

<b>Item No.</b> 9.1	<b>Classification:</b> Open	<b>Date:</b> 6 March 2018	<b>Meeting Name:</b> Planning Committee
<b>Report title:</b>	<b>Development Management planning application:</b> Application 17/AP/3070 for: Full Planning Application  <b>Address:</b> BELTWOOD, 41 SYDENHAM HILL, LONDON SE26 6TH  <b>Proposal:</b> Alterations to enable a change of use of Beltwood House (a Grade II listed building) from a Class C2 residential institution to provide 7 apartments with external works comprising demolition of the service wing outriggers and replacement with a new communal entrance. Demolition of curtilage outbuildings to the east of Beltwood House ('Stables and Worker's cottage') and replacement with 3 No. residential units. Creation of new Gate House and a Pavilion House within the site curtilage. Alterations including underpinning of the existing Gate Lodge (curtilage listed building) and ground floor extension. A comprehensive landscape strategy comprising communal and private spaces and gardens for use by residents. Car parking for 17 cars for residents and visitors. Provision of new refuse and cycle storage structures. Creation of new vehicular access on to Sydenham Hill from the south-east of the site to serve one new dwelling (new Gate House).		
<b>Ward(s) or groups affected:</b>	College		
<b>From:</b>	Director of Planning		
<b>Application Start Date</b> 14/08/2017		<b>Application Expiry Date</b> 13/11/2017	
<b>Earliest Decision Date</b> 21/10/2017			

## RECOMMENDATION

1. a. That planning permission be granted subject to the completion of a legal agreement.
- b. That in the event that a satisfactory legal agreement is not signed by 30 May 2018, the director of planning be authorised to refuse planning permission for the reason given in paragraph 115 of this report.

## BACKGROUND INFORMATION

### Site location and description

2. The application site is Beltwood House, 41 Sydenham Hill, a large Grade II listed house set in the middle of 1.2 hectares of garden grounds with an outlying stables/garage and workers cottage and gate house. Beltwood House was statutorily listed Grade II in May 1995. It is a Victorian villa remodelled in the early twentieth century in a renaissance manner with neo-classical detailing.
3. Beltwood House is one of the oldest houses in the area, constructed in 1851 for Edward Saxton. It was originally surrounded by woodland and formed part of the

Great North Wood. The surroundings became further developed with the arrival of the railway during the 1860s. The grounds in which the house sits are mature and comprise a gate house, stable block and worker's cottage. The gate house is a modest Arts and Crafts building which stands at the driveway entrance to the house and is visible from the street. The stables, a simple utilitarian building with some later alterations, is next to the house to the east. The worker's cottage, another simple building, is to the south of this. These buildings are part of the historic estate of Beltwood. The historic form of landscaping is still visible within the site. Originally built as a residence, from historical maps, the house appears to have been a YMCA hostel (1960-70), Dental Hostel and the Sydenham Hill Invalid Babies Hospital before that. The house is currently vacant. Despite several changes in use the plan form of the building has been little altered since early twentieth century re-modelling.

4. Access to the site is by way of a driveway in the western corner of the site off Sydenham Hill. Double gates set back from the edge of the pavement enclose a driveway which sweeps past the single storey Gate House at the entrance to the site to the main house which is situated in the middle of the site. To the north of Beltwood House are three listed buildings: Six Pillars, Nos. 2 and 4 Crescent Wood House. Six Pillars is listed Grade II\* with the other two buildings designated Grade II.
5. The main house is surrounded by lawns and woodland. To the side (south) and rear (west) of the house are landscaped lawns and to the north is a wooded area which includes a former tennis court. There is dense tree coverage on the western side of the site and along the site boundaries. The entire site is covered by a tree preservation order (Tree Preservation Order No. 98 (1985)) covers all of the grounds. After several trees were removed from the site and cut back without permission, the Council obtained an injunction on 20 May 2016 preventing the owner from cutting down or wilfully damaging or destroying any further trees within the site. The injunction is still in effect and the council is likely to only agree to lift it providing the owner submits a tree mitigation strategy to avoid further harm and the submission of a landscaping strategy. These documents and subsequent compliance will be ensured through the section 106 agreement.
6. Buildings within the Dulwich Wood Conservation Area tend to be around the perimeters of a central large open space, including some good quality Victorian dwellings set within substantial grounds. The large areas of open space and generous garden grounds within the conservation area are an important factor which has created its sense of place and character.
7. Historic England has placed Beltwood House on their Heritage Risk Register due to it being vacant and in a deteriorating condition. Whilst permission was granted in 1999, this was for conversion of the main house into 3 town houses and development within the grounds. The decision pre-dates more recent national and local planning policy changes, for example the requirement to assess the impact of a proposal on the significance of the listed building. The Council's view regarding the significance of the Beltwood Estate to this and future generations is because of the heritage interest of the constituent parts, physical presence and setting.
8. When making a decision on all listed building consent applications or any decision on a planning application for development that affects a listed building or its setting, a local planning authority must 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. Preservation in this context means not harming the interest in the building as opposed to keeping it unchanged.

This obligation, found in sections 16 and 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990, applies to all decisions concerning listed buildings.

A recent court case has made it clear that in enacting section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 the intention was that decision makers should give “considerable importance and weight” to the desirability of preserving the setting of listed buildings when carrying out the balancing exercise.

9. Decision-making policies in the National Planning Policy Framework and in the local development plan are also to be applied, but they cannot directly conflict with or avoid the obligatory consideration in these statutory provisions.
10. Furthermore, when considering any planning application that affects a conservation area a local planning authority must pay special attention to the desirability of preserving or enhancing the character or appearance of that area.
11. The statutorily desirable object of preserving the character of appearance of an area is achieved either by a positive contribution to preservation or by development which leaves character or appearance unharmed.
12. Policies in the NPPF do however seek positive improvement in conservation areas. Most explicitly paragraphs 126 and 131 require that local planning authorities should take into account "the desirability of new development making a positive contribution to local character and distinctiveness". Paragraph 9 says that pursuing "sustainable development involves seeking positive improvements in the quality of the...historic environment...". The design policies further reinforce the objective of enhancement of an area's character and local distinctiveness, concluding that "Permission should be refused for development of poor design that fails to take opportunities available for improving the character and quality of an area..." (paragraph 64).

### **Details of proposal**

13. The proposal is for:-
  - Alterations to enable a change of use of Beltwood House (a Grade II listed building) from a Class C2 residential institution to provide 7 apartments with external works comprising demolition of the service wing outriggers and replacement with a new communal entrance;
  - Demolition of curtilage outbuildings to the east of Beltwood House and their replacement with 3 residential units;
  - Creation of new Gate House and a Pavilion House within the site curtilage. - Alterations including underpinning of the existing Gate Lodge (a curtilage listed building) and ground floor extension;
  - A comprehensive landscape strategy comprising communal and private spaces and gardens for use by residents;
  - Car parking for 17 cars for residents and visitors;
  - Provision of new refuse and cycle storage structures; and
  - the creation of new vehicular access on to Sydenham Hill from the south-east of the site to serve one new dwelling.

### **Amendments to the application:**

14. The proposal initially included a block of flats referred to as 'wooded flats'; a two storey building including basement for 4 flats. This has now been omitted and replaced by a

two storey (plus basement) dwellinghouse on a much smaller footprint. Other alterations also included the addition of a flat within the main Beltwood House building as well as a revision to the landscaping strategy, which included a tree planting programme and reduction in parking. Additional information on development viability has also been provided.

## Planning history

15.

<p>04/AP/0280 Application type: Listed Building Consent (LBC) Renewal of Listed Building Consent dated 22/02/99 (ref. 9700598A) for the conversion of Beltwood House to 3 residential units and associated internal works; part demolition of rear outbuildings and erection of new buildings to provide eight 2-storey houses and single storey ground floor extension to lodge building. Decision date 19/10/2004 Decision: Grant (GRA)</p>
<p>11/EQ/0138 Application type: Pre-Application Enquiry (ENQ) Conversion of Beltwood House into a single dwelling and the extension of the gate house and the erection of 5 new detached dwellings on the site to enable the conversion and works to the listed building. Decision date 07/11/2011 Decision: Pre-application enquiry closed (EQ)</p>
<p>11/EQ/0065 Application type: Pre-Application Enquiry (ENQ) Construction of eight new 3 bedroom houses within the grounds, restoration of Beltwood House with alterations to the vehicular access from Sydenham Hill and within the site. Decision date 02/12/2011 Decision: Pre-application enquiry closed (EQ)</p>
<p>12/EQ/0267 Application type: Pre-Application Enquiry (ENQ) Conversion and restoration of existing building to single family home (Beltwood House) and construction of 8 new 3 bedroom houses within the grounds. Decision date 16/04/2013 Decision: Pre-application enquiry closed (EQ)</p>
<p>13/AP/3032 Application type: Listed Building Consent (LBC) Extension to gatehouse building comprising construction of basement and underpinning of existing structure underneath and to the west of the existing building, two storey extension above basement and alterations to the roof and internal layout, together with alterations to the front entrance gate and walls to Beltwood House. Decision date 06/01/2015 Decision: Refused (REF) Reasons for refusal:</p> <p>1 The loss of historic fabric and plan form would cause harm to the architectural and historic significance of the Grade II listed building, and therefore is contrary to Saved Policies 3.15 (Conservation of the Historic Environment), 3.16 (Conservation Areas), 3.17 (Listed Buildings) of the Southwark Plan 2007; Strategic Policy 12 (Design and Conservation) of the Core Strategy 2011; Policy 7.8 (Heritage Assets and Archaeology) of the London Plan 2013; and Section 12 (Conserving and Enhancing the Historic Environment) of the NPPF.</p> <p>2 The Structural Report provided is insufficient in detail and contradictory information has been provided by the applicant to justify that no harm to the heritage asset will be caused by the proposed internal works and excavation works as required under paragraphs 128 and 133 of the NPPF. The proposal therefore is not in accordance with: Section 12 (Conserving and Enhancing the Historic Environment) of the NPPF; Policy 7.8 (Heritage Assets and Archaeology) of the London Plan 2013; Strategic policy 12 (Design and Conservation), the Core Strategy 2011 and Saved Policies 3.15 (Conservation of the Historic Environment) and 3.17 (Listed Buildings) of the</p>

Southwark Plan 2007.

3 The proposed rear extension, due to its excessive height, bulk, mass and detailed design would cause harm to the architectural and historic significance of the Grade II listed building, and will be overly dominant causing harm to the character and appearance of the Dulwich Wood Conservation Area, which is contrary to Saved Policies 3.12 (Quality in Design), 3.13 (Urban Design), 3.15 (Conservation of the Historic Environment), 3.16 (Conservation Areas), 3.17 (Listed Buildings), 3.18 (Setting of Listed Buildings, Conservation Areas and World Heritage Sites) of the Southwark Plan 2007; Strategic policy 12 (Design and Conservation) of the Core Strategy 2011 and Section 12 (Conserving and Enhancing the Historic Environment) of the NPPF.

4 The proposed basement extension and lightwell, due to its extent into the garden, depth and detailed design would cause harm to the architectural and historic significance of the Grade II listed building and its setting contrary to Saved Policies 3.12 (Quality in Design), 3.13 (Urban Design), 3.15 (Conservation of the Historic Environment), 3.16 (Conservation Areas), 3.17 (Listed Buildings), 3.18 (Setting of Listed Buildings, Conservation Areas and World Heritage Sites) of the Southwark Plan 2007; Strategic policy 12 (Design and Conservation) of the Core Strategy 2011 and Section 12 (Conserving and Enhancing the Historic Environment) of the NPPF.

13/AP/3031 Application type: Full Planning Application (FUL)

Extension to gatehouse building comprising construction of basement and underpinning of existing structure underneath and a two storey extension above basement to west of the building and alterations to the roof and internal layout, together with alterations to the front entrance gate and walls to Beltwood House.

Decision date 06/01/2015 Decision: Refused (REF)

Reasons for refusal:

1. The proposed basement extension, associated lightwell and rear extension due to the height, bulk, mass, detailed design, and the extent of the basement excavation would fail to appear subservient to the host building; result in substantial harm to the architectural and historic significance of the Grade II listed building and adversely impact upon the setting of the listed building and harm the character and appearance of the Dulwich Wood Conservation Area. As such, the proposal is contrary to Saved Policies 3.2 (Protection of Amenity), 3.12 (Quality in Design), 3.13 (Urban Design), 3.15 (Conservation of the Historic Environment), 3.16 (Conservation Areas), 3.17 (Listed Buildings) and 3.18 (Setting of Listed Buildings, Conservation Areas and World Heritage Sites) of the Southwark Plan 2007; Strategic policy 12 (Design and Conservation) of the Core Strategy 2011 and Section 12 (Conserving and Enhancing the Historic Environment) of the NPPF.

2. The proposed development will result in the removal of trees adjacent to the lodge which would be harmful to the setting of the listed building and the character and appearance of this part of the Dulwich Wood Conservation Area. The development has also failed to demonstrate sufficient mitigation planting through appropriate landscaping. The development is therefore contrary to policies 7.19 (Biodiversity and Access to Nature) and 7.21 (Trees and Woodland) of the London Plan 2013; Strategic policy 11 (Open Spaces and Wildlife) of the Core Strategy 2011 and saved policies 3.1 (Environmental Effects), 3.2 (Protection of Amenity), 3.13 (Urban Design), 3.16 (Conservation Areas) and 3.28 (Biodiversity) of the Southwark Plan 2007.

3. The development has failed to demonstrate that the retained vegetation in the vicinity of the Lodge will be adequately protected from construction impacts; in particular from level changes and other basement excavation, all of which affect the tree and woodland protected by a TPO, and furthermore from post development

pressure arising from potential future overshadowing and maintenance issues. As such the development is contrary to policy 7.21 (Trees and Woodland) of the London Plan 2013, Strategic policy 11 (Open Spaces and Wildlife) of the Core Strategy 2011 and saved policy 3.1 (Environmental Effects) of the Southwark Plan 2007.

13/AP/3031 Application type: Full Planning Permission (FUL)

Extension to gatehouse building comprising construction of basement and underpinning of existing structure underneath and a two storey extension above basement to west of the building and alterations to the roof and internal layout, together with alterations to the front entrance gate and walls to Beltwood House.

Decision date 06/01/2015 Decision: Refused (REF)

Reasons for refusal:

1. The proposed basement extension, associated lightwell and rear extension due to the height, bulk, mass, detailed design, and the extent of the basement excavation would fail to appear subservient to the host building; result in substantial harm to the architectural and historic significance of the Grade II listed building; and adversely impact upon the setting of the listed building and harm the character and appearance of the Dulwich Wood Conservation Area. As such, the proposal is contrary to Saved Policies 3.2 (Protection of Amenity), 3.12 (Quality in Design), 3.13 (Urban Design), 3.15 (Conservation of the Historic Environment), 3.16 (Conservation Areas), 3.17 (Listed Buildings) and 3.18 (Setting of listed buildings, conservation areas and world heritage sites) of the Southwark Plan 2007; Strategic Policy 12 (Design and Conservation) of the Core Strategy 2011 and Section 12 (Conserving and Enhancing the Historic Environment) of the NPPF.

2. The proposed development will result in the removal of trees adjacent to the lodge which would be harmful to the setting of the listed building and the character and appearance of this part of the Dulwich Wood Conservation Area. The development has also failed to demonstrate sufficient mitigation planting through appropriate landscaping. The development is therefore contrary to policies 7.19 (Biodiversity and Access to Nature) and 7.21 (Trees and woodland) of the London Plan (2013); Strategic Policy 11 (Open Spaces and Wildlife) of the Core Strategy 2011 and saved policies 3.1 (Environmental Effects), 3.2 (Protection of Amenity), 3.13 (Urban Design), 3.16 (Conservation Areas) and 3.28 (Biodiversity) of the Southwark Plan 2007.

3. The development has failed to demonstrate that the retained vegetation in the vicinity of the Lodge will be adequately protected from construction impacts; in particular from level changes and other basement excavation, all of which affect the tree and woodland protected by a TPO, and furthermore from post development pressure arising from potential future overshadowing and maintenance issues. As such the development is contrary to policy 7.21 (Trees and Woodland) of the London Plan (2013), Strategic policy 11 (Open Spaces and Wildlife) of the Core Strategy 2011 and saved policy 3.1 (Environmental Effects) of the Southwark Plan 2007.

13/AP/3341 - Full Planning Permission - A planning application was made for "Conversion of vacant building to ten self-contained apartments including external works comprising the addition of basement light wells. Demolition of ancillary buildings and the construction of 6 x 5 bedroom three storey houses with 9 lower ground parking spaces and 15 surface level parking spaces and associated vehicular and pedestrian access routes".

The Council gave the following reasons for the refusal of the application:

1. Due to the footprint, bulk, massing and detailed design of the new curtilage development and the proposed external alterations to the main house the proposal would detract from the setting of the Listed Building and the character and appearance

of the wider Dulwich Wood Conservation Area. It would therefore be contrary to saved policies 3.15 (Conservation of the Historic Environment), 3.16 (Conservation Areas ) and 3.18 (Setting of Listed Buildings, Conservation Areas and World Heritage Sites) of the Southwark Plan 2007; Strategic Policy 12 (Design and Conservation) of the Core Strategy 2011; policy 7.9 (Heritage led regeneration) of the London Plan (2013, and Section 12 (Conserving the Built Environment) of the NPPF.

2. The proposal would fail to provide adequate sunlight and daylight to habitable rooms within the basement units and it would therefore fail to provide a satisfactory living environment for future occupiers contrary to saved policy 4.2 (Quality of Residential Accommodation) of the Southwark Plan 2007; Strategic policy 13 (High Environmental Standards) of the Core Strategy 2011 and the Council's Residential Design Standards SPD 2011.

3. The proposal would fail to provide sufficient and satisfactory wheelchair standard housing. The proposed wheelchair units would fail to meet the standards prescribed in the Council's Residential Design Standards 2011. Additionally the proposal would fail to provide safe, convenient and equal access to the proposed wheelchair units. The proposal would therefore be contrary to saved policies 4.2 (Quality of Residential Accommodation) and 4.3 (Mix of Dwellings) of the Southwark Plan 2007.

4. The proposal, by failing to provide for appropriate planning obligations secured through the completion of a S106 agreement, fails to ensure adequate provision of affordable housing and 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 2013 and the Council's Planning Obligations SPD 2007.

5. The proposal has failed to comprehensively assess the existing biodiversity of the site, and as such the full impact of the development on ecological habitats and species, and any adequate mitigation measures, is unable to be accurately assessed. The development therefore fails to sufficiently protect existing species and their habitats and as such is contrary to saved policies 3.1 (Environmental Effects) and 3.28 (Biodiversity) of the Southwark Plan 2007; Strategic Policy 11 (Open Spaces and Wildlife) of the Core Strategy 2011; policy 7.19 (Biodiversity and Access to Nature) of the London Plan 2013, the Council's Sustainable Design and Construction SPD and the Council's Work for Wildlife Southwark Biodiversity Action Plan.

6. The development has failed to demonstrate that the retained vegetation will be adequately protected from construction impacts; in particular from the proposed development within the woodland, level changes and other basement excavation associated with the curtilage development, all of which affect the tree and woodland protected by TPO ref. no. 98, and furthermore from post development pressure arising from potential future overshadowing and maintenance issues. As such the development is contrary to policy 7.21 (Trees and Woodlands) of the London Plan 2013, Strategic policy 11 (Open Spaces and Wildlife) of the Core Strategy 2011 and saved policy 3.1 (Environmental Effects) of the Southwark Plan 2007.

7. The proposed development will result in the removal of an excessive amount of mature trees and those which would develop to sustain the site's continued wooded character, in particular trees within the wooded area adjacent to the former tennis courts, trees adjacent to the lodge and other boundary specimens. The volume of trees removed and the extent of hard landscaping for car parking would harm the open, green and intrinsic nature of the woodland area, the amenity of adjoining properties and both the character and setting of the wider Conservation Area and Listed Building. The development has also failed to demonstrate sufficient mitigation

planting through appropriate landscaping. The development is therefore contrary to policies 7.19 (Biodiversity and Access to Nature) and 7.21 (Trees and Woodlands) of the London Plan 2013, Strategic policy 11 (Open Spaces and Wildlife) of the Core Strategy 2011 and saved policies 3.1 (Environmental Effects), 3.2 (Protection of Amenity), 3.13 (Urban Design), 3.16 (Conservation Areas) and 3.28 (Biodiversity) of the Southwark Plan 2007.

8. The proposed size, siting and design of the proposed curtilage development would be overbearing to and would result in increased overlooking of adjoining rooms and private gardens at the nearest dwellings within Crescent Wood Road. The proposal would therefore be contrary to saved policy 3.2 (Protection of Amenity) of the Southwark Plan 2007 and Strategic Policy 13 (High Environmental Standards) of the Core Strategy 2011.

This application was subsequently appealed against non-determination of the application. The following is a summary of the Inspectors decision:

**External Alterations to Beltwood House:**

The Inspector did not raise concern with the majority of these works to the Listed Building, however the Inspector did agree with the Council in relation to all of the lightwells proposed to the building as this would make the basement accommodation various obvious and introduce a feature to the building that otherwise would not have been there.

**Internal alterations:**

The Inspector raised concerns with the works at ground floor, including the internal stair core which would undermine the singular character of the room and that the corridor link to the service wing and secondary staircase would be lost. The Inspector also raised concerns about the works at first floor level including the impacts on the south-western room and adjacent room which would reduce the size of these rooms, harming the character of both.

**Basement and underpinning:**

Concerns were raised by the Inspector for these works as they noted that the applicants had not justified full underpinning of the building. The Inspector also noted that changes to the basement layout would represent change to the existing fabric and harm the significance of the listed building.

**Demolition of curtilage listed buildings:**

The Inspector noted that no harm would arise from the loss of the cottage and garage to the north east of the house if a new development would stand comfortably in the context.

**Development in the grounds:**

Concerns were raised with the size and scale of the buildings at three stories proposed to replace the cottage and garage. The design would also create an uncomfortable contrast between the proposed new buildings and main house.

**Trees and landscaping:**

The Inspector did not raise any significant concerns regarding the tree loss, however outlined that suitable replanting would be required. The Inspector also noted that the level of hard surfacing was also acceptable.

**Viability:**

The Inspector noted that there would be significant public benefits from bringing the building into a more effective use. However they noted that the information submitted did not lead to a clear conclusion whether the proposal was the optimum viable use.



**Daylight:**

The Inspector reasoned that the original proposed light wells would provide sufficient amounts of daylight into the basement flats.

**Overlooking:**

The Inspector agreed with the Council that concerns about overlooking, in particular with no.6 Crescent Wood Road would be sufficient grounds to refuse the application.

16/AP/0446 Application type: Tree Preservation Order - works related (TPO)

T1: Sycamore - reduce crown by reducing branches by a maximum 3m and remove dead wood

T2: Sycamore - Fell

T3: Sycamore - Crown lift to clear property by 2m

G4: Lawson Cypress (x3) - Fell

T5: Black Pine - Dead. Fell

G6: Mixed Species - Crown lift all roadside trees to 4m over road

T7: Beech False - Reduce west bound fork by reducing branches by a maximum 4m, fit non-invasive cable brace.

T8: Acacia - Fell

T9: Holm Oak - Crown lift to 3m

G10: Mixed Species - Crown lift all to 3m

T11/ T12: Lawson Cypress Fell

T13: goat Willow - Fell

T14: Sycamore - Fell

G15: Mixed Species - Coppice 2x hazel, fell laurel

Decision date 21/03/2016 Decision: TPO consent granted (TPOG)

16/EN/0188 Enforcement type: Change of use (COU)

Change of use of the site from hostel (Sui Generis) to a mixed use comprising a large house in multiple occupation shared by property guardians and individuals and a family in residence in the Gate Lodge.

Sign-off date 20/07/2016 Sign-off reason: Final closure - no breach of control (FCNB)

16/AP/3455 Application type: Tree Preservation Order - works related (TPO)

List of comprised/structurally unsound trees to remove and mitigate with new planting

- Reasons: in the interests of safety and to allow future planting to create a diverse landscape. T2 Beech, Common, T0894 Sycamore T0893 Sycamore T0890 Sycamore T0888 Oak, Holm T0882 Oak, Holm T0881 Sycamore T0880 Ash T0879 Sycamore T0864 Holm Oak T0865 Sycamore T0866 Sycamore T0867 Sycamore T0868 Sycamore T0869 Sycamore T0870 Sycamore T0871 Sycamore T0872 Sycamore T0873 Sycamore T0855 Oak, pedunculate T0826 Sycamore T0828 Sycamore T0831 Oak, Holm T0829 Sycamore T0805 Oak, pedunculate T0807 Leylandii T0810 Sycamore T0811 Oak, Holm T0792 Lime, Common T0793 Pine, Corsican T0794 Cypress, Lawson T0795 Cypress, Lawson T0796 Leylandii T0784 Sycamore T0797 Leylandii T0771a Holly, Common T0771b Viburnum T0772 Oak, pedunculate T0772a Oak, Holm T0769 Beech, Copper T0736 Plum T0751 Leylandii

Decision date 19/10/2016 Decision: TPO consent refused (TPOR)

Reasons for refusal:

1. Insufficient information has been provided to substantiate the need for removal of the TPO trees nor why alternative works such as pruning may not be appropriate in order to avoid the need for felling of TPO trees.

Beech T2 has already undergone significance crown reduction and limb removal work. Such a significant loss of canopy would adversely impact upon the character of the conservation area and habitat for protected species.

The proposed work to remove the trees and the substantial loss of canopy are therefore contrary to the NPPF Parts 7, 8, 11 & 12; the following policies of the Core Strategy 2011: SP11 (Open Spaces and Wildlife), SP12 (Design and Conservation), SP13 (High Environmental Standards); London Plan policy 5.10 (Urban greening), 7.19 (Biodiversity), 7.21 (Trees and Woodlands) and the following Saved Policies of the Southwark Plan 2007: Policy 3.2 (Protection of Amenity), Policy 3.15 (Conservation of the Historic Environment), Policy 3.18 (Setting of Listed Buildings, Conservation Areas and World Heritage Sites) and Policy 3.28 (Biodiversity).

16/AP/3877 Application type: Listed Building Consent (LBC)

Conversion of existing hostel building to 8 self-contained apartments including external works comprising the alteration of existing dormers and rooflights and creation of two half-storey light wells to the rear of the building. Works also to include underpinning to the existing basement and creation of basement car parking to the north of the building. Refurbishment of the existing stable block and single storey extension to the east to create a four-bedroom dwelling house. Facade retention to west-facing facade of existing Hunting Lodge, with demolition of the remaining building and construction of new replacement dwelling on the existing footprint, with single-storey extensions to the east and south, to create a four-bedroom dwelling house. Underpinning to the existing Gate Lodge and extension to the west to create a four-bedroom dwelling.

Decision date 07/12/2016 Decision: Refused (REF)

Reasons for refusal:

1 The loss of historic fabric including the removal of the secondary staircase and the adjustments to the plan form would cause significant harm to the architectural and historic significance of the Grade II listed Beltwood House, and therefore is contrary to Saved Policies 3.15 (Conservation of the Historic Environment), 3.16 (Conservation Areas), 3.17 (Listed Buildings) of the Southwark Plan 2007; Strategic policy 12 (Design and Conservation) of the Core Strategy 2011; Policy 7.8 (Heritage Assets and Archaeology) and 7.9 (Heritage-Led Regeneration) of the London Plan 2016 and Section 12 (Conserving and Enhancing the Historic Environment) of the NPPF.

2 The proposed new rooflights on the west and south elevations by virtue of their location and size would be overly dominant and unduly harmful to the form and appearance of Beltwood. The proposed rooflight on the south elevation would be visually intrusive on the principal elevation. The proposal would therefore fail to preserve or enhance the special architectural or historic significance of the Grade II listed building. As such, the proposal is contrary to saved policies 3.15 (Conservation of the Historic Environment) and 3.17 (Listed Buildings) of the Southwark Plan 2007; Strategic policy 12 (Design and Conservation) of the Core Strategy 2011; the London Plan 2016 and Section 12 (Conserving and Enhancing the Historic Environment) of the NPPF.

3 Insufficient supporting documentation and detail has been provided and therefore the application fails to justify the harm to the heritage asset (Beltwood House) that will be caused by the proposed internal works (including installation of services, damp and rot treatment, repairs/ replacement of windows, structural works on upper floors) and excavation of the basement car park and associated structural works, plus introduction of lightwells (north elevation) as required under paragraphs 128 and 133 of the NPPF. The proposal therefore is not in accordance with: Section 12 (Conserving and Enhancing the Historic Environment) of the NPPF 2012; Policy 7.8 (Heritage Assets and Archaeology) of the London Plan 2016; Strategic policy 12 (Design and Conservation) of the Core Strategy 2011 and Saved Policies 3.15 (Conservation of the Historic Environment) and 3.17 (Listed Buildings) of the Southwark Plan 2007.

4 The loss of historic fabric and plan form would cause harm to the architectural and historic significance of the Grade II Gate Lodge, and therefore is contrary to Saved Policies 3.15 (Conservation of the Historic Environment), 3.16 (Conservation Areas), 3.17 (Listed Buildings) of the Southwark Plan 2007; Strategic policy 12 (Design and Conservation) of the Core Strategy 2011, Policy 7.8 (Heritage Assets and Archaeology) of the London Plan 2016 and Section 12 (Conserving and Enhancing the Historic Environment) of the NPPF.

5 Insufficient supporting documentation and detail has been provided by the applicant in relation to the proposed internal works and excavation works to the Gate Lodge. No supporting documents have been provided showing how the proposals will be undertaken or illustrating the extent of fabric that is proposed to be demolished. No structural engineer's report together with a recent Japanese Knotweed survey has been provided to justify the proposed basement extension. Therefore the application fails to justify the harm to the heritage asset, as required under paragraphs 128 and 133 of the NPPF. The proposal therefore is not in accordance with Section 12 (Conserving and Enhancing the Historic Environment) of the NPPF; Policy 7.8 (Heritage Assets and Archaeology) of the London Plan 2016; Strategic policy 12 (Design and Conservation) of the Core Strategy 2011 and Saved Policies 3.15 (Conservation of the Historic Environment) and 3.17 (Listed Buildings) of the Southwark Plan 2007.

6 The proposed rear extension to the Gate Lodge, due to its excessive height, bulk, mass and detailed design would cause harm to the architectural and historic significance of the Grade II listed building, and will be overly dominant causing harm to the character and appearance of the Dulwich Wood Conservation Area, which is contrary to Saved Policies 3.12 (Quality in Design), 3.13 (Urban Design), 3.15 (Conservation of the Historic Environment), 3.16 (Conservation Areas), 3.17 (Listed Buildings), 3.18 (Setting of listed buildings, conservation areas and world heritage sites) of the Southwark Plan 2007; Strategic policy 12 (Design and Conservation of the Core Strategy 2011); the London Plan 2016 and Section 12 (Conserving and Enhancing the Historic Environment) of the NPPF.

7 The replacement of all the original windows to the Gate Lodge has not been adequately justified in the application and the visual impact of the 'sandwich-depth' double-glazing would have a harmful impact on the significance of the listed building. The proposal is therefore not in accordance with Section 12 (Conserving and Enhancing the Historic Environment) of the NPPF 2012; the London Plan 2016; Policy 7.8 (Heritage Assets and Archaeology); Strategic policy 12 (Design and Conservation) of the Core Strategy 2011 and Saved Policies 3.15 (Conservation of the Historic Environment), 3.16 (Conservation Areas) and 3.17 (Listed Buildings) of the Southwark Plan 2007.

8 Insufficient supporting documentation and detail has been provided by the applicant in relation to the proposed internal works and excavation works to the Hunting Lodge and Stables. No supporting documents have been provided showing how the proposals will be undertaken or illustrating the extent of fabric that is proposed to be demolished. Therefore the application fails to justify the harm to the heritage asset, as required under paragraphs 128 and 133 of the NPPF. The proposal therefore is not in accordance with Section 12 (Conserving and Enhancing the Historic Environment) of the NPPF 2012; policy 7.8 (Heritage and Archaeology) of the London Plan 2016; Strategic Policy 12 (Design and Conservation) of the Core Strategy 2011 and Saved Policies 3.15 (Conservation of the Historic Environment) and 3.17 (Listed Buildings) of the Southwark Plan 2007.

9 The proposed extensions to the curtilage listed structures, due their detailed design

and the associated works resulting in loss of plan form and historic fabric would cause harm to the architectural and historic significance and setting of the Grade II listed building, and will be overly dominant causing harm to the character and appearance of the Dulwich Wood Conservation Area, which is contrary to Saved Policies 3.12 (Quality in Design), 3.13 (Urban Design), 3.15 (Conservation of the Historic Environment), 3.16 (Conservation Areas), 3.17 (Listed Buildings), 3.18 (Setting of Listed Buildings, Conservation Areas and World Heritage Sites) of the Southwark Plan 2007; Strategic policy 12 (Design and Conservation) of the Core Strategy 2011, the London Plan 2016 and Section 12 (Conserving and Enhancing the Historic Environment) of the NPPF.

10 The installation of: sprinklers, fire protection and acoustic measures and other service intrusions will have an adverse visual impact on the interior of the listed buildings. The proposed works will harm those parts of the building considered to be of high significance. The proposal is therefore not in accordance with Section 12 (Conserving and Enhancing the Historic Environment) of the NPPF 2012;; Policy 7.8 (Heritage Assets and Archaeology) of the London Plan 2016; Strategic policy 12 (Design and Conservation) of the Core Strategy 2011 and Saved Policies 3.15 (Conservation of the Historic Environment) and 3.17 (Listed Buildings) of the Southwark Plan 2007.

11 Insufficient supporting information, in the form of a costed condition survey, has been provided in order to justify the proposed subdivision of Beltwood House into multiple units together with the alteration and extension of the curtilage listed buildings, and therefore the application fails to justify the harm to the heritage assets as required under paragraphs 128 and 133 of the NPPF. The proposal therefore is not in accordance with Section 12 (Conserving and Enhancing the Historic Environment) of the London Plan 2016; Policy 7.8 (Heritage Assets and Archaeology); Strategic Policy 12 (Design and Conservation) of the Core Strategy 2011 and Saved Policies 3.15 (Conservation of the Historic Environment) and 3.17 (Listed Buildings) of the Southwark Plan 2007.

16/AP/3876 Application type: Full Planning Application (FUL)

Provision of 13 residential dwellings within the site consisting of the conversion of existing hostel building to 8 self-contained apartments including external works comprising the alteration of existing dormers and rooflights (no increase in number) and creation of two half-storey light wells to the rear of the building.

Works also to include underpinning to the existing basement and creation of basement car parking to the north of the building.

Refurbishment of the existing stable block and single storey extension to the east to create a four-bedroom dwelling house.

Facade retention to west-facing facade of existing Hunting Lodge, with demolition of the remaining building and construction of new replacement dwelling on the existing footprint, with single-storey extensions to the east and south, to create a four-bedroom dwelling house.

Construction of a new two storey Kitchen Garden House to the east of the main house, one storey above ground, one storey below, with sunken patio to create new four-bedroom dwelling, with new kitchen garden wall running along the south.

Construction of a new three-bedroom gate lodge dwelling to the south-east of the site, and new access from the highway.

Underpinning to the existing Gate Lodge and extension to the west to create a

four-bedroom dwelling. Reinstatement of historic tennis courts, tennis pavilion and formal gardens, and soft landscaping throughout site. Provision of car parking, refuse and recycling stores and cycle stores.

Decision date 10/02/2017 Decision: Refused (REF)

Reasons for refusal:

1 The proposed extensions to the curtilage listed structures, due their detailed design would cause harm to the architectural and historic significance and setting of the Grade II listed building, and will be overly dominant causing harm to the character and appearance of the Dulwich Wood Conservation Area, which is contrary to Saved Policies 3.12 (Quality in Design), 3.13 (Urban Design), 3.15 (Conservation of the Historic Environment), 3.16 (Conservation Areas), 3.17 (Listed Buildings), 3.18 (Setting of Listed Buildings, Conservation Areas and World Heritage Sites) of the Southwark Plan 2007; Strategic policy 12 (Design and Conservation) of the Core Strategy 2011, the London Plan 2016 and Section 12 (Conserving and Enhancing the Historic Environment) of the NPPF.

2 The proposed basement extension and rear extension to the Gate Lodge, due to the height, bulk, mass, detailed design, and the extent of the basement excavation would fail to appear subservient to the host building; result in substantial harm to the architectural and historic significance of the Grade II listed building; and adversely impact upon the setting of the listed building and harm the character and appearance of the Dulwich Wood Conservation Area. As such, the proposal is contrary to Saved Policies 3.2 (Protection of Amenity), 3.12 (Quality in Design), 3.13 (Urban Design), 3.15 (Conservation of the Historic Environment), 3.16 (Conservation Areas), 3.17 (Listed Buildings) and 3.18 (Setting of Listed Buildings, Conservation Areas and World Heritage Sites) of the Southwark Plan 2007; Strategic policy 12 (Design and Conservation) of the Core Strategy 2011, the London Plan 2016 and Section 12 (Conserving and Enhancing the Historic Environment) of the NPPF.

3 Due to the number, detailed design, footprint and cumulative impact of this quantum of development within the grounds of Beltwood House the proposal would detract from the setting of the Listed Building and the character and appearance of the wider Dulwich Wood Conservation Area. It would therefore be contrary to Saved Policies 3.15 (Conservation of the Historic Environment), 3.16 (Conservation Areas) and 3.18 (Setting of Listed Buildings, Conservation Areas and World Heritage Sites) of the Southwark Plan 2007; Strategic Policy 12 (Design and Conservation) of the Core Strategy 2011, policy 7.9 (Heritage Led Regeneration) of the London Plan 2016 and Section 12 (Conserving and Enhancing the Historic Environment) of the NPPF.

4 The proposed new rooflights on the west and south elevations by virtue of their location and size would be overly dominant and unduly harmful to the form and appearance of Beltwood. The proposed rooflight on the south elevation would be visually intrusive on the principal elevation. The proposal would therefore fail to preserve or enhance the special architectural or historic significance of the Grade II listed building. As such, the proposal is contrary to saved policies 3.15 (Conservation of the historic environment) and 3.17 (Listed Buildings) of the Southwark Plan 2007; Strategic Policy 12 (Design and Conservation) of the Core Strategy 2011; the London Plan 2016 and Section 12 (Conserving and Enhancing the Historic Environment) of the NPPF.

5 The proposed development will result in the removal of an excessive amount of mature trees and those which would develop to sustain the site's continued wooded character, in particular trees within the wooded area adjacent to the former tennis courts, trees adjacent to the wooded lodge and other boundary specimens. The volume of trees removed and the extent of hard landscaping would harm the open, green and intrinsic nature of the woodland area, the amenity of adjoining properties

and both the character and setting of the wider Conservation Area and Listed Building. The development has also failed to demonstrate sufficient mitigation planting through appropriate landscaping. The development is therefore contrary to policies 7.19 (Biodiversity and Access to Nature) and 7.21 (Trees and Woodlands) of the London Plan 2016; Strategic Policy 11 (Open Spaces and Wildlife) of the Core Strategy 2011 and saved policies 3.1 (Environmental Effects), 3.2 (Protection of Amenity), 3.13 (Urban design), 3.16 (Conservation Areas) and 3.28 (Biodiversity) of the Southwark Plan 2007.

6 The development has failed to demonstrate that the retained vegetation will be adequately protected from construction impacts; in particular from the proposed development within the woodland, level changes and other basement excavation associated with the curtilage development, all of which affect the tree and woodland protected by TPO ref. no. 98, and furthermore from post development pressure arising from potential future overshadowing and maintenance issues. As such the development is contrary to policy 7.21 (Trees and Woodlands) of the London Plan 2016; Strategic policy 11 (Open Spaces and Wildlife) of the Core Strategy 2011 and saved policy 3.1('Environmental Effects) of the Southwark Plan 2007.

7 The application fails to provide sufficient and satisfactory wheelchair standard housing. The proposal would therefore be contrary to saved policies 4.2 (Quality of Residential Accommodation) and 4.3 (Mix of Dwellings) of the Southwark Plan 2007.

8 The proposal, by failing to provide for appropriate planning obligations secured through the completion of a S106 agreement, fails to ensure adequate provision of affordable housing 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 the Council's S106 and Community Infrastructure Levy SPD 2015.

9 The proposal fails to provide a sufficient justification for the proposed level of parking within the development and thus fails to promote sustainable modes of transport and thus is contrary to saved policy 5.6 (Parking) of the Southwark Plan 2007; Strategic policy 2 (Sustainable Transport) of the Core Strategy 2011 and the NPPF.

10 The proposed siting and design of the proposed 'wooded lodge' would result in increased overlooking of the adjoining property and private gardens at the nearest dwelling at 75 Sydenham Hill. The proposal would therefore be contrary to saved policy 3.2 (Protection of Amenity) of the Southwark Plan 2007 and Strategic policy 13 (High Environmental Standards) of the Core Strategy 2011.

17/AP/0063 Application type: Tree Preservation Order - works related (TPO)  
Tree Removals List: Reason for removals the following specimen is in a poor structural condition overall. Pruning is not an option the overall poor structural defects identified and low potential amenity in the future.

T0736 Plum

T0751 Leylandii

T0769 Copper Beech

T0771a Holly

T0772 Oak

T0772a Holm Oak

T0784 Sycamore

T0789 Lime

T0792 Lime

T0793 Corsican Pine

T0794 - Cypress

<p> T095 - Cypress  T096 - Leylandii  T097 - Leylandii  T0805 - Leaning Oak  T0807 - Leylandii  T0810- Sycamore  T0811 - Holm Oak  T0829 - Sycamore  T0831 Holm Oak  T0864 Holm Oak  T065, T0866, T0867, T0868, T0869, T0870, T0871, T0872, T0873, T0879, T0881 - 11 no. Sycamores  T0880 - Ash  T0882 -Holm Oak  T0888 - Holm Oak  T0890 - Sycamore  T0893 - Sycamore  T0894 - Sycamore  T2 - Beech Monolith  Decision date 20/02/2017 Decision: TPO consent refused (TPOR)  Reason for refusal:   Insufficient information has been provided to substantiate the need for removal or why alternative works such as pruning may not be appropriate in order to avoid the need for felling. Beech T2 has recently undergone significant crown reduction and limb removal work. Such a significant loss of canopy would adversely impact upon the character of the conservation area and habitat for protected species. No replacement planting is proposed, nor provided as required as a condition of consent for application ref 16/AP/0446. The reasons stated for removal are therefore not considered sufficient to give approval.   The proposed work to remove the trees is therefore contrary to the NPPF Parts 7, 8, 11 &amp; 12; the following policies of the Core Strategy 2011: Strategic policy 11 (Open Spaces and Wildlife), 12 (Design and Conservation), 13 (High Environmental Standards); London Plan policy 5.10 (Urban greening), 7.19 (Biodiversity), 7.21 (Trees and Woodlands) and the following Saved Policies of the Southwark Plan 2007: Policy 3.2 (Protection of Amenity), Policy 3.15 (Conservation of the Historic Environment), Policy 3.18 (Setting of Listed Buildings, Conservation Areas and World Heritage Sites) and Policy 3.28 Biodiversity. </p>
<p>16/EN/0190 enforcement investigation into alleged: Unauthorised works to listed building - Deterioration of and unauthorised works to the main house, servants' wing and outbuildings. The main building which is listed has deteriorated and as such the Council are currently in the process of considering issuing notices to require repair works to be undertaken.</p>
<p>16/EN/0149 enforcement investigation into alleged: Unauthorised building works - Alleged breach of planning control: Alterations to the entrance gates, erection of new close-boarded timber fence around the perimeter of the site, CCTV cameras along the front boundary and brick pavements adjacent to the Gate Lodge. The fencing subject to this enforcement investigation is not sought to be retrospectively granted within this planning application, however the alterations to the entrance do form part of the application. The high close board fencing that has been installed around the perimeter of the site has replaced low picket fencing to the front of the site and open fencing to the rear of the site, where it adjoins the surrounding residential properties. The Council has issued an enforcement notice requiring the removal of the fencing and reinstatement of the original boundary treatment.</p>

<p>17/AP/3071 - An application for Listed Building Consent has been made along side this application for alterations to enable a change of use of Beltwood House (a Grade II listed building) from a Class C2 residential institution to provide 7 apartments with external works comprising demolition of the service wing outriggers and replacement with a new communal entrance. Demolition of curtilage outbuildings to the east of Beltwood House ('Stables and Workers' cottage') and replacement with 3 No. residential units. Creation of new Gate House and a detached house within the site curtilage. Alterations including underpinning of the existing Gate Lodge (curtilage listed building) and, ground floor extension. This application is to be determined alongside the application subject to this report.</p>
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### **Planning history of adjoining sites**

16. None relevant.

## **KEY ISSUES FOR CONSIDERATION**

### **Summary of main issues**

17. The main issues to be considered in respect of this application are:
- a) The principle of the development
  - b) The effects on the amenity of neighbours.
  - c) Parking and highway issues
  - d) Design issues and impact on setting of listed buildings and character and appearance of conservation area
  - e) Arboricultural implications; loss of and harm to significant irreplaceable trees
  - f) Ecological implications
  - g) The quality of the proposed accommodation/compliance with design and accessibility standards
  - h) Affordable housing
  - i) Planning obligations (S.106 undertaking or agreement)
  - j) Community Infrastructure Levy
  - k) Sustainable development implications.

### **Planning policy**

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

- 18.
- Section 6 - Delivering a Wide Choice of Family Homes
  - Section 7 - Requiring Good Design
  - Section 12 – Conserving and Enhancing the Historic Environment
  - Section 13 – Conserving and Enhancing the Natural Environment

#### The London Plan 2016

- 19.
- Policy 3.3 - Increasing housing supply
  - Policy 3.4 - Optimising housing potential
  - Policy 3.5 - Quality and design of housing developments
  - Policy 3.7 - Large residential developments
  - Policy 3.8 - Housing choice
  - Policy 3.11 - Affordable housing targets
  - Policy 3.12 - Negotiating affordable housing on individual private residential and mixed use schemes
  - Policy 3.13 - Affordable housing thresholds



- Policy 5.2 - Minimising carbon dioxide emissions
- Policy 5.3 - Sustainable design and construction
- Policy 5.7 - Renewable energy
- Policy 6.5 - Funding Crossrail and other strategically important transport infrastructure
- Policy 6.9 - Cycling
- Policy 6.10 - Walking
- Policy 7.8 - Heritage assets and archaeology
- Policy 7.9 - Heritage-led regeneration
- Policy 7.19 - Biodiversity and Access to Nature
- Policy 7.21 - Trees and Woodlands
- Policy 8.1 - Implementation
- Policy 8.2 - Planning Obligations
- Policy 8.3 - Community Infrastructure Levy

#### Core Strategy 2011

20.

- SP1 - Sustainable development
- SP2 - Sustainable transport
- SP5 - Providing new homes
- SP6 - Homes for people on different incomes
- SP7 - Family homes
- SP12 - Design and conservation
- SP13 - High Environmental standards
- SP14 - Implementation and delivery

#### Southwark Plan 2007 (July) - saved policies

21. 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 3.4 – Energy efficiency
- Policy 3.6 – Air quality
- Policy 3.7 – Waste management
- 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 3.16 – Conservation areas
- Policy 3.17 – Listed buildings
- Policy 3.18 – Setting of listed buildings, conservation areas and world heritage sites
- Policy 3.28 – Biodiversity
- Policy 4.2 – Quality of residential accommodation
- 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

Supplementary planning documents  
Affordable Housing 2008  
Draft Affordable Housing 2011  
2015 Technical Update to the Residential Design Standards 2011  
Section 106 Planning Obligations and Community Infrastructure Levy SPD 2015  
Sustainable Design and Construction 2009  
Development Viability SPD March 2016  
Dulwich 2013

## **Consultations**

### Summary of consultation responses

#### Statutory responses

22. Met Police - Recommend that the proposal should be secure by design compliant.
23. London Fire and Emergency Planning Authority - Note that pump appliance access and water supplies for the fire service were not specifically addressed in the supplied documentation; however they do appear adequate. In other respects this proposal should conform to the requirements of part B5 of Approved Document B.
24. Environment Agency - No comments.
25. Natural England - Note that part of the site is a priority habitat site and advise that if significant harm resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused. The scheme, if approved would improve biodiversity on the site (please see the ecology section below).
26. Historic England – Note that Beltwood House has been partially vacant or underused for a number of years and is on their Heritage at Risk Register for London. While they welcome the repair and reuse of the house, they have concerns about the proposed development within the grounds entitled the 'Wooded Apartments'. They urge the Council to consider this harm in relation to the policies set out within the NPPF. Following the revision, which omitted the wooded flats they note that despite the Pavilion House being smaller than the Wooded Flats, they still consider the proposals to cause harm to the historic environment. They maintain however that the local planning authority should be determined on the basis of the council's specialist conservation advice.
27. Victorian Society – The two most concerning aspects of the scheme were the proposed new block of four apartments west of Beltwood House and the three residential units proposed directly to the east. While they previously conceded the principle of demolishing the curtilage-listed buildings to the east of the house, they maintain the view that their preservation - or the preservation of their more interesting parts - would be preferable.
28. TfL - No objections as the proposal is unlikely to impact on the wider TfL network.
29. Thames Water - Note that they would expect the developer to demonstrate what

measures he will undertake to minimise groundwater discharges into the public sewer. They would also recommend that petrol/oil interceptors be fitted in all car parking/washing/repair facilities.

#### Internal consultee responses

30. Environmental Protection - No objections; recommend a number of conditions.
31. Transport - No objections; however note that the level of parking proposed is high.
32. Ecology Officer – Advised that the issue of the bat survey has been resolved via an addendum which rates the site as having negligible potential for bat roosts. To avoid risk the applicant will retain an ecologist on a watching brief during the works. The grounds contain mature trees which can provide valuable habitat. The area around the gatehouse has a bat roost close by because of the emergence times recorded in the bat survey. Lighting around this area should be kept to a minimum. Japanese Knotweed is still present on site. This should be treated appropriately. The ecology and bat survey reports make a number of recommendations. These are best dealt with through conditions or agreed actions.
33. Flood and drainage team - no objections; request a drainage strategy submitted.
34. Highways - The proposed low brick wall must not be higher than 600mm. There should be no obstruction within the visibility splay. Vehicle waiting area at both entrances should be set back at least 6m from the site boundary.

#### Neighbour consultee responses:

35. A total of 27 responses have been received with the application, 13 in support of the application and 14 against. The concerns raised are as follows:

#### Amenity impacts

36.
  - Overlooking and high roofs of the New Gatehouse.
  - Concerns about the proposed terrace of properties introducing a large near 3-storey building in close proximity to neighbouring properties.
  - The proposal will bring more noise.
  - Concerns about noise from construction.
  - Daylight and sunlight into adjoining properties.
  - Concerns about the use of roof gardens of new terraced houses.

#### Transport Impacts

37.
  - Danger in terms of transport and traffic presented by the location of the proposed new development to the South East known as The New Gatehouse.
  - Concerns raised about increased traffic on a busy corner.

#### Design and Heritage Impacts

38.
  - Proposed new development to the south east of Beltwood House has significant negative impact on the setting of Beltwood House.
  - Temporary fencing surrounding the site should be removed.
  - Inappropriate architectural design of the south east development
  - The design of the proposed properties seems out of keeping with the main Grade 2 listed stately home.
  - The number of properties that are to be built within the grounds is excessive and will detract from the setting of Beltwood House.

- Concerns regarding the demolition of the buildings within the site.
- Negative impact on historical and heritage perspectives, entailing permanent loss of historically-intended visual access along the length of the house's southern perimeter with Sydenham Hill.
- Concerns regarding squeezing the number of flats into the main dwelling.

#### Viability

39. - Absence of financial evidence that the three proposed new building developments are essential for Enabling Development of the Listed Site No evidence is presented by the Applicant.

#### Tree Impacts/Biodiversity

40. - Failure to produce a sensible tree plan or to plan with consideration and consultation.
- The construction of a new Gate House to the southeast of the Beltwood site together with a new access road would necessitate the wholesale removal of many sound trees in a Conservation Area.
- The applicant's destruction of trees and shrubs has a detrimental effect on the local ecosystem which is very rich in wildlife.

#### Flood and Drainage implications

41. - Digging a large basement for three homes close to our site gives us concern that the water table may be affected and that such variation may damage trees and shrubs.

#### Other Comments

42. - The proposal does not serve the community.

#### Re-consultation

43. The application was re-consulted on as a revised scheme was received which involved the removal of a block of flats referred to as 'wooded flats'; a two storey building including plus basement for 4 flats. This has now been omitted and replaced by a two storey (plus basement) dwellinghouse on a much smaller footprint. Other alterations also included the addition of a flat within the main Beltwood House building as well as a revision to the landscaping strategy, which included a tree planting programme and reduction in parking. Additional information on development viability has also been provided Concerns have continued to be raised in relation to the above comments as residents have outlined that the revised scheme does not overcome the concerns raised previously.
44. The comments in support of the application raise the following points as positives for the site:
- The site will long overdue bring Beltwood House back into use.
  - It will provide a range of quality homes for different people.
  - The quality of architecture is of a high standard and would not detrimentally impact on the key features of Beltwood House.
  - Provides high quality and careful landscaping.
  - Improvements to the fencing and gates are of a high quality.

#### **Principle of development**

45. The site lies in a residential area and it is not designated for alternative uses.

Additionally, while the main dwelling has been used as a hostel in the past, this use appears to have been abandoned, a residential land use at the site is established and is acceptable.

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

46. The proposals consist of the conversion of Beltwood House to provide seven flats; the erection of three terraced properties to the east of the main house; a new gate lodge to the southeast of the site; conversion of the existing gate lodge and the erection of a new pavilion house to the west of the main house.



#### **Beltwood House**

47. The conversion of Beltwood House into seven flats would not significantly affect the residential amenity of neighbours as the windows within the main building are existing; no further overlooking would ensue. No additional daylight or sunlight impacts would occur. The proposed new entrance would also not result in any further impacts on the neighbours as it would be a sufficient distance from apertures within the proposed dwellings and properties outside the site. There are some windows within the eastern elevation of the main house that would be approximately 9m away from the end terrace house, however there is an established pattern of overlooking between the main house and worker's cottage and thus this would not worsen any overlooking. Furthermore, the rooms within the main dwelling are bedrooms that are less sensitive to overlooking as these rooms are generally used at night time. Overall the amenity for the future occupiers is considered acceptable.

#### **Terraced properties**

48. In terms of the buildings within the grounds of the site, the proposed terraced properties would be close to the neighbouring 6 Crescent Wood Road; it would be approximately 8m to the site boundary at its closest point and 16m to the main building. When undertaking the 25 degree test as outlined within the BRE guidance, the proposal would not intersect this line and as such it is considered that there would

be no noticeable impacts on daylight or sunlight on this property. Furthermore, the large garden would receive significant levels of sunlight and thus the proposal would not detrimentally impact on the use of the outdoor amenity space. All other properties are further away and would not be affected.

49. Two windows are shown in the side elevation facing no. 6 Crescent Wood Road, however these serve hallways; a condition requiring these windows to be obscure glazed is recommended to prevent overlooking. All other windows would be well in excess of the required 21m separation distances recommended in the Residential Design Standards SPD to prevent unnecessary problems of overlooking and loss of privacy. One objector refers to the use of the roofs of these properties as terraced areas, however this is not proposed, access to the roofs is proposed for maintenance only; a condition ensuring this area is not used for sitting out is recommended.

#### Pavilion House

50. The proposed pavilion house is located within the area that was previously a tennis court and would be well in excess of 21m from all surrounding properties; as such no overlooking would occur. Given the distance from the neighbouring properties, the proposal would not intersect the 25 degree line test, as outlined within the BRE guidance and as such no daylight/sunlight issues arise from this property.

#### Existing gate lodge

51. The existing gate lodge is again located well in excess of 21m from all surrounding properties and as such no overlooking would occur. Given the distance from the neighbouring properties, the proposal would not intersect the 25 degree line test, as outlined within the BRE guidance and as such no daylight/sunlight issues arise from this property.

#### Proposed gate lodge

52. The proposed gate lodge would be approximately 8m from the property at 75 Sydenham Hill, however the scale of the dwelling is not such that it would impact on the daylight or sunlight within this property. The only window on the upper floor of this building would be within the rear elevation facing back into the site and thus would not result in any overlooking. Some windows are proposed within the side elevation at ground floor, however suitable planting and screening from boundary treatment would ensure that no overlooking would arise from this property.
53. The development would result in an increase of vehicular and general activity at the site but the quantum of development and availability and layout of gardens/communal space should not result in excessive noise or disturbance to surrounding properties over and above that which might be experienced in the Suburban Density Zone.
54. The issue of noise and disturbance during construction has been raised by residents. For a development of this scale, it is more appropriate to deal with any noise and disturbance through legislation that Environmental Health use than planning.
55. Overall the scheme would not result in significant amenity impacts on neighbours and the application complies with saved policy 3.2 of the Southwark Plan 2007.

#### **Impact of adjoining and nearby uses on occupiers and users of proposed development**

56. The surrounding properties are within residential use and as such would not conflict with the proposed residential uses within the site. Whilst there is a public house

situated to the west of the site, this will be adequate distance from properties to ensure that there are no significant impacts of additional residential use within the site.

## **Transport issues**

### Access

57. Previous concerns were raised in relation to highways and access relating to the provision of a new access to the wooded lodge and in relation to the level of parking proposed and access and egress into the basement car park.
58. The main vehicular access proposed is making use of the existing entrance/exit, albeit with a greater set back to allow space for vehicles to wait off street, which is an improvement on the existing access arrangements and thus is welcomed. However it is still proposed to provide a secondary access and egress to the new Gate Lodge for which a new dropped kerb is proposed. Detailed visibility splays have been provided and indicate that there would be acceptable levels of visibility into and out of the site. The Council's transport team have reviewed these and are satisfied that the existing and proposed access would not result in any significant highways implications. The basement car park to which there was some objection from neighbours has been omitted; an improvement to the scheme. Tracked drawings are also provided which indicate that refuse and emergency vehicles can enter and exit the site in a forward gear. Overall the previous access issues have been overcome by the new application.

### Cycle parking

59. To satisfy the London Plan requirements, for this development of 13 dwellings, a total of 22 cycle parking spaces need to be provided. The applicant has proposed 20 spaces within the main communal cycle store and two in a separate store for the wooded lodge dwelling, as well as sufficient space for cycle storage within the existing gate lodge and proposed lodge. This provision is considered acceptable as it would exceed the requirements of the London Plan.

### Car parking

60. With the basement car park now omitted, and a further reduction in the level of parking above ground, the proposal is for 17 car parking spaces; a reduction of nine.
61. The level of parking at 17 spaces is acceptable as it would meet the requirements outlined within the London Plan 2016. The London Plan sets out that up to 2 per unit of 4 or more bedrooms would be allowed, up to 1.5 per unit for 3 beds and less than 1 per unit for 1-2 beds (17 spaces). The site has a relatively low PTAL of 2 and as such officers accept that there is scope to provide parking at the maximum end of the parking standards. Given the nature of the proposed units, with many large family dwellings, it is considered that the proposed level of parking is acceptable. There are six charging points that will provide charging for 50% of the cars on site, encouraging electric car use for residents and future-proofing the site. This is considered acceptable and would help encourage more sustainable transport methods.

### Service access

62. The applicant has provided a swept-path analysis that identifies any vehicle entering/exiting the site can do so in forward gear. The transport statement says that the expected levels of servicing and delivery associated with the site should be one to two a day. Space has been provided for smaller vehicles to wait off the highway with a key pad access into the site. Further details would be required to identify

arrangements for refuse and servicing vehicles gaining access to the site through the video controlled entry system. A condition is recommended that details of this be provided through a delivery and servicing strategy.

#### Refuse storage

63. The proposed refuse store is located at the north of the site, close to the boundary with the property at no. 6 Crescent Wood Road. Separate bin stores are also proposed for the existing and proposed gate lodge buildings. Objections have been received from residents to note that the location would not be suitable due to the noise and potential for vermin. The refuse stores have been located within this area in order to provide convenient access for the refuse vehicles where they can manoeuvre without obstructing the access road within the site provided that the enclosures are provided and effectively maintained; it is not considered that this would result in a significant impact that would warrant refusal. The level of provision is considered acceptable, provided further details can be provided in relation to service access as above.
64. Overall the information submitted is acceptable to fully assess the transport implications of the development. As such it would accord with saved policies policy 5.2 (Transport impacts) and 5.6 (Car parking).

#### **Mix of Dwellings**

65. Southwark Plan policy requires a mix of dwellings sizes and types to be provided within major new developments in order to cater for a range of housing needs. There is a particular need for family units in the borough and therefore policy requires that the majority of units should have two or more bedrooms and at least 10% three or more bedrooms with direct access to private outdoor amenity space. The number of studio flats should not exceed 5% and at least 10% of the units should be suitable for wheelchair users. Strategic policy 7 (Family homes) of the Core Strategy requires at least 20% of new schemes in the urban density zone, as here, to be of 3 or more bedrooms.
66. The proposed development comprises 13 dwellings consisting of 1 x studio (over two floors) (7.7%), 2 x 1 bed (15.4%), 2 x 2 bed (15.4%), 7 x 3 bed units (53.8%) and 1 x 4 bed unit (7.7%). The proposed mix therefore meets the requirement for the majority of units to have two or more bedrooms (69.2%). The scheme will provide a good proportion of three bedroom (or more) units with a provision of 53.8% family sized units which is well in excess of the minimum 20% requirement of the Core Strategy, which is a positive element of the scheme. Whilst the one studio unit would amount to more than 5% provision, this layout is proposed in order to ensure that the key features of the listed building are maintained. As such, overall the mix of units is appropriate.

#### **Quality of accommodation**

67. All of the units located within the main Beltwood House are of a good quality in terms of size with each of the units significantly exceeding the minimum requirements for the overall flat sizes. Generally all of the rooms significantly exceed the minimum size standards. While most of the units would not have direct access to private amenity space, there would be a generous communal amenity space located within the grounds of the site and as such this is considered acceptable.
68. All of the units proposed are dual aspect, although the basement flat would have some limited outlook from the two bedrooms. In the basement flat, all rooms would have vertical windows and given the sensitivity of the heritage asset and the need to have



as little intervention as possible, this is considered reasonable.

69. In terms of each of the buildings located within the grounds of the main Beltwood House, the terraced dwellings would overall exceed the size requirements within the Residential Design Standards SPD, as well as each room also meeting these standards. In terms of the proposed pavilion house, again the overall dwelling and individual room sizes would be met. All of these dwellings would be at least dual aspect and have access to private garden space with low planted edges to the openness of the gardens within the site is retained.
70. The existing gate lodge would also meet the overall unit size with all rooms complying with the required standards. The proposed pavilion house would also meet the overall floorspace and minimum room standards. As such the overall level of accommodation would be acceptable.
71. The proposed new gate lodge would be provided as a wheelchair accessible unit and would exceed the requirements as outlined within the National Housing Standards. The overall size is generous and would be provided with level access and an internal lift. This is considered acceptable.
72. Overall the accommodation of the dwellings proposed is considered to be of a high quality and would accord with the guidance within the Residential Design Standards SPD and Saved Policy 4.2 (Quality of accommodation) of the Southwark Plan 2007.

#### **Design issues and Impact on character and setting of a listed building and/or conservation area**

73. The refurbishment and alteration works proposed to the heritage assets are considered in more detail under the associated Listed Building Consent application 17/AP/3071. The impact on the setting of the heritage assets as a consequence of the proposed development within the grounds is discussed below.

#### **External Alterations to Beltwood House**

74. A number of external alterations are proposed to the main listed building. These are restricted largely to the servants' wing which is of less architectural significance. On the north side (rear elevation) a new light well will be introduced, with a glazed balustrade. Two existing openings in this location will be increased in size by 300mm and new timber windows installed. The existing store double doors will be replaced with a timber window. A new stepped access down into the basement will also be created on the north side. On the eastern elevation an existing opening will be uncovered and a new timber window installed. Proposed on the north elevation is a new formal entrance to Units 3, 4, 5 and 6 in the form of a stone colonnade. The classical form of the colonnade has been derived from arched features around Beltwood and will replace a series of mis-matched outriggers. The over-riding stone colonnade is steps forward of a series of glazed infills and stone arches, to give order and depth to the facade.
75. At second floor level on the southern side, currently there is an awkward junction between the servants' wing and main house. The servants' wing will be cut back at this level and re-built in line with the existing chimney breast. The existing window will be relocated in the new wall, a blind window re-opened and a new timber window installed. At roof level the only change proposed is the introduction of a rooflight over living area of the second floor apartment. The proposed rooflight would not be visible in the principal view of the building. Conditions have been recommended for the associated Listed Building Consent for material samples and detailed drawings of the colonnade, rooflight, glass balustrade, stepped access and for all new windows and

doors. The impacts of the architectural and historic significance of these external changes are dealt with in more detail under the associated Listed Building Consent application (17/AP/3071).

#### Gate House

76. The proposal is to extend the gate house with a modest single storey extension expressed in an Arts and Craft style. The proposed extension is considered to be proportionate in scale and will match the existing building in terms of detailed design and materials. Overall, it is considered that due to the design and location, the proposed extension will not result in an incongruous addition, would preserve and enhance the curtilage listed building and not result in significant harm to recognised heritage assets and Dulwich Wood Conservation Area. Given the distance between the gate house and main house, the proposed extension will not harm the appreciation of Beltwood House.

#### New Gate House

77. The proposed new gate house is located on the south-eastern corner of the site. The two bedroom house will employ high quality materials and detailing. Being modest in scale there will be a similar proportional relationship between the height of the new and existing gate houses. In contrast to the existing Arts and Crafts styled gate house the new dwelling will be contemporary in architectural form. However, the massing with the steep pitch to the roof, window to solid ratio and single storey outrigger to the rear have all been influenced by the existing gate house.

#### Terraced Houses

78. The refused schemes had proposed a mock Arts and Craft and Victorian language for the new dwellings, which had been considered an inappropriate design response. Whereas the 2016 scheme had sought a facade retention of the stable and worker's cottage and large pastiche extensions and basements, the 2015 refusal was for wholesale demolition of the buildings, as is the case here. In the 2015 appeal decision, the inspector considered that the demolition of these buildings would only be acceptable if the new development sat comfortably in the context of mass, scale, orientation and style of the listed building. The current scheme seeks again to demolish the buildings and replace them with a terrace of three, two storey houses with basements. The footprint for these demolitions has dictated the area covered by the new dwellings. Similarly the height of the new development is comparable to the stables they are to replace. A courtyard area or buffer is retained between the new houses and the servants' wing. This buffer also acts as a break between the new houses and Beltwood in views from Sydenham Hill, thus avoiding a continuous frontage. As with the other proposed houses, the design will be a high quality contemporary build. The terraced houses will have a clear hierarchy of base, middle and top, ensuring comfortable proportions. The base will ground the building at the back edge of the new courtyard. The middle will feature a strong reconstituted stone banding course. The top will also be well articulated with a clear rhythm windows and balconies, broken up by changes in massing, hit and miss brickwork and reconstituted stone detailing in order to terminate the building. The entrances to all three dwellings will be generously proportioned within the facade and clearly legible from the courtyard. The overall mass of the terrace will be broken down by staggering the individual dwellings and planter beds facing onto the courtyard. To the rear the individual gardens are to be demarked by low hedges.

#### Pavilion House

79. The revised scheme has seen the omission of the 3 storey wooded apartment block

and its replacement with a 3 bedroom 2 storey house with basement, in the same location albeit a reduced footprint. The house has been designed in such a way as to keep the height to a minimum above ground level, with the roof set lower than the ridge of the existing gate house. Once again a contemporary styled masonry building is proposed. The house will have a clear hierarchy, ensuring comfortable proportions. Each floor will feature a clear rhythm of windows and balconies, broken up by changes in massing, and reconstituted stone detailing. The top will be well articulated with a reconstituted limestone banding in order to terminate the building. Overall it is thought that the simplicity of form will contrast and complement the richness of the Arts and Crafts and neo-classical detailing of the listed building.

### Materials

80. Across the wider conservation area there is a variety of brick colours and bonds. On the Beltwood Estate, brick is confined to the gate house, the garden end of the servants' wing, stables and worker's cottage. The tone of the gate house is a much brighter yellow stock than the other buildings. A masonry language is proposed for the new buildings, in response to the character of the surrounding area and to complement the heritage assets. This will consist predominantly of brick, with reconstituted stone or timber features. With the proposed terrace of houses a textural handmade brick is proposed, in a Flemish bond to reflect the un-rendered end of the servants' end of Beltwood House.
81. The set-back entrances and first floor terrace will be highlighted in a herringbone bond. The first floor elevation has hit and miss brickwork in front of the timber framed glazing. The roofs of the terraced houses are to have a wildflower living roof. The same materials have been selected for the new pavilion house; with reconstituted limestone that would provide a termination to the walls. With the new gate house the same brick has been chosen, in contrast the fenestration will be PPC aluminium framed units in a dark grey. To add texture to the façade of the new gate house, the brickwork is rusticated to the bottom 900mm and chimney. The roof of the new gate house will be a blue/black slate. The use of reconstituted stone and buff brick have been carried through to the alterations proposed to the main house and the introduction of a new entrance. The single storey extension to the gate house is to match the existing materials: render, slate and timber. In summary, this soft palette of materials is considered an appropriate response to reflect the character of the surrounding area. In order to ensure the quality of the final scheme, material samples and detailed drawings should be secured by condition.

### Entrance gates and boundary treatment

82. The existing access onto the Beltwood Estate will be maintained and upgraded. The existing gates will be replaced with reclaimed wrought iron gates and new pillars constructed. The existing brick piers and wall date from the later twentieth century and not considered to be curtilage listed. A new entrance will be created by the proposed gate house, as a secondary entrance to serve just the one dwelling. This new access will be subservient in character to the main entrance. No objection is raised to this approach subject to detailed design. Along the Sydenham Hill boundary a brick wall with metal railings is proposed. This will replace the existing and unauthorised closed board fencing. However, originally a picket fence, which is a characteristic boundary treatment of the wider Dulwich area, ran along this southern edge. Officers would wish to see a return to this historic boundary treatment and a notwithstanding condition is suggested for further details of the proposed replacement fencing and access gates to the new dwelling.
83. The Local Planning Authority is required by section 72(1) of the Planning (Listed

Buildings and Conservation Areas) Act 1990 to pay special regard to the desirability of preserving the character or appearance of the Dulwich Wood Conservation Area. There is a strong presumption against the grant of permission for development that would harm the character and appearance of the conservation area. This is reinforced by both local and national planning policy. In terms of listed buildings and their setting section 16(2) and 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 puts a similar duty on Local Planning Authorities.

84. Paragraph 129 of the NPPF requires that Local Planning Authorities take the significance of the heritage asset into consideration when determining applications. Paragraph 131 requires that the LPA also takes 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.

85. Paragraph 132 of the NPPF requires "great weight" to be given to the asset's conservation in decision making. Core Strategy Strategic policy 12 (Design and Conservation) expects development to preserve or enhance the significance of the borough's heritage assets and their settings. Southwark Local Plan policy 3.15 (Conservation of the historic environment) requires that development should preserve or enhance the special interest or historic character or appearance of buildings or areas of historical or architectural significance. Policy 3.16 (Conservation areas) asserts that within conservation areas, development should preserve or enhance the character or appearance of the area.

86. The Historic England guidance document "Historic Environment Good Practice Advice in Planning 3 - The Setting of Heritage Assets - 2017" sets out a methodology for assessing the impact of development within the setting of heritage assets as part of the planning process.

Broadly, the guidance outlines that the extent of setting embraces all of its surroundings from which an asset can be experienced. It also makes clear that settings of heritage assets do not have fixed boundaries, and elements of a setting may have a positive or negative contribution to the significance of the asset.

87. Identification of the heritage assets and their settings which would be affected: Beltwood House, a grade II listed Victorian villa, remodelled in the early twentieth century in a "renaissance" manner with neo-classical detailing. The list description states:

*"The three-bay west elevation has a large semi-circular hooded porch with a dentilled cornice, carried on paired Ionic columns with stylised squared volutes (a recurrent motif in the interior). A flight of stone steps leads to an open-pedimented doorcase. To the left of the entrance is a large mullion-and-transom window; the right-hand bay is blind. The upper floor has tripartite bow windows. The south elevation is a symmetrical composition of seven bays arranged 2-3-2; the central pilastered bays break forward under a pediment with an oculus and swagged Adamesque decoration. The ground floor has triple semi-circular arches with keystones and imposts, the outer arches have timber bow windows, the central one a door; each has a leaded patterned fanlight. To either side is a large bow French window with a dentil cornice, lead roof and lead patterned transom lights (the left window reinstated c1993 after fire damage). Upper windows are cross-framed. The frieze is decorated with paterae. The north elevation has a two-bay projection to the left, and irregular fenestration including a Venetian*

*stair window. The service wing is an irregular, accretive two-storey range built in brick, largely rendered, with hipped roofs. The terrace to the south is enclosed by a stone balustraded wall, the piers embellished with urns"*

88. Within the grounds, the gate lodge is a simple Arts and Crafts building which stands at the driveway entrance to the house and is visible from the street. The stables, a simple utilitarian building with some later alterations located adjacent to the house to the east, and the worker's cottage another simple building within the grounds. The buildings sit within mature gardens with some remnants of formal gardens including terraces and tree planting. The setting of the house is considered to be the experience of these buildings within a planned hierarchy, and their location within an extensive mature garden. There are glimpses of the house from the street, and the immediate part of Sydenham Hill is considered to be within the wider setting of the asset. Beltwood was designed and conceived to stand in its own grounds and appreciated from its own landscaped garden setting. Originally there would have been two entrances onto the estate and the existing lodge accentuates the importance of the southern and western elevations of the main house, upon arrival from Sydenham Hill.
89. Immediately outside the grounds the heritage assets in Crescent Wood Road turn their back on Beltwood. Historically there has never been a strong relationship between these buildings and the Beltwood Estate. Beltwood was never intended to be appreciated from Crescent Wood Road and vice versa. All three listed buildings in Crescent Wood Road, including the II\* listed Six Pillars address the street frontage. The views between Beltwood and the Crescent Wood heritage assets are of back elevations rather than principal frontages.

How and to what degree these settings make a contribution to the significance of the heritage assets?

90. The significance of the house is positively contributed to by the simple subservient experience of the gate lodge, stables and worker's cottage within the landscape garden setting. The size, character and appearance of these buildings forms part of the experience of the house as a large detached villa of 19th and early twentieth century construction. The landscaped gardens, while overgrown in some parts, also form a positive part of the experience of the asset. Together the cumulative experience of the outbuildings and extensive gardens sitting around the house has remained unchanged since the late 19th and early twentieth century. This setting positively contributes to the significance of the house.
91. The setting is considered to enhance the listed building and it contributes to the significance of the asset. It is considered that the supporting documents have adequately assessed the impact of the new development on the setting of the listed building and whether the proposal accords with both national and local planning policies. An assessment has been provided on the impact on setting proportionate to the significance of the asset and degree to which proposed changes enhance or detract from that significance and ability to appreciate it. Furthermore, this current application is supported by information on views looking towards the house, but also neighbouring heritage assets such as the Grade II\* Six Pillars.
92. Officers consider that the setting of Beltwood House extends into Sydenham Hill and it is an integral part of the character and appearance of the Dulwich Wood Conservation Area. Whilst the listed buildings in Crescent Wood Road have been designated for their individual architectural and historic interest, the reasons were not for a perceived spatial relationship with Beltwood or contribution to its setting.
93. Given that the proposed scheme does not meet the requirements of Historic England's guidance in relation to Enabling Development as such, any proposed development

would be required to meet planning policy in relation to assessment of harm of the development on the heritage assets. The harm arising out of the proposed demolition of the worker's cottage and stables and the impact of the terrace of three houses, new gate house and pavilion requires the additional justification set out in the NPPF.

94. The NPPF requires Local Planning Authorities to consider whether a proposal would result in harm to the significance of a heritage asset and to decide whether that harm would be 'substantial' or 'less than substantial'. Paragraphs 133 and 134 of the NPPF also require Local Planning Authorities to weigh any harm against the public benefits of the development proposed, including securing the optimal viable use of the heritage asset. The harm to the Beltwood and the gate house in terms of the proposed internal works and external alterations are discussed in detail under the associated Listed Building Consent application (17/AP/3071). The demolition of the stables and worker's cottage, considered not to be of significance themselves, will give rise to less than substantial harm within the meaning of paragraph 134 of the NPPF.
95. Officers acknowledge that the proposed development within the grounds will have an impact on the setting of Beltwood and character and appearance of the wider Dulwich Wood Conservation Area. Officers concur with the applicant's analysis of significance in that the most important and sensitive area within the setting of Beltwood lies between the gate house and the south and west elevations. The proposal under consideration here seeks to preserve these views by the quality of the design, scale of the development and landscape strategy. With regard to the proposed new gate house, given its location and distance from Beltwood, it is considered that the new dwelling will have no more of an impact on the setting of the house or wider conservation area than the existing building to the east (No. 75 Sydenham Hill). The pavilion house to the west of Beltwood will have little impact on the setting of the heritage assets located on Crescent Wood Road due to the distance to these properties and the scale of this building being modest. While there will be some impact on views from the south west towards the main house, given the scale of the proposed dwelling and landscape strategy to provide a comprehensive planting programme, the harm is considered less than substantial. The terrace of three houses to the north east will have no impact on the setting of the listed buildings on Crescent Wood Road. However, there will be an impact on the setting of the main house from views from the west and south, but this is considered to be comparable to the impact of existing structures. Again, this harm is considered to be less than substantial.
96. The primary heritage benefit of the application under consideration here is the repair and renovation of Beltwood and the gate house, thereby preserving its physical fabric and the most important parts of the internal floor plans and external appearance. Unlike the previous refusals, this current application has been supported with detailed documents setting out the extensive works required to the heritage assets and how the buildings will be sensitively restored and converted into flats in the case of the main house.
97. The applicant has demonstrated that the proposal represents a viable and deliverable scheme, one which will secure the future of Beltwood and seek its removal from the Heritage at Risk Register. Furthermore, officers are satisfied that the proposal would involve the least level of development that would be commercially deliverable and would deliver the optimum viable use for Beltwood House and its surrounding grounds. The proposal would lead to less than substantial harm to the significance of Beltwood House, and the public benefits of the proposal, would outweigh the harm to the setting of the listed building.
98. Overall, the level of development and its siting within the grounds of the listed building would result in less than substantial harm on the setting of the listed building. Any harm perceived will be outweighed by the wider benefits of the scheme and therefore

in accordance with saved policies 3.15 (Conservation of the Historic Environment), 3.16 (Conservation areas), 3.17 (Listed buildings) and 3.18 (Setting of Listed Buildings, Conservation Areas and World Heritage Sites) of the Southwark Plan 2007, policy SP12 (Design and Conservation) of the Core Strategy 2011, policy 7.8 (Heritage assets and archaeology) and 7.9 (Heritage led regeneration) of the London Plan 2016 and 'Conserving the Built Environment' within the National Planning Policy Framework 2012.

### Impact on trees

99. The entire site is covered by a Tree Preservation Order (TPO no. 98) with the schedule referring to 'mixed hardwoods consisting mainly of beech, holly, oak, lime, maple, cedars, mulberry, cupressus, yew and willow'.
100. The applicant has provided an Arboricultural Impact Assessment and this notes that a number of trees are proposed to be removed: within the wooded area, adjacent to the former tennis court, to the north of the site, and towards the eastern end of the site.
101. The woodland character of the rear garden is a significant contributor to the setting of the conservation area and listed building. The applicants have worked closely with the Councils Urban Forester and the London Wildlife Trust in order to ensure that any tree loss is minimised and that all tree replacement would be of suitable species and size in order to ensure that the wooded character can be reinstated and maintained for future generations.
102. Following revisions to the proposed development during the application, sufficient details within the tree survey and proposed tree planting programme have now been provided identifying the number and location of trees to be removed, together with mitigation for any losses.
103. The total number of trees proposed to be removed under this application is 24 - all U category trees. This classification is used for trees that have short life expectancy have little amenity benefit or are diseased. It is good practice for these trees to be removed and replaced with healthy specimens, and as such the principle of their loss is accepted. In addition to these trees, a number of other trees were removed without authorisation. Tree Plan ref: 006 Rev C outlines the overall planting programme which indicates that 82 trees are proposed to be replanted to mitigate both the unauthorised and proposed removals.



104. Details of tree protection will be secured by way of legal agreement to ensure that the trees to be retained would not be damaged.
105. Overall, previous comments regarding excessive intrusion and harm to the woodland character have subsequently been overcome following detailed negotiations to provide a reduced sized building within the wooded area, as well as suitable replanting programme and reduction in tree loss. As part of the legal agreement, officers propose to secure the replanting programme as well as management plan that would help ensure the reinstatement of the historic woodland and provide an improved canopy cover throughout the site which is welcomed.

### **Landscaping**

106. A landscaping strategy has been developed which incorporates the above mentioned planting programme and additional landscaping measures, including the addition of formal planting, ecological enhancement through fallen log piles and a pond as well as new paving and permeable greenscrete to the parking and turning areas. The broad principles of this landscape strategy are acceptable, however a condition is proposed to gain further details of the proposed materials to be used within the final landscaping plan.

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

107. The proposal constitutes a form of development for which planning obligations are applicable in accordance with London Plan policies and Southwark Plan 2007 Policy 2.5 (Planning Obligations). These policies indicate the need for developments to contribute to social infrastructure commensurate with the level of development. The Councils S106 and CIL SPD outlines the requirements for planning obligations on major applications. The Core Strategy details a requirement of 35% of all new dwellings to be as affordable housing.
108. The applicant has submitted a development Viability Appraisal to report upon the financial implications of the proposal. The appraisal does not include any affordable housing and this has been rigorously analysed by the Council's surveyor.
109. Previous applications submitted at Beltwood House have not provided an adequate assessment of viability and the provision of affordable housing. The previous submission made a case for enabling development as which Historic England outline is for development that would usually be considered harmful but is considered acceptable because the resulting benefits outweighing the harm.
110. The applicant discussed with Historic England whether the proposal would meet the Enabling Development guidance. The problem which enabling development typically seeks to address occurs when the cost of maintenance, major repair or conversion to the optimum viable use of a building is greater than its resulting value to its owner or in the property market. This means that a subsidy to cover the difference – the 'conservation deficit' – is necessary to secure its future. Following a conservation deficit assessment, Historic England advised the applicants that in this instance, there was no conservation deficit and as such the requirements for Enabling Development were not met.
111. To support the applicant's contention that the proposal is the minimum amount of development required to restore and secure the future of Beltwood House, the applicants have submitted a viability appraisal and associated documents which looked at various schemes and their deliverability, one of which was the use of Beltwood House as one dwelling. The evidence has been assessed by the Council's



Surveyor who has confirmed that the current scheme represents the least development that would be commercially deliverable. Any less development than that proposed would result in a scheme that would not be viable, calling into question whether it would in fact be delivered. As noted above, officers are now satisfied that the level of development proposed is acceptable and it would not result in substantial harm to the Beltwood House and the wider setting.

112. As part of the viability assessment, an appraisal has been provided that looks at whether the development could viably provide affordable housing within the site. The appraisal noted that the current scheme in order to be commercially viable could not provide any affordable housing. Based on the other significant public benefits that the scheme brings, including the full refurbishment of the building at risk, the improved woodland, as well as new market housing provided, officers are satisfied that in this instance it is not deliverable to provide affordable housing for this scheme.
113. In terms of other contributions, the viability appraisal takes full account of the Mayoral and Southwark CIL liabilities as well as providing other contributions where required. In this instance, the other required contributions are as follows:
  - Carbon offset - £1,800 x 10.31 Tonnes - £18,558 (27.73% saving).
  - Child play space - £6,251.40

The Council's Highways team have also requested the following details as part of a section 278 agreement:

S278 agreement to complete the following works:

- Construct new vehicle access for New Gate House to current SSDM standards.
  - Reconstruct existing vehicle access at the main site entrance to current SSDM standards.
  - Repair any damages to the highway within the vicinity of the development resulting from.
114. A legal agreement will be provided that will take into account of these contributions. It is also proposed that a phasing programme for the site is included within the legal agreement in order to ensure that the works to Beltwood House are completed before development in the wider grounds being occupied. This will ensure that the works to the main house are prioritised and brought forward at the earliest opportunity.
  115. Finally, as noted above, it is proposed that the tree replacement programme and a woodland management plan are also included within the agreement so that the unauthorised and proposed tree losses mitigated at the earliest opportunity.
  116. In the event that an acceptable legal agreement is not completed by 30 May 2018, the director of planning shall be authorised to refuse the application for the following reason:

The proposal, by failing to provide for appropriate planning obligations secured through the completion of a S106 agreement, fails to ensure adequate mitigation 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 the S106 and Community Infrastructure Levy SPD 2015.

### **Sustainable development implications**

117. The applicant has provided an energy statement that looks at the level of carbon savings that can be provided within the site. As the application is a major

development, the London Plan requires development to be carbon neutral, however the Councils S106 and CIL SPD outlines that where this is not possible, any shortfall can be offset by way of a financial contribution. In this instance, given the sensitive heritage matters, the applicants have identified that a carbon saving of 27.73% can be achieved. As noted above, this will thus require a contribution of £18,558 to offset the shortfall.

## **Other matters**

### Ecology

118. An ecology assessment and addendum rate the site as having negligible potential for bat roosts. To avoid risk the applicant will retain an ecologist on a watching brief during the works which is supported.
119. The report also notes that the proposed landscape plan incorporates native woodland trees and plants which will re-instate native habitats away from formal gardens which would result in a net gain in biodiversity for the grounds and provide an increase in foraging resources for wildlife locally. The Council's Ecology Officer found that the proposal would result in an overall gain in biodiversity and as such raised no objections.
120. The grounds contain mature trees which can provide valuable habitat. The area around the gatehouse has a bat roost close by because of the emergence times recorded in the bat survey. Lighting around this area is to be kept to a minimum in order to ensure that the bats migration routes are not impacted upon. A condition is proposed to require further details of the lighting strategy for this unit.
121. Japanese Knotweed is still present on site however the applicant is continuing to treat it. A condition is proposed requiring details of the long term management or eradication of the knotweed to be submitted for approval.
122. The ecology and bat surveys make a number of recommendations and these are best dealt with through conditions. As such a condition requiring 2 Bat boxes to be installed as well as 2 bird boxes installed on trees and 3 house sparrow boxes installed on the new buildings. Landscaping conditions are also proposed to ensure that further habitat improvements can be made within the site. With these enhancements proposed within the site, as well as the significant level of replanting, would provide a significant ecological enhancement to wildlife within the site which is welcomed.

### Archaeology

123. The application site is not within an Archaeological Priority Zone (APZ), but Beltwood House is a Grade II Listed Building, of striking architectural interest with an impressive suite of principal rooms, staircase and many fittings and decorative features. To the north and east of the house are a service wing, mews lodge and stables/garage. The house is surrounded on all sides by a substantial designed garden and is approached via a driveway accessed from Sydenham Hill, at which point there is a gatehouse.
124. In support of this application an archaeological desk based assessment (DBA), by Archaeology Collective and dated August 2017, has been submitted. The desk based assessment conforms to current standards and guidance and is considered acceptable.
125. Officers noted in earlier applications that the Heritage Statement makes reference to an historical assessment of the building and site prepared by Bob Zeepvat, in July 2011, and states that this provides the most definitive assessment of the site's history.

The Heritage Statement also notes that 'a photographic record of the interior of the building is also supplied as part of this application', photographs are supplied but they are not sufficient in detail to record this building and its landscape setting in accordance with current guidance.

126. Appraisal of this planning application using the Greater London Historic Environment Record (GLHER) and information submitted with the application indicates that, in this instance, it can be concluded that the buried archaeological resource would not be compromised by these works, however, there is a requirement for a programme of historic building recording. This can be secured by condition as part of the associated listed building consent application (ref 17/AP/3071).

#### Basement impact assessment

127. The applicant has provided a BIA which assesses the proposal's impact on surface flow and flooding, groundwater flow and the impact of proposals on structural stability of the existing buildings within the site. The Councils Flood and Drainage team have assessed this and are satisfied with the assessment. The basements proposed occupies a small footprint on the site and as they are distributed across the site they will not interfere with the flow of ground water to any noticeable extent. However, they have requested that a drainage strategy is provided, this is proposed to be secured by way of condition.

#### Conclusion on planning issues

128. After careful consideration, the harm arising to the heritage assets, the listed Beltwood House itself and the surrounding curtilage listed buildings, through the sub-division and addition of additional dwellings are considered to cause less than substantial harm to the heritage asset of Beltwood House and its setting and as such would not warrant refusal of planning permission. The proposal would provide additional residential accommodation, preserve the significance of the heritage assets and bring this long-term vacant listed building back into beneficial use. There are no significant impacts arising from the development in terms of neighbour amenity. The principle of this development is acceptable as it raises no substantial conflict with planning policy or guidance, the proposal will secure the long term future of the property and this is considered to be sustainable development as set out in the NPPF. As such it is recommended that planning permission is granted subject to conditions and the completion of a satisfactory legal agreement.

#### Community impact statement

129. 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.
  - a) The impact on local people is set out above.
  - b) The issues relevant to particular communities/groups likely to be affected by the proposal have been identified above.
  - c) The likely adverse or less good implications for any particular communities/groups have been also been discussed above.

## Consultations

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

## Consultation replies

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

## Human rights implications

132. This planning application engages certain human rights under the Human Rights Act 1998 (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.
133. This application has the legitimate aim of providing alterations to a listed building on the buildings at risk register and new dwellings within the grounds. 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/2345-41  Application file: 17/AP/3070  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 5416 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	Alex Cameron, Team Leader		
Version	Final		
Dated	22 February 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 Social Regeneration	No	No	
Strategic Director of Housing and Modernisation	No	No	
Director of Regeneration	No	No	
Date final report sent to Constitutional Team		22 February 2018	

## APPENDIX 1

### Consultation undertaken

**Site notice date:** 28/09/2017

**Press notice date:** 31/08/2017

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

**Neighbour consultation letters sent:** 24/08/2017

### Internal services consulted:

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

### Statutory and non-statutory organisations consulted:

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

### Neighbour and local groups consulted:

Flat 4 2 Crescent Wood Road SE26 6RU  
Flat 3 2 Crescent Wood Road SE26 6RU  
18 Crescent Wood Road London SE26 6RU  
22 Crescent Wood Road London SE26 6RU  
20 Crescent Wood Road London SE26 6RU  
Flat 2 2 Crescent Wood Road SE26 6RU  
77 Sydenham Hill London SE26 6TQ  
Living Accommodation 39 Sydenham Hill SE26 6RS  
79 Sydenham Hill London SE26 6TQ  
Flat 1 2 Crescent Wood Road SE26 6RU  
81 Sydenham Hill London SE26 6TQ  
24 Crescent Wood Road London SE26 6RU  
Six Pillars Crescent Wood Road SE26 6RU  
Dulwich Wood House 39 Sydenham Hill SE26 6RS  
75 Sydenham Hill London SE26 6TQ  
4 Crescent Wood Road London SE26 6RU  
6 Crescent Wood Road London SE26 6RU  
4a Crescent Wood Road London SE26 6RU  
26 Crescent Wood Road London SE26 6RU  
40 Crescent Wood Road London SE26 6RU  
44 Crescent Wood Road London SE26 6RU  
42 Crescent Wood Road London SE26 6RU  
Flat 16 High Trees Mansions SE26 6RU  
Flat 15 High Trees Mansions SE26 6RU  
Flat 17 High Trees Mansions SE26 6RU  
Flat 19 High Trees Mansions SE26 6RU  
Flat 18 High Trees Mansions SE26 6RU  
Flat 14 High Trees Mansions SE26 6RU  
Flat 10 High Trees Mansions SE26 6RU

Basement Flat 4 Crescent Wood Road SE26 6RU  
Managers Flat Dulwich Wood House SE26 6RS  
Flat 6 High Trees Mansions SE26 6RU  
Flat 21 High Trees Mansions SE26 6RU  
Flat 20 High Trees Mansions SE26 6RU  
Flat 3 High Trees Mansions SE26 6RU  
Flat 5 High Trees Mansions SE26 6RU  
Flat 4 High Trees Mansions SE26 6RU  
6 Woodsyre, Sydenham Hill SE26 6SS  
7 Canbury Mews, Sydenham Hill, SE26 6TJ  
4 Crescent Wood Road London SE26 6RU  
20 Crescent Wood Road London SE26 6RU  
24 Crescent Wood Road London SE26 6RU  
6 Crescent Wood Road London SE26 6RU  
6 Harrogate Court Sydenham Hill SE26 6TL

30 Crescent Wood Road SE26 6RU

The Old College Gallery Road SE21 7AE

25 Kingsthorpe Road London SE26 4PG  
52 De Frene Road Sydenham SE26 4AG  
39 Sydenham Hill Sydenham SE26 6RS  
39 Sydenham Hill London SE26 6RS  
39 Sydenham Hill The Wood House SE26 6RS  
11a Tintagel Crescent East Dulwich SE22 8HT  
42 Great Brownings London SE21 7HP  
8 Little Brownings London SE23 3XJ

Flat 1 High Trees Mansions SE26 6RU  
Flat 11 High Trees Mansions SE26 6RU  
Flat 13 High Trees Mansions SE26 6RU  
Flat 12 High Trees Mansions SE26 6RU  
Flat 2 High Trees Mansions SE26 6RU  
Flat 8 High Trees Mansions SE26 6RU  
Flat 7 High Trees Mansions SE26 6RU  
Flat 9 High Trees Mansions SE26 6RU

7 Longhedge House High Level Drive SE26 6XS  
No2 Vigilant Close SE26 6YA  
22 Crescent Wood Road London SE26 6RU  
46 Crescent Wood Road Sydenham Hill  
12 Shackleton Court Acacia Grove SE21 8RS  
  
39 Homildon House Sydenham Hill SE26 6AH  
12 Shackleton Court SE21 8RS

**Re-consultation: 18/12/2017**

## APPENDIX 2

### Consultation responses received

#### Internal services

None

#### Statutory and non-statutory organisations

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

#### Neighbours and local groups

Email representation  
Email representation  
Flat 14 High Trees Mansions SE26 6RU  
Flat 21 High Trees Mansions SE26 6RU  
No2 Vigilant Close SE26 6YA  
No2 Vigilant Close SE26 6YA  
No2 Vigilant Close SE26 6YA  
11a Tintagel Crescent East Dulwich SE22 8HT  
12 Shackleton Court Acacia Grove SE21 8RS  
12 Shackleton Court SE21 8RS  
18 Crescent Wood Road London SE26 6RU  
20 Crescent Wood Road London SE26 6RU  
22 Crescent Wood Road London SE26 6RU  
22 Crescent Wood Road London SE26 6RU  
26 Crescent Wood Road London SE26 6RU  
39 Homildon House Sydenham Hill SE26 6AH  
39 Sydenham Hill London SE26 6RS  
39 Sydenham Hill Sydenham SE26 6RS  
39 Sydenham Hill The Wood House SE26 6RS  
4 Crescent Wood Road London SE26 6RU  
4 Crescent Wood Road London SE26 6RU  
4 Crescent Wood Road London SE26 6RU  
4 Crescent Wood Road London SE26 6RU  
4 Crescent Wood Road London SE26 6RU  
42 Great Brownings London SE21 7hp  
52 De Frene Road Sydenham SE26 4AG  
52 De Frene Road Sydenham SE26 4AG  
6 Harrogate Court Sydenham Hill SE26 6TL  
6 Harrogate Court Sydenham Hill SE26 6TL  
7 Longhedge House High Level Drive SE26 6XS  
75 Sydenham Hill London SE26 6TQ  
75 Sydenham Hill London SE26 6TQ  
77 Sydenham Hill London SE26 6TQ  
8 Little Brownings London SE23 3XJ