

Chief executive's department

Planning division
Development management (5th floor - hub 2)
PO Box 64529
LONDON SE1P 5LX

Your Ref:

Our Ref: 14/EQ/0107 Contact: Dipesh Patel Telephone: 020 7525 1778

E-Mail: planning.applications@southwark.gov.uk

Web Site: http://www.southwark.gov.uk

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43 Chalton Street

Mr Jon Grantham LUC Architects

NW1 1JD

Dear Mr Grantham

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

At: DULWICH COLLEGE, COLLEGE ROAD, LONDON, SE21 7LG **Proposal:** Improvements to Barry Building external space and new car park.

I write in connection with your pre-application enquiry received on 10/06/2014 regarding a scheme to redevelop the site above. This letter summarises the council's written advice on your proposal and whether, based on the details submitted, it meets local planning requirements

Planning Policy

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

The site is located within the Dulwich College Conservation Area and on Metropolitan Open Land (MOL). The proposals for the new landscaping would be within the immediate setting of the Grade II* main building of the college, otherwise known as the Barry buildings. The Grade II listed war memorial and Old Library are also on the site but the proposals are not within their immediate setting.

Land Use

Metropolitan Open Land

The development of the part of the site close to Alleyn Park would be considered to be inappropriate development on MOL which policy advises that inappropriate development should be refused except in very special circumstances. In this instance, the proposal is to relocate parking that presently occurs outside the Barry Building to the western part of the site, close to Alleyn Park. The amount of weight that can be afforded the relocation of parking depends, to a high degree, on how the setting of the Barry Building would be improved. While the use of the area in front of the building for a modest amount of disabled parking, along with student pick up and drop off, other parking, even of a temporary nature should be removed. This would allow greater, more appropriate landscaping to enhance the setting of the Barry building.

Other material considerations such as a more sustainable transport policy, wider landscaping and ecological enhancements can also be taken into consideration. It is essential any future proposal include a significant reduction in the number of car parking spaces, both to encourage a modal shift away from cars and to limit the size of the car park itself.

Playing fields

Paragraph 74 of the National Planning Policy Framework advises that playing fields should only be built on in very particular circumstances. The site in question may not be used as a playing field presently, but was in the recent past; an aerial photograph of the site in 2007 shows part of it to be laid out as a rugby pitch. The advice provided in our letter dated 8 September 2014 stands and you are advised to consult Sport England about any change in the use of this parcel of land. The acceptability of a loss of the playing field in this case largely

depends on whether the area can be shown to be surplus to requirements by a thorough and robust assessment.

Landscaping

The reinstatement of a more formal planted setting is welcome but more detailed plans will be needed for area 1 which would have the most significant impact on the Barry Building. It is recommended that the future masterplan proposals detailed as 5-8 are brought forward to be included in any application for a new car park area so they may be considered in the balancing exercise. The landscaping for the area in front of the Barry Building should be as close as possible to the original landscaping.

Replacement of poor and declining quality trees near the boundary should be included where there are gaps. Additionally, replacement planting should be included to the rear of the avenue, along Alleyn Park and within the central group of trees to provide succession planting. It is recommended Oak, Beech, Lime and other larger, long lived ornamental species are considered, alongside the historic planting palette that would have been available to Barry such as Cedar trees with reference to the original planting plan.

School Travel Plan

The school travel plan submitted has good data collection and the proposed targets to increase sustainable transport use by students is commendable. It is recommended that the targets for staff for encouraging staff away from using private vehicles to travel to work are increased. Measures detailed in the document that would lead to a silver award could be used to this end and assist in reducing the number of parking spaces required.

Ecological assessment

The assessment refers to the desk study being based, in part, on the MAGIC dataset. MAGIC does not provide the level of detail needed to properly assess this site, the GiGL species data referenced elsewhere in the document should be used. The Council's Ecology Officer has records of species referred to in the UK Biodiversity Action plan which have not been listed or noted, such as the Brown Long Eared Bat, recorded within 1km of the site.

A bat activity survey, while not recommended in the report, is something that should be undertaken to allow a full assessment of the impact that the proposal may have, particularly from artificial lighting would be required. There are some errors in the report, such as the reference to the table 3.1 being the criteria used to categorise bat root potential but it actually listing the sites and the fact that the habitat map in appendix 2 is not shown, that should be rectified.

Conclusion

The proposal is considered to be inappropriate in land use terms and its acceptability rests on whether very special circumstances can be shown to outweigh the harm to MOL, and whether it can be demonstrated that the playing field that presently occupies the site is surplus to requirements. The improvement of the setting of the Barry Building is crucial and it is recommended that as much effort be made to return the landscaping around it to its original form as possible. Other factors that would be taken into account are the benefits that may come forward from wider landscaping and ecological improvements along with a reduction in the number of car parking spaces and car usage by users of the site.

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

Please accept this letter as the closure of your current enquiry.

Yours sincerely

Simon Bevan Director of Planning