southeast of each block (both of which fall within the red line of the application site). These communal outdoor spaces have a combined area of 632.0 square metres. At present, they are grassed and accommodate some mature trees, but are not particularly welcoming to encourage their use. A comprehensive scheme of hard and soft landscaping for both parks, to include new planting and the installation of outdoor furniture, would improve the quality of these areas and encourage better use of these spaces by all existing and future residents. Along with

the landscaping improvements associated with the Maydew House and Bede Centre applications, outdoor amenity space provision across the three sites would be generous. The Maydew House application proposes a new pedestrian access into Southwark Park which would reduce the walk distance for residents in Damory House.

70. To achieve this aim, an obligation in the unilateral undertaking is recommended requiring landscaping improvements.

Young people's play space

71. Policy 3.6 of the London Plan requires new residential development with an estimated occupancy of 10 or more children to make provision for play and informal recreation based on the expected child population generated by the scheme. This need is reinforced in the council's S106 Planning Obligations and CIL SPD. Any shortfall in child play space will be charged at £151 per square metre.
72. The total children's play space requirement for the development is 310 square metres, calculated using the Mayor of London's play space calculator. The estimates for the calculator produced the following results for the proportion of age groups this development will bring:

	Number (percentage) of children	Area of play space required
Under 5	18 (58%)	180 square metres
5 to 11	9 (28%)	87 square metres
Over 11	4 (14%)	44 square metres
Total	31 (100%)	311 square metres

Play space for under-5s

73. No under-5s play space facilities are proposed within the boundaries of the application site.
74. However, as part of the associated application at the Bede Centre (ref: 17/AP/2908), it is proposed to create a courtyard between Thaxted Court and the proposed new-build development. The courtyard would deliver 530 square metres of new public realm, of which 410 square metres would be dedicated playspace for under 5s. In order that the new-build development on the site of the Bede Centre fully satisfies its under-5s playspace obligation, 310 square metres of the courtyard has been allocated to the Bede Centre development. The remaining 100 square metres will be attributed to under-5s playspace for Thaxted Court.
75. As part of the associated application at Maydew House (17/AP/0527) under-5s playspace facilities are proposed on the forecourt. These facilities would be within 100 metres of and easily accessible from Damory House. The facilities' location on the forecourt would, however, make them readily available for use by children residing in the surrounding Abbeyfield Estate and possibly the wider Rotherhithe area. For this reason, it would not be appropriate to use these playspace facilities to off-set the outstanding 80 square metre under-5s playspace shortfall for Damory House.
76. As such, when 17/AP/0527, 17/AP/2562 and 17/AP/2908 are assessed as a single development proposal, the requirement to deliver 180 square metres of playspace for

children under 5 years of age residing in Damory House and Thaxted Court would be partly achieved.

77. The shortfall of 80 square metres will be compensated for through a financial contribution. The sum will be £12,080.00 (calculated on the basis of 80 square metres x £151).

Play space for 5-11s

78. For a development of this size, table 4.7 of the *Shaping Neighbourhoods: Play and Informal Recreation SPG* requires on-site local playable space to be provided for children aged up to 11 years old. The application is unable to deliver this playspace due to the constraints of the site.
79. Where on-site local playspace for 5-11s cannot be provided, an off-site contribution may be deemed acceptable as long as there are existing facilities for 5-11s within 400 metres. Such facilities would be available at the adjacent Southwark Park.
80. The applicant will be liable for the sum of £13,137.00 (calculated on the basis of 87 square metres x £151) to offset this deficit.

Play space for over-11s

81. Facilities for children aged 12 or over can be provided off-site within 800 metres, as set out in the *Shaping Neighbourhoods: Play and Informal Recreation SPG*. It should also be noted that facilities for over-11s exist at the nearby Southwark Park.
82. The applicant will be liable for the sum of £6,644.00 (calculated on the basis of 44 square metres x £151) to offset the failure to provide on-site play facilities for over-11s.

Impact on the amenity of adjoining occupiers, excluding daylight and sunlight

Outlook and sense of enclosure

83. Provided below is an assessment of the impact the development will have on the properties most sensitive to increased sense of enclosure.

19-30 Frankland Close

84. Nos. 19-30 Frankland Close is a terrace of 12 flats located to the northwest of and oriented parallel to Damory House. The flats incorporate rear-facing windows which look towards the northwest elevation of Damory House.
85. The separation distance of over 20 metres would be adequate to ensure that the dwellings continue to experience an acceptable quality of outlook to the rear. It should also be noted that the dwellings at nos. 19-30 Frankland Close are dual aspect, benefiting from open views across the public green space directly to the north. Furthermore, the rear gardens of these properties are well-planted with mature trees which would obscure a large amount of the proposed development.

31 and 31A Frankland Close

86. Nos. 31 and 31A Frankland Close are located to the north of and oriented perpendicular to Damory House. Both are dual aspect dwellings, with no. 31A being the most sensitive due to being the closest to Damory House.

87. All but one of the habitable room windows at no. 31A Frankland Close are in the rear elevation. It is not possible to see Damory House within the outlook from these windows. The one other habitable room window at no. 31A Frankland Close has a southwestern outlook (obliquely towards Damory House) but serves one of the property's three bedrooms and in this regard is not especially sensitive to some increased sense of enclose. As such, it is considered that an acceptable quality of outlook would be preserved for nos. 31 and 31A Frankland Close.

1-12 Benwick Close

88. This two-storey terrace comprises a total of twelve flats, each of which benefits from outward views to the northeast and to the southwest. The separation distance between the sensitive windows at these properties and the southwest elevation of Damory House is approximately 18 metres at the closest point. From these dwellings, the two additional storeys would be viewed from the side (i.e. towards the building's short profile) meaning this development would exhibit a relatively contained width within this viewframe. As such, the development would not have a significant impact on the outlook from these properties.

1-4 Dilston Grove

89. These four terraced properties lie to the southeast of Thaxted Court. At their closest point, the properties and Thaxted Court are separated by approximately 20 metres. All four dwellings are dual aspect and separated from the development by the pocket park. Moreover, most of the north-facing windows offer oblique rather than direct views towards Thaxted Court. On balance, while the proposed extra storeys to Thaxted Court would have some effect on the outlook from these four nearby residents, a good sense of openness would remain.

42-52 Abbeyfield Road

90. Nos. 42-52 Abbeyfield Road are oriented perpendicular to Thaxted Court, meaning that outward views from this row of properties are in the main part towards the short profile (i.e. the southwest elevation) of Thaxted Court. The side-on direction from which the two additional storeys would be viewed means this development would exhibit a relatively contained width as seen from nos. 42 and 44 Abbeyfield Road, guarding against any unduly diminished outlook.

Overlooking

91. All twenty-eight proposed dwellings would replicate the existing pattern of overlooking and none of the elevations containing clear-glazed windows would be any closer than 20 metres to the nearest surrounding existing dwellings. For these reasons, none of the existing dwellings within the vicinity of the site would be subject to undue increased overlooking.

Noise disturbance

92. The proposed development would introduce new dwellings within and on top of the two existing buildings which are presently in exclusively residential use. Noise generated by typical domestic activities such as cooking and watching television is to be expected in a predominantly residential location such as this. As such, it is considered that existing nearby occupiers would not be subject to undue noise disturbance as a result of the inhabitation of the proposed dwellings.

Daylight impacts

93. A daylight and sunlight report has been submitted which assesses the scheme based on the Building Research Establishments (BRE) guidelines on daylight and sunlight.
94. The BRE sets out the rationale for testing the daylight impacts of new development through various tests. The first is the Vertical Sky Component test (VSC), which is the most readily adopted. This test considers the potential for daylight by calculating the angle of vertical sky at the centre of each of the windows serving the residential buildings which look towards the site. The target figure for VSC recommended by the BRE is 27% which is considered to be a good level of daylight and the level recommended for habitable rooms with windows on principal elevations. The BRE have determined that the daylight can be reduced by about 20% of the original value before the loss is noticeable.
95. The second method is the No Sky Line (NSL) or Daylight Distribution (DD) method which assesses the proportion of the room where the sky is visible, and plots the change in the No Sky Line between the existing and proposed situation. It advises that if there is a reduction of more than 20% in the area of sky visibility, daylight may be affected.
96. Another method of calculation is the Average Daylight Factor (ADF) which is a more detailed assessment and considers the amount of sky visibility on the vertical face of a window, but also the window size, room size and room use. The recommendations for ADF in dwellings are 2 per cent for kitchens, 1.5 per cent for living rooms and 1 per cent for bedrooms. The BRE recommends that whilst ADF is an appropriate measure for new buildings and master planned areas, VSC/NSL should be principally used to assess impact on existing buildings.
97. Important to note is that the BRE guidelines should be applied flexibly particularly in dense urban locations where such standards can be difficult to achieve.
98. Assessed as part of the daylight and sunlight report due to their risk of daylight loss as a result of the works are:
 - 31 and 31A Frankland Close (located to the northwest of Damory House, these two dwellings terminate the terrace numbering 31A to 42 Frankland Close).
 - 19-30 Frankland Close (a row of properties immediately to the northwest of Damory House);
 - 1-12 Benwick Close (a terrace of properties lying to the southwest of Damory House);
 - 17-20 Benwick Close (four properties lining the curving northwestern side of Benwick Close);
 - 1 -4 Dilston Grove (the properties lining the southeastern side of Dilston Grove);
 - 42 to 54 (evens) Abbeyfield Road (the properties lining the stretch of Abbeyfield Road lying to the southwest of Thaxted Court), and;
 - 1 Pedworth Gardens (the dwellinghouse at the far southeastern end of Abbeyfield Road).
99. The VSC results of the daylight and sunlight report are summarised in the table below:

Property	VSC reduction (as a percentage of the baseline VSC value)			
	Up to 20%	Up to 30% (minor adverse impact)	Up to 40% (moderate adverse impact)	40% or over (substantial adverse impact)
Properties adjacent to Damory House				
19-30 Frankland Close	1	13	2	8
31&31A Frankland Close	4	0	0	0
1-12 Benwick Close	16	2	0	0
17-20 Benwick Close	12	0	0	0
Properties adjacent to Thaxted Court				
1-4 Dilston Grove	5	7	1	0
42-54 Abbeyfield Road	17	0	0	0
1 Pedworth Gardens	2	0	0	0

Note: omitted from the table above are the VSC levels for windows which serve non-habitable rooms

Note: the figures given in the table above use the average VSC where two or more windows serve the same room

100. The NSL results of the daylight and sunlight report are summarised in the table below:

Property	NSL reduction (as a percentage of the baseline NSL value)			
	Up to 20%	Up to 30% (minor adverse impact)	Up to 40% (moderate adverse impact)	40% or over (substantial adverse impact)
Properties adjacent to Damory House				
19-30 Frankland Close	2	0	4	18
31&31A Frankland Close	4	0	0	0
1-12 Benwick Close	17	1	0	0
17-20 Benwick Close	9	3	0	0
Properties adjacent to Thaxted Court				
1-4 Dilston Grove	8	3	2	0
42-54 Abbeyfield Road	17	0	0	0
1 Pedworth Gardens	2	0	0	0

Note: omitted from the table above are the NSL levels for windows which serve non-habitable rooms

Assessment of daylight impacts

19-30 Frankland Close

101. Nos. 19-30 Frankland Close would experience the greatest change in VSC. On the rear (southeast) elevation of this terrace, 26 glazed panes (serving 22 rooms) would experience a loss of VSC in excess of 20% with losses in the range of 22% to 50%. All 28 glazed panes previously had a VSC level below 27%.
102. There are eight glazed panes (eight rooms) that would experience a loss of more than 40% VSC. Of these eight rooms, five are bedrooms, which the BRE considers to be less sensitive to reductions in daylight. Of the three that are living rooms, it should be noted that the VSC levels of these affected windows were already low and as such any further reduction generates a significant percentage loss. For example, the worst affected living room window has an existing VSC level of 15.02% and the proposed VSC level would be 7.44%. This means the reduction in VSC is 50% even though the reduction in the VSC level itself is not significant.
103. The 26 windows which would experience a loss of VSC serve 22 rooms. All 22 of these rooms would see a sky visibility reduction in excess of 20% with losses in the range of 32% to 66%.
104. To further explore the potential VSC and NSL alterations within nos. 19-30 Frankland Close, the *Daylight, Sunlight and Overshadowing Report* provides a detailed radiance based assessment to compare the daylight factor. While ADF is less often used to assess daylight within existing dwellings because it is not always possible to determine with certainty factors such as reflectances of interior surfaces, the assessment provided within the *Daylight, Sunlight and Overshadowing Report* adopts the criteria set out in Appendix C of the BRE guidelines, which account to some degree for variances of transmittance, maintenance and reflectance. It also factors-in the CIE standard overcast sky to better reflect the range of daylight levels experienced across the year.
105. The results illustrate that most of the rooms within nos. 19-30 Frankland Close —and, most importantly, all of the living rooms— would maintain an ADF of between 1.5% and 2% in the half of the room closest to the window. The results also reveal that the degree of change between these rooms' existing ADF and proposed ADF would not be marked. While the ADF results indicate compliance with the BRE guidance would be achieved, only some weight can be given to this analysis for the reasons set out in the preceding paragraph.
106. In summary, while it is recognised that there would be a substantial adverse impact to eight habitable room windows within this nearby terrace, the majority serve bedrooms, a use which is recognised as being generally less sensitive to reductions in daylight. Although three of the windows serve living rooms, having regard to the VSC levels these windows currently receive, it is more appropriate in this instance to consider the existing and proposed VSCs as absolute figures rather than one as a percentage of the other. When considered in this way, the resultant VSC would not be considerably less than at present. Moreover, the level of daylight experienced by the occupiers would not be untypical of a central London location such as this. Therefore, it is considered that the occupiers of these properties would not experience an undue loss of amenity.

All other nearby properties

107. With the exception of a few relatively minor deviations, the results of the daylight and sunlight assessment demonstrate that the windows and rooms assessed in nos. 31

and 31 Frankland Close, nos. 1-12 Benwick Close, nos. 17-20 Benwick Close, nos. 42-54 (evens) Abbeyfield Road and no. 1 Pedworth Gardens would be fully compliant with the BRE Guidelines following construction of the proposed development.

108. At nos. 1-4 Dilston Grove, the window to experience a 'moderate adverse' reduction in VSC would pass the NSL test. The window also serves a bedroom, which the BRE recognises as not being especially sensitive to daylight losses. As such, it is considered that the proposed development would not reduce the functionality or amenity levels of this room to a detrimental level.

Sunlight impacts

109. All of the windows within 90 degrees of due south have been assessed with regards to impact on sunlight. The BRE guide states that if a window can receive 25 per cent of summer sunlight, including at least 5% of Annual Probable Sunlight Hours between 21 September and 21 March, then the room would be adequately sunlit. A reduction in APSH of more than 20% is considered to be an adverse impact.
110. Assessed as part of the Report due to their risk of sunlight loss as a result of the works at Damory House are the south-facing windows at the following addresses:
- The existing flats within Damory House;
 - 1-2, 5-6, 9-10 Benwick Close (properties within a terrace which lies to the southwest of Damory House);
 - 17-20 Benwick Close (four properties lining the curving northwestern side of Benwick Close);
 - 19-30 Frankland Close (a row of properties immediately to the northwest of Damory House), and;
 - 31 and 31A Frankland Close (located to the northwest of Damory House, these two dwellings terminate the terrace numbering 31A to 42 Frankland Close).
111. Only at nos. 19-30 Frankland Close would a reduction in APSH exceeding the BRE guidance be experienced.
112. Taking account of instances where two windows serve a single room, a total of eleven rooms (equating to 46% of all rooms) would experience: a reduction of APSH to less than 25%, or; a reduction of WAPSH to less than 5%, or; both a reduction of APSH to less than 25% and a reduction of WAPSH to less than 5%.
113. In each case there would be a reduction in APSH of more than 20%. Wherever this occurs, the BRE guidance requires the annual loss of sunlight to be assessed, advising that if the overall annual loss is greater than 4% of APSH, the room may appear colder and less cheerful and pleasant. There would not be a loss greater than 4% of APSH at any of the properties within this terrace, meaning the BRE guidance would be met and no rooms would experience undue losses of sunlight.

Overshadowing

114. In terms of overshadowing the BRE guidance recommends that outdoor amenity areas be adequately sunlit throughout the year, specifying that at least 50% of a garden or amenity area should receive at least 2 hours of sunlight on 21 March.
115. The properties with outdoor spaces sensitive to overshadowing are nos. 19-30, 31 and 31A Frankland Close. The application document entitled *Daylight, Sunlight and Overshadowing Report* includes overshadowing analysis of these nearby gardens. The results show that four of the seven open spaces would comply with the BRE Guidelines for solar access. Of the three which do not comply, the proportion of the

garden which would receive at least 2 hours of sunlight would be 41%, 47% and 48% respectively. In the latter two instances, the non-compliance would be only very slightly below the lower threshold of the BRE guidelines. While it is undesirable for the solar access to fall to 41% in one of the gardens, the additional area to be overshadowed is, purely in terms of square meterage, not markedly greater than at present. Furthermore, some acknowledgement must be given that in urban contexts such as the subject site, the BRE guidelines should be applied flexibly.

116. For the reasons set out above, the proposed development would not unacceptably overshadow outdoor spaces at nearby properties.

Amenity impacts arising from the construction process

117. Local residents have raised concerns that the construction and refurbishment phases will impact on their amenity. Foreseen impacts including increased noise, dust and dirt as well as safety hazards such as falling objects.
118. With regard to noise, it is inevitable that there will be some disruption and disturbance during the works. It is also recognised that works of the kind proposed are likely to raise level of dust and particulate matter unless there are suitable control measures. These impacts would, however, be for a temporary period and must be balanced with the long-term benefit brought by the refurbishment as well as the provision of additional homes in the borough.
119. In the interests of minimising impacts from noise and dust, it is recommended that a Construction Management Plan be submitted and approved prior to commencement. This will also set out how working practices will uphold health and safety for local residents, ensuring the site is kept clean and well-maintained. A representation from a member of the public raised concerns about the lack of a predicted time frame for the proposed works. However, there is nothing to suggest that the works would take an overly long period of time to carry out, particularly in light not only of the detailed nature of the Phasing Strategy supplied as part of the application but also the expeditious manner in which other Direct Delivery programmes have been delivered in the borough.
120. The applicant has confirmed that decanting existing residents during the construction phase is not possible but has submitted a construction programme for minimising resident disturbance. This outlines a number of measures for limiting the impact and supporting residents through the construction period, including:
- holding an initial residents meeting at which project impacts will be discussed;
 - conducting a resident profiling exercise (identifying vulnerabilities, disabilities, medical conditions, pets, working hours etc.) from which work activities can be tailored to have the least impact on residents;
 - ensuring the Contractor's Resident Liaison officer—who will maintain continual communication with the Site Manager—will be contactable throughout the construction process;
 - providing a residents' refuge within the Abbeyfield Estate, where residents can sit in peace with tea and coffee making facilities;
 - providing residents with a 24-hour 'call out' telephone number, and;
 - agreeing on hours between which noisy activities will take place.
121. Carrying out the development in accordance with the construction programme will be a condition of the planning permission.
122. On account of the above, it is considered that robust safeguards are in place to minimise the impact on residents' amenity during the construction process.

Design quality

Height, mass and relationship to neighbouring buildings

123. Within the context of close-by tall buildings on the estate and the relatively spacious surroundings of the blocks, an additional two storeys on each is not excessive. The height, scale and massing of the two blocks as proposed would create a fitting step-down between Maydew House and the lower-rise housing on the northern and southern edges of the Estate. As such, the massing is appropriate to the local context and would not dominate the surroundings.
124. Thaxted Court will form an attractive courtyard complex with the proposed Abbeyfield House, contributing to the provision a varied mix of private, semi-private and public spaces across the regenerated Estate.

Detailed design

125. The overall architectural form of projecting bays and balconies on alternate floors sympathetically replicates the form and elevational character of the original architecture. The use of brick elements will give a feeling of solidity and weight to the building. The use of a lighter contrasting cladding material will help emphasise the existing and proposed geometry of the buildings. In the interests of ensuring a suitably high-quality finish, samples of the Marley Eternit product and the dark brown brick currently proposed should be submitted for approval along with a specification for the fixing and joining of the panels.

Creation of an enclosed communal circulation core at each block

126. Damory House and Thaxted Court are each articulated as two sub-blocks connected on the upper levels by the deck walkways. This creates a publicly-accessible through-route between the sub-blocks at Damory House (historically, there was also a through-route at Thaxted Court but this has since been blocked-up). This application proposes to create ground floor lobbies at both Damory House and Thaxted Court, extinguishing the existing through-route at Damory Court in so doing.
127. Enclosing the through-route in this way will create controlled-access entrance points for the residents of Damory House and prevent the vertical circulation core from being publicly-accessible. This is welcomed in the interests of reducing opportunities for crime and anti-social behaviour. The land itself is in the ownership of the applicant and is not currently well-traversed, so its extinguishment would not have a harmful effect on the pedestrian permeability of the estate.
128. The proposed facade system, comprising a mixture of Reglit glazing and sand-coloured cladding, would tie-in with the proposed finishing materials on the host building. As such, a good quality of design would be achieved.

Secured by design

129. Saved Policy 3.14 'Designing out Crime', requires that development in both the private and public realm should be designed to improve community safety and reduce the risk of crime.
130. Metropolitan Police notes that the area currently suffers from incidents of burglary, criminal damage, motor vehicle crime and general anti-social behaviour and so security is fundamental to the success of the development. As such, the Police strongly encourage the applicant to engage with their design out crime officer to

ensure the scheme complies with the security requirements of secured by design. The adoption of these standards will reduce the opportunity for crime, thereby creating a safer, more sustainable environment. A condition will, therefore, be attached to ensure this is achieved.

Impact on heritage assets

131. Damory House and Thaxted Court adjoin the historic Southwark Park (a grade II registered park). Thaxted Court is also situated in close proximity to the grade II listed former Clare College Mission Church on Dilston Grove. The setting of the park has changed over the years, not least by the construction of the Abbeyfield Estate.
132. In considering the impact of a proposal on a heritage asset such as a listed building, the local planning authority must have regard to planning legislation in its determination of a planning application. Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires that, when considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority shall have special regard to the desirability of preserving the building or its setting, or any features of special architectural or historic interest which it possesses. In this context, "preserving", means doing no harm. The council's conservation policies echo the requirements of the NPPF and require all development to conserve or enhance the setting of heritage assets.
133. The National Planning Policy Framework states at paragraph 131 that in determining a planning application, the local planning authority should take account of:
 - the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
 - the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
 - the desirability of new development making a positive contribution to local character and distinctiveness.
134. Paragraph 132 of the NPPF states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. Similarly Saved Policy 3.15 "Conservation of the historic environment" requires development to preserve or enhance the special interest or historic character or appearance of buildings and areas of historical or architectural significance, and this is repeated in Strategic Policy 12. Saved Policy 3.18 "Setting of listed buildings, conservation areas and world heritage sites" states that permission will not be granted for developments that would not preserve or enhance the setting of a listed building or a conservation area.
135. Damory House and Thaxted Court are already visible from Southwark Park but, in the context of the point-tower of Maydew House, both figure much less assertively in the setting of the park. The more historically significant core of the Park is to the north of this location and is centred round the bandstand. Being at the edge of the former cricket ground, the area of the Park immediately adjacent to Damory House and Thaxted Court is of less significance.
136. As such, an additional two storeys on two of the blocks within the estate will not cause any additional harm to the setting of the Park. The finishing materials and architectural form of the additional storeys would achieve a high quality of design appropriate in this sensitive context.
137. Thaxted Court forms part of the setting of the former Clare College Mission Church on Dilston Grove, which is grade II listed. Being located considerably further away to the

northwest, Damory House does not form part of this listed building's setting. When viewed from Southwark Park, the listed building is dominated by the surrounding mature trees within the park. When in leaf, these soften the relationship between the former Mission Church and Thaxted Court. Presently, there is a clear stepping-up in height from the former Mission Church to Thaxted Court, and from Thaxted Court to Maydew House. Given that, firstly, the proposed additional storeys would not considerably alter this change in scale, and secondly, the trees between Thaxted Court and the former Mission Church are to be retained, it is considered that the former Mission church would not be dominated by the development and the building's setting would be preserved.

Trees, landscaping and biodiversity

Trees

138. It is proposed to retain all nine existing trees within the application site, which is welcomed. A Tree Survey, Arboricultural Impact Assessment and Arboricultural Method Statement have been submitted to demonstrate how the trees will be protected during construction works.
139. A condition relating to tree protection, which will be imposed in the event that planning permission is granted.

Bat boxes

140. Given the proximity of Damory House and Thaxted Court to Southwark Park, the Council's Ecologist has recommended the installation of four nest boxes and three bat tubes on the 'build on top' additional storeys, to be positioned close to the roof tops and facing the park. The applicant has agreed that it is feasible to accommodate the boxes and tubes within the proposed design. A condition will be imposed to ensure this requirement is realised

Green roofs

141. The Council's Ecologist requires the development to provide ecological enhancement due to the location of the site adjacent to Southwark Park. To achieve this, it has been agreed that a sedum or lightweight green roof should be incorporated into the 'build on top' elements at both Damory House and Thaxted Court. The applicant has agreed that it is feasible to incorporate a meaningful green roof on the roof of both buildings. A condition will be imposed to ensure this requirement is met.

Landscaping

142. Although a landscape masterplan for the Abbeyfield Estate was submitted by the applicant as part of 17/AP/4004, this is a draft document for reference only; it does not form part of the proposed development, but gives an indication as to the likely nature of the forthcoming proposals on this site. Given, therefore, that the application is not accompanied by any formal landscaping proposals, the Urban Forester has requested that landscaping details be submitted for the Council's approval before any above grade works begin.

Transport and highways matters, including cycle storage

143. Saved Policy 5.2 'Transport Impacts' states that planning permission will be granted for development unless there is an adverse impact on the transport network. Saved Policy 5.3 'Walking and Cycling' requires that provision is made for pedestrians and cyclists within the development and Saved Policies 5.6 and 5.7 relate to car parking.

Strategic Policy 2 'Sustainable Transport' of the Core Strategy re-asserts the commitment to encouraging walking, cycling and use of public transport rather than travel by car and requiring transport assessments with applications to show that schemes minimise their impacts, minimise car parking and maximise cycle parking to provide as many sustainable transport options as possible. The main issues to consider in this case are considered to be in relation to car parking, in particular provision for disabled parking, cycle parking, access and servicing. These matters are addressed below

Site context

144. Abbeyfield Road running through the estate is a local residential street with traffic calming measures. Frankland Close (a partly private and partly adopted road not within a Controlled Parking Zone) and Dilston Grove (an adopted road within Controlled Parking Zone N) both fall within the boundaries of the application site. The site is connected to the local road network by Aspinden Road and Frankland Close.
145. Southwark Park provides local off-road cycle routes located within the park and provides linkage to local cycle routes to the east of the park, including National Cycle Network 4. The site is served by a variety of public transport services including bus routes, Overground and Underground rail networks.
146. Damory House and its associated land has a PTAL rating of 3 while Thaxted Court and its associated land has a PTAL rating of 4. This indicates a 'good' level of accessibility to public transport.

Impact on local highway network during construction

147. In the interests of ensuring the impact of construction vehicles on the local highway network is minimised, the Council's Highways department has asked that a construction management plan be submitted and approved prior to implementation of the development. This will be secured by condition.

Impact on local highway network post-construction

148. The submitted Transport Statement, which includes predicted trip rates for the residential development, has carried out analysis to a satisfactory level of depth.
149. The zero increase in vehicle movements associated with the intensification of the site demonstrates that there would be no material impact on the operation of the local highway network. It is acceptable, on this basis, for the application to propose no highway improvements in the vicinity of the site. Highway improvements are, in any case, to be secured through the associated application at Abbeyfield House (presently the Bede Centre), the reference number for which is 17/AP/2908

Impact on public transport network post-construction

150. As the Transport Statement shows, the proposed twenty-eight dwellings would generate up to an additional fifteen London Underground movements, five additional trips on local London Bus services and two rail movements in the combined weekday morning and evening peak hours. The level of impact on the transport infrastructure is considered to be negligible.

Car parking for future residents

151. The proposed development would be car free. Given the good public transport accessibility of the site, the 'car free' nature of the scheme is supported by officers and

Transport for London. A condition would be required on any grant of permission to ensure that future residents of the additional twenty-eight flats are, with the exception of blue badge holders, exempt from obtaining on-street parking permits. With this in place, the additional new units would not add strain to local on-street car parking.

152. Saved Policy 5.7 'Parking Standards for Disabled People and the Mobility Impaired' of the Southwark Plan states that developments must provide adequate parking for disabled people and the mobility impaired. This policy is expanded in Section 9.1.2 of Southwark Council's Sustainable Transport SPD which notes the requirement for one disabled car parking space for each disabled flat or house. The scheme includes no wheelchair accessible units and as such there is a requirement to provide additional wheelchair accessible parking spaces. As part of the highway works to the hammer head of Frankland Close, the one existing disabled parking space would be re-provided, which is acceptable.

Car parking for existing residents

153. Consultation responses raised concerns that the proposal would reduce the number of parking bays available to residents not holding blue badges, the knock-on effect of which would be an exacerbation of local parking pressure.
154. This planning application proposes no altered car parking provision at Thaxted Court. The associated application at the Bede Centre (ref: 17/AP/2908) will, in its amended form, deliver wheelchair parking adequate to meet the needs of the existing occupiers of Maydew House and Thaxted Court, as well as the future occupiers of the proposed Abbeyfield House who require wheelchair parking. No new non-wheelchair parking spaces are proposed, thereby achieving car-free development without compromising existing residents' car parking access.
155. The developments proposed by 17/AP/2562 include highway works to the hammerhead of Frankland Close, which would see the four existing car parking spaces (one of which is a wheelchair parking space) replaced with eight new car parking spaces including one re-provided wheelchair parking space. These car parking changes must be understood within the context of the associated application at Maydew House (ref: 17/AP/0527) which proposes to remove the five existing spaces in the parking court adjacent to Damory House to create an expansive new public realm. As such, the proposals would result in a net loss of one non-wheelchair parking bay in the vicinity of Damory House. This is not considered to be a significant reduction. Furthermore, given that a CPZ is in place in this part of the site, there is no risk of increased parking strain being experienced on Abbeyfield Road, Aspinden Road or Benwick Close.
156. A car parking management plan will be sought as part of the Unilateral Undertaking. This will ensure that there is a strategy in place to manage and allocate the off-street parking bays without prejudice to the existing residents of the Estate.

Car club

157. The nearest car club locations are on Lynton Road, approximately 800 metres from the site. There are further car club bays located about 1 kilometre away. The applicant would be required to fund three years car club membership for the first occupant of each residential unit by a proposed planning obligation.

Cycle storage

158. There is currently no cycle parking provision in Damory House or Thaxted Court.

159. At Damory House, 66 secure cycle parking spaces for the residential flats are proposed within a dedicated bike store located at ground floor level. Each of the 35 flats within in the refurbished part of the building is to be allocated one of these cycle spaces. The cycle storage would be two-tiered.
160. At Thaxted Court, 54 secure cycle parking spaces for the residential flats are proposed within a dedicated bike store located at ground floor level. Each of the 24 flats within in the refurbished part of the building is to be allocated one of these cycle spaces. The cycle storage would be two-tiered
161. The proposed number of space meets the minimum standards for all proposed dwellings. Although single-tier storage is preferred, given the site constraints and the very good offer of one new cycle space for all existing units, two-tier storage is considered acceptable in this instance.
162. A further two Sheffield stands will be provided within the entrance lobby of each building for visitors, thereby achieving compliance with the requirements of the London Plan.
163. Officers are satisfied with the level of long-stay and visitor cycle parking provision. The detailed design (including dimensions) of the cycle stores is however required and this can be secured by condition. Transport for London has also requested that the connections to local cycling routes should be considered. This matter is dealt with in the officer reports for the associated Bede Centre applications (17/AP/2908) as the proposed units at Damory House and Thaxted Court, of which there are 28 in total, are not sufficient in number to require such off-site works.
164. Transport for London's consultation response requested that the ground floor layout of each block be redesigned so that residents would be able to access the cycle stores not just from the exterior, but also from the internal lobby. To achieve this aim, the location of the cycle store and refuse store would need to be switched at both Damory House and Thaxted Court. Both housing blocks are physically constrained such that to rearrange the cycle stores as suggested by TfL would make much less efficient use of the relatively limited available space at ground floor level, the consequence of which would almost certainly be a failure to deliver adequately-sized refuse and cycle storage facilities. As such, while TfL's preference for directly accessible from the lobbies of the two housing blocks as well as from the exterior, the Local Planning Authority considers it acceptable for the cycle stores to be externally-accessible only.

Refuse collection and servicing

165. As part of the redevelopment of the wider Abbeyfield Estate, the existing vehicular access and parking court at the front (south) of Damory House via Aspinden Road will be removed to make way for a new plaza to the front of the refurbished Maydew House. As such, all servicing (deliveries and refuse collection) for Damory House would be undertaken from Frankland Close.
166. Vehicle tracking diagrams have been submitted to demonstrate that a refuse vehicle for waste skip and Eurobin collection can manoeuvre at the hammerhead of Frankland Close to enter and exit the vicinity in forward gear. The Council's Highways department has been consulted on the proposed use of Frankland Close for servicing and consider the risk to pedestrian and cyclist safety to be minimal.
167. Transport for London has requested that a final Delivery and Servicing Plan is secured to ensure there is a strategy in place for how the three sites will be managed. Transport for London suggested that parcels and large deliveries to occupiers of the flats at Damory House and Thaxted Court could be received by the concierge service

to be based at Maydew House. The Delivery and Servicing Plan will be secured through the Unilateral Undertaking.

Refuse storage

168. Calculated in line with the instructions of the Council's 'Waste Management Guidance Notes for Residential Developments' (February 2014, the application would be expected to provide facilities within for the storage of 9800 litres of recycling and residual waste at Damory House for existing and proposed residents, and 7376 litres of recycling and residual waste at Thaxted Court.
169. The plans show that the proposed refuse storage space would be adequate in size to cater for this, and therefore the proposal is compliant.
170. A Waste Strategy Statement has been submitted outlining that the concierge service at the redeveloped Maydew House would arrange for the refuse from the existing chute bin to be transferred to the proposed new bin store on refuse collection days. By transferring bins to this location would ensure all refuse is within the recommended 10 metre pick-up distance for the collection truck, which would service the building from the hammerhead of Frankland Close. This is considered to be a satisfactory arrangement. A condition will be imposed to ensure the refuse management strategy outlined in the Waste Strategy Statement is adhered to.

Environmental matters

Flood risk and flood resilience

171. The Environment Agency's flood mapping identifies the site as being located within Flood Zone 3, indicating a high probability of flooding. Accordingly, a Flood Risk Assessment (FRA) has been submitted which details the proposed flood management measures. The Sequential and Exception Tests have been satisfied for this development.
172. A Flood Risk Assessment was provided in support of the application, which the Environment Agency has considered and raised no objection to. The Environment Agency recommended that a Flood Evacuation Plan be implemented, and so this will be sought by condition. The Council's Flood Risk Management team reflected the views of the Environment Agency.

Sustainable urban drainage

173. The Council's Flood and Drainage Team and the Environment Agency have raised no objections to the proposal but the recommendations set out in the submitted FRA, including a Flood Management Plan (detailing safe access and egress, warning and evacuation procedures), should be adhered to and secured by conditions.
174. The preference of the Flood and Drainage Team is to see a drainage strategy pre-approval but it has been accepted in this instance that, not until landscaping and green roofs matters have been finalised, can a full surface water drainage strategy be resolved. As such, the Team has agreed that a drainage strategy be secured by condition.

Land contamination

175. While the majority of the development would require limited ground works, the infilling of the existing undercroft presents potential land contamination issues. The Environment Protection Team has recommended a condition requiring a Phase 1

Land Contamination Assessment be carried out, which is included in the recommendation.

Archaeology

176. The site is not in an archaeological priority zone and given the limited groundworks involved to this 1960s development, the proposal would not affect any archaeological remains.

Sustainability

Energy

177. Policy 5.1 'Climate Change Mitigation' of The London Plan requires that major development schemes should provide an assessment of their energy demands and demonstrate how they have taken steps to apply the Mayor's energy hierarchy. Policies 5.2 'Minimising Carbon Dioxide Emissions' and 5.7 'Renewable Energy' of The London Plan require a demonstration that the scheme has applied the Mayor's energy hierarchy and that a reduction in carbon dioxide emissions targeting at least 20% can be gained from on-site renewable energy generation. Saved Policy 3.4 'Energy Efficiency' of the Southwark Plan seeks energy efficient development and Saved Policy 3.9 'Water' advises that all development should incorporate measures to reduce the demand for water supply. Core Strategy Strategic Policy 13 'High Environmental Standards' applies a similar energy hierarchy to the London Plan and requires the highest environmental standards.

The reports submitted demonstrate that the refurbishment and extension works would follow the London Plan's energy hierarchy, which is as follows:

- Be lean - use less energy;
- Be clean - supply energy efficiently;
- Be green - use renewable energy.

Existing dwellings

178. The refurbishment works, whereby the existing walls of Damory House and Thaxted Court would be re-clad, would improve the energy efficiency of the existing units. Both Damory House and Thaxted Court would be connected to the South East London Combined Heat and Power district heating network. This would effect a 37% reduction in carbon emissions for the refurbished units.

Proposed dwellings

179. The new dwellings would use energy efficient measures such as high-performance insulation, an enhanced air permeability rate and energy efficient lighting. They would also be connected to the South East London Combined Heat and Power district heating network. This would achieve an improvement of 35% over the Building Regulations Part L 2013 Target Emissions Rate (TER). The development has followed the energy hierarchy and all feasible measures are incorporated to achieve the targets. A contribution would be required for the new units in order to achieve the zero carbon requirements by offsetting the 27.399 tonnes per year predicted emissions. The contribution of £49,319 for Damory House and Thaxted Court would be secured in the unilateral undertaking.
180. The GLA has sought further information on overheating, worksheet calculations, the site heat network, district heating, and photovoltaic installation, before the proposals can be considered acceptable and the carbon dioxide savings verified. As such, the offset figure of £49,319 is subject to change. This matter can be resolved, and

changes to the Unilateral Undertaking made accordingly, subsequent to the application being considered by Members at Committee and prior to the GLA's Stage 2 response.

BREEAM

181. The refurbishment works would be required to achieve a "very good" rating. Although the submission does not include a BREEAM pre-assessment, this is not a validation requirement and the Local Planning Authority has no reason to doubt that "very good" can be achieved.
182. Achieving this in the completed project would be a condition requirement to ensure the significant works to the building take sufficient consideration of sustainability.

Air quality

183. London Plan policy 7.14 states that development proposals should minimise exposure to poor air quality, being at least 'air quality neutral'. This is particularly the case where developments are located within designated Air Quality Management Areas (AQMA) as is the case with this proposal. Southwark Plan policy 3.6 advises that planning permission will not be granted where a development leads to a reduction in air quality.
184. The Air Quality Assessment as originally submitted only assessed the impacts during construction. At the request of the Environmental Protection Team, an addendum was supplied to cover the operational phase impacts. The residential nature of the development and surrounding area makes it sensitive and so receptors were chosen at various locations to assess the potential impacts
185. The development would achieve air quality neutrality and therefore would not impact nearby sensitive receptors. The Environmental Protection Team considered the submitted assessment to be acceptable. Notwithstanding, the Team has requested a condition regarding domestic gas boiler emissions and, due to the significant risk from the construction activities, a condition requiring all mitigation measures to be detailed in a Construction Environmental Management Plan.

Light pollution

186. No external lighting is shown on the proposed plans. In the interests of sound planning, the Environmental Protection Team has requested that any external lighting installed at the development comply with certain lux limits. A condition will be imposed to this end.

Employment benefits

187. When considered with the two associated applications currently under determination (17/AP/0527 and 17/AP/2908) the developments would be expected to deliver 29 sustained jobs to unemployed Southwark residents, 29 short courses, and take on 7 construction industry apprentices during the construction phase. The maximum Employment and Training Contribution would be £139,550 (£124,700 against sustained jobs, £4,350 against short courses, and £10,500 against construction industry apprenticeships). This will be secured in the Unilateral Undertaking, as will an employment, skills and business support plan.

Community engagement

188. Objections have been received from members of the public contending that insufficient public consultation was carried out by Southwark Councils' Housing department

before submitting the planning application.

189. Section 5.2 of the *Design and Access Statement* submitted in support of the application provides evidence:
- 29 September 2016:
a 'drop in' session showing the early design proposals
 - 4 October 2016:
a letter sent to all residents on those residents who were unable to attend the 'drop in' session held on 29th September 2016, in which was enclosed a booklet describing the proposals
 - 16 March 2017:
a 'drop in' session (invitation letters were sent beforehand to residents of Damory House and Thaxted Court)
190. Notwithstanding that there are no statutory requirements in relation to Community Involvement, this is considered to be an adequate effort to engage with those affected by the proposals. The Local Planning Authority, as part of its statutory requirements, sent letters to all residents, displayed site notices adjacent to both Damory House and Thaxted Court, and published a press notice publicising the planning application. Adequate efforts have, therefore, been made to ensure the community has been given the opportunity to participate in the planning process. The responses received are summarised later in this report.

Planning obligations and Community Infrastructure Levy

191. Section 143 of the Localism Act states that any financial contribution received as community infrastructure levy (CIL) is a material "local financial consideration" in planning decisions. The requirement for payment of the Mayoral or Southwark CIL is therefore a material consideration, however the weight attached is determined by the decision maker. The Mayoral CIL is required to contribute towards strategic transport investments in London as a whole, primarily Crossrail, while Southwark's CIL will provide for infrastructure that supports growth in Southwark. In this instance it is estimated that a Mayoral CIL payment of (£105,083 pre-relief) and Southwark CIL payment (£510,338 pre-relief) would be payable in the event planning permission is granted and payment of the Mayoral CIL would accord with policy 8.3 of the London Plan.
192. Saved Policy 2.5 'Planning Obligations' advises that planning obligations should be secured to overcome the negative impacts of a generally acceptable proposal. Saved Policy 2.5 is reinforced by the *Section 106 Planning Obligations and Community Infrastructure Levy (CIL) SPD*, which sets out in detail the type of development that qualifies for planning obligations.
193. The applicant is the council. For the council to enter into a legal agreement with itself would not be enforceable, meaning to complete a Section 106 agreement is not possible in this case. Instead, the required obligations and contributions are to be secured by conditions and through a Unilateral Undertaking.
194. In accordance with Southwark's *Section 106 Planning Obligations and Community Infrastructure Levy (CIL) SPD*, the following contributions have been agreed with the applicant, in order to mitigate the impacts of the development:

Planning Obligation	Mitigation	Applicant's position
Affordable Housing	Retention in perpetuity of all twenty-eight proposed dwellings on a social rented tenure	Agreed
Carbon Offset - Green Fund	Payment based on the shortfall of 27.399 tonnes of carbon per year over a 30 year period = £49,318 (indexed) Achievement of the 35.0% carbon reduction for the new units set out in the submitted Energy Strategy.	Agreed
Car Club	Provision of three years membership for each eligible resident.	Agreed
Car Parking	Implementation of a Car Parking Management Plan detailing the management and allocation the off-street parking bays.	Agreed
Children's Play Equipment	Payment in lieu of the provision of children's play space, comprising: Under-5s: £12,080.00 5-11 year olds: £13,137.00 12 and over: £6,644.00 Total: £31,861.00 (indexed)	Agreed
Delivery and Servicing Plan	Provision of a Plan detailing the arrangements for deliveries and servicing across all three sites.	Agreed
District Heat Network	Obligation to connect to the South East London Combined Heat and Power district heating network.	Agreed
Employment During the Construction Period	Contribution towards the cumulative targets of 29 jobs, 29 short courses and 7 apprenticeships during construction period for the 3 applications in the Abbeyfield Estate (or the equivalent contribution in line with the CIL & S106 SPD). Provision of an Employment, Skills and Business Support Plan Local procurement and supply chain measures during the construction phase.	Agreed
Outdoor Amenity Space	To require improvements to the landscaping to the communal gardens around Thaxted Court and Damory House (to improve the quality given no additional communal amenity space is proposed)	Agreed
Wheelchair Housing	Payment in lieu of the provision of the requisite 8.7 habitable rooms = £87,000 (indexed)	Agreed
Administration charge (2%)	Payment to cover the costs of monitoring these necessary planning	Agreed

	obligations calculated as 2% of total sum £168,179.00 = £3,363.58 (indexed)	
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195. These obligations are necessary to make the development acceptable in planning terms, mitigating for its adverse impacts. In the event that a satisfactory legal agreement has not been entered into by 31 May 2018 it is recommended that the Director of Planning refuses planning permission, if appropriate, for the following reason:

“The proposal, by failing to provide for appropriate planning obligations secured through the completion of a unilateral undertaking, fails to ensure adequate provision of mitigation against the adverse impacts of the development through projects or contributions in accordance with saved policy 2.5 'Planning obligations' of the Southwark Plan (2007), strategic policy 14 'Delivery and implementation' of the Core Strategy (2011), policy 8.2 'Planning obligations' of the London Plan (2016), and Southwark Council's Planning Obligations and Community Infrastructure Levy SPD (2015).”

Conclusion

196. The proposed extension and refurbishment works would significantly improve the appearance and environmental performance of Damory House and Thaxted Court, while preserving the setting of the registered Southwark Park and Grade II listed Dilston Grove building. The scheme would deliver high quality accommodation catering for a range of family sizes. All twenty-eight dwellings would be offered on a social rent basis which, together with the range of proposed tenure types at the adjoining Maydeu House and Bede Centre sites, would make a valuable contribution towards the Council's aim of achieving mixed and balanced communities.
197. It is acknowledged that there would be an adverse impact on daylight to some of the properties numbering 19-30 Frankland Close, primarily affecting bedroom windows. This impact must be assessed in the context of a number of key considerations. All the affected properties are dual aspect, and the windows in the other elevations would continue to benefit from very good levels of daylight. The extra storeys at Damory House are of a crenulated planform which creates a pattern of regular set-backs on the elevation facing the affected properties, providing visual relief and reducing the sense of enclosure for residents of nos. 19-30 Frankland Close. Moreover, the resulting level of daylight these nearby occupiers would experience is comparable with other properties in this part of the borough and is not untypical for a central London location such as this. Other factors including the high quality of design of the proposal, the generous affordable housing offer and the absence of other amenity impacts such as overlooking or sense of enclosure should be given weight. On balance, while recognising the impacts, it is concluded that the merits of the scheme, and the context within which it would sit, would not justify the refusal of planning permission.
198. The application raises no other neighbour amenity concerns, and while a number of objections were received about the risk of increased noise and disturbance resulting from the construction and refurbishment phases, it is considered that the impacts can be mitigated through the imposition of conditions. Other conditions relating to materials, tree protection, landscaping, play space, some transport matters, sustainability items, flooding, drainage and contamination are proposed.
199. In line with the requirements of the NPPF, the Council has applied the presumption in favour of sustainable development. The proposed development would accord with sustainable principles and would make efficient use of the land to deliver a high quality and 100% affordable housing development that meets the Council's aspirations for the

area. It is therefore recommended that permission be granted, subject to conditions as set out in the attached draft decision notice, the completion of a Unilateral undertaking, and referral to the Greater London Authority.

Community impact statement

200. In line with the council's community impact statement the impact of this application has been assessed as part of the application process with regard to local people in respect of their age, disability, faith/religion, gender, race and ethnicity and sexual orientation. Consultation with the community has been undertaken as part of the application process.

Consultations

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

Consultation replies

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

Summary of consultation responses – public comments

203. A total of 12 responses were received from members of the public. All 12 were in objection. Listed below are the issues raised which constitute material planning considerations, together with the number of times each was raised:

- Pre-application consultation
 - Poor/misleading prior consultation with local residents x3
- Impact on local infrastructure
 - Strain on waste disposal, drainage etc. x1
 - Reduction in the number of parking bays x2
- Construction issues
 - Unacceptable disruption and health risks arising from the construction process (noise, dust, smoke, things falling from scaffolding, obstacles within communal/circulation areas etc.) x6
 - No opportunity for residents to be accommodated elsewhere while the works are carried out x1
 - No clear indication as to the predicated timeframe of the works x1
- Long-term amenity impacts
 - Post-completion noise disruption generated by the future occupants x4
- Design
 - Intensification/densification of the estate would be harmful to its character x1

204. *Officer response:* These matters have been comprehensively addressed in the assessment parts of this report regarding design, refuse arrangements, parking, and neighbour amenity impacts. A construction environmental management plan would be required by a recommended condition.

Summary of consultation responses from statutory consultees

205. **Environment Agency** - No objection, but with comments summarised as:
- The finished floor levels of the ground floor units are set at 1.65m, meaning if

the simultaneous failure of all the linear defences along the River Thames did occur, flood depths in the region of 0.65m could occur at the site. Safe refuge for such an event has been included within the design, which is welcomed.

- Although the ground floor levels are not situated 300mm above the 0.5% AEP (200 year) plus climate change floor level, as required by Southwark's Strategic Flood Risk Assessment, by virtue of the application proposing to convert part of an existing building, the EA has taken a pragmatic approach.
- The inclusion of flood resilience is recommended.
- Any evacuation plan should provide suitable access and egress from the site and would need to be approved by the Local Planning Authorities (LPA's) Emergency Planning Department (EPD).

206. **GLA** – provided a combined response for the two applications (for the Bede Centre redevelopment, and the extensions to Thaxted Court and Damory House) was provided. This sets out the remedies needed to the applications to address deficiencies and ensure compliance with the London Plan:

- The principle of the estate renewal is strongly supported.
- Provision of 100% affordable housing is strongly supported.
- The applicant must demonstrate that achieving step free access for Damory House and Thaxted Court is not possible.
- A cycling level of service assessment.
- Cycle parking should be amended to meet London Plan standards for all residents (existing and new), parking areas should be re-designed to include the more convenient direct access, and 5% of the spaces should be suitable for use by larger bikes
- Further information is required to verify the proposed carbon dioxide savings.

207. *Officer response:* In response to these comments, applicant has since demonstrated that it is not possible to provide step-free access to the new units, and a cycling level of service assessment was provided. The number of cycle stands for new units would be compliant and conveniently located, and it is considered that the cycle storage provision for existing residents to be a good offer. The additional carbon saving information will be provided to the GLA for the Stage 2 review.

208. **Historic England** - has no comment

209. **London Underground** – has no comment

210. **Metropolitan Police** – no objection and recommends the achievement of Secured by Design is required by condition.

211. **Natural England** – has no comment

212. **Transport for London** – commented that:

- All residents should be made exempt from parking permits.
- Cycle parking should be amended to meet London Plan standards for all existing and new residents, parking areas should be re-designed to include the more convenient direct access, and 5% of the spaces should be suitable for use by larger bikes.
- Construction Logistics Plan should be secured by condition.
- Delivery and Servicing Plan should be secured by condition [noted, but will be secured through the Unilateral Undertaking rather than by condition].

213. *Officer response:* As set out above in the officer response to the GLA comment the proposed cycle parking is considered acceptable. The other items are to be secured by condition or through the unilateral undertaking.

214. **Thames Water** – comments on storm water flows, discharging to a public sewer, and water pressure. These can form informatives on any permission.

Human rights implications

215. This planning application engages certain human rights under the Human Rights Act 2008 (the HRA). The HRA prohibits unlawful interference by public bodies with conventions rights. The term 'engage' simply means that human rights may be affected or relevant.

216. This application has the legitimate aim of providing new dwellings and associated works. The rights potentially engaged by this application, including the right to a fair trial and the right to respect for private and family life are not considered to be unlawfully interfered with by this proposal.

BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
Site history file: TP/H66 Application file: 17/AP/0527 Southwark Local Development Framework and Development Plan Documents	Chief Executive's Department 160 Tooley Street London SE1 2QH	Planning enquiries telephone: 020 7525 5403 Planning enquiries email: planning.enquiries@southwark.gov.uk Case officer telephone: 020-7525-5349 Council website: www.southwark.gov.uk

APPENDICES

No.	Title
Appendix 1	Consultation undertaken
Appendix 2	Consultation responses received
Appendix 3	Recommendation

AUDIT TRAIL

Lead Officer	Simon Bevan, Director of Planning	
Report Author	Patrick Cronin, Planner	
Version	Final	
Dated	30 January 2018	
Key Decision	No	
CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER		
Officer Title	Comments Sought	Comments included
Strategic Director of Finance and Governance	No	No
Strategic Director of Environment and Leisure	No	No
Strategic Director of Housing and Modernisation	No	No
Director of Regeneration	No	No
Date final report sent to Constitutional Team		29 January 2018

Consultation undertaken

Site notice date: 03/07/2017

Press notice date: 06/07/2017

Case officer site visit date: 04/07/2017

Neighbour consultation letters sent: 03/07/2017

Internal services consulted:

Ecology Officer
Economic Development Team
Environmental Protection Team Formal Consultation [Noise / Air Quality / Land Contamination / Ventilation]
Flood and Drainage Team
HIGHWAY LICENSING
Highway Development Management
Housing Regeneration Initiatives
Waste Management

Statutory and non-statutory organisations consulted:

EDF Energy
Environment Agency
Greater London Authority
Historic England
London Fire & Emergency Planning Authority
London Underground Limited
Metropolitan Police Service (Designing out Crime)
Natural England - London Region & South East Region
Network Rail (Planning)
Thames Water - Development Planning
Transport for London (referable & non-referable app notifications and pre-apps)

Neighbour and local groups consulted:

28 Maydew House Abbeyfield Estate Abbeyfield Road SE16 2DP	28 Damory House Abbeyfield Estate Abbeyfield Road SE16 2EZ
27 Maydew House Abbeyfield Estate Abbeyfield Road SE16 2DP	32 Damory House Abbeyfield Estate Abbeyfield Road SE16 2EZ
26 Maydew House Abbeyfield Estate Abbeyfield Road SE16 2DP	31 Damory House Abbeyfield Estate Abbeyfield Road SE16 2EZ
30 Maydew House Abbeyfield Estate Abbeyfield Road SE16 2DP	30 Damory House Abbeyfield Estate Abbeyfield Road SE16 2EZ
3 Maydew House Abbeyfield Estate Abbeyfield Road SE16 2DP	27 Damory House Abbeyfield Estate Abbeyfield Road SE16 2EZ
29 Maydew House Abbeyfield Estate Abbeyfield Road SE16 2DP	23 Damory House Abbeyfield Estate Abbeyfield Road SE16 2EZ
25 Maydew House Abbeyfield Estate Abbeyfield Road SE16 2DP	22 Damory House Abbeyfield Estate Abbeyfield Road SE16 2EZ
21 Maydew House Abbeyfield Estate Abbeyfield Road SE16 2DP	21 Damory House Abbeyfield Estate Abbeyfield Road SE16 2EZ
20 Maydew House Abbeyfield Estate Abbeyfield Road SE16 2DP	26 Damory House Abbeyfield Estate Abbeyfield Road SE16 2EZ
2 Maydew House Abbeyfield Estate Abbeyfield Road SE16 2DP	25 Damory House Abbeyfield Estate Abbeyfield Road SE16 2EZ

65 Maydew House Abbeyfield Estate Abbeyfield Road SE16 2DP	SE16 2DW
64 Maydew House Abbeyfield Estate Abbeyfield Road SE16 2DP	129 Maydew House Abbeyfield Estate Abbeyfield Road SE16 2DW
8 Maydew House Abbeyfield Estate Abbeyfield Road SE16 2DP	128 Maydew House Abbeyfield Estate Abbeyfield Road SE16 2DW
7 Maydew House Abbeyfield Estate Abbeyfield Road SE16 2DP	127 Maydew House Abbeyfield Estate Abbeyfield Road SE16 2DW
67 Maydew House Abbeyfield Estate Abbeyfield Road SE16 2DP	132 Maydew House Abbeyfield Estate Abbeyfield Road SE16 2DW
63 Maydew House Abbeyfield Estate Abbeyfield Road SE16 2DP	131 Maydew House Abbeyfield Estate Abbeyfield Road SE16 2DW
6 Maydew House Abbeyfield Estate Abbeyfield Road SE16 2DP	130 Maydew House Abbeyfield Estate Abbeyfield Road SE16 2DW
59 Maydew House Abbeyfield Estate Abbeyfield Road SE16 2DP	126 Maydew House Abbeyfield Estate Abbeyfield Road SE16 2DW
58 Maydew House Abbeyfield Estate Abbeyfield Road SE16 2DP	122 Maydew House Abbeyfield Estate Abbeyfield Road SE16 2DW
62 Maydew House Abbeyfield Estate Abbeyfield Road SE16 2DP	121 Maydew House Abbeyfield Estate Abbeyfield Road SE16 2DW
61 Maydew House Abbeyfield Estate Abbeyfield Road SE16 2DP	120 Maydew House Abbeyfield Estate Abbeyfield Road SE16 2DW
60 Maydew House Abbeyfield Estate Abbeyfield Road SE16 2DP	125 Maydew House Abbeyfield Estate Abbeyfield Road SE16 2DW
3 Damory House Abbeyfield Estate Abbeyfield Road SE16 2EZ	124 Maydew House Abbeyfield Estate Abbeyfield Road SE16 2DW
29 Damory House Abbeyfield Estate Abbeyfield Road SE16 2EZ	123 Maydew House Abbeyfield Estate Abbeyfield Road SE16 2DW
	273 Montrose Avenue DA16 2QU
	Thaxted Court London se16 3rr

Re-consultation: n/a

APPENDIX 2

Consultation responses received

Internal services

Environmental Protection Team Formal Consultation [Noise / Air Quality / Land Contamination / Ventilation]

Statutory and non-statutory organisations

Historic England
London Fire & Emergency Planning Authority
London Underground Limited
Natural England - London Region & South East Region
Thames Water - Development Planning

Neighbours and local groups

Thaxted Court London se16 3rr
12 Thaxted Court Abbeyfield Estate Abbeyfield Road SE16 2BU
15 Damory House Abbeyfield Estate Abbeyfield Road SE16 2EZ
17 Thaxted Court Abbeyfield Estate Abbeyfield Road SE16 2BU
21 Thaxted Court Abbeyfield Estate Abbeyfield Road SE16 2BU
21 Thaxted Court Abbeyfield Estate Abbeyfield Road SE16 2BU
23 Damory House Abbeyfield Estate Abbeyfield Road SE16 2EZ
273 Montrose Avenue DA16 2QU
28 Damory House Abbeyfield Estate Abbeyfield Road SE16 2EZ
3 Thaxted Court Abbeyfield Estate Abbeyfield Road SE16 2BU
34 Damory House Abbeyfield Estate Abbeyfield Road SE16 2EZ
4 Damory House Abbeyfield Estate Abbeyfield Road SE16 2EZ
9 Damory House Abbeyfield Estate Abbeyfield Road SE16 2EZ