

Item No. 6.1	Classification: Open	Date: 2 April 2019	Meeting Name: Planning Committee
Report title:	<p>Development Management planning application: Application 18/AP/1577 for Full Planning Permission, and; Application 18/AP/4084 for Listed Building Consent</p> <p>Address: ALL SAINTS ANNEXE (IMPERIAL WAR MUSEUM) AND LAND TO THE REAR, AUSTRAL STREET, LONDON, SE11 4SJ</p> <p>Proposal: Full Planning Permission for: Construction of a three-storey building for Class D1 use (to provide offices and staff accommodation ancillary to the Imperial War Museum) within the rear yard, to incorporate rooftop plant and photovoltaics, together with the change of use of the existing All Saints Annexe building from Class D1 (ancillary to the museum) use to a mixed Class B1 (office) / Class D1 (ancillary to museum) use. The development will include hard and soft landscaping improvements, the provision of a cycle and refuse store, the provision of one accessible car parking space at the front of the All Saints Annexe building, the demolition of a portion of the site's boundary wall to Geraldine Mary Harmsworth Park and the incorporation of the replacement wall into the ground floor of the proposed building, the realignment of the access road into the site from the Park, demolition of the portakabins and other associated works.</p> <p>Listed Building Consent for: The demolition of part of the existing boundary wall between the All Saints Annexe and Geraldine Mary Harmsworth Park and the construction of a new wall, incorporating gates and windows, in association with planning application 18/AP/1577</p>		
Ward(s) affected:	St George's		
From:	Director of Planning		
Application Start Date 03/05/2018		Application Expiry Date 02/08/2018	
Earliest Decision Date 16/06/2018		Committee Date	

RECOMMENDATION

1. That full planning permission be granted for 18/AP/1577, subject to conditions.
2. That listed building consent be granted for 18/AP/4084, subject to conditions.

SUMMARY OF EVENTS SINCE THE DEFERRAL OF 18/AP/1577 ON 9 OCTOBER 2018

The deferral of 18/AP/1577

3. 18/AP/1577 was originally submitted without an accompanying Listed Building Consent application on the understanding that the existing boundary wall between the All Saints Annexe and Geraldine Mary Harmsworth Park, which the proposed development sought to demolish and replace, was not curtilage listed. 18/AP/1577

was brought by officers to the Main Planning Committee on 9 October 2018 with a recommendation that planning permission be granted.

4. In the days immediately prior to the Committee meeting, the Local Planning Authority received information from a number of sources, some suggesting that the wall was curtilage listed and some suggesting otherwise. Curtilage listing is a complex assessment. Given the conflicting nature of the information and the varied condition of the wall, officers took a cautious view and decided to treat the wall as if it were listed. Accordingly, officers advised Members at the Committee meeting that a separate application for Listed Building Consent would be required but that this additional requirement need not impede Members in determining the planning application. Any planning permission would not authorise any works to the wall, and no works could be carried out to the wall unless and until Listed Building Consent had been granted.
5. At the Committee meeting three residents made representations in objection to the application, as did Councillor Linforth-Hall and Councillor Neale. The objections related not only to the status of the wall, but also to the potential impact of the new building on the amenity of neighbours, particularly the impact on privacy.
6. The Committee resolved to defer the determination of 18/AP/1577 pending further clarification about the Listed status of the boundary wall, and the submission of a Listed Building Consent application for the works to the wall. Members of the Committee also considered that the proposal should be amended to include frosting/obscuring of the windows on the northeast and southwest elevations at first- and second-floor level, expressing a preference for such frosting/obscuring to be applied to a height of 2 metres above the internal floor level.

Application for Listed Building Consent

7. The applicant submitted a Listed Building Consent application in December 2018, the reference number for which is 18/AP/4084. The application proposes the demolition of the 34 metre stretch of the boundary wall between All Saints Annexe and Geraldine Mary Harmsworth Park and the construction of a new wall in its place. The new wall would contain three window openings along its central portion where it forms part of the proposed building. It would be finished in vertically-bonded brickwork of a light grey-yellow tone to match the brick proposed for the new building. The historic cast iron plaque identifying the ownership of the Bethlem Royal Hospital grounds would be removed from the existing wall and reattached to the replacement wall.

Amendments to the design of the proposal

8. In light of the deferral and in addition to applying for Listed Building Consent, the applicant has amended the design of the proposed building in the following ways:
 - Reducing the overall number of windows—in particular the larger ‘picture’ windows— on the southwest and northeast elevations, and proposing in their place recessed brickwork panels featuring vertically-laid corduroy bonding;
 - Proposing an irremovable graduated treatment to all first- and second-floor glazing on the southwest and northeast elevations to partially obscure views outward towards the neighbouring dwellings;
 - Altering the design of the ‘slot window’ reveals by omitting the chocolate coloured brick and by chamfering only the cill (the original scheme proposed that all ‘slot windows’ would have chamfered sides as well as a chamfered cill);
 - Re-designing the ‘pop-out’ window at first floor level on the western corner of the building so that it now sits within the envelope of the building, and;
 - Removing the back-up refuse store from the single-storey structure adjacent to the boundary wall shared with the Harmsworth Mews properties, instead locating

it within the plaza on the southern side of the proposed building.

Additional consultation

9. Representatives of the Imperial War Museum (IWM) held a meeting on-site on December 4 2018 with the West Square Residents' Association and the Harmsworth Mews Residents' Association, during which a sample was shown of the proposed graduated obscuring treatment. A further meeting was held between representatives of IWM and these residents on January 17 2019 to discuss the evolution of the proposed development in light of the December meeting. Subsequent to each meeting, IWM sent the residents a letter summarising the discussions.
10. In light of the discussions with residents, the applicant submitted their amended proposals for the planning application alongside an application for Listed Building Consent. The Local Planning Authority carried out neighbour consultation on the listed building consent and neighbour re-consultation on the amended planning application. In each case, two formal responses (one in support and one in objection) were received. The material planning considerations raised by the representations are detailed in the '*Engagement with, and consultation responses from, members of the public*' section of this Committee Report.
11. The representations in support of the listed building consent and amended planning application were submitted by the Chairs of the West Square Residents' Association and the Harmsworth Mews Residents' Association. These representations stated that the Chairs now took the view that "the amended planning application and Listed Building Consent application provide the best achievable outcome for local residents" and that they "accordingly support these applications". The full content of the comment can be viewed on the Register.

Scope of this Committee Report

12. For the sake of completeness, this Committee Report addresses all the relevant planning issues in the same level of detail as the Report presented to Members at the 9 October 2018 Committee meeting, even where matters have remained unchanged. This Report also provides a comprehensive assessment of the application for Listed Building Consent, 18/AP/4084.
13. The respects in which this assessment differs substantively from that set out in the Report presented at the 9 October 2018 Committee are:
 - Details of proposal
Paragraphs 32 to 48
 - Planning policy
Paragraphs 52 to 60
 - Overlooking [within the 'Impact on the amenity of adjoining occupiers' chapter]
Paragraphs 92 to 104
 - Quality of design
Paragraphs 135 to 153
 - Impact on the curtilage listed wall and its contribution to other heritage
Paragraphs 154 to 164
 - Refuse storage and collection arrangements [within the 'Transport, highways and servicing matters' chapter]

Paragraphs 184 to 187

- Trees and landscaping
Paragraphs 198 to 200
- Engagement with, and consultation responses from, members of the public
Paragraphs 222 to 245
- Consultation responses: Statutory consultees
Paragraphs 246 to 252

BACKGROUND INFORMATION

Site location and description

14. The application site comprises a late nineteenth century three-winged building of three storeys with a raised basement, known as the All Saints Annexe, currently in a use as ancillary floorspace to the nearby Imperial War Museum London (IWML). The All Saints Annexe provides office floorspace and houses the Museum's photography, film and video archive as well as the organisation's computer servers. The site includes a forecourt, accessways along either side of the building, and a large rear yard in which portakabins and several shipping containers currently stand. There is also an emergency generator associated with the IT servers located to the rear of the All Saints Annexe. The three boundaries to the north, south and west of the site are all formed of high masonry walls.
15. The application site also includes a 0.05 hectare portion of the Geraldine Mary Harmsworth Park adjacent to the site's north-western boundary, as well as a stretch of wall separating the yard from the park of approximate length 24 metres. It is known that the wall once formed the boundary between the Annexe and King Edward's School, the latter having been demolished circa 1930. Despite extensive research and an analysis of the bricks which has shown large sections to have been constructed of 19th century stocks, the exact date of the wall remains unknown. The wall is not mentioned in the statutory list description for the Imperial War Museum (Former Bethlem Royal Hospital) and did not form the perimeter, which is further west. Additionally, the applicant has not been able to establish whether the wall ever had a functional relationship with this building. However, given that there is no firm evidence to conclude definitively that the wall is not curtilage listed; the Local Planning Authority has adopted a cautious approach of treating the wall as being curtilage listed.

16.



Figure 1: The 34 metre stretch of the boundary wall to IWML, as seen from within Geraldine Mary Harmsworth Park, which forms the north western perimeter to the application site

17. The site is bounded by:

- residential properties numbering 20-24 West Square and 1-5 Harmsworth Mews to the northeast;
- the highway of Austral Street to the southeast;
- residential properties numbering 91-111 (odds) Brook Drive, the garden of 71-89 Brook Drive and 2 Austral Street to the southwest;
- Geraldine Mary Harmsworth Park to the northwest, beyond which is IWML.



Figure 2: Site location plan, showing the boundaries of the application site edged in red. The 0.05 hectare area of Geraldine Mary Harmsworth Park, which is owned and managed by Southwark Council, can be seen within the top left hand portion of the red line boundary.

18. To the south and east of the site, surrounding uses are predominantly residential. In the vicinity of the site to the north and west, a mixture of residential, educational, cultural and open space uses can be found. The housing stock in the nearby area, including those dwellings which adjoin the application site to the north and south, is prevaillingly three or four-storeyed. In the main part, it is only the few non-residential buildings —namely the All Saints Annexe itself, IWML and the Charlotte Sharman School— which are taller.
19. The site is located within the:
 - Central Activities Zone (CAZ);
 - Elephant and Castle Opportunity Area;
 - Borough, Bermondsey and Rivers Archaeological Priority Zone;
 - Air Quality Management Area;
 - Elephant and Castle Major Town Centre, and;
 - Flood Zone 3 (area benefitting from flood defences).
20. The site is located within the West Square Conservation Area, the Appraisal for which identifies the All Saints Annexe as a key unlisted building. The site lies approximately 5 metres to the northwest of the Elliott's Row Conservation Area. Two other conservation areas, both of which are within the Borough of Lambeth, lie within the surrounding area: Walcot, which is approximately 30 metres southwest of the site, and Lambeth Walk and China Walk, which is approximately 220 metres to the west.
21. Within 100 metres of the site are the following listed structures:
 - nos. 6-45 West Square and attached railings (Grade II);
 - nos. 1-7 Orient Street and attached railings (Grade II),
 - Charlotte Sharman School (Grade II), and;
 - IWML (Grade II).
22. Geraldine Mary Harmsworth Park is designated as a Site of Importance for Nature Conservation and all but a small pocket of land in the park's southern corner (immediately to the northwest of the application site) is designated as Metropolitan Open Land. The submission version of the New Southwark Plan seeks to designate this small portion of the park, which historically contained an outdoor swimming pool, as Metropolitan Open Land.
23. The application site accommodates eight trees: four on the forecourt and four within the rear yard. Those on the forecourt are high value (grade A) specimens, while those in the rear yard are of moderate value (grade B).
24. The application site lies within the background of LVMF Protected View 23.A, which is the view towards Westminster from the bridge over the Serpentine at Hyde Park.
25. It has a Public Transport Accessibility Level (PTAL) of 6b where 1 is the lowest level and 6b the highest. Within easy walking distance are Lambeth North and Waterloo Stations to the north-west, and Elephant and Castle Station to the east. Southwark and Kennington Underground Stations can be found further away to the north and south respectively. A number of bus services operate along Kennington Road, Lambeth Road, and St George's Road. There are four London Cycle hire docking stations located nearby on Kennington Road, Walnut Tree Walk, Geraldine Street and Gaywood Street. A controlled parking zone designation applies locally.
26. The centreline of Brook Drive, which lies approximately 50 metres to the southwest of the site, demarcates the Borough of Southwark from the Borough of Lambeth.

Background to the proposal

27. The IWML is the flagship branch of the Imperial War Museums. In addition to IWML, the charity's estate comprises the Imperial War Museum North, the Imperial War Museum Duxford, the Churchill Museum and Cabinet War Rooms, and HMS Belfast. IWML also acts as the administrative headquarters.
28. In 2007, the IWM Board of Trustees agreed that major capital investment was required at the IWML in order to address significant deficiencies and ensure the charity remains fit for purpose in the 21st century. The museum produced a spatial masterplan to identify how IWML could be transformed to improve existing facilities, optimise the visitor experience, and ensure the long term sustainability of the museum's flagship branch.
29. A key conclusion of the masterplan exercise was that the existing layout and room configuration of the All Saints Annexe no longer meets the operational needs of IWM. To attempt to meet these needs by converting or modernising of the premises would require substantial investment and likely prove unsuccessful in any case. The spatial masterplan exercise brought IWM to the conclusion that developing the rear yard of the All Saints Annexe was the most appropriate way to deliver purpose-built modern and flexible workspace better suited to the charity's working practices and long-term needs. Such a new building would fulfil a long-held aim of IWM to accommodate in a single location the core creative and administrative teams for the wider Imperial War Museum estate, who are currently split across a number of sites.
30. The new building would free-up the All Saints Annexe for an alternative purpose to which it is better lent functionally and spatially. Liability for the maintenance of the ageing All Saints Annexe would be transferred to the new tenant and the rent would be used to offset the running costs of the new build. IWM would retain the freehold of the All Saints Annexe.
31. The masterplan comprises the following phases:
 - Phase 1: Refurbishment of IWML and creation of the First World War galleries [completed in 2014].
 - Phase 2: Creation of new Second World War Galleries and The Holocaust Gallery [due to commence imminently, following the granting of listed building consent and planning permission in April 2018]
 - Phase 3: Creation of new and fit-for-purpose accommodation in which all IWM staff can be located
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As such, the works for which 18/AP/1577 seeks planning permission would realise the final phase of the IWM masterplan.

Details of proposal

32. The proposal comprises two distinct parts:
 - the construction of a three-storey building containing workspace for IWM staff within the yard at the rear of the All Saints Annexe, and;
 - the change of use of the All Saints Annexe from Class D1 (ancillary to the museum) to a mixed Class B1 (office) / Class D1 (ancillary to museum) use.

Details of each part follow below.

Construction of a three-storey building within the rear yard

33. It is proposed to redevelop the yard to the rear of the All Saints Annexe through the construction of a three-storey building with rooftop plant to provide offices and staff accommodation ancillary to the IWML. In total, the proposal would deliver 1063 square metres (GIA) of floorspace. The works would include the demolition of the existing portakabins and the removal of the shipping containers.
34. The proposed building would be articulated in two parts. The main volume would be three storeyed and flat-roofed with a raised parapet. The second element, which would assume the role of an entrance pavilion, would similarly be flat roofed but two-storeyed and of a much smaller footprint.
35. The main body of the building, measuring a maximum width of 27.6 metres and a maximum length of 17.7 metres, would be oriented so that its long axis runs broadly parallel to the terraces of housing to the northeast and southwest. It would stand 12.975 metres high to the parapet level and 13.975 metres high to the top of the plant. A gap of 6.4 metres would separate the building's southeast elevation from the nearest part of the existing All Saints Annexe. Along its north-western edge, the building would extend up to the common boundary with the park at ground floor level, but the upper two storeys would be set-back by a widening distance of 1.7 to 2.8 metres. A range of bronze-framed windows would be dispersed across the brick-faced elevations.
36. The entrance pavilion would be of a rectangular footprint, measuring 12.2 metres long and 3.9 metres wide. Standing 7.5 metres high at its maximum point, it would, like the main body of the building, be flat-roofed. The entrance pavilion would be clad in curtain walling, some of which would be opaque —such as the entire first floor level of the south-west elevation— and some of which would be clear glazed. The walling would be clad externally with a regular array of deep protruding bronzed aluminium fins, which would break only around the building's main entrance on the northwest elevation.

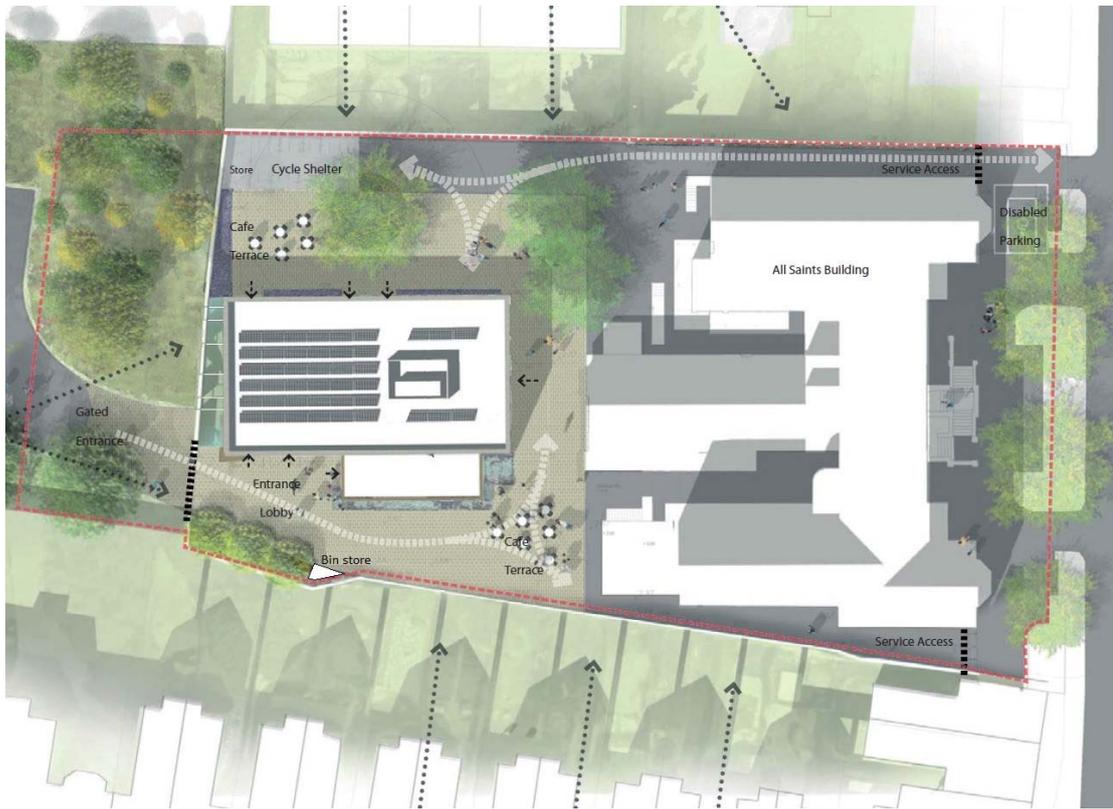


Figure 3: Illustrative site layout, showing the relationship of the proposed building to the existing All Saints Annexe.

37. The accommodation within the building would be arranged over three floors. The ground floor would be given over to canteen/café space (not open to the general public), meetings areas and the reception. The upper two floors would comprise open plan workspace and a small number of meeting rooms. Toilets and other ancillary facilities would be located on all floors, with a lift and staircore to provide vertical circulation, and a hatch positioned above the staircore to facilitate access to the roof for maintenance purposes.



Figure 4: The southwest elevation of the proposed building, featuring a mixture of glazed (but fitted with graduated obscuring treatment) and brick-faced panels.

38. Photovoltaic panels would be positioned on the roof, and all would sit beneath the building's parapet. Mechanical cooling plant, occupying an area measuring 3.2 metres

wide and 6.0 metres long, would also be located on the roof and housed in acoustic screening. The structure would be positioned towards the southeastern end of the roof, set-in by identical distances from the building's northeast and southwest edges. The acoustic screening, which would be bronzed aluminium to match the window frames and pavilion fins, would stand proud of the parapet by 1.0 metre. A biodiverse blanket green roof would cover approximately 80% of the surface area of the roof.

39. As part of the construction of the proposed building, the boundary wall separating the site from Geraldine Mary Harmsworth Park, which is considered to be curtilage listed by reason of its relationship to the Grade II listed IWML, would be demolished. In its place, a new wall would be constructed in grey-yellow brick to a height of 3.1 metres. Contained within the central stretch of the wall would be three windows, while towards the wall's southwestern end would be a double leaf pedestrian and vehicle gate providing access between the site and the park.
40. The siting of the building would create two main areas of external space — one area on the building's north-eastern side and one on its south-western side. On the south-western side of the proposed building, an entrance plaza capable of doubling-up as a 'spill-out space' for the canteen/café is proposed. This plaza would be hard-surfaced using clay brick of varying colours which reflect the building façade. The external realm would be for the sole use of the IWM workforce and would not be publicly-accessible.
41. As deliveries to the canteen would be via the alleyway running along the north-east side of the All Saints Annexe building, the external realm to the north-eastern side of the proposed building would be a more functional external space than the plaza. It is proposed to locate a single-storey structure for the storage of cycles within the open space to the north-eastern side of the new building alongside the high boundary wall to the Harmsworth Mews properties. This timber-clad shelter would have a monopitched roof with a ridge of height 2.6 metres.
42. A small refuse store would be located on the southwestern edge of the application site, close to the gates connecting the site to Geraldine Mary Harmsworth Park. The refuse store would be used only on the occasion that a bin bag's worth of refuse is generated after the daily transfer by cart from the building to IWML has occurred. As such, the maximum period of time refuse would be in the store is one day. It was previously proposed to store refuse within the single-storey timber structure on the northeastern side of the building, but the applicant has decided to make this change to the scheme in response to concerns raised by neighbours and Committee Members. Placing the store on the southern side of the building would also have the effect of shortening the journey time of the waste transfer cart between the site and IWML.
43. The layout of the site has been driven by the desire to retain the mature trees on the northern half of the yard which have high amenity value. Further tree planting is proposed within a raised bed along a section of the site's south-western boundary, together with border shrubbery and planting around the building's perimeter.
44. In the south-eastern corner of the park, due to the new gate being in a slightly different position to the existing gate, it is proposed to realign the final few metres of the tarmac access road. A scheme of re-planting is proposed directly in front of the rebuilt boundary wall within Geraldine Mary Harmsworth Park.
45. One accessible parking space would be located in the forecourt of the All Saints Annexe.

Change of use of the All Saints Annexe

46. In tandem with seeking permission for the construction of a building within the rear yard, this planning application seeks permission to change the use of the All Saints Annexe from wholly Class D1 (ancillary-to-museum) to 'mixed' Class B1 (office) / Class D1 (ancillary-to-museum). The change of use would apply to all 2,476 squares metres (GIA) of floorspace within the building.
47. This 'mixed' use would allow Class B1 and Class D1 functions to take place in the building concurrently, or it would enable the use of the whole space for either Class B1 or Class D1. This would facilitate the building's leasing out to a future tenant for office accommodation or, alternatively, it would enable IWM to occupy the building again in the future if required without needing to seek permission to revert the premises to Class D1. There are no other physical changes proposed to the All Saints Annexe as part of this application.
48. Although reconfiguration of the existing All Saints Annexe may be necessary to suit the needs of the new tenant, these works do not form part of this planning application and permission will be sought separately at a later time if required.

Planning history

49. The following planning history exists for the application site:

<p>Application reference no.: 95/AP/0389 Application type: Full Planning Permission (FUL)</p> <p><i>Erection of 3 storey rear extension to Museum to form storage area, workshops and associated offices</i></p> <p>Decision date: 22.08.1995 Decision: Granted (GRA)</p> <p>Notes: This permission was not implemented.</p>
<p>Application reference no.: 98/AP/1109 Application type: Full Planning Permission (FUL)</p> <p><i>Construction of new basement below previously approved (22.8.95 LBS Reg.No. 9500389) 3 storey rear extension.</i></p> <p>Decision date: 22.08.1995 Decision: Granted (GRA)</p> <p>Notes: This permission was not implemented.</p>

<p>Application reference no.: 00/AP/0069 Application type: Full Planning Permission (FUL)</p> <p><i>1. Demolition of part existing building and erection of 4/part 3 storey rear extension to form workshops, offices, archive storage and visitor facilities, together with erection of small extension to existing electricity sub-station and access ramp at front of building.</i></p> <p><i>2. Erection of separate two storey temporary building on north-east side of site and two small temporary stores and enclosing screen at front of main building for limited period.</i></p> <p>Decision date: 14.12.2000 Decision: Granted (GRA)</p> <p>Notes: This permission was not implemented.</p>
<p>Application reference no.: 12/AP/0778 Application type: Full Planning Permission (FUL)</p> <p><i>Provision of new windows and a double door to give access to the basement from the South Elevation</i></p> <p>Decision date: 03.05.2012 Decision: Granted (GRA)</p>
<p>Application reference no.: 13/AP/1699 Application type: Full Planning Permission (FUL)</p> <p><i>Installation of a platform lift to front entrance steps to improve accessibility to the building for wheelchair users</i></p> <p>Decision date: 19.08.2013 Decision: Granted (GRA)</p>
<p>Application reference no.: 14/AP/1445 Application type: Full Planning Permission (FUL)</p> <p><i>Installation of emergency diesel generator, reinforced concrete base pad and acoustic enclosure located within the rear yard service compound</i></p> <p>Decision date: 02.02.2015 Decision: Granted (GRA)</p>
<p>Application reference no.: 16/AP/4684 Application type: Non-material Amendment (VNMC)</p> <p><i>Non-material amendment to Condition 4 (materials) of permission 16/AP/1596 to amend the external finished colour of the diesel generator container and associated external input and output attenuators from the specified manufacturers standard colour [...]</i></p> <p>Decision date: 08.12.2016 Decision: Agreed</p>

Application reference no.: 16/AP/1596
Application type: Minor Material Amendment (VMC)

Minor material amendments to Condition 1 (approved drawings) of planning permission 14/AP/1445 for the 'Installation of emergency diesel generator, reinforced concrete base pad and acoustic enclosure located within the rear yard service compound' to [...]

Decision date: 07.10.2016
Decision: **Granted (GRA)**

Application reference no.: 17/AP/3195
Application type: Tree Works

(T1) London Plane - Fell as it is currently undermining the foundations of the listed wall, repairs to be made to the foundations of the wall will require the complete removal of the tree and the roots

Decision date: 27.09.2017
Decision: **Works acceptable - no intervention (WANI)**

Application reference no.: 17/EQ/0448
Application type: Pre-Application Enquiry (ENQ)

Construction of a building of either three or four storeys on land at the rear of the All Saints Annexe, to comprise administration space for use by the Imperial War Museums (Class D1); change of use of the existing All Saints Annexe (Class D1) to a mixed office/ancillary-to-museum (Class B1/D1) use over all floors.

Decision date: 14.02.2018
Decision: **Pre-application enquiry closed (EQC)**

50. There are no relevant cases of planning history locally except for these at IWML:

Application reference no.: 12/AP/0696
Application type: Full Planning Permission (FUL)

Refurbishment works comprising opening up of the existing brick arches on the west facade, creation of an ancillary cafe terrace and installation of minor plant on the roof and within the rear service yard

Decision date: 08/05/2012
Decision: **Granted (GRA)**

Application reference no.: 12/AP/0699
Application type: Listed Building Consent (LBC)

Refurbishment works comprising opening up of the existing brick arches on the west facade, ancillary cafe terrace and internal relocation of existing cafe to the west wing. Internal works to central atrium including insertion of tapered structural fins, removal of B floor, introduction of temporary stair and insertion of new floor in atrium void at E floor. Alterations and improvements to central circulation core including removal of north wall and insertion of new lifts and stair. Refurbishment of existing galleries to create First World War galleries at A floor and extended galleries at B and C floors.

Decision date: 08/05/2012
Decision: **Granted (GRA)**

Application reference no.: 18/AP/0312
Application type: Full Planning Permission (FUL)

Refurbishment of windows, including new vents on East, South and West elevations.

Decision date: 06.04.2018
Decision: **Granted (GRA)**

Application reference no.: 18/AP/0313
Application type: Pre-Application Enquiry (ENQ)

Internal re-configuration works to create new Second World War Galleries, Holocaust Galleries and learning and event spaces with refurbishment of windows, including new vents on East, South and West elevations.

Decision date: 06.04.2018
Decision: **Granted (GRA)**

KEY ISSUES FOR CONSIDERATION

Summary of main issues

51. The main issues to be considered in respect of this application are:
- a. Preliminary principle of development matters;
 - b. Principle of development in terms of land use and conformity with strategic policies;
 - c. Environmental impact assessment;
 - d. Impact of adjoining and nearby uses on occupiers and users of proposed development;
 - e. Impact on the amenity of adjoining occupiers;
 - f. Quality of design;
 - g. Impact on the curtilage listed wall and its contribution to other heritage assets;
 - h. Impact on the West Square Conservation Area and the setting of nearby heritage assets;
 - i. Impact on views in the London View Management Framework;
 - j. Impact on the Metropolitan Open Land;
 - k. Transport, highways and servicing matters;
 - l. Flood risk and sustainable urban drainage;
 - m. Trees and landscaping;
 - n. Biodiversity and ecology;

- o. Environmental matters;
- p. Construction impacts;
- q. Sustainability;
- r. Planning obligations;
- s. Engagement with, and consultation responses from, members of the public;
- t. Consultation responses from statutory consultees.

Planning policy and legislation

National Planning Policy Framework (the Framework) 2019

- 52. Chapter 2 - Achieving Sustainable Development
- Chapter 4 - Decision-making
- Chapter 6 - Building a Strong, Competitive Economy
- Chapter 7 - Ensuring the Vitality of Town Centres
- Chapter 8 - Promoting Healthy and Safe Communities
- Chapter 9 - Promoting Sustainable Transport
- Chapter 11 - Making Efficient Use of Land
- Chapter 12 - Achieving Well-designed Places
- Chapter 13 - Meeting the Challenge of Climate Change, Flooding and Coastal Change
- Chapter 15 - Conserving and Enhancing the Natural Environment
- Chapter 16 - Conserving and Enhancing the Historic Environment

The London Plan 2016

- 53. Policy 1.1 - Delivering the Strategic Vision and Objectives for London
- Policy 2.1 - London in its global, European and United Kingdom context
- Policy 2.5 - Sub-regions
- Policy 2.10 - Central Activities Zone - Strategic Priorities
- Policy 2.11 - Central Activities Zone - Strategic Functions
- Policy 2.12 - Central Activities Zone - predominantly local activities
- Policy 2.13 - Opportunity Areas and Intensification Areas
- Policy 2.15 - Town Centres
- Policy 4.1 - Developing London's Economy
- Policy 4.2 - Offices
- Policy 4.3 - Mixed Use Development and Offices
- Policy 4.5 - London's Visitor Infrastructure
- Policy 4.6 - Support for Enhancement of Arts, Culture, Sport and Entertainment
- Policy 4.7 - Retail and town centre development
- Policy 4.12 - Improving Opportunities for All
- Policy 5.1 - Climate Change Mitigation
- Policy 5.2 - Minimising Carbon Dioxide Emissions
- Policy 5.3 - Sustainable Design and Construction
- Policy 5.5 - Decentralised Energy Networks
- Policy 5.6 - Decentralised Energy in Development Proposals
- Policy 5.7 - Renewable Energy
- Policy 5.9 - Overheating and Cooling
- Policy 5.10 - Urban Greening
- Policy 5.11 - Green Roofs and Development Site Environs
- Policy 5.12 - Flood Risk Management
- Policy 5.13 - Sustainable Drainage
- Policy 5.15 - Water Use and Supplies
- Policy 5.17 - Waste Capacity
- Policy 5.18 - Construction, Excavation and Demolition Waste
- Policy 5.21 - Contaminated Land
- Policy 6.1 - Strategic Approach (Transport)

- Policy 6.2 - Providing Public Transport Capacity and Safeguarding Land for Transport
- Policy 6.3 - Assessing effects of development on transport capacity
- Policy 6.9 - Cycling
- Policy 6.10 - Walking
- Policy 6.11 - Smoothing Traffic Flow and Tackling Congestion
- Policy 6.12 - Road Network Capacity
- Policy 6.13 - Parking
- Policy 7.3 - Secured by Design
- Policy 7.4 - Local Character
- Policy 7.5 - Public Realm
- Policy 7.6 - Architecture
- Policy 7.8 - Heritage Assets and Archaeology
- Policy 7.14 - Improving Air Quality
- Policy 7.17 - Metropolitan Open Land
- Policy 7.19 - Biodiversity and Access to Nature
- Policy 7.21 - Trees and Woodlands
- Policy 8.2 - Planning Obligations
- Policy 8.3 - Community Infrastructure Levy

Mayor of London: Accessible London: Achieving an Inclusive Environment (SPG, 2004)

Mayor of London: Shaping Neighbourhoods - Character and Context (SPG, 2014)

Mayor of London: Sustainable Design and Construction (SPG, 2014)

Mayor of London: Social Infrastructure (SPG, 2015)

Mayor of London: Transport Strategy (2010)

Mayor of London: Climate Change Mitigation and Energy Strategy (2011)

Mayor of London: Climate Change Adaptation Strategy (2011)

Mayor of London: Central Activities Zone (SPG, 2016)

Core Strategy 2011

- 54. Strategic Targets Policy 1 - Achieving Growth
- Strategic Targets Policy 2 - Improving Places
- Strategic Policy 1 - Sustainable Development
- Strategic Policy 2 - Sustainable Transport
- Strategic Policy 4 - Places for Learning, Enjoyment and Healthy Lifestyles
- Strategic Policy 10 - Jobs and Businesses
- Strategic Policy 11 - Open Spaces and Wildlife
- Strategic Policy 12 - Design and Conservation
- Strategic Policy 13 - High Environmental Standards
- Strategic Policy 14 - Implementation and Delivery

Southwark Plan 2007 (July) - saved policies

- 55. The Council's cabinet on 19 March 2013, as required by paragraph 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 1.1 - Access to Employment Opportunities

Policy 1.7 - Development within Town and Local Centres

Policy 1.11 - Arts, Culture and Tourism Use

- Policy 2.1 - Enhancement of Community Facilities
- Policy 2.5 - Planning Obligations
- Policy 3.1 - Environmental Effects
- Policy 3.2 - Protection of Amenity
- Policy 3.3 - Sustainability Assessment
- Policy 3.4 - Energy Efficiency
- Policy 3.6 - Air Quality
- Policy 3.7 - Waste Reduction
- Policy 3.9 - Water
- Policy 3.11 - Efficient Use of Land
- Policy 3.12 - Quality in Design
- Policy 3.13 - Urban Design
- Policy 3.14 - Designing Out Crime
- Policy 3.15 - Conservation of the Historic Environment
- Policy 3.17 - Listed Buildings
- Policy 3.18 - Setting of Listed Buildings, Conservation Areas and World Heritage Sites
- Policy 3.19 - Archaeology
- Policy 3.28 - Biodiversity
- Policy 5.1 - Locating Developments
- Policy 5.2 - Transport Impacts
- Policy 5.3 - Walking and Cycling
- Policy 5.6 - Car Parking
- Policy 5.7 - Parking Standards for Disabled People and the Mobility Impaired

Relevant Supplementary Planning Documents and Conservation Area Appraisals

56. Sustainable Design and Construction (SPD, 2009)
 Sustainable Transport (SPD, 2010)
 Design and Access Statements (SPD, 2007)
 Section 106 Planning Obligations / Community Infrastructure Levy (SPD, 2015)
 Sustainability Assessment (SPD, 2009)
 Elephant and Castle (SPD & OAPF, 2012)
 West Square Conservation Area Appraisal (2013)

New Southwark Plan

57. For the last five years the council has been preparing the New Southwark Plan (NSP) which will replace the saved policies of the 2007 Southwark Plan and the 2011 Core Strategy. The council concluded consultation on the Proposed Submission version (Regulation 19) on 27 February 2018. The New Southwark Plan Proposed Submission Version: Amended Policies January 2019 is being consulted on until 17 May 2019. It is anticipated that the plan will be adopted in late 2019 following an Examination in Public (EIP). As the NSP is not yet adopted policy, it can only be attributed limited weight. Nevertheless paragraph 48 of the NPPF states that decision makers may give weight to relevant policies in emerging plans according to the stage of preparation of the emerging plan, the extent to which there are unresolved objections to the policy and the degree of consistency with the Framework.

Draft New London Plan

58. The draft New London Plan was published on 30 November 2017 and the first and only stage of consultation closed on 2 March 2018. Minor suggested changes to the plan were published on 13 August 2018 and an Examination in Public (EIP) began on 15 January 2019. The EIP will continue until May 2019 and until the London Plan reaches formal adoption it can only be attributed limited weight.

Listed Building and Conservation Areas Act 1991

59. Listed Building Consent is considered under the terms of the Listed Building and Conservation Areas Act 1991 [the Act] as amended and updated. The main principles of the Act are repeated in the NPPF (2019), and reinforced by the council's policies, and associated guidance documents. The main issue in these cases is the effect of the proposal on the special architectural and historic interest of the listed building/structure.
60. The Act places great weight on the 'special interest' of heritage assets and their settings, and stresses the importance of preserving and enhancing their architectural and historic significance.

Preliminary principle of development: establishing the lawful use of the site

61. The existing lawful use of the All Saints Annexe, and indeed whether it is ancillary to the main IWML site, has not been established as part of any previous planning applications. It is necessary, therefore, to establish the existing lawful use of the site by determining whether it is a standalone planning unit or ancillary to the nearby IWML.
62. Case law confirms that incidental or ancillary uses are "*uses which are subservient to a primary use taking place within the same planning unit*". Importantly, one single planning unit may comprise physically separate and distinct areas, provided the areas are used for similar and related purposes. As such, it does not automatically follow that the All Saints Annexe site is a separate planning unit from the main IWML site purely because an area of parkland separates the two. From this basis, it is necessary to next consider whether the primary use of the Annexe is ancillary to the IWML.
63. It is known that the All Saints Annexe has functioned since the late 1980s as:
- an office for the Imperial War Museum technical and support staff (occupying approximately 60% of the total floor area);
 - as a publicly-accessible archive/library facility containing war-related materials (occupying approximately 40% of the total floor area), and;
 - the site of the central servers upon which both the Annexe and IWML rely (occupying a negligible percentage of the total floor area).
64. In assessing whether one use is ancillary to another, the relevant considerations as established by case law are:
1. Severability
i.e. could one use practically and viably operate and meet the basic needs of its users independently of the other?
 2. Scale
i.e. is one clearly subservient in size/floorspace to the other?
 3. Environmental impact
i.e. does the alleged ancillary use have outward effects (amenity impact, traffic effects, environmental conditions, general appearance etc.) distinctly greater or more impactful than the other?
65. Turning to Test 1, the office within the Annexe is used by technical and support staff directly serving the IWML. Thus, there is a critical interdependence between these two functions: in the event that the office was to cease operating the IWML would likely not be able to function, and vice-versa. Similarly, the IWML relies upon the servers within the Annexe building to perform its essential technological functions. Officers consider that IWML and the Annexe's library/archive could practically and viably operate

independent of each other; however, because the office floorspace occupies the majority of the Annexe, it is the office use which determines the host building's primary use. As such, because the primary use of the Annexe is inseverable from IWML, Test 1 "severability" has been met.

66. The quantum of floorspace within the Annexe is less than that within the main IWML building, and thus Test 2 "scale" has been met.
67. With regard to Test 3, the Annexe site does not generate environmental impacts distinctly greater or more impactful than the main IWML building due to, amongst other things: the appointment-based nature of the archive/library facility meaning visitor numbers are controlled and relatively low at any one time; both sites accommodating similar numbers of staff; both sites having similar staff and servicing access; neither site generating any notable potential for noise or light pollution; and both buildings operating within 'daytime' hours. As such, officers consider that Test 3 "environmental impact" has been met.
68. With all three tests met, and duly recognising that this assessment is a matter of fact and degree, officers are satisfied that the lawful use of the All Saints Annexe site is ancillary to IWML (Class D1).

Principle of development

Policy Context

69. The application site is located in the Central Activities Zone (CAZ), the Elephant and Castle Opportunity Area and the Elephant and Castle Major Town Centre.
70. At the heart of the NPPF is the presumption in favour of sustainable development. Amongst the key themes in achieving sustainable development are ensuring the vitality of town centres, promoting sustainable transport, supporting a strong economy, and delivering good design.
71. The London Plan considers Opportunity Areas to be "*the capital's major reservoir of brownfield land with significant capacity to accommodate new housing, commercial and other developments linked to existing or potential improvements to public transport.*" Policy 2.13 (Opportunity Areas and Intensification) seeks to optimise residential and non-residential output and densities within Opportunity Areas, and provide social and other infrastructure to sustain growth. In locations where an Opportunity Area Planning Framework has been adopted, the policy requires new development to conform to these strategic policy directions. Policy 4.6 (Support for and Enhancement of Arts, Culture, Sport and Entertainment) sets out the principles for maintaining the capital's status as one of greatest world cities for culture and creativity. Examples of these principles include remedying deficiencies in existing cultural facilities and promoting development that will enhance and provide support to existing and new cultural and visitor attractions.
72. Southwark's Core Strategy reinforces the London Plan aspirations for development in the CAZ to support London as a world class city. The CAZ and Opportunity Areas are targeted as growth areas in the borough where development will be prioritised. The Council will allow more intense development for a mix of uses in the growth areas and will ensure development makes the most of a site's potential while protecting open space (Strategic Policy 1). Core Strategy Strategic Targets Policy 2 reflects the above London Plan targets for the opportunity areas.

Proposed D1 use of the new building within the rear yard

73. The proposed building within the rear yard would provide floorspace for IWM's technical and support staff. This constitutes an ancillary-to-museum (Class D1) use for the reasons expanded on in earlier parts of this report. In land use terms, no issues are raised by this proposed ancillary-to-D1 use because, although a new building would be constructed, there would be no change to the site's existing lawful use.
74. The quantum of ancillary-to-D1 floorspace within the proposed building would be less than that within the existing All Saints Annexe (which, as explained above, is to undergo a change of use). However, the space within the Annexe currently occupied by the photography and film archive is no longer required because this is to be moved to a state-of-the-art facility at Imperial War Museum Duxford. The application documents demonstrate that all remaining functions could be accommodated in the new building simply by virtue of its more efficient layout. Taking this into consideration together with the uplift and improvements to the D1 floorspace within IWML for which permission was granted earlier this year, officers consider that all existing D Class floorspace would be effectively re-provided. This is in line with the requirements of Saved Policies 1.11 and 2.1. As such, there is sound justification to release the floorspace within the existing Annexe building for an alternative appropriate use.
75. More broadly, the provision of Class D1 floorspace specifically for a purpose ancillary to and supportive of the future effective functioning of one of the Borough's key museums would comply with a wide range of policies, most significantly: Policies 1.11 (Delivering the Strategic Vision and Objectives for London) and 4.6 (Support for and Enhancement of Arts, Culture, Sport and Entertainment) of the London Plan 2016; Strategic Policy 4 (Places for Learning, Enjoyment and Healthy Lifestyles) of the Core Strategy 2011, and; Saved Policy 1.11 (Arts, Culture and Tourism Use), 1.7 (Developments within Town and Local Centres) of the Southwark Plan 2007.

Change of use of the existing All Saints Annexe building from D1 to 'mixed' B1/D1

76. The proposed change of use of the Annexe to 'mixed' use would allow Class B1 and D1 functions to take place simultaneously and in a spatially intertwined way but would also afford the applicant the flexibility to use the entirety of the floorspace for just one of the permitted uses without forfeiting their right to revert the space to the other use at a future time. IWM seeks this 'mixed use' because, although it is likely that the All Saints Annexe building would be leased out on a long-term basis to a future occupier for office accommodation, the flexible D1 element of the Annexe would allow IWM to re-occupy all or part of the building should they require this space in the future.
77. The proposed change of use of the Annexe from D1 (ancillary-to-museum) to B1/D1 (office/ancillary-to-museum) is acceptable because the creation of B1 floorspace, even if part of a mixed use, within the CAZ and a Major Town Centre is supported by policy. The proposed B1 use would promote jobs growth and help meet general demand for office space in this location, which benefits from the highest possible transport accessibility (PTAL) rating of 6b.
78. As explained above, although the change of use of the Annexe would potentially entail a partial or entire loss of D1 floorspace within the CAZ, this loss would be directly offset by the ancillary-to-D1 building proposed within the rear yard.
79. It is noted that, in order to support the vibrancy and vitality of the CAZ, London Plan policies 2.11 and 4.3 promote mixed use development, including housing, alongside the provision of office floorspace. The proposed development does not include a residential component. However, the London Plan allows a degree of flexibility with respect to the provision of mixed uses in the CAZ in recognition that it may not always

be suitable to provide housing on-site. The Mayor's Central Activities Zone SPG contains additional guidance on maintaining an appropriate mix of uses within the CAZ, setting out the weight that should be afforded to CAZ strategic functions, such as office and culture, relative to residential. Paragraph 4.2.2 of the SPG requires the provision of residential development within the CAZ to be managed sensitively to ensure new development neither strategically constrains the overall supply of office floorspace nor fails to support and complement other important CAZ functions, such as cultural activities.

80. There would be limited scope to introduce residential into the development without increasing the scale of the buildings or compromising the layouts and functionality of the office/support floorspace. Increasing the scale of the buildings would be inappropriate given the potential impact on surrounding residential occupiers. Given the constraints of the site it would be reasonable to conclude that priority should be given to supporting the future of the IWML as an important cultural and tourist institution.
81. Whilst it is concluded that the proposed 'mixed' use of the All Saints Annexe presents no potential adverse environmental or amenity implications, it would be important to restrict the use to that linked to the IWML and prohibit other uses within Class D1 which might have different or greater local impacts. As such it is recommended that, in the event of planning permission being granted, a condition be imposed that:
- restricts the 'D1' element to a museum use only, and;
 - removes permitted development rights afforded by the GPDO for temporary changes of D Class floorspace to uses falling within A1, A2 or A3 Classes.

Conformity with the aims of the Elephant and Castle SPD and OAPF

82. The vision set out in the Elephant and Castle Supplementary Planning Document and Opportunity Area Planning Framework (SPD and OAPF) (2012) is to realise the area's potential as an attractive central London destination by delivering excellent shopping, leisure facilities and cultural activities. Critical to this vision is the delivery of 5000 new jobs, which is to be achieved by bringing forward appropriate new development —in particular offices, hotels and small businesses— alongside improving the area's existing cultural offering. Additionally, the SPD recognises the significant need to improve the look and feel of the area through better architecture, street forms and new public spaces.
83. The site lies within the West Square character area, in which the Elephant and Castle SPD and OAPF seeks to, amongst other things:
- Maintain and improve the existing open spaces;
 - Support improvements to IWML and its setting, and;
 - Ensure that development conserves or enhances the character and appearance of the West Square conservation area and Elliott's Row conservation area and their settings.
84. SPD6 sets out that proposals involving arts, cultural, leisure and entertainment uses which contribute towards consolidating Elephant and Castle and Walworth Road as a major town centre will be supported.
85. The proposed development would support the ability of IWM to sustain the cultural offering of IWML by providing consolidated and modern office accommodation for its workforce. In turn, this would release the 2,476 square metres of floorspace within the All Saints Annexe for a new employment use. As detailed in a later section of this Committee Report, it is considered that the development would enhance the setting of

IWML and the character and appearance of the West Square Conservation Area without harming any other nearby designated heritage assets.

86. For the reasons given above, the proposed development accords with the Elephant and Castle SPD and OAPF in respect of both the broader vision and the location-specific development guidelines.

Summary

87. The proposed Class D1 and 'mixed' Class B1/D1 land uses would support an important existing cultural use while delivering new employment floorspace. These uses are appropriate in this location, which is within the CAZ and the Elephant and Castle Opportunity Area, and as such the application is acceptable in principle.

Environmental Impact Assessment

88. The European SEA Directive is transposed into UK law by the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. The Regulations set out the circumstances under which development needs to be underpinned by an Environmental Impact Assessment (EIA). Schedule 1 of the Regulations set out a range of development, predominantly involving industrial operations, for which an EIA is mandatory. Schedule 2 lists a range of development for which an EIA might be required on the basis that it could give rise to significant environmental impacts. Schedule 3 sets out that the significance of any impact should include consideration of the characteristics of the development, the environmental sensitivity of the location and the nature of the development.
89. The development is not considered to constitute EIA development, based on a review of the scheme against both the EIA Regulations and the European Commission guidance.
90. Consideration should, nevertheless, still be given to: the scale, location or nature of development; cumulative impacts, and; whether these or anything else are likely to give rise to significant environmental impacts. This report sets out the reasons for concluding that the scale is appropriate to the site's urban setting and the users are unlikely to give rise to any significant environmental impacts.

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

91. The site is located in an area comprising residential, educational and cultural uses as well as public open space. None of the existing surrounding uses would preclude or curtail the full use of the proposed development by staff and visitors.

Impact on the amenity of adjoining occupiers

Overlooking

92. The Residential Design Standards SPD states that in order to prevent unnecessary problems of overlooking, development should achieve the following distances:
- A minimum distance of 12 metres at the front of the building and any elevation that fronts onto a highway
 - A minimum distance of 21 metres at the rear of the building.
93. It should be noted, however, that these rules apply where the 'facing' buildings are both in residential use. The proposed building would provide employment workspace

ancillary to the nearby IWML, and thus would be akin to commercial use. Therefore, while the separation distances set out in the Residential Design Standards SPD are a useful guide, they can be applied with some degree of flexibility in this instance.

94. As there are no residential uses directly to the northwest or southeast of the site, the nearest dwellings are to the northeast and southwest at nos. 1 to 5 Harmsworth Mews and nos. 91-105 (odds) Brook Drive respectively. All of the Harmsworth Mews properties contain clear-glazed habitable room windows in their rear (site-facing) elevation at ground, first and second floor level. With respect to the Brook Drive properties, all eight contains one clear-glazed habitable room window within the rear (site-facing) elevation of the outrigger at first floor level. Only at nos. 95, 97 and 101 is there a clear-glazed aperture at ground floor level in the rear elevation of the outrigger. All eight Brook Drive properties contain clear-glazed openings at ground, first and/or second floor level within the outrigger side elevation and the main rear elevation.
95. The proposed development would contain glazed openings on all elevations except at upper (first floor) level on the southwest elevation of the pavilion element. However, in response to the concerns raised by residents and Members at the Committee on 9th October 2018, the applicant has decreased the number of glazed openings on the southwest and northeast elevations, proposing brick-faced recessed panels in their place. The diagrams below depict the reductions in the number of glazed panels.



Figure 5: A comparison showing the southwest elevation, the windows within which face towards the Brook Drive properties, in its originally-proposed format (top) and amended format (bottom)

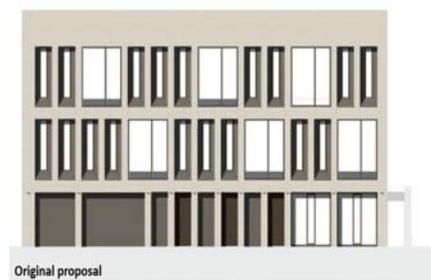


Figure 6: A comparison showing the northeast elevation, the windows within which face towards the Harmsworth Mews properties, in its originally-proposed format (top) and amended format (bottom)

96. In addition to the omission of some of the glazing on these two elevations, and as a further response to the concerns raised by residents and Members at the Committee on 9 October 2018, the applicant proposes to fit all the windows in these elevations with a graduated obscuring treatment. This would be permanent to the glass, and its design would ensure that views 'out' for a seated worker would be almost entirely obstructed, while views 'out' from a standing position would be partially obscured.

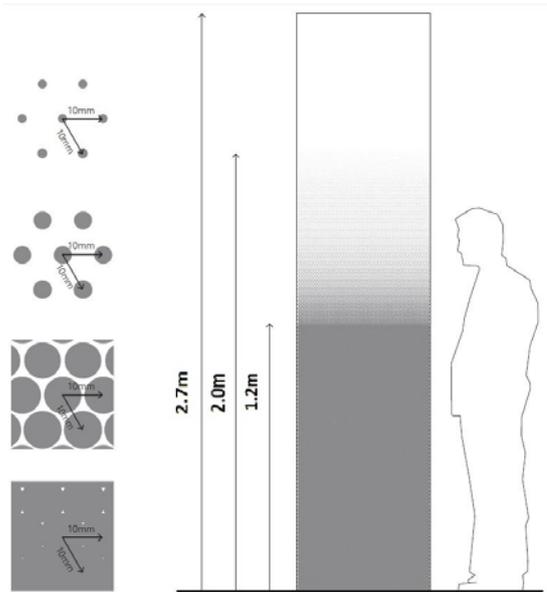


Figure 7: The design principles of the graduated window treatment.



Figure 8: An example, as provided by the applicant, of the graduated window treatment.

97. In addition to the above measures, the building has been designed to achieve good separation distances from the neighbouring properties. The planning application documents include a measured survey drawing showing the distances between the proposed building and these existing nearby residences. This drawing is provided below, with extra annotations (all in red) by the case officer identifying each of these thirteen addresses and showing two important additional dimensions.

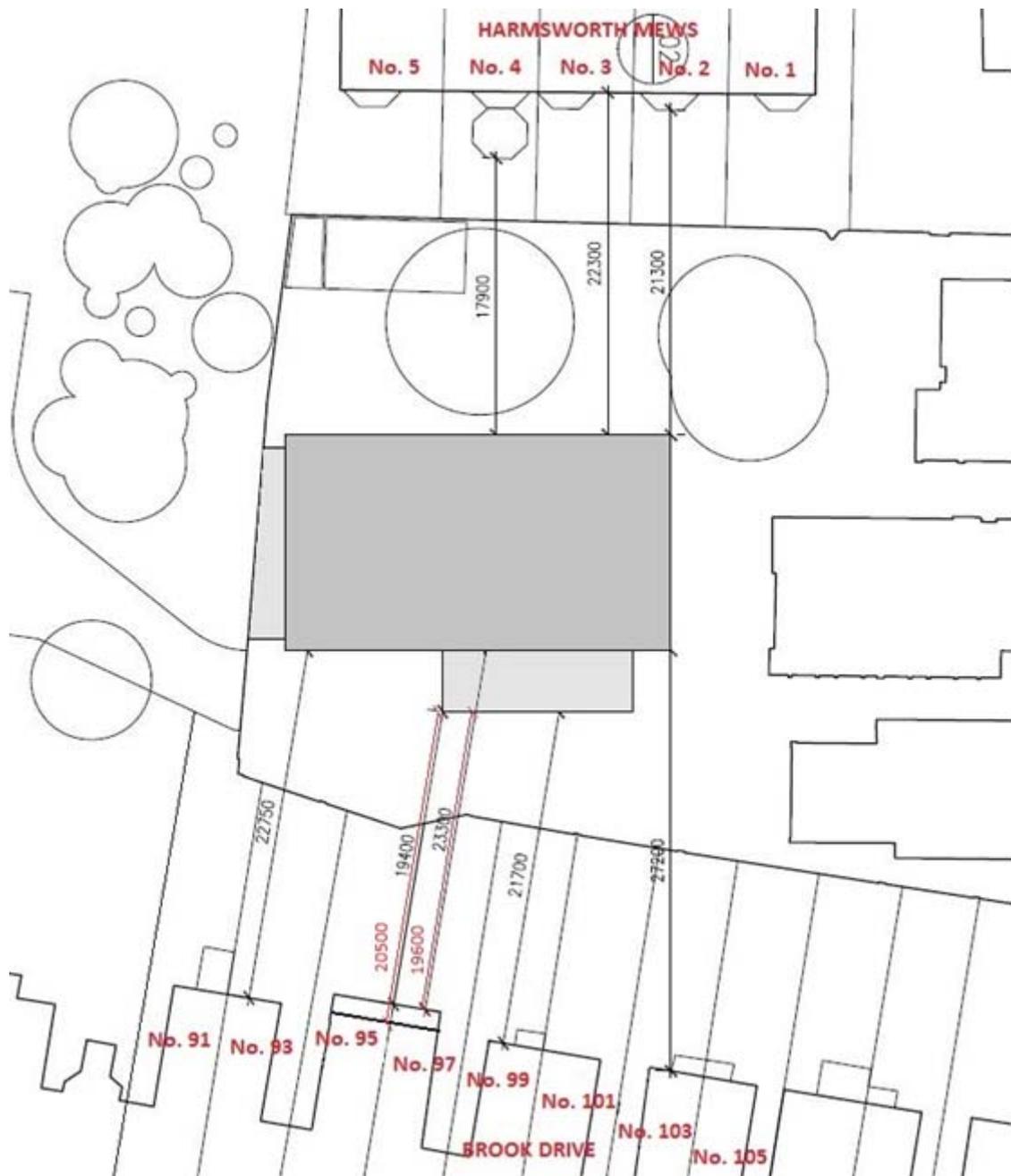


Figure 9: The proposed site layout, annotated to show the distances between the proposed building and the nearest residential properties. The three-storeyed body of the proposed building is shown in dark grey. The two-storeyed pavilion and single-storeyed extruded ground floor element are both shown in light grey.

98. With one exception, the distance between the proposed building and the Harmsworth Mews properties would exceed the 21.0 metres recommended by the Residential Design Standards SPD. The exception is the distance to the conservatory at no. 4 Harmsworth Mews, which would be 17.90 metres.
99. The conservatory is clear glazed on all elevations and its roof. From the ground floor level of the proposed building, horizontal views towards the conservatory would be screened entirely by the high boundary wall which separates the two sites. From the first and second floor levels of the proposed building, obtaining invasive views towards the conservatory, the potential for which would be minimal in any case, would be mitigated by the graduated obscuring treatment within the glazing.
100. As such, there would be no risk of the occupiers of the Harmsworth Mews dwellings experiencing unduly intrusive overlooking.

101. With respect to the Brook Drive properties, the diagram shows that the proposed building would, with two exceptions, be more than 21.0 metres away. The two exceptions are no. 95 Brook Drive and no. 97 Brook Drive. The development would be no less than 19.40 metres from the closest window at no. 95 Brook Drive and no less than 19.60 metres from the closest window at no. 97 Brook Drive. Both of these distances are to the two-storeyed pavilion.
102. As the pavilion would not be glazed on its southwest-facing façade at first floor level, and because all first- and second-floor glazing on the southwest elevation of the main body of the building would be fitted with graduated obscuring treatment, the privacy of the occupiers of all the Brook Drive dwellings would not be harmed.
103. It is considered that the amendments made to the glazing following the meeting on 9 October 2018 properly address the concerns raised by the Committee, Ward Members and neighbouring residents. The reduction in the number of window openings, the omission of the larger picture windows, and the introduction of permanent opaquing treatment to the windows would reduce both the actual and perceived impact on the privacy of the neighbours.
104. IWML consulted with their neighbours during the process of designing these changes. Details of this engagement are set out in paragraphs 238 to 239 of this report. In response to the Council's re-consultation on the application (following submission of the changes) the Chairs of the West Square Residents Association and Harmsworth Mews Residents Association advised that the residents were now able to support the proposals.

Outlook and sense of enclosure

105. When seen in the context of the distances which would separate it from the Harmsworth Mews and Brook Drive properties, the proposed building is considered to be of a sympathetic height, mass and scale such that no undue sense of enclosure or curtailed outlook would be experienced by existing residents. To further reduce the impact on surrounding occupiers, careful consideration has been given to breaking up the elevations through a mixture of brick-faced and glazed panels, changes in materiality and a predominance of light-coloured yellow-grey brick. New boundary edge planting, together with the retention of a number of existing mature trees would further lessen the building's visual prominence. While residents' outlook would change to some degree, officers are satisfied that the impact on the existing residents would not be harmful.

Daylight

106. A daylight and sunlight report has been submitted which assesses the scheme based on the Building Research Establishments (BRE) guidelines. The changes made following the 9 October 2018 meeting have not affected the daylight and sunlight impacts and no update to the report was required.
107. The BRE sets out the rationale for testing the daylight impacts of new development through various tests. The first is the Vertical Sky Component test (VSC), which is the most readily adopted. This test considers the potential for daylight by calculating the angle of vertical sky at the centre of each of the windows serving the residential buildings which look towards the site. The target figure for VSC recommended by the BRE is 27% which is considered to be a good level of daylight and the level recommended for habitable rooms with windows on principal elevations. The BRE have determined that the daylight can be reduced by about 20% of the original value before the loss is noticeable.

108. The second method is the No Sky Line (NSL) or Daylight Distribution (DD) method which assesses the proportion of the room where the sky is visible, and plots the change in the No Sky Line between the existing and proposed situation. It advises that if there is a reduction of more than 20% in the area of sky visibility, daylight may be affected.
109. Although the proposed development has undergone some changes since the deferral by the Main Committee at the 9 October 2018 meeting, the height, footprint and location of the building have remained unchanged. As such, no update to the original daylight and sunlight report has been required.
110. Assessed as part of the daylight and sunlight report due to their risk of VSC loss as a result of the works are:
- The flats at nos. 71-89 Brook Drive;
 - Nos. 91-117 (odds) Brook Drive;
 - Nos. 2, 4 and 6 Austral Street;
 - Nos. 20, 21 and 22 West Square, and;
 - Nos. 1-5 Harmsworth Mews.
111. None of the windows at these neighbouring properties would experience a VSC reduction (as a percentage of the baseline VSC value) of 20% or more.
112. All of the properties tested for VSC loss were also tested for NSL loss. The results show that for all but two of the rooms tested the NSL loss would not exceed 20%. Where there would be a reduction of more than 20%, which is at each of the ground floor rear-facing rooms within nos. 95 and 97 Brook Drive, the reduction would be 32% and 48% respectively.



113. Figure 10: A photograph of the rear of the Brook Drive properties, highlighting the two glazed apertures which serve rooms where a reduction in NSL of more than 20% would be experienced.

114. The 32% reduction constitutes a moderate adverse impact and the 48% reduction constitutes a substantial adverse impact. However, it must be recognised that these two rooms currently benefit from an open outlook over vacant land, meaning that — notwithstanding the obstruction caused by the boundary wall— the existing area of sky visibility these rooms enjoy is uncharacteristically generous in the context of this central London location. Therefore, NSL losses will inevitably arise from any reasonable redevelopment of the yard. Taking into account the scale and modulation of the proposed development whereby the three-storeyed main body of the body is set-back behind the two-storeyed pavilion, together with the separation distance being 19.60 metres at its minimum point, it is considered that acceptable daylight levels would be retained for these two rooms, especially in light of the VSC loss at both of these glazed apertures being 16% in each case (i.e. not in breach of the 20% threshold recommended by BRE).
115. In summary, there would be no noticeable loss of VSC to any nearby dwellings as a result of the proposed development. There would be noticeable NSL losses at one ground floor room in no. 95 Brook Drive and one ground floor room in no. 97 Brook Drive. These losses are a consequence of the rooms benefitting from an unusually substantial area of sky visibility due to the yard being undeveloped at present. The level of impact is not untypical for a central London location.

Sunlight

116. The applicant's daylight and sunlight report has assessed the impact of the proposed development on the sunlight received at all windows facing within 90 degrees. The BRE guide states that nearby windows must be assessed to determine whether any of the following would be experienced:
- a reduction in sunlight to less than 25% Annual Probable Sunlight Hours (APSH), or;
 - a reduction in sunlight to less than 5% Winter Annual Probable Sunlight Hours (WAPSH) or;
 - both of the above.
117. Where any of the above occurs, if the window's resulting APSH is less than 0.8 times its former value, there may be an appreciable loss of sunlight.
118. Assessed as part of the Report due to their risk of sunlight loss are the south-facing windows at the following addresses:
- Nos. 20, 21 and 22 West Square, and;
 - Nos. 1-5 Harmsworth Mews.
119. The results show that, with the exception of the some of the glazed panes within the conservatory at no. 20 West Square, there would be no APSH or WAPSH reductions in excess of those recommended by the Building Research Establishments (BRE) guidelines.



Figure 11: Proposed site layout, showing the conservatory at no. 20 West Square edged in green.

120. With respect to the conservatory at no. 20 West Square, 44 individual glazed panes were tested, of which 17 fell short of the winter sunlight hour test. While in and of themselves such transgressions would indicate significant losses of APSH, because they combine to provide sunlight to a single room the effect would be much less noticeable to the users/occupiers. Moreover, the glazed panes where transgressions would be experienced currently receive low levels of winter sunlight due to their orientation and proximity to existing surrounding structures, the consequence of which is that a modest loss will generate a relatively high percentage reduction. In addition to the 44 panes tested within the conservatory, there are further (more distant) openings that have not been tested, and through which the room receives natural light. There is also a 'lip' over the conservatory leaded dome, which reduces the potential for sunlight to hit the centre of the windows directly underneath this detail.
121. In summary, while some of the glazed panes within the conservatory at no. 20 West Square would experience a reduction in sunlight to less than 5% Winter Annual Probable Sunlight Hours, the majority of the glazed panes would not experience a reduction of this magnitude. The room in question is served by windows other than those in the conservatory. Taking these factors into account in the round, it is considered that the sunlight losses at this one neighbouring property would not be detrimental to the occupiers' amenity.

Overshadowing

122. An overshadowing assessment, the purpose of which is to measure and compare the level of sunlighting within gardens and open spaces before and after a proposed development, has been submitted by the applicant. The BRE guidance sets out that at least 50 percent of any garden or open space should receive no less than 2 hours of

direct sun on 21 March. If, as a result of new development, the area which can receive two hours of direct sunlight on 21 March is reduced by more than 20% of its former size, the BRE guide considers this to be a transgression because the space may look more heavily overshadowed.

123. By virtue of their orientation and relationship to the application site, the properties with amenity spaces susceptible to overshadowing are:
- The flats at nos. 71-89 Brook Drive;
 - Nos. 91-117 (odds) Brook Drive;
 - Nos. 2, 4 and 6 Austral Street;
 - Nos. 20, 21 and 22 West Square, and;
 - Nos. 1-5 Harmsworth Mews.
124. The overshadowing assessment demonstrates that none of the amenity spaces at these surrounding properties would undergo a reduction of more than 20% to the area of ground which currently receives two hours of direct sunlight on March 21st.
125. In summary, the proposal would not create any undue overshadowing of neighbouring gardens and open spaces.

Noise disturbance

126. In terms of noise generation, the use of neither the proposed building nor the All Saints Annexe for D1/B1 purposes would be incompatible with the nearby residential uses. The proposed building would be used largely during standard daytime working hours with all activities except for spill-out from the canteen/café taking place within the confines of the building. A condition will be imposed requiring the spill-out tables and chairs to be brought inside the building or otherwise made unusable in the evening.
127. A condition will be imposed to ensure that the specific plant sound level shall be 10dB(A) or more below the background noise level.
128. It is inevitable that servicing vehicles will generate some low-level noise, but it is also reasonable that in the interests of residential amenity this activity be minimised certainly during night-time hours. As such, and in line with the request of the Council's Environmental Protection Team, a condition will be imposed to restrict deliveries to the proposed building to between the hours of 08:00 and 18:00 Monday to Friday with no deliveries on Saturdays, Sundays and Bank Holidays.

Light pollution

129. The proposed building is to be used by IWM staff, and as such would be occupied in the most part during daytime hours. Throughout the building, internal light fittings would be motion-sensitive with timed shut-off. As such, on the occasion that a staff member needs to work outside normal office hours, internal lighting would be isolated solely to the area where the individual is working, the effect of which is that the entire building would not be internally lit-up. This would minimise light pollution and disturbance during hours of darkness for those dwellings which back onto the application site. It should also be noted that the operational characteristics of the existing All Saints Annexe are very similar to those of the proposed building and so the degree of change to the existing conditions and use of the site would not be pronounced.
130. In terms of external lighting, an indicative strategy is contained within the Design and Access Statement and the Landscaping Report. The strategy proposes to attach up-

and down-lighters at the heads of the ground floor windows. The down components would assist with ground surface lighting while the up components would illuminate the elevations. Lighting would also be located within the grounds of the building to provide low-level illumination for wayfinding and security purposes.

131. The Environmental Protection Team has assessed the indicative lighting strategy and has raised no issues in principle. Through the imposition of a condition, the team wishes to reserve authority over the lighting's detailed design (power and position of luminaries; light intensity contours etc.) in the interests of ensuring the surrounding residential occupiers do not suffer from light pollution or have their privacy or visual amenity affected detrimentally. These details are to be agreed and approved prior to occupation of the new building.

Odour disturbance

132. There would be no commercial kitchen facilities associated with the canteen/café space. The food sold at the canteen/café would be sandwiches, soup and the like, most of which would be prepared off-site. There is, therefore, no risk of undue odour disturbance for neighbours.
133. Should the applicant later decide to carry out large-scale food preparation on-site requiring ventilation/extraction equipment, planning permission would be required for this. Any such planning application would be determined by the Local Planning Authority with due regard to the potential odour disturbance to neighbours.
134. In respect of the proposal which was taken to Committee on 9 October 2018, neighbours raised concerns that the proposed bin store (which was, at the time, proposed within the single-storey timber structure) would create odours in close proximity to Harmsworth Mews. In response, the applicant is now proposing to locate the bin store on the southern side of the building close to the gates separating the site from the As discussed in a later section of this report the refuse generated by the proposed development would be transferred on a daily basis to IWML. The proposed on-site store would, therefore, simply act as an occasional back-up facility and would not be used for stowing large quantities of refuse for protracted periods of time. The store would, in any case, be covered and secure, thereby adequately protecting surrounding occupiers from undue odour disturbance.

Quality of design

135. Saved Policy 3.13 (Urban Design) requires the height, scale and massing of buildings to be appropriate to the local context in order that they do not dominate their surroundings inappropriately. Saved Policy 3.12 (Quality in Design) requires developments to achieve a high quality of both architectural and urban design, enhancing the quality of the built environment as well as preserving or enhancing the historic environment.

Form, height and scale

136. The proposed building would be articulated as two conjoined rectilinear volumes, one of three storeys and the other of two, but with the ground floor level of the larger volume extruded so that it extends to create the boundary wall to the park. The building's crisp form and flat roof depart from the domestic architecture which characterises the properties adjoining the site. This is considered appropriate given that the proposal would serve a non-residential function.
137. No part of the main three-storeyed body of the building would be higher than the main eaves line of the Annexe building — the top of the proposed rooftop plant would be

slightly lower and the proposed parapet would be markedly lower. The proposal's flat roof helps to limit its overall height and achieve a sensitivity of scale to the existing Annexe building. The Brook Drive and Harmsworth Mews properties which border the site are also three-storeyed, but their height and scale is smaller than the Annexe building due to their residential character. The parapet of the proposed building would, nevertheless, only exceed the ridge height of these dwellings by a modest amount (approximately 1.0 metre in the case of the Harmsworth Mews properties and approximately 2.0 metres in the case of the Brook Drive properties). As such, the height and form of the proposed building strike an appropriate balance between the scale of the All Saints Annexe building and the residential dwellings to the north and south, and could not be said to dominate its context.

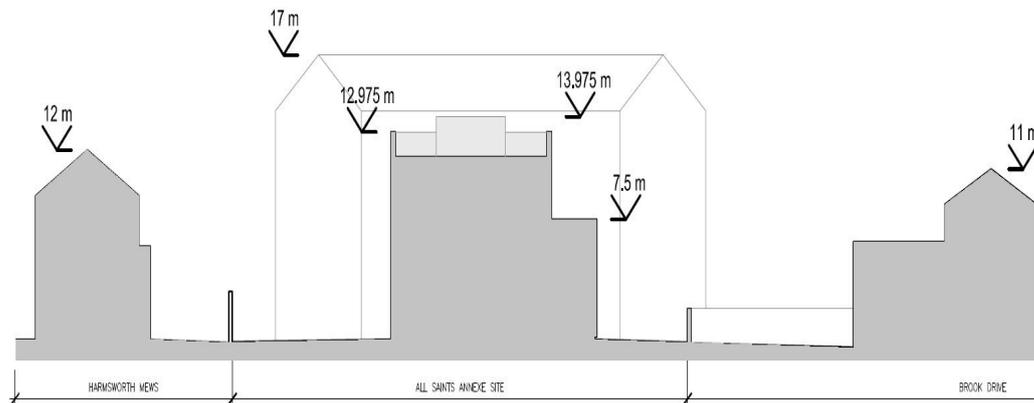


Figure 12: North-south site section, showing the proposed building in the centre of the image in relation to the All Saints Annexe (in the background), the Harmsworth Mews properties (left-hand side of image) and the Brook Drive dwellings (right-hand side of image).

138. Within almost all views across the park, the building would appear as a single, simple form because of the entrance pavilion element being out of view due to its considerable set-back from the parkside elevation of the main volume. The rooftop plant has been positioned towards the south-eastern end of the building's footprint such that it would not be visible above the raised parapet in views from the park.
139. The cycle store, being modestly-proportioned and single-storeyed, would read very much as a subservient and ancillary volume to the new building. Due to being concealed by the new boundary wall, it would not be visible within wider views across the park or within the majority of views from surrounding dwellings. The refuse store would be a small-scale and visually discreet structure.
140. Overall, it is considered the proposed building's form is well-conceived and its scale and massing would be proportionate to its context.

Detailed design, fenestration and materiality

141. Drawing on a number of characteristics from the local context not only in terms of materiality but also visual rhythm, the elevational treatment of the proposed building is well-resolved. The changes to the fenestration following the 9th October Planning Committee meeting alter the proportions of glazing to solid faces, but maintain the overall rhythm and character of the building.
142. With respect to the main body of the building, a strong sense of verticality would be achieved through the use of slender panels, some brick-finished and some glazed, with further emphasis provided by stretches of upright brickwork at lintel level. Interspersing these narrow recessed openings would be some broader panels. Where non-glazed, these wider panels would be lent vertical stress by corduroy brick

coursing; where glazed, the window frames would subdivide the expanse of glass and help maintain the regular rhythm of the façade.

143.

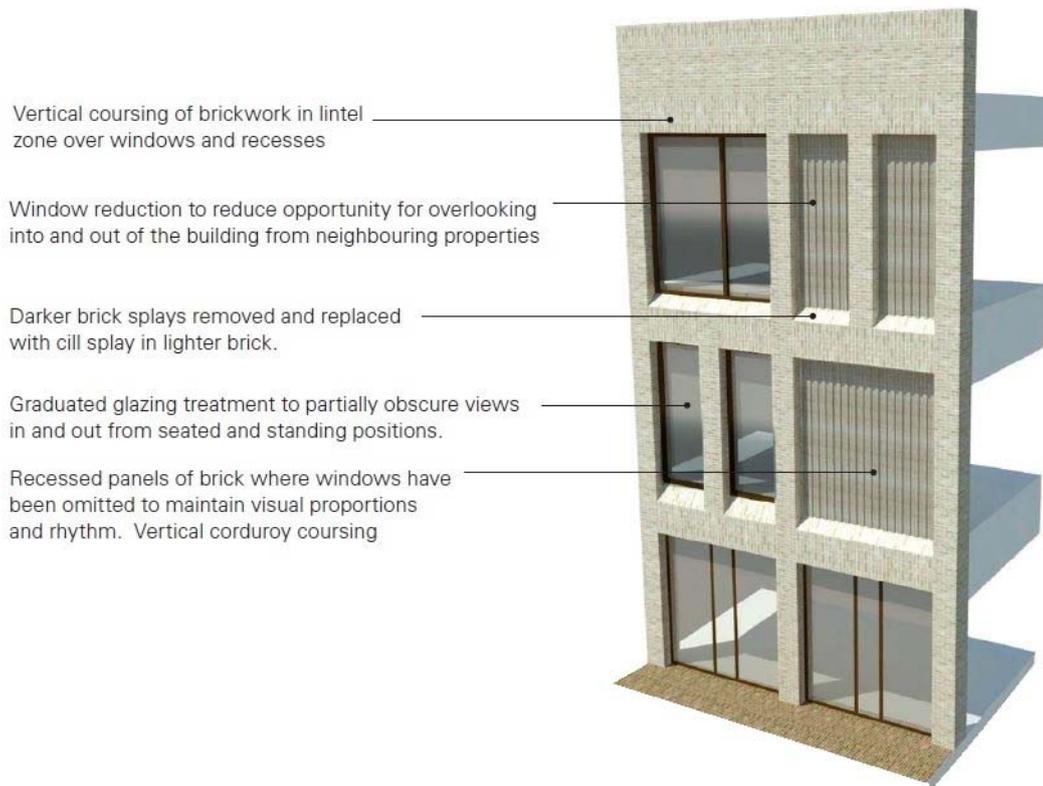


Figure 13: Bay study, annotated to explain the changes made by the applicant to the fenestration and detailed design since the 9 October 2018 deferral.

144. The majority of the recessed panels would have splayed cills to accentuate their depth; these reveals would lend a subtle dynamism to the otherwise ordered and geometric façades. A few of the wider glazed panels on the park-facing elevation would be set flush to the façade but with deep internal frames visible from the exterior. Solar glazing of a neutral tone would be fitted throughout, with the graduated obscuring treatment applied to all first- and second-floor glazing on the northeast and southwest elevations.



Figure 14: A view of the building as seen from the southern corner of Geraldine Mary

Harmsworth Park, showing the interrelationship of the building and the rebuilt boundary wall.

145. All elevations of the main body of the building would be faced in a grey-yellow mottled brick with a strong textural quality. All window and door openings would have slimline bronzed aluminium frames, the colour of which would sit comfortably alongside the brick. A small number of panels on the east elevation would be fitted with bronzed aluminium louvre panels to conceal the services or back-of-house uses contained behind



Figure 15: Physical samples of the proposed facing materials. Since the deferral of 18/AP/1577 at the 9 October 2018 Main Committee meeting, one of the materials (no.5, a brown facing brick) has been omitted from the design of the building; hence the absence of material no.5 from the above pallet.

146. The façades of the two-storey entrance wing would comprise curtain walling on the ground floor and part of the first floor, externally affixed with vertically-oriented

bronzed aluminium fins to match the window frames on the main body of the building. This treatment would help to visually distinguish the entrance wing from the main body, in so doing reinforcing the articulation of the building as two rectilinear volumes sat side-by-side, without appearing discordant. The entrance pavilion would be of striking design, providing a suitable focal point for those entering the site from Geraldine Mary Harmsworth Park.

147. The new wall running along the site's boundary to the Park would be constructed in the same brick as used on the façades of the main building. Where the new boundary wall meets the proposed building, it would become part of the building itself, enclosing the staff welfare and canteen areas. Three windows would punctuate the wall with frames that extrude slightly above the parapet; a glazed roof would span back from each of these three windows to the main structural frame of the building. Cleverly, this allows for the ground floor level accommodation to discreetly extend up to the boundary line (in so doing facilitating natural surveillance of an area of the park dogged by antisocial behaviour) without resulting in all three storeys of the building standing hard against the boundary.
148. A new pedestrian/vehicle gate is proposed in replacement of and slightly further to the south of the existing solid gate. Sitting within and rising to the same height as the new boundary wall, the gate is to be formed of vertical slats which pick up on the materials and rhythm of the entrance wing; these slats would allow views both into and out of the site. This would form a high-quality section of boundary treatment and help the development read as an integral part of the park setting.
149. Given the function and modest scale of the cycle store, it is considered that the proposed timber cladding would achieve an acceptable quality of design.
150. Critical to the success of the building's design is achieving the depth of architectural expression, the contrast of the materials and the crispness of the geometry. Detailed construction drawings and materials samples have been submitted during the course of the application process which demonstrate that the desired effect will be achieved.
151. In summary, officers are satisfied that the key views and sensitive local receptors — listed buildings and conservation areas— have been considered in the articulation of the façade and the detailed design and materiality. The resolution is well-considered, high quality and suitably restrained.

External realm

152. The proposed surface treatment, planting mix and new trees would secure a high quality external realm. The retention of the existing mature trees within the northern part of the site is a significant benefit of the scheme and will help the proposed building sit more comfortably within its environs.
153. The short stretch of access road within Geraldine Mary Harmsworth Park which the application proposes to realign would be finished in the same pavers as the external realm within the application site. This is a high quality surfacing treatment that would subtly help strengthen the connection between the site and the parkland while still preserving the openness of the landscape.

Impact on the curtilage listed wall and its contribution to other heritage assets

Significance of the curtilage listed wall

154. Paragraph 189 of the NPPF requires applicant together with the Local Planning Authority to identify the architectural or historic significance of a designated heritage

asset and to record the effect of any proposal on that architectural or historic significance.

155. Listed Building Consent is sought for the demolition of part of the existing boundary wall between the All Saints Annex and Geraldine Mary Harmsworth Park and the construction of a new wall, incorporating gates and windows, as part of the wider development to create new staff accommodation ancillary to the Imperial War Museum. The section of wall proposed for demolition is approximately 34 metres in length and is a combination of Victorian and more recent construction.
156. The applicant has submitted a survey of the wall's structural condition, prepared by a conservation engineer. The report confirms that the wall is composed of several phases of construction from the first half of the 19th century through to the 20th century and identifies where these areas are based on analysis of brick type. Comparing the analysis of the bricks and the history of the site, the conclusion is that the oldest section of wall is likely associated with the construction of King Edward's Schools (c. 1828-30). The sections north and south of this brickwork have been rebuilt on a number of occasions, as evidenced by the existence of visible joints and type of brick used. The most recent intervention was in 1994 when a pedestrian and vehicular access was created by the Imperial War Museum, connecting the Annexe and Geraldine Mary Harmsworth Park. The report concludes that the northern section of the wall is in a fair condition with only localised defects, whereas the southern section is suffering from differential settlement of the foundations.

Contribution of the curtilage listed wall to the significance and setting of nearby heritage assets and/or their setting

157. The wall is set some distance from the Imperial War Museum (IWM) and therefore makes little contribution to the significance or setting of the listed building. Given the distance of the wall and degree of separation, the structure does not contribute to setting of the listed terraces in West Square.
158. With its secluded location, this section of wall makes only a very minor contribution to the character and appearance of the West Square Conservation Area. The wall does not feature to the same degree as the perimeter walls elsewhere in the park, nor does it feature in any prominent views across the park. Officers consider that the loss of this particular section of wall and the associated new development would not harm the appreciation of the heritage assets. Given the quality of the bricks and the various phases of construction, reuse of the bricks is not envisaged. No objection is raised to this, but it is considered appropriate to require by condition the provision of a Method Statement for the plaque's reinstatement. The applicant is presently suggesting that the plaque would be reinstated on the inner (yard-facing) side of the wall to the north of the new building. Officers consider it would be more appropriate for the plaque to be located on the park-facing side of the original wall, A condition requiring an appropriate reinstatement is recommended for inclusion on the Listed Building Consent decision notice.

Is there sufficient information to demonstrate the public benefits of the proposal or the improved usability of the heritage asset?

159. The proposed demolition of this stretch of wall would facilitate the redevelopment of the existing yard with a building of high quality design. Officers consider that the 'public benefits' of the scheme, specifically the provision of new staff accommodation ancillary to IWML (which would provide critical business support to this important cultural institution) together with landscaping both on-site and within the park, sufficiently outweighs the harm caused. Thus, to refuse Listed Building Consent would be unwarranted.

Would the harm be 'less than substantial'?

160. The demolition of this section of wall would provide a greatly strengthened physical and visual connection between the application site and IWML yet would not erase the memory of the original structure because the new wall would follow the same line and the historic plaque would be reinstated. The alternative would have been to introduce a building set back from and hidden behind the existing wall, which would have been an inferior response spatially, physically and functionally.
161. Therefore, officers consider that the perceived harm caused by the loss of fabric in removing this length of wall and the rebuilding of the structure as part of the proposed three-storey building is considered to be less than substantial.

Is any harm to the heritage asset outweighed by public benefits arising from the proposal including securing an optimal viable use?

162. The NPPF requires Local Planning Authorities to consider whether the public benefits of the proposed development outweigh the harm that may arise and whether such harm is justified. In the case of substantial harm, Local Planning Authorities should consider whether the harm is necessary to deliver the public benefits. The greater the harm the greater the justification necessary.
163. After careful consideration, the perceived harm arising to the heritage assets, the wall and the West Square Conservation Area as a result of the partial demolition and associated development within the grounds of the All Saints Annexe building, is not considered to be significant such that refusal of Listed Building Consent would be warranted. The proposed development would deliver additional office accommodation for the internationally-recognised visitor attraction and preserve the significance of the Grade II listed Imperial War Museum and West Square Conservation Area.
164. The proposal demonstrates conformity with the Listed Building and Conservation Areas Act (1991) [the Act] as amended and updated. It complies with current policy to: preserve and enhance the heritage asset and its setting; provide good design, and; address issues raised by statutory consultees. It is therefore recommended that the Listed Building Consent application 18/AP/4084 is granted.

Impact of the proposal on the West Square Conservation Area and the setting of nearby heritage assets

Significance of the site and its contribution to heritage assets and/or their setting

165. The All Saints Annexe is a fine late nineteenth century, three-storey building with raised basement located in the West Square Conservation Area, the appraisal for which identifies the Annexe as a key unlisted building. The Elephant and Castle OAPD and SDP also lists the All Saints Annexe on its 'Schedule of buildings which have the potential to be locally Listed'.
166. The Annexe is of an Italianate style with ended bays set forward, a pedimented Ionic porch at the head of the central flight of steps, and prominent chimney stacks. It is within views along Austral Street that the Annexe can be seen most prominently. The valuable role the building plays within the wider Conservation Area derives principally from the imposing presence of its front façade within the streetscene. The front of the building is comparatively much better preserved than the rear elevation.
167. The rear of the building, which is open to views across Geraldine Mary Harmsworth Park, has been the subject of piecemeal alterations historically including lean-to

extensions and the installation of air conditioning units. The yard is surfaced in a mixture of paving and gravel, and currently accommodates two portakabins and several shipping containers. The portakabins—which, despite never having been given planning consent, have gained lawfulness through the passage of time and consequently form part of the West Square Conservation Area—are simple structures that neither play a noteworthy townscape role nor make a positive contribution to the designated heritage asset. In its current state, the area to the rear of the Annexe building fails to contribute positively to the Conservation Area.

168. There are a number of Grade II listed buildings within the vicinity of the site, the closest of which are IWML and nos. 9 to 25 West Square. The yard can be seen in the same context as the IWML and thus forms part of the setting of this designated heritage asset. Not within any meaningful public view, however, can the yard and the West Square listed properties be seen together. This is due to the visual obstruction caused by other non-listed West Square dwellings and the All Saints Annexe building itself (the outward appearance of which is to remain unchanged as part of the proposed developments).
169. Immediately to the south-east of the site is the Elliott's Row Conservation Area. Although the front façade of the All Saints Annexe building forms part of the setting of the Elliott's Row Conservation Area, the Annexe screens the rear yard to such an extent that the yard is not a feature within the setting of this nearby Conservation Area.
170. The other two nearby conservation areas, both of which are in the Borough of Lambeth, are the Walcot Conservation Area and the Lambeth Walk and China Walk Conservation Area. These are separated from the site by low- and mid-rise housing, the vast majority of which is terraced. This tightly-knit stock, together with the relatively narrow and contained character of the local streetscape as well as the considerable tree coverage to the rear of the application site, means it is not possible even to glimpse either the yard or Annexe within the same context as the Lambeth Walk and China Walk Conservation Area. Although the All Saints Annexe features within southwards views along Austral Street towards the northern edge of the Walcot Conservation Area, the rear yard (where all development entailing a material change to the appearance of the site is proposed by this planning application) does not form part of the context of the Walcot Conservation Area. Thus, there is no need to further consider whether the setting of this piece of nearby protected historic townscape would be impacted.
171. Therefore, and aside from the wall forming the boundary with Geraldine Mary Harmsworth Park (which is assessed in detail in the preceding part of this Report)—the proposed development would affect only the following designated heritage assets or their setting:
 - the West Square Conservation Area, and;
 - IWML.

Assessment of impact on the West Square Conservation Area

172. Paragraph 129 of the NPPF 2018 requires Local Planning Authorities to identify and assess the particular significance of any heritage asset that may be affected by a proposal. The particular significance of this conservation area derives from it being a notable example of high quality late Georgian and mid-19th century townscape, containing a number of important public buildings. The centrepiece is the Imperial War Museum, surrounded by the open space of the Mary Harmsworth Park. The proposed development would fulfil the requirement of conserving or enhancing the heritage asset by introducing to this currently underused site a modestly-proportioned and

carefully-configured new building that would sit comfortably among the surrounding buildings and trees. The detailed design pays reference to the adjacent built form and subtly interfaces with the park, while still employing a contemporary architectural style and using complementary materials.

173. Strategic Policy 12 (Design and Conservation) of Core Strategy 2011 requires development to achieve the highest possible standards of design for buildings and public spaces to help create attractive and distinctive places which are safe, easy to get around and a pleasure to be in. To achieve this, new development must conserve or enhance the significance of Southwark's heritage assets, their settings and wider historic environment, including conservation areas. The design of this proposal—with its crisp form, well-balanced proportions, modest height and a robust and contextually-sensitive material palette— achieves a standard that is considered to be acceptable for such a sensitive site.
174. Saved Policy 3.16 (Conservation Areas) requires development within conservation areas to preserve or enhance the character or appearance of the area, use high quality materials and not introduce design details or features that are out of character with the area. For the reasons given in the preceding paragraphs, the proposal is considered to be in conformity with these three policies such that the result would be an enhancement of the character and appearance of the West Square Conservation Area.
175. The proposed development of the rear yard would necessitate the removal of the portakabins. As explained in a preceding section of this report, these modern structures neither play a noteworthy townscape role nor make a positive contribution to the designated heritage asset. Their removal from the site would, therefore, have a neutral or beneficial impact.

Assessment of impact on the setting of IWML

176. A considerable stretch of parkland would separate the proposed building from IWML and, within the relatively limited viewframe where it would be possible to appreciate both buildings together, the development would appear subservient in scale. Within such views, a large number of mature trees would stand in-between the two buildings; due to their proximity to the application site, these trees would seasonally screen the development from view to a large degree.
177. For these reasons, it is considered that the proposed development would not impact on the setting of IWML.

Impact on views in the London View Management Framework

178. The application site lies within the background of LVMF Protected View 23.A, which is the view towards Westminster from the bridge over the Serpentine at Hyde Park. The threshold plane within which the site is situated is 55-60 metres. The maximum height of the proposed development would be 13.975 metres, which is significantly lower than the threshold. The building would, therefore, be subordinate to the Westminster World Heritage site and would not be visible in this Townscape View.

Impact on the nearby Metropolitan Open Land

179. The application site includes a small area of open space at the southern tip of Geraldine Mary Harmsworth Park. Within this parcel of land, it is proposed to realign the existing private access route and introduce new planting. There would be no new structures.

180. Despite the majority of the park forming part of Metropolitan Open Land under adopted policy, this particular parcel remains outside of the designation. While the parcel is proposed to be MOL “new open space”, as specified in Annex 11 (Open Space Designations) of the Proposed Submission Version (Amended Policies January 2019) of the New Southwark Plan, this is not due to be adopted until late 2019 following submission and Examination in Public. In any case, the realignment of the access road (to be finished in a high-quality surfacing treatment) and the informal yet rich new planting would preserve the openness of the parkland and protect its landscape features, in line with the aims of all relevant adopted policy as well as the proposed submission version of the New Southwark Plan

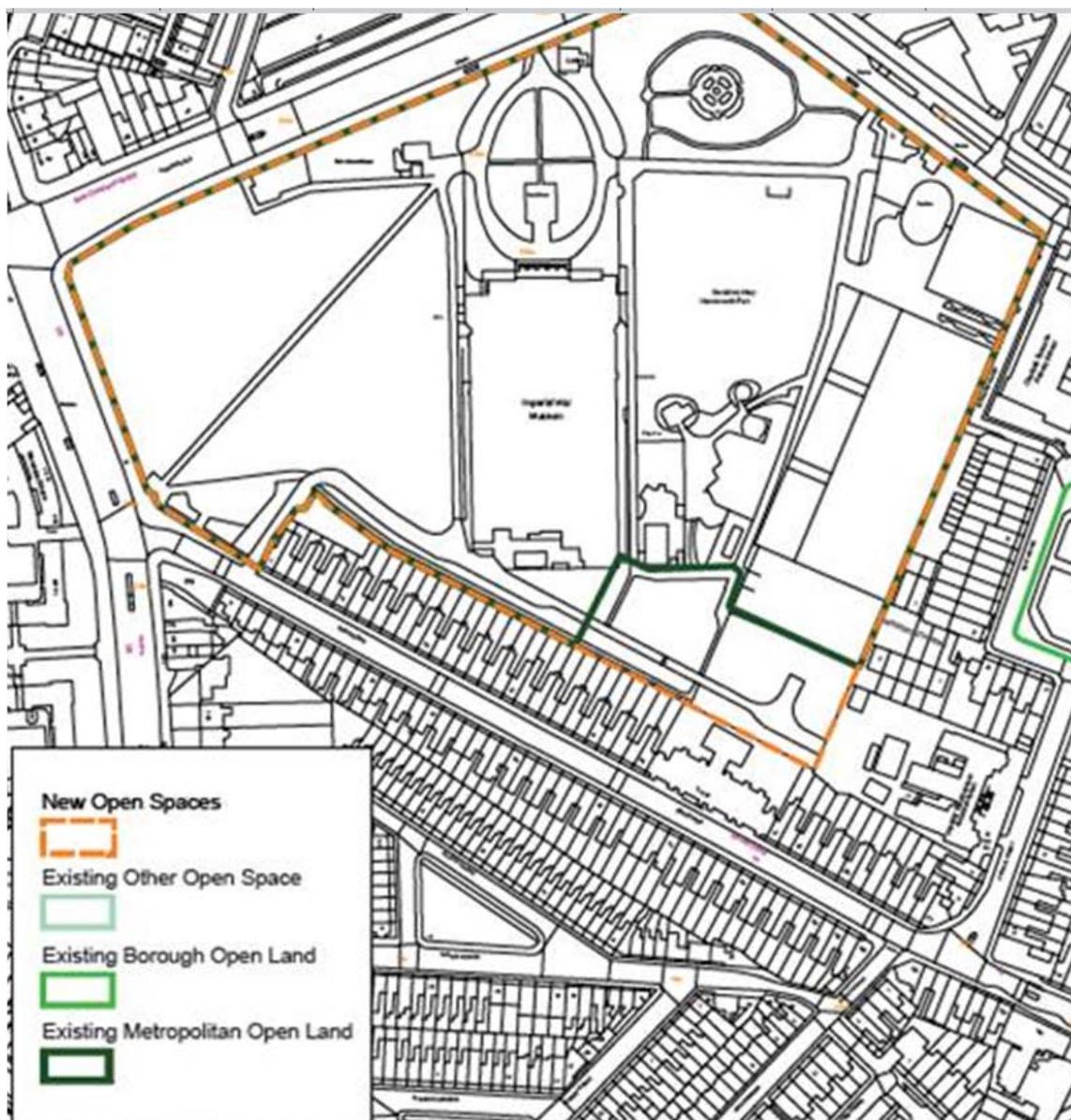


Figure 13: Map showing the adopted open space designations outlined in various shades of green, and the proposed “new open space” designation of the New Southwark Plan outlined in orange. The portion of the park which forms part of the application site lies at the southernmost tip of the parkland, outside of the areas edged in green.

Transport, highways and servicing matters

Trip generation and encouraging sustainable travel

181. The application site benefits from extremely good public transport accessibility. The Transport Assessment prepared by the applicant concluded that the Annexe and the

new building together would generate seven additional two-way vehicle trips during peak hours, all of which would derive from the new 'mixed' D1/B1 use of the existing All Saints Annexe. The Assessment predicted that no net gain in trips would be generated by the new building within the rear yard because the highway network already hosts all of these trips. The Council's Transport Planning team has conducted its own independent assessment by interrogating comparable sites' travel surveys, from which it was concluded that the Annexe and the new building together would generate eleven and thirteen additional two-way vehicle movements in the morning and evening peak hours respectively. Despite the Transport Planning team's trip generation figures being higher than the applicant's, the figure is still minimal such that there would be no noticeable adverse impact on the prevailing vehicular traffic on the adjoining roads.

182. In any event, the applicant has proposed travel plan measures encompassing the provision of cycling facilities and dissemination of public transport information to staff. A travel plan survey undertaken by the applicant in 2017 revealed that most of the staff currently use sustainable travel modes, with only one person travelling by car. Moreover, the analysis of the traffic accidents occurring in the vicinity of this development in the last five years by the applicant's consultants has shown there to be no specific pattern of accidents that would warrant any ameliorative action.
183. In summary, the anticipated level of public transport trips would not have a detrimental impact on existing public transport services. This takes account of the extensive provision of rail, underground and bus routes operating in the local vicinity, alongside the mitigation measures proposed by the applicant within their Travel Plan, the implementation of which will be secured by condition.

Refuse storage and collection arrangements

184. Presently, a waste provider collects recycling and waste from the front of the All Saints Annexe (i.e. on Austral Street) twice a week. Separate waste and recycling collections for IWML take place from a loading bay area on Lambeth Road six days a week.
185. The applicant's Delivery and Servicing Plan details how the recycling and residual waste generated by the proposed new building would be stored and collected. The intention is for all waste and refuse to be placed onto a cart and wheeled from the building through Geraldine Mary Harmsworth Park to IWML on a daily basis. This route would be entirely off the public highway. Once brought to IWML, the waste would be amalgamated with the refuse and recycling generated by IWML, and thereafter collected from the loading bay area on Lambeth Road. Any waste waiting to be transferred from the new building to IWML could be temporarily stored within the small-scale refuse structure on the plaza to the southern side of the proposed building.
186. As such, the current collections associated with IWM on Austral Street would cease once the new building is operational. Refuse generated by any future tenants of the All Saints Annexe could, and in all likelihood would, continue to be collected from Austral Street. The quantum of refuse would not materially differ from the quantum generated by the current activities within the premises.
187. The Council's Transport Planning team has deemed the Delivery and Servicing Plan to be sound in respect of refuse storage and collection, noting that while the proposals would generate a greater volume of waste and recycling to be collected from Lambeth Road, the change would not be significant. Thus, the likelihood of needing to increase the current frequency of refuse collection services would be very low.

Site servicing

188. With the exception of deliveries to the proposed canteen/café, all deliveries and servicing would take place via the gated private road that runs through Geraldine Mary Harmsworth Park and ultimately opens onto Brook Drive. In the event of an emergency, fire tenders and other emergency vehicles would also use this route to gain access to the proposed building. The applicant's Delivery and Servicing Plan details how the largest of these vehicles (a fire/pumping engine) would be able to enter, exit and manoeuvre on the site without obstruction. The Transport Planning team are satisfied with the content with the strategy and require no further information in respect of vehicle routing via the park.
189. Deliveries to the proposed canteen/café would arrive via the existing accessway which runs along the north-eastern side of the All Saints Annexe. The tracking diagrams within the Delivery and Servicing Plan evidence that, after having entered the rear yard via the accessway, a medium sized (5.2 metre long) delivery van could manoeuvre on site and exit onto the public highway in forward gear. These diagrams show that the swept path would not conflict with any of the three retained trees.
190. The proposed building within the rear yard is expected to generate nine fewer weekly delivery and servicing movements within Geraldine Mary Harmsworth Park than those associated with the All Saints Annexe in its current use, which is welcomed.
191. There is potential for the future occupier of the All Saints Annexe to generate up to nine additional delivery and servicing trips. The Transport Planning team is satisfied that these vehicles would be accommodated within the Annexe's forecourt (i.e. off the public highway) and thus would not significantly impact traffic flows on Austral Street.

Car parking

192. The proposal is located within the Central Activities Zone (CAZ) and a Controlled Parking Zone (CPZ). Given the excellent accessibility to public transport, the car free nature of the development is appropriate. One on-site disabled parking space would be created, as per the requirements of the London Plan, on a portion of the All Saints Annexe forecourt but accessed off the alleyway rather than from the forecourt itself. This space would be provided with an Electric Vehicle Charging Point, in line with London Plan Policy 6.13.

Cycle parking and promoting safer cycling

193. A cycle parking shelter with 20 'Sheffield' stands, providing a total of 40 cycle parking spaces for use by IWM staff of the new building would be provided for the new building. The storage would be secure, weatherproof and accessible, making it compliant with the London Plan 2016 and Saved Policy 5.3 of the Southwark Plan 2007. The provision of these stands, to the specification and in the locations shown on the application documents, will be secured by condition.

Highway works

194. The access/egress to the site for delivery vehicles is to be via the existing crossovers on Austral Street and Brook Street, and so the proposal necessitates no public highway works.
195. The Highways Authority has considered the application documentation, including the Construction Management Plan, and is satisfied that there would be no impact on the public highways. The Highways Authority has suggested that, in the event of planning permission being granted, informatives be attached to the decision notice requesting

the undertaking of a joint condition survey and the carrying out of any damages to the highway within the vicinity of the development as a result of the construction works.

Flood risk and sustainable urban drainage

Flood risk, flood resilience and the water environment

196. The Environment Agency was consulted on the application and recommended that conditions be imposed in the event of permission being granted pertaining to previously unidentified contamination. These conditions have been recommended due to the associated potential implications on the water environment. No issues were raised in respect of flood risk to users of the proposed building or users of the Annexe in its new 'mixed' Class B1/D1 use.

Sustainable urban drainage

197. The Council's Flood Risk Management team was consulted on the application and raised no objections to the application. A condition requiring the development to be implemented in accordance with the approved drainage strategy is included in the draft decision notice.

Trees and landscaping

198. The three mature trees on site at present would be retained. Additionally, a replacement tree is proposed to the south-west corner of the site in accordance with Condition 1 of a recent tree works consent (the reference number for which is 17/AP/4228) which permitted the removal of an existing tree because it was posing structural problems for the boundary wall.
199. The applicant supplied as part of the original planning application an arboricultural survey, an arboricultural impact assessment, a tree strategy and bedding details. As part of the amended application, an arboricultural method statement was also supplied. The Council's Urban Forester has assessed all the information and considers it to be acceptable.
200. With respect to the proposed landscaping, the planting bed against the boundary wall shared with the Brook Drive properties would contain a mix of shrubs and three new trees. There would also be perimeter planting around the base of the proposed building. In addition to a detailed landscape strategy, the applicant has supplied a planting plan (specifying planting species and their locations), details of the beds and a maintenance strategy. The Council's Urban Forester has assessed this information and considers it to be acceptable. A condition is recommended to ensure that all soft landscaping is carried out and maintained in accordance with the approved details.

Biodiversity and ecology

201. The proposal incorporates a biodiverse roof, details of the construction of which were supplied to the Council's Ecologist. The Ecologist has deemed these details acceptable, noting that the blanket would be placed underneath the photovoltaic array, a strategy which has been shown to optimise photovoltaic performance. The Ecologist has recommended the imposition of a condition requiring the biodiverse roof to be laid out in accordance with the plans and an agreed mix of species.
202. The proposal incorporates bird and bat boxes, the proposed specification of which has been approved by the Council's Ecologist. Constructing the development with these features incorporated will be a condition of consent.

Environmental matters

Land contamination

203. There are no land contamination concerns but a precautionary condition is recommended to ensure remediation is carried out should previously unidentified contamination be found during development.

Archaeology

204. The application site is not within an Archaeological Priority Zone (APZ), but is within an area where archaeological remains should be anticipated. The site was partially archaeologically excavated in 1998 by the Museum of London Archaeology Service. These works revealed a post medieval cultivation soil, circa 1 metre below the present ground level.
205. The applicant has submitted an archaeological Desk Based Assessment which determines, as far as is reasonably possible, the location, extent, date, character, condition, significance and quality of any surviving archaeological remains liable to be threatened by the proposed redevelopment. A Written Scheme of Investigation has also been supplied. There is sufficient information to establish that, subject to conditions, the development is not likely to cause harm. These conditions will cover archaeological evaluation, archaeological mitigation, archaeological foundation design and archaeological reporting site work.

Construction impacts

206. A Construction Environmental Management Plan (CEMP) and a Construction Traffic Management Plan (CTMP) have been submitted in support of the application.
207. Due to the pre-fabricated nature of the proposed building, construction will be 80% completed off-site, the effect of which is that on-site construction works and waste removal would be minimised. The modular units would be installed over a two week period, minimising disruption to IWML and local residents. Construction vehicles are to be routed along A roads, entering the site via the private access road through Geraldine Mary Harmsworth Park. As such, the use of residential streets would be avoided as far as possible.
208. Through the course of the application process, the CEMP has been amended at the request of the Highways Authority and the Council's Environmental Protection and Transport Planning teams. Its content is now to the satisfaction of all three consultees. A condition will be imposed to ensure the construction works are carried out in accordance with the CEMP, in its final amended form, as well as the CTMP. This will ensure minimised neighbour amenity, environmental and transport/highways impacts.

Sustainability

Carbon emissions and renewable technologies

209. London Plan Policy 5.2 requires a reduction in carbon emissions of 35% below the Part L 2013 target. There is no requirement for non-residential developments, such as the building proposed on the All Saints Annexe rear yard, to be carbon neutral.
210. A detailed energy assessment has been submitted as part of the application to demonstrate how the targets for carbon dioxide emissions reduction are to be met. Overall, the new building would achieve a carbon saving of 35.23%, thereby meeting the policy requirement. This has been achieved through passive design and a

high-specification building fabric, together with the provision of a high-energy air source heat pump and the installation of photovoltaic panels. The energy strategy is, therefore, acceptable and it is recommended that a condition be imposed to secure the details for the development.

211. The proposed change of use of the All Saints Annexe does not trigger a requirement to achieve carbon reductions.

BREEAM

212. A BREEAM pre-assessment has been submitted as part of the application documents, with the proposed building achieving a score of 74.38%, which translates to an 'Excellent' rating. A condition is recommended to achieve "excellent". This will ensure the works take sufficient consideration of sustainability.
213. As the change of use of the All Saints Annexe would not involve any floorspace uplift, this element of the planning application does not need to meet any BREEAM rating

Air quality

214. London Plan policy 7.14 states that development proposals should minimise exposure to poor air quality, being at least 'air quality neutral'. This is particularly the case where developments are located within designated Air Quality Management Areas (AQMA) as is the case with this proposal. Southwark Plan policy 3.6 advises that planning permission will not be granted where a development leads to a reduction in air quality.
215. The CEMP has considered potential dust emissions during construction and the attendant impact on air quality. A number of mitigation measures are proposed during the construction phase to alleviate any dust and particulates which may impact on local air quality. With respect to the air quality impacts of the development once operational, there would be an insignificant increase in vehicle movements to the site due to the 'car-free' nature of the scheme. The Travel Plan sets out measures to encourage IWM staff to use more sustainable transport methods.
216. The Council's Environmental Protection team has assessed the air quality information and is satisfied that the mitigation measures proposed would achieve air quality neutrality.

Planning obligations

217. The site is not within the Central London Crossrail S.106 contribution area, and thus the proposed development does not incur a Crossrail contribution.
218. The application has been assessed with regard to the Council's Section 106 and CIL SPD and it has been resolved that no obligations are required. All necessary mitigation is either captured within the application or to be achieved through compliance with or discharge of planning conditions.

Community Infrastructure Levy

Southwark CIL

219. The building located within the rear yard would not trigger a payment towards funding additional infrastructure under the London Borough of Southwark revised Community Infrastructure Levy charging schedule (December 2017).

Mayoral CIL

220. A payment of £52,220.47 would be required under the Mayor of London's Community Infrastructure Levy at £35 per square metre.
221. Owing to being a charity, IWM is eligible to seek relief from this liability under regulations 43 to 48 of the The Community Infrastructure Levy Regulations 2010 (as amended). Exemption will be granted subject to the development being deemed to meet the relief criteria.

Engagement with, and consultation responses from, members of the public

Original planning application: Community engagement

222. The applicant's Statement of Community Involvement (contained within the Planning Statement) details the consultation undertaken before 18/AP/1577 was submitted. These community engagement efforts included:
- Four public exhibitions on 21.11.2017, 27.02.2018, 07.03.2018 and 11.04.2018 (for which invitations were sent by post to over 150 residents)
 - A public briefing with site walk-around on 20.02.2018
 - A questionnaire survey
223. The Statement of Community Involvement also explains how much of the feedback was used to inform the design evolution of the proposal.
224. As part of its statutory requirements, the Council sent letters to all residents, displayed site notices in the vicinity, and issued a press notice publicising the planning application.

Original application: Responses from members of the public

225. The planning application as originally submitted received the following responses from members of the public:

Planning application 18/AP/1577 (original)					
Total number of representations:		32			
In favour:	0	Against:	31	Neutral:	0
Petitions in favour:		0	Petitions against:		1

226. The material planning considerations raised by the consultation responses are summarised in the following paragraphs
227. Principle of development:
- Increasing office space would not be in line with the guidance set out in the Elephant and Castle OAPDF and SPD.
 - Moving the archives from the All Saints Annexe to a location outside London would represent a cultural and societal loss for the city.
 - The D1 use of the new building, if not restricted to an ancillary-to-museum use, could allow for the full range of D1 uses to take place within the building.
 - There is a lack of clarity as to how many members of staff would be accommodated within the new building.

228. Design quality and impact on heritage assets:

- The overall height and scale of the proposed building would be excessive.
- The proposed building would be harmful to the setting of nearby listed and key unlisted buildings.
- The proposed building would be harmful to the West Square Conservation Area, and erode its residential character.
- The proposed building would not be in conformity with the guidelines set out in the Conservation Area Appraisal.
- The proposed building would not be subservient in scale to the All Saints Annexe.
- The fenestration intensifies the height and scale of the proposed building.
- The proposed building could have incorporated a basement as a way of reducing its overall height but this option has not been pursued by IWM.
- The pre-fabricated nature of the proposed building would fail to achieve an acceptable quality of design, given the Conservation Area designation.
- The solar controlled glazing would reflect heat and create glare.
- The original Bethlem boundary wall is considered to be curtilage listed, and thus its proposed removal would be unacceptable.

229. Neighbour amenity impacts during construction:

- Risk of noise, dust and dirt during the construction period.
- Risk of works being undertaken outside of normal working hours.

230. Neighbour amenity impacts post-completion:

- Loss of daylight and sunlight to nearby properties.
- Overshadowing of outdoor amenity spaces at nearby properties.
- Increased sense of enclosure and diminished quality of outlook for nearby properties.
- Overlooking of neighbouring properties.
- Light pollution, and associated health impacts, generated by the illumination of the building during night-time hours.
- Noise disturbance generated by employees coming and going, delivery vehicles manoeuvring on site, the operations of the plant, the use of the cycle/refuse store, and chiller/extraction equipment which may be placed within the food preparation area associated with the canteen/café.
- Odour disturbance generated by the proposed refuse store and employees smoking outdoors.
- Vermin and pest disturbance due to the proposed refuse store.
- For those local residents who do not have a private garden, there would be a reduction in the availability of the nearby West Square garden due to increased use by IWM staff force and/or employees of the future tenant of the All Saints Annexe.

231. Transport, highways, deliveries and servicing matters:

- The proposed routing of delivery and servicing and refuse collection vehicles would be harmful to residential amenity.
- There would be an increase in the number of vehicle trips as a result of the development, especially in respect of the change-of-use of the Annexe.
- The local highways network would be placed under increased parking pressure.
- Routing vehicles through the park is unacceptable.
- Hours between which deliveries and servicing can take should be restricted.

232. Impacts on ground conditions:

- The new proposed trees would cause subsidence and/or structural issues at nearby properties.
- The proposed building would cause subsidence and/or structural issues at nearby properties.

233. Impacts on the nearby Metropolitan Open Land and Site of Importance for Nature Conservation:

- The loss of the yard as an 'open space buffer' between the MOL and the All Saints Annexe would be harmful to the MOL.
- Routing vehicles through the park for servicing/access purposes is contrary to MOL policy.

234. Impacts on trees and local ecology:

- The loss of plants and shrubs from within the site would cause ecological harm.
- The development and associated works on the park boundary would cause harm to woodland wildlife.
- The incursion of the proposed building into the root protection zone of the three trees on the northern part of the site would place the trees at risk.

235. Other matters:

- Flood risk would increase as a result of the proposed building within the rear yard.
- The Flood Risk Assessment does not properly assess the flood risk for the proposed B1/D1 use of the Annexe, the concern with which is that any D1 use other than ancillary-to-museum (such as a crèche or health centre) could pose flood risks to staff and visitors.
- The application drawings are inaccurate, in particular the measured drawing showing distances to neighbours' properties.
- The potential for weekend and evening working will create security risks because the site will not have closed-off access during these times.
- The final proposed has not taken into account the views and concerns raised by local residents during the pre-application consultation.

236. All of these matters were addressed in the Report presented to Committee Members at the 9 October 2018 meeting, and have been also been addressed where relevant in the assessment parts of this new Committee Report. Other matters were raised by the public consultation process, such as IWM's financial motives for the development, but these do not constitute material planning considerations so cannot be taken into account in the determination of 18/AP/1577.

Amended planning application and accompanying Listed Building Consent application:
Community engagement

237. Following the deferral of the determination of application 18/AP/1577 at the 9th October 2018 Committee meeting, the applicant revised the design of the building and made their application for Listed Building Consent in respect of the boundary wall. The Local Planning Authority carried out consultation on the Listed Building Consent application (18/AP/4084) and reconsultation on the amended application for full planning permission (18/AP/1577).

238. Additionally, representatives of IWM held a meeting on-site on 4 December 2018 with the West Square Residents' Association and the Harmsworth Mews Residents' Association, during which a sample was shown of the proposed graduated obscuring treatment. Subsequent to the meeting, IWM sent a letter to the local residents summarising the on-site discussions.
239. A further meeting was held between representatives of IWM and these residents on 17 January 2019 to discuss the evolution of the proposed development in light of the December meeting, shortly after which IWM sent the residents a letter summarising the discussions.
240. On 11th March 2019, the Chairs of the West Square Residents' Association and the Harmsworth Mews Residents' Association submitted a representation via the Council's *Public Access for Planning* Register. This stated that the Chairs now took the view that "the amended planning application and Listed Building Consent application provide the best achievable outcome for local residents" and that they "accordingly support these applications". The full content of the comment can be viewed on the Register.

Amended planning application and accompanying Listed Building Consent application:
Responses from members of the public

241. The planning application in its amended form received the following responses from members of the public:

Planning application 18/AP/1577 (amended)					
Total number of additional representations:					2
In favour:	1	Against:	1	Neutral:	0
Petitions in favour:		0	Petitions against:		0

242. The one objection raised five main concerns, as follows:

- impacts on ground conditions;
- height of the proposed building;
- overlooking;
- increased traffic, and;
- harm to the Conservation Area and the nearby listed buildings.

243. All of these material planning considerations were raised as part of the original consultation process. They were fully assessed in the Report presented at the 9th October 2018 Committee meeting, and are comprehensively assessed within the main body of this new Committee Report.

244. The Listed Building Consent application received the following responses from members of the public:

Listed Building Consent application 18/AP/4084					
Total number of representations:					2
In favour:	1	Against:	1	Neutral:	0
Petitions in favour:		0	Petitions against:		0

245. The one objection was submitted by the same individual who objected to 18/AP/1577 as amended and the objection was of identical content. As the concerns raised by the comment are not germane to the Listed Building Consent proposal, and because the

issues raised have been addressed in detail in earlier parts of this report, there are no issues to discuss.

Consultation responses from statutory consultees

246. The following consultation responses were received from statutory consultees in respect of 18/AP/1577. Although other statutory consultees were consulted, these did not respond.

Environment Agency

247. No objections. Conditions relating to contamination and foundation design recommended.

Historic England

248. No objections. Instructed the LPA to proceed with determination of the planning application and the Listed Building Consent as seen fit, noting that the Listed Building Consent application is not referable because the proposed works relates solely to a curtilage listed structure.

Natural England

249. No objections. Instructed the LPA to proceed with determination of the applications as seen fit.

Metropolitan Police

250. No objections. Condition relating to Secure by Design accreditation.

London Underground

251. No objections, no comments.

Conservation Area Advisory Group (CAAG)

252. CAAG was generally supportive of the proposal. The group felt the design and the detailing were promising but the two-tone brick cladding was potentially distracting but would have preferred a single tone brick with deep angled reveals. The Group felt the landscape was underplayed and dominated by hard surfaces. The adjacency of the park provides an opportunity to introduce a complementary landscape with green roofs and trees to screen the new building from the residential properties nearby.

Note: a green roof and further details of the planting scheme were submitted subsequent to and partly in response to the views expressed by CAAG. The CAAG comments were made in response to the original application so does not reflect the changes to the fenestration.

Community impact statement

253. The Public Sector Equality Duty (PSED) contained in Section 149 (1) of the Equality Act 2010 imposes a duty on public authorities to have, in the exercise of their functions, due regard to three “needs” which are central to the aims of the Act: -

a) The need to eliminate discrimination, harassment, victimisation and any other conduct prohibited by the Act

b) The need to advance equality of opportunity between persons sharing a relevant protected characteristic and persons who do not share it. This involves having due regard to the need to:

- Remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connect to that characteristic
- Take steps to meets the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it
- Encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low

c) The need to foster good relations between persons who share a relevant protected characteristic and those who do not share it. This involves having due regard, in particular, to the need to tackle prejudice and promote understanding.

254. The protected characteristics are: race, age, gender reassignment, pregnancy and maternity, disability, sexual orientation, religion or belief, sex, marriage and civil partnership.

255. The Council must not act in a way which is incompatible with rights contained within the European Convention of Human Rights.

256. The Council has given due regard to the above needs and rights where relevant or engaged throughout the course of determining this application.

Consultations

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

Human rights implications

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

259. This application has the legitimate aim of providing a new 'mixed' Class B1/D1 building together with the change of use of an existing building, and all associated works. The rights potentially engaged by this application, including the right to a fair trial and the right to respect for private and family life are not considered to be unlawfully interfered with by this proposal.

Conclusion on planning and listed building issues

260. The proposed land uses, comprising new Class D1 floorspace and 'mixed' Class D1/B1 repurposed floorspace, would support an important existing cultural use while delivering new employment floorspace. These uses are appropriate in this location, which benefits from the highest possible public transport accessibility and is within both the Central Activities Zone and an Opportunity Area.

261. In relation to overlooking and impact on privacy, it is noted that the majority of windows within the proposed building would be a distance of at least 21 metres from the Brook Drive properties to the south and the Harmsworth Mews properties to the north. In addition, and in response to concerns raised by Members and residents, all the first- and second-floor glazing on the elevations facing these nearby properties

would be fitted with a graduated obscuring treatment. This treatment would significantly obscure views 'out' to the northeast or southwest for anyone within the proposed office accommodation.

262. With respect to daylight impacts, while there would be noticeable NSL losses at two rooms within properties adjoining the site, these losses are a consequence of the rooms benefitting from an unusually substantial area of sky visibility due to the yard being undeveloped at present. The resulting NSL levels are, in any case, not untypical for a central London location. Furthermore, there would be no VSC losses at either of these rooms (or at any other affected room) in excess of the BRE recommendations. On balance, it is considered that the daylight level within the affected rooms would not noticeably change.
263. In terms of sunlight impacts, a conservatory at a property adjoining the site would experience an APSH reduction by more than the BRE recommendations. However, these losses would affect only some of the glazed panes in the conservatory, leaving the majority of the panes with a complaint APSH level. As these glazed panes combine to provide sunlight to a single room the effect would be much less noticeable to the users/occupiers. Thus, while the impact is recognised, it is considered that the sunlight losses at this one neighbouring property would not be detrimental to the occupiers' amenity.
264. The proposed building would achieve a high quality of design that would preserve the character and appearance of the West Square Conservation Area and the setting of the nearby Grade II listed IWML. Well-detailed and incorporating a high quality palette of materials, the building would relate sensitively to the historic context while also maintaining the openness and character of Geraldine Mary Harmsworth Park, most of which is designated Metropolitan Open Land.
265. The new boundary wall proposed in replacement of the curtilage listed wall would enable the delivery of a high quality building that would greatly strengthen the physical and visual connection between the application site and IWML. The memory of the original structure would be retained through the new wall following the same line as the original and through the reinstatement (in a location to be agreed) of the historic plaque. The perceived harm arising to the heritage assets, the wall and the West Square Conservation Area as a result of the partial demolition and associated development within the grounds of the All Saints Annexe building, is considered to be less than substantial. Weighing this less than substantial harm against the public benefits of the proposal, officers are satisfied that it would be appropriate to grant the Listed Building Consent application.
266. The trip generation, servicing and refuse arrangements, cycle storage and travel plan are all acceptable. Adequate measures are in place to protect the existing mature trees on site, while the high-quality scheme of hard and soft landscaping —to include some planting along the park boundary— is welcomed.
267. In line with the requirements of the NPPF, the Council has applied the presumption in favour of sustainable development. The proposed development would accord with sustainable principles and would make efficient use of the land to deliver a high quality development that is in accordance with the Council's aspirations for the area. The harm arising from the demolition of the curtilage listed wall would be less than substantial and would be outweighed by the public benefits of the proposal. It is therefore recommended that Members grant permission for 18/AP/1577 and 18/AP/4084, subject in both cases to conditions as set out in the attached draft decision notices.

BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
Site history file: TP/1357-A Application file: 18/AP/1577 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 5535 Council website: www.southwark.gov.uk

APPENDICES

No.	Title
Appendix 1	Consultation undertaken
Appendix 2	Consultation responses received
Appendix 3	Recommendation (18/AP/1577)
Appendix 3	Recommendation (18/AP/4084)

AUDIT TRAIL

Lead Officer	Simon Bevan, Director of Planning	
Report Author	Patrick Cronin, Senior Planning Officer (for 18/AP/1577) Tracy Chapman, Team Leader (for 18/AP/4084)	
Version	Final	
Dated	20 March 2019	
Key Decision	No	
CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER		
Officer Title	Comments sought	Comments included
Strategic Director of Finance & Governance	No	No
Strategic Director, 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 March 2019	

APPENDIX 1

Consultation undertaken

18/AP/1577: Site notice date: 25/05/2018

18/AP/1577: Press notice date: 17/05/2018

18/AP/1577: Case officer site visit date: 25/05/2018

18/AP/1577: Neighbour consultation letters sent: 16/05/2018

18/AP/1577: Neighbour re-consultation letters sent: 05/02/2019

18/AP/4084: Site notice date: 06/02/2019

18/AP/4084: Press notice date: 10/01/2019

18/AP/4084: Case officer site visit date: 06/02/2019

18/AP/4084: Neighbour consultation letters sent: 08/01/2019

Internal services consulted:

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

Statutory and non-statutory organisations consulted:

- EDF Energy
- Environment Agency
- Historic England
- London Borough of Lambeth
- London Underground Limited
- Metropolitan Police Service (Designing out Crime)
- Natural England - London Region & South East Region
- Thames Water - Development Planning
- The Georgian Group
- The Victorian Society

18/AP/1577: Neighbour and local groups consulted:

- 13 Orient Street London SE11 4SR
- 47 West Square London SE11 4SP
- 34 West Square London SE11 4SP
- 6 Temple West Mews West Square SE11 4TJ
- 7 Temple West Mews West Square SE11 4TJ
- 29 West Square London SE11 4SP
- 44 West Square London SE11 4SP
- 10 Hayles Street London SE11 4SS
- 12 Hayles Street London SE11 4SS
- 7 Orient Street London SE11 4SR

- Flat 21 71-89 Brook Drive SE11 4TR
 - Flat 22 71-89 Brook Drive SE11 4TR
 - 139b Brook Drive London SE11 4TQ
 - 19 Orient Street London SE11 4SR
 - Flat 8 71-89 Brook Drive SE11 4TR
 - Flat 9 71-89 Brook Drive SE11 4TR
 - Flat 7 71-89 Brook Drive SE11 4TR
 - Flat 5 71-89 Brook Drive SE11 4TR
 - Flat 6 71-89 Brook Drive SE11 4TR
 - 4 Temple West Mews West Square SE11 4TJ
 - 5 Temple West Mews West Square SE11 4TJ
 - 3 Temple West Mews West Square SE11 4TJ
 - 1 Temple West Mews West Square SE11 4TJ
 - 2 Temple West Mews West Square SE11 4TJ
 - Flat 23 71-89 Brook Drive SE11 4TR
 - Flat 37 71-89 Brook Drive SE11 4TR
 - Flat 38 71-89 Brook Drive SE11 4TR
 - Flat 36 71-89 Brook Drive SE11 4TR
 - Flat 34 71-89 Brook Drive SE11 4TR
 - Flat 35 71-89 Brook Drive SE11 4TR
 - 7 Hedger Street London SE11 4ST
 - 9 Hedger Street London SE11 4ST
 - 5 Hedger Street London SE11 4ST
 - 1 Hedger Street London SE11 4ST
 - 3 Hedger Street London SE11 4ST
 - Flat 27 71-89 Brook Drive SE11 4TR
- Flat 28 71-89 Brook Drive SE11 4TR
 - Flat 26 71-89 Brook Drive SE11 4TR
 - Flat 24 71-89 Brook Drive SE11 4TR
- Flat 25 71-89 Brook Drive SE11 4TR
 - Flat 32 71-89 Brook Drive SE11 4TR
- Flat 33 71-89 Brook Drive SE11 4TR
 - Flat 31 71-89 Brook Drive SE11 4TR
 - Flat 29 71-89 Brook Drive SE11 4TR
 - Flat 30 71-89 Brook Drive SE11 4TR
 - Flat 4 71-89 Brook Drive SE11 4TR
 - Flat A 109 Brook Drive SE11 4TU
 - Flat B 109 Brook Drive SE11 4TU
 - Flat B 107 Brook Drive SE11 4TU
 - Flat B 99 Brook Drive SE11 4TU
 - Flat A 107 Brook Drive SE11 4TU
 - Flat B 115 Brook Drive SE11 4TU
 - Flat A 111 Brook Drive SE11 4TU
 - Flat A 115 Brook Drive SE11 4TU
 - Flat A 113 Brook Drive SE11 4TU
 - Flat B 113 Brook Drive SE11 4TU
 - Flat B 55 Brook Drive SE11 4TU
 - Flat B 57 Brook Drive SE11 4TU
 - Flat B 53 Brook Drive SE11 4TU
 - Flat B 49 Brook Drive SE11 4TU
 - Flat B 51 Brook Drive SE11 4TU
 - Flat B 67 Brook Drive SE11 4TU
 - Flat B 69 Brook Drive SE11 4TU
 - Flat B 65 Brook Drive SE11 4TU
 - Flat B 59 Brook Drive SE11 4TU
 - Flat B 61 Brook Drive SE11 4TU
 - Flat B 111 Brook Drive SE11 4TU
 - Flat 1 71-89 Brook Drive SE11 4TR
 - Flat 17 71-89 Brook Drive SE11 4TR
 - Flat 16 71-89 Brook Drive SE11 4TR
 - Flat 14 71-89 Brook Drive SE11 4TR
 - Flat 15 71-89 Brook Drive SE11 4TR
 - Flat 2 71-89 Brook Drive SE11 4TR
 - Flat 3 71-89 Brook Drive SE11 4TR
 - Flat 20 71-89 Brook Drive SE11 4TR
 - Flat 18 71-89 Brook Drive SE11 4TR
 - Flat 19 71-89 Brook Drive SE11 4TR
 - 143b Brook Drive London SE11 4TQ
 - 145b Brook Drive London SE11 4TQ
 - 137b Brook Drive London SE11 4TQ
 - 125b Brook Drive London SE11 4TQ
- 3 Orient Street London SE11 4SR
 - 5 Orient Street London SE11 4SR
 - 2 Hayles Street London SE11 4SS
 - 20 Hayles Street London SE11 4SS
 - 18 Hayles Street London SE11 4SS
 - 14 Hayles Street London SE11 4SS
 - 16 Hayles Street London SE11 4SS
 - 49 West Square London SE11 4SP
 - 50 West Square London SE11 4SP
 - 48 West Square London SE11 4SP
 - 45 West Square London SE11 4SP
 - 46 West Square London SE11 4SP
 - 1 Orient Street London SE11 4SR
 - 15 Orient Street London SE11 4SR
 - 53 West Square London SE11 4SP
 - 51 West Square London SE11 4SP
 - 52 West Square London SE11 4SP
 - 24 West Square London SE11 4SN
 - 34 Hayles Street London SE11 4SS
 - Flat A 117 Brook Drive SE11 4TU
 - Sports Facility Geraldine Mary Harmsworth Park SE1 6ER
 - Garden House 44 West Square SE11 4SP
 - Flat B 117 Brook Drive SE11 4TU
 - Ground Floor Flat 30 West Square SE11 4SP
 - Third Floor Flat 30 West Square SE11 4SP
 - Second Floor And Third Floor Flat 1 Austral Street SE11 4SJ
 - Ground Floor Flat 1 Austral Street SE11 4SJ
 - First Floor Flat 1 Austral Street SE11 4SJ
 - First Floor And Second Floor Flat 22 West Square SE11 4SN
 - Imperial War Museum Annex Austral Street SE11 4SJ
 - Basement And Ground Floor Flat 22 West Square SE11 4SN
 - Flat 1 103 Brook Drive SE11 4TU
 - 6 Austral Street London SE11 4SJ
 - 7 Austral Street London SE11 4SJ
 - 4 Austral Street London SE11 4SJ
 - 27 Austral Street London SE11 4SJ
 - 3 Austral Street London SE11 4SJ
 - 23 West Square London SE11 4SN
 - 21 West Square London SE11 4SN
 - 20 West Square London SE11 4SN
 - 17 Austral Street London SE11 4SJ
 - Flat 2 103 Brook Drive SE11 4TU
 - Imperial War Museum Lambeth Road SE1 6HZ
 - 23 Austral Street London SE11 4SJ
 - 25 Austral Street London SE11 4SJ
 - 19 Austral Street London SE11 4SJ
 - 2 Austral Street London SE11 4SJ
 - Flat 2 5 Austral Street SE11 4SJ
 - Flat 3 5 Austral Street SE11 4SJ
 - Flat 1 5 Austral Street SE11 4SJ
 - Flat C 11 Austral Street SE11 4SJ
 - Flat C 13 Austral Street SE11 4SJ
 - 125a Brook Drive London SE11 4TQ
 - 131a Brook Drive London SE11 4TQ
 - 11c West Square London SE11 4SN
 - 11a West Square London SE11 4SN
 - 11b West Square London SE11 4SN
 - 6 Harmsworth Mews London SE11 4SQ
 - 7 Harmsworth Mews London SE11 4SQ
 - 5 Harmsworth Mews London SE11 4SQ
 - 3 Harmsworth Mews London SE11 4SQ
 - 4 Harmsworth Mews London SE11 4SQ
 - Flat B 11 Austral Street SE11 4SJ
 - Flat B 13 Austral Street SE11 4SJ
 - Flat A 13 Austral Street SE11 4SJ
 - Basement Flat 28 West Square SE11 4SP
 - Flat A 11 Austral Street SE11 4SJ
 - 137a Brook Drive London SE11 4TQ
 - Flat A 65 Brook Drive SE11 4TU
 - Flat A 67 Brook Drive SE11 4TU
 - Flat A 61 Brook Drive SE11 4TU

- 131b Brook Drive London SE11 4TQ
- Flat 12 71-89 Brook Drive SE11 4TR
- Flat 13 71-89 Brook Drive SE11 4TR
- Flat 11 71-89 Brook Drive SE11 4TR
- 147b Brook Drive London SE11 4TQ
- Flat 10 71-89 Brook Drive SE11 4TR
- Second Floor And Third Floor Flat 15 Austral Street SE11 4SJ
- Second Floor Flat 28 West Square SE11 4SP
- Ground Floor Flat 9 Austral Street SE11 4SJ
- Ground Floor Flat 15 Austral Street SE11 4SJ
- Ground Floor Flat 28 West Square SE11 4SP
- Southwark College West Square SE11 4SN
- Charlotte Sharman Primary School West Square SE11 4SN
- Second Floor Flat 9 Austral Street SE11 4SJ
- Third Floor Flat 28 West Square SE11 4SP
- 22b Hayles Street London SE11 4SS
- First Floor Flat 15 Austral Street SE11 4SJ
- 22a Hayles Street London SE11 4SS
- Flat 1 95 Brook Drive SE11 4TU
- 14 West Square London SE11 4SN
- First Floor And Second Floor Flat 45 Brook Drive SE11 4TU
- Ground Floor And First Floor Flat 45 Brook Drive SE11 4TU
- Basement Flat 25 West Square SE11 4SP
- First Floor Flat 28 West Square SE11 4SP
- First Floor Flat 9 Austral Street SE11 4SJ
- 63 Brook Drive London SE11 4TU
- Top Floor 97 Brook Drive SE11 4TU
- 6 West Square London SE11 4SN
- 12 West Square London SE11 4SN
- 7 West Square London SE11 4SN
- 8 West Square London SE11 4SN
- 19 West Square London SE11 4SN
- Flat 2 Two Eagles House SE11 4TQ
- Flat 3 Two Eagles House SE11 4TQ
- Flat 1 Two Eagles House SE11 4TQ
- 16 West Square London SE11 4SN
- 15 West Square London SE11 4SN
- 17 Hedger Street London SE11 4ST
- 19 Hedger Street London SE11 4ST
- 15 Hedger Street London SE11 4ST
- 11 Hedger Street London SE11 4ST
- 13 Hedger Street London SE11 4ST
- 8 Orient Street London SE11 4SR
- 18 West Square London SE11 4SN
- 6 Orient Street London SE11 4SR
- 2 Orient Street London SE11 4SR
- 4 Orient Street London SE11 4SR
- Flat 4 Two Eagles House SE11 4TQ
- 6a Austral Street London SE11 4SJ
- 141a Brook Drive London SE11 4TQ
- 141b Brook Drive London SE11 4TQ
- Ground Flat 97 Brook Drive SE11 4TU
- First Floor Flat 97 Brook Drive SE11 4TU
- Flat 3 95 Brook Drive SE11 4TU
- 93 Brook Drive London SE11 4TU
- Flat 2 95 Brook Drive SE11 4TU
- 11 West Square London SE11 4SN
- 13 West Square London SE11 4SN
- 119d Brook Drive London SE11 4TQ
- 119a Brook Drive London SE11 4TQ
- 119b Brook Drive London SE11 4TQ
- 129a Brook Drive London SE11 4TQ
- 129b Brook Drive London SE11 4TQ
- 21b Austral Street London SE11 4SJ
- 17 West Square London SE11 4SN
- 21a Austral Street London SE11 4SJ
- 37 West Square London SE11 4SP
- 38 West Square London SE11 4SP
- 36 West Square London SE11 4SP
- 33 West Square London SE11 4SP
- 35 West Square London SE11 4SP
- Flat A 57 Brook Drive SE11 4TU
- Flat A 59 Brook Drive SE11 4TU
- Flat B 105 Brook Drive SE11 4TU
- Flat B 43 Brook Drive SE11 4TU
- Flat A 99 Brook Drive SE11 4TU
- Flat A 69 Brook Drive SE11 4TU
- 147a Brook Drive London SE11 4TQ
- Flat A 105 Brook Drive SE11 4TU
- 145a Brook Drive London SE11 4TQ
- 139a Brook Drive London SE11 4TQ
- 143a Brook Drive London SE11 4TQ
- Flat A 53 Brook Drive SE11 4TU
- Flat A 55 Brook Drive SE11 4TU
- Flat A 51 Brook Drive SE11 4TU
- Flat A 43 Brook Drive SE11 4TU
- Flat A 49 Brook Drive SE11 4TU
- 2 Harmsworth Mews London SE11 4SQ
- 46 Hayles Street London SE11 4SX
- 48 Hayles Street London SE11 4SX
- 44 Hayles Street London SE11 4SX
- 40 Hayles Street London SE11 4SX
- 42 Hayles Street London SE11 4SX
- 56 Hayles Street London SE11 4SX
- 58 Hayles Street London SE11 4SX
- 54 Hayles Street London SE11 4SX
- 50 Hayles Street London SE11 4SX
- 52 Hayles Street London SE11 4SX
- 28 Hayles Street London SE11 4SS
- 30 Hayles Street London SE11 4SS
- 26 Hayles Street London SE11 4SS
- 24 Hayles Street London SE11 4SS
- 8 Hayles Street London SE11 4SS
- 38 Hayles Street London SE11 4SX
- 6 Hayles Street London SE11 4SS
- 32 Hayles Street London SE11 4SS
- 4 Hayles Street London SE11 4SS
- 60 Hayles Street London SE11 4SX
- 101 Brook Drive London SE11 4TU
- 135 Brook Drive London SE11 4TQ
- 149 Brook Drive London SE11 4TQ
- 1 Harmsworth Mews London SE11 4SQ
- 91 Brook Drive London SE11 4TU
- 47 Brook Drive London SE11 4TU
- 68 Hayles Street London SE11 4SX
- 119 Brook Drive London SE11 4TQ
- 66 Hayles Street London SE11 4SX
- 62 Hayles Street London SE11 4SX
- 64 Hayles Street London SE11 4SX
- 133 Brook Drive London SE11 4TQ
- 127 Brook Drive London SE11 4TQ
- 121 Brook Drive London SE11 4TQ
- 123 Brook Drive London SE11 4TQ
- 78 Brook Drive SE11 4TS
- 80 Brook Drive SE11 4TS
- 82 Brook Drive SE11 4TS
- 44 Brook Drive SE11 4TS
- 46 Brook Drive London SE11 4TS
- 50 Brook Drive SE11 4TS
- 52 Brook Drive SE11 4TS
- 54 Brook Drive SE11 4TS
- 56 Brook Drive SE11 4TS
- 64 Brook Drive London SE11 4TS
- 66 Brook Drive SE11 4TS
- 60 Brook Drive SE11 4TS
- 84 Brook Drive London SE11 4TS
- 30 West Square London SE11 4SP
- 157 Kennington Road London SE11 6SF
- 7 Orient Street London SE11 4SR
- 31 West Square London SE11 4SP
- 12 West Square London SE11 4SN
- 125 High Street Sevenoaks TN13 1UT

- 42 West Square London SE11 4SP
- 43 West Square London SE11 4SP
- 41 West Square London SE11 4SP
- 39 West Square London SE11 4SP
- 40 West Square London SE11 4SP
- 26 West Square London SE11 4SP
- 27 West Square London SE11 4SP
- 3 West Square London SE11 4SN
- 9 West Square London SE11 4SN
- 31 West Square London SE11 4SP
- 32 West Square London SE11 4SP

- 95 Brook Drive SE11 4TU
- 7 Orient Street London SE11 4SR
- 20, West Square London SE11 4SN
- 1c Austral Street London SE11 4SJ
- 6 Harmsworth Mews London SE11 4SQ
- 4 Harmsworth Mews London SE11 4SQ
- 4 Harmsworth Mews London SE11 4SQ
- 2 Harmsworth Mews West Square SE11 4SQ
- C/O Phillips Planning Services Ltd
- 7 Orient Street London SE11 4SR
- C/O 1 Harmsworth Mews London SE11 4SD

18/AP/1577 (Re-consultation): Neighbour and local groups consulted:

- C/O 160 Tooley Street
- C/O 1 Harmsworth Mews London SE11 4SD [PETITION]
- Email representation
- Email representation
- First Floor Flat 97 Brook Drive SE11 4TU
- 1 Harmsworth Mews London SE11 4SQ
- 1 Harmsworth Mews London SE11 4SQ
- 1c Austral Street London SE11 4SJ
- 12 West Square London SE11 4SN
- 125 High Street Sevenoaks TN13 1UT
- 2 Harmsworth Mews West Square SE11 4SQ
- 2 Harmsworth Mews West Square SE11 4SQ
- 20 West Square London SE11 4SN
- 20 West Square London SE11 4SN
- 21 West Square London SE11 4SN
- 3 Harmsworth Mews London SE11 4SQ
- 3 Harmsworth Mews London SE11 4SQ
- 3 Harmsworth Mews London SE11 4SQ
- 38 West Square London SE11 4SP
- 4 Harmsworth Mews London SE11 4SQ
- 49 West Square London SE11 4SP
- 5 Harmsworth Mews London SE11 4SQ
- 6 Harmsworth Mews London SE11 4SQ
- 6 Harmsworth Mews London SE11 4SQ
- 7 Orient Street London SE11 4SR
- 7 Orient Street London SE11 4SR
- 7 Orient Street London SE11 4SR
- 95 Brook Drive SE11 4TU
- 13 West Square SE11 4SN

18/AP/4084: Neighbour and local groups consulted:

- Southwark Council
- Southwark Council
- Southwark Council
- Friends of Geraldine Mary Harmsworth Park
- West Square Residents Association
- West Square Residents Association
- West Square Residents Association
- Howard Sharp & Partners
- The Occupier 95 Brook Drive London SE11 4TU
- The Occupier 1 Harmsworth Mews Kennington London SE11 4SQ
- The Occupier c/o 1 Harmsworth Mews LONDON SE11 4SD
- The Occupier 1 HARMSWORTH MEWS LONDON SE11 4SQ
- The Occupier 13 WEST SQUARE LONDON SE11 4SN
- The Occupier 2 HARMSWORTH MEWS LONDON SE11 4SQ
- The Occupier 20 WEST SQUARE LONDON SE11 4SN
- The Occupier 21 WEST SQUARE LONDON SE11 4SN
- The Occupier 24 WEST SQUARE LONDON SE11 4SN
- The Occupier 3 HARMSWORTH MEWS LONDON SE11 4SQ
- The Occupier 38 WEST SQUARE LONDON SE11 4SP
- The Occupier 4 HARMSWORTH MEWS LONDON SE11 4SQ
- The Occupier 49 WEST SQUARE LONDON SE11 4SP
- The Occupier 5 HARMSWORTH MEWS LONDON SE11 4SQ
- The Occupier 6 HARMSWORTH MEWS LONDON SE11 4SQ
- The Occupier 7 ORIENT STREET LONDON SE11 4SR
- The Occupier 1c Austral Street London SE11 4SJ
- The Occupier 12 West Square London SE11 4SN
- The Occupier 20, West Square London SE11 4SN
- The Occupier 4 Harmsworth Mews London SE11 4SQ
- The Occupier 4 Harmsworth Mews London SE11 4SQ
- The Occupier 5 Harmsworth Mews London SE11 4SQ
- The Occupier 53 Hanover Gardens London SE11 5TN
- The Occupier 6 Harmsworth Mews London SE11 4SQ
- The Occupier 7 Orient Street London SE11 4SR
- The Occupier 2 Harmsworth Mews West Square London SE11 4SQ
- The Occupier FIRST FLOOR FLAT 97 BROOK DRIVE LONDON SE11 4TU
- The Occupier by email SE1
- The Occupier c/o Phillips Planning Services Ltd

APPENDIX 2

Consultation responses received

Internal services

As discussed in the main body of the Report.

Statutory and non-statutory organisations

- Environment Agency
- Historic England
- London Underground Limited
- Natural England - London Region & South East Region
- Metropolitan Police

18/AP/1577: Neighbours and local groups

- C/O 160 Tooley Street
- C/O 1 Harmsworth Mews London SE11 4SD [PETITION]
- Email representation
- Email representation
- First Floor Flat 97 Brook Drive SE11 4TU
- 1 Harmsworth Mews London SE11 4SQ
- 1 Harmsworth Mews London SE11 4SQ
- 1c Austral Street London SE11 4SJ
- 12 West Square London SE11 4SN
- 125 High Street Sevenoaks TN13 1UT
- 2 Harmsworth Mews West Square SE11 4SQ
- 2 Harmsworth Mews West Square SE11 4SQ
- 20 West Square London SE11 4SN
- 20 West Square London SE11 4SN
- 21 West Square London SE11 4SN
- 3 Harmsworth Mews London SE11 4SQ
- 3 Harmsworth Mews London SE11 4SQ
- 3 Harmsworth Mews London SE11 4SQ
- 38 West Square London SE11 4SP
- 4 Harmsworth Mews London SE11 4SQ
- 49 West Square London SE11 4SP
- 5 Harmsworth Mews London SE11 4SQ
- 6 Harmsworth Mews London SE11 4SQ
- 6 Harmsworth Mews London SE11 4SQ
- 7 Orient Street London SE11 4SR
- 7 Orient Street London SE11 4SR
- 7 Orient Street London SE11 4SR
- 95 Brook Drive SE11 4TU
- 13 West Square SE11 4SN

18/AP/4084: Neighbours and local groups

- First Floor Flat 97 Brook Drive SE11 4TU
- 41 West Square London SE11 4SP