

Planning Committee (Major Applications) A

Tuesday 11 February 2025

6.30 pm

Ground Floor Meeting Room G02 - 160 Tooley Street, London SE1 2QH

Membership

Councillor Richard Livingstone (Chair)
Councillor Kath Whittam (Vice-Chair)
Councillor Gavin Edwards
Councillor Esme Hicks
Councillor Nick Johnson
Councillor Darren Merrill
Councillor Reginald Popoola

Reserves

Councillor Maggie Browning
Councillor Ellie Cumbo
Councillor Ketzia Harper
Councillor Jon Hartley
Councillor Michael Situ
Councillor Cleo Soanes
Councillor Emily Tester

INFORMATION FOR MEMBERS OF THE PUBLIC

Access to information

You have the right to request to inspect copies of minutes and reports on this agenda as well as the background documents used in the preparation of these reports.

Babysitting/Carers allowances

If you are a resident of the borough and have paid someone to look after your children, an elderly dependant or a dependant with disabilities so that you could attend this meeting, you may claim an allowance from the council. Please collect a claim form at the meeting.

Access

The council is committed to making its meetings accessible. For details on building access, translation, provision of signers or any other requirements for this meeting, please contact the person below.

Contact: Gerald Gohler on 020 7525 7420 or email: gerald.gohler@southwark.gov.uk

Members of the committee are summoned to attend this meeting

Althea Loderick

Chief Executive

Date: 3 February 2025



Planning Committee (Major Applications) A

Tuesday 11 February 2025

6.30 pm

Ground Floor Meeting Room G02 - 160 Tooley Street, London SE1 2QH

Order of Business

Item No.	Title	Page No.
1.	APOLOGIES	
	To receive any apologies for absence.	
2.	CONFIRMATION OF VOTING MEMBERS	
	A representative of each political group will confirm the voting members of the committee.	
3.	NOTIFICATION OF ANY ITEMS OF BUSINESS WHICH THE CHAIR DEEMS URGENT	
	In special circumstances, an item of business may be added to an agenda within five clear days of the meeting.	
4.	DISCLOSURE OF INTERESTS AND DISPENSATIONS	
	Members to declare any personal interests and dispensation in respect of any item of business to be considered at this meeting.	
5.	MINUTES	1 - 5
	To approve as a correct record the minutes of the meeting held on 26 November 2024.	
6.	CONFIRMATION OF ARTICLE 4(1) DIRECTION TO WITHDRAW PERMITTED DEVELOPMENT RIGHTS FOR OPERATIONS WITHIN PART OF THE DULWICH WOOD CONSERVATION AREA, WITHIN AND ADJACENT TO ANCIENT WOODLAND	6 - 86

Item No.	Title	Page No.
7.	CONFIRMATION OF ARTICLE 4 DIRECTION FOR THE WITHDRAWAL OF PART 16 PERMITTED DEVELOPMENT RIGHTS (COMMUNICATIONS DEVELOPMENT) AT THE JUNCTION OF CROXTED ROAD AND NORWOOD ROAD, LONDON SE24 9DA	87 - 120
8.	DEVELOPMENT MANAGEMENT	121 - 125

8.1. 22-24 SOUTHWARK BRIDGE ROAD, LONDON SE1 9HB

(To follow)

ANY OTHER OPEN BUSINESS AS NOTIFIED AT THE START OF THE MEETING AND ACCEPTED BY THE CHAIR AS URGENT

EXCLUSION OF PRESS AND PUBLIC

The following motion should be moved, seconded and approved if the committee wishes to exclude the press and public to deal with reports revealing exempt information:

“That the public be excluded from the meeting for the following items of business on the grounds that they involve the likely disclosure of exempt information as defined in paragraphs 1-7, Access to Information Procedure rules of the Constitution.”

Date: 3 February 2025



Planning Committee (Major Applications)

Guidance on conduct of business for planning applications, enforcement cases and other planning proposals

1. The reports are taken in the order of business on the agenda.
2. The officers present the report and recommendations and answer points raised by members of the committee.
3. The role of members of the planning committee (major applications) is to make planning decisions openly, impartially, with sound judgement and for justifiable reasons in accordance with the statutory planning framework.
4. The following may address the committee (if they are present and wish to speak) for **not more than 3 minutes each**.

- (a) One representative (spokesperson) for any objectors. If there is more than one objector wishing to speak, the time is then divided within the 3-minute time slot.
- (b) The applicant or applicant's agent.
- (c) One representative for any supporters (who live within 100 metres of the development site).
- (d) Ward councillor (spokesperson) from where the proposal is located.
- (e) The members of the committee will then debate the application and consider the recommendation.

Note: Members of the committee may question those who speak only on matters relevant to the roles and functions of the planning committee that are outlined in the constitution and in accordance with the statutory planning framework.

5. If there are a number of people who are objecting to, or are in support of, an application or an enforcement of action, you are requested to identify a representative to address the committee. If more than one person wishes to speak, the 3-minute time allowance must be divided amongst those who wish to speak. Where you are unable to decide who is to speak in advance of the meeting, you are advised to meet with other objectors in the foyer of the council offices prior to the start of the meeting to identify a representative. If this is not possible, the chair

will ask which objector(s) would like to speak at the point the actual item is being considered.

6. Speakers should lead the committee to subjects on which they would welcome further questioning.
7. Those people nominated to speak on behalf of objectors, supporters or applicants, as well as ward members, should sit on the front row of the public seating area. This is for ease of communication between the committee and the speaker, in case any issues need to be clarified later in the proceedings; it is **not** an opportunity to take part in the debate of the committee.
8. Each speaker should restrict their comments to the planning aspects of the proposal and should avoid repeating what is already in the report. The meeting is not a hearing where all participants present evidence to be examined by other participants. **As meetings are usually livestreamed, speakers should not disclose any information they do not wish to be in the public domain.**
9. This is a council committee meeting which is open to the public and there should be no interruptions from the audience.
10. No smoking is allowed at committee.
11. Members of the public are welcome to film, audio record, photograph, or tweet the public proceedings of the meeting; please be considerate towards other people in the room and take care not to disturb the proceedings.

Please note:

Those wishing to speak at the meeting should notify the constitutional team by email at ConsTeam@southwark.gov.uk in advance of the meeting by **5pm** on the working day preceding the meeting.

The arrangements at the meeting may be varied at the discretion of the chair.

Contacts: General Enquiries
Planning Section
Resources
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Planning Committee Clerk, Constitutional Team
Governance and Assurance
Tel: 020 7525 7420



Planning Committee (Major Applications) A

MINUTES of the Planning Committee (Major Applications) A held on Tuesday 26 November 2024 at 6.30 pm at Ground Floor Meeting Room G02A - 160 Tooley Street, London SE1 2QH

PRESENT: Councillor Richard Livingstone (Chair)
Councillor Kath Whittam (Vice-Chair)
Councillor Ellie Cumbo (Reserve)
Councillor Esme Hicks
Councillor Nick Johnson
Councillor Darren Merrill
Councillor Reginald Popoola

OTHER MEMBERS PRESENT: Councillor Andy Simmons

OFFICER SUPPORT: Dipesh Patel (Manager Strategic Applications)
Stephanie Bruce-Smith (External Legal Counsel, WFB Chambers)
Michael Tsoukaris (Manager Design and Conservation)
Liam Bullen (Senior Planner – Urban Forester)
Nathaniel Young (Planning Team Leader)
Gerald Gohler (Constitutional Officer)

1. APOLOGIES

There were apologies for absence from Councillors Gavin Edwards.

2. CONFIRMATION OF VOTING MEMBERS

Those members listed as present above were confirmed as the voting members for the meeting.

3. **NOTIFICATION OF ANY ITEMS OF BUSINESS WHICH THE CHAIR DEEMS URGENT**

The chair drew members' attention to the development report, members' pack and addendum report which had been circulated before the meeting.

4. **DISCLOSURE OF INTERESTS AND DISPENSATIONS**

The following member declared an interest in item:

7.1. 24/AP/0892 CHATELAIN HOUSE, 182-202 WALWORTH ROAD, LONDON, SE17

Councillor Darren Merrill, non-pecuniary, as he would be speaking on this item in his capacity as a ward councillor.

5. **MINUTES**

RESOLVED:

That the minutes for Planning Committee (Major Applications) A meeting held on the 8 October 2024 be approved as a correct record and signed by the chair.

6. **PROPOSED ARTICLE 4(1) DIRECTION TO WITHDRAW PERMITTED DEVELOPMENT RIGHTS FOR OPERATIONS WITHIN PART OF THE DULWICH WOOD CONSERVATION AREA, WITHIN AND ADJACENT TO ANCIENT WOODLAND**

The officer introduced the report and drew members' attention to questions raised in writing by one of the ward councillors, Councillor Catherine Rose.

The meeting then heard from another Dulwich Wood ward councillor, Councillor Andy Simmons, who responded to questions put by members of the committee.

Members of the committee put questions to the officers.

Members asked for the following organisations to be included in the consultation and communication on this item:

- the London Borough of Lewisham
- Sydenham Hill Neighbourhood Forum,
- the Dulwich Estate and
- local tenants' and residents' associations, particularly the two Great Brownings TRAs.

Members also asked for the communication with consultees to include a Frequently Asked Questions section.

A motion to approve a non-immediate article 4(1) direction was moved, seconded, put to the vote and declared carried.

RESOLVED:

1. That a non-immediate Article 4(1) direction as set out in Appendix A of the report to withdraw the permitted development right granted by the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended), hereafter, "GPDO", be approved.
2. That consultations be undertaken for a period of six weeks in relation to the non-immediate Article 4(1) direction.
3. That the Equality Impact and Needs Analysis (EINA) of the proposed Article 4(1) direction (Appendix D of the report) be noted.

At 7:08pm, Councillor Darren Merrill left the top table and sat with the audience.

7. DEVELOPMENT MANAGEMENT

RESOLVED:

1. That the determination of planning applications, or formal observations and comments, the instigation of enforcement action and the receipt of the reports included in the attached items were considered.
2. That the decisions made on the planning applications be subject to the conditions and/or made for the reasons set out in the attached reports unless otherwise stated be agreed.
3. That where reasons for decisions or conditions were not included or not as included in the reports relating to an individual item, they be clearly specified and agreed.

7.1 24/AP/0892 CHATELAIN HOUSE, 182-202 WALWORTH ROAD, LONDON, SE17

Planning Application Number: 24/AP/0892

Report: see pages 80 to 191 of the agenda pack and pages 6 to 8 of the addendum report.

PROPOSAL:

Redevelopment including part demolition and part retention of existing building to provide mixed-use development comprising purpose-built student accommodation (Sui Generis), residential accommodation (Use Class C3), Commercial, Business and Service floorspace (Use Class E excluding E(g)(ii) and (iii)), Community floorspace (Use Class F2), flexible Commercial, Business and Service (Use Class E excluding E(g)(ii) and (iii))/Community floorspace (Use Class F2) within two buildings ranging from 6 to 7 storeys with associated amenity space, landscaping, car and cycle parking, public realm and highways improvements.

The committee heard the officer's introduction to the report and addendum report. Members put questions to officers.

There were no objectors present wishing to speak.

The applicant's representatives addressed the committee and answered questions put by members of the committee.

A representative of supporters of the application living within 100 metres of the development site addressed the committee. Members of the committee did not ask questions of the supporter.

Councillor Darren Merrill addressed the committee in his capacity as a ward councillor and responded to questions from members of the committee.

Following this, Councillor Darren Merrill left the meeting room.

Councillors asked for the construction management plan to take into account the local low traffic neighbourhood and the needs of the police station regarding road closures.

The committee put further questions to officers and discussed the application.

A motion to grant planning permission as on paper with an additional condition was moved, seconded, put to the vote and declared carried.

RESOLVED:

1. That planning permission be granted subject to:
 - the conditions set out in the report and addendum report
 - an additional condition stipulating that details of the play space and play equipment be submitted to officers for approval, and
 - the applicant entering into an appropriate legal agreement.

2. That in the event that the requirements of paragraph 1 above are not met by 26 November 2025 the director of planning and growth be authorised to refuse planning permission, if appropriate, for the reasons set out in paragraph 251 of the report.

The meeting ended at 8.15 pm.

CHAIR:

DATED:

Meeting Name:	Planning Committee (Major Applications) A
Date:	11 February 2025
Report title:	Confirmation of Article 4(1) Direction to withdraw Permitted Development Rights for operations within part of the Dulwich Wood Conservation Area, within and adjacent to Ancient Woodland
Ward(s) or groups affected:	Dulwich Wood
Classification:	Open
Reason for lateness (if applicable):	Not Applicable
From:	Director of Planning and Growth

RECOMMENDATIONS

That the planning committee:

1. Authorises the confirmation of the Article 4(1) direction as set out in Appendix A to withdraw the permitted development right granted by the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended), hereafter “GPDO”, for operations within and adjacent to the Great North Wood, including to domestic and non-domestic properties identified in Appendix C.
2. Notes the updated equalities impact and needs analysis of the proposed Article 4 Directions (Appendix D).
3. Delegates to the director of planning and growth the arrangements for confirming the Article 4 Direction including compliance with the notification requirements under the Town and Country Planning (General Permitted Development) Order 1995.

BACKGROUND INFORMATION

4. A Local Planning Authority (LPA) may introduce an Article 4 Direction to remove permitted development rights where the impact of development brought forward under provisions in the GDPO cause harm.
5. On the 26 November 2024, this planning committee resolved to make a Non-Immediate Article 4 Direction to protect irreplaceable habitat from inconsiderate development within ancient woodland and also for properties with land within the woodland’s nominal buffer zone of 15m from the boundary, in keeping with the principles of paragraph 193 of the National Planning Policy

Framework (2024) and in respect of standing advice from Natural England.

6. The next stage in implementing the Article 4 Direction: Great North Wood; requires that the planning committee authorise confirmation of the Article 4 Direction. This is a requirement under Article 4 (1) of the GPDO.
7. Paragraph 1 (9) of Schedule 3 of the GPDO stipulates that in deciding whether to confirm a direction made under Article 4 (1), the local planning authority must take into account any representations received during the representation period specified in accordance with sub-paragraph (4)(d) of the same.
8. Paragraph 1(10) of Schedule 3 of the GPDO stipulates the local planning authority must not confirm a direction until after the expiration of –
 - a. a period of at least 28 days following the latest date on which any notice relating to the direction was served or published; or
 - b. such longer period as may be specified by the Secretary of State of the direction.
9. The Secretary of State has advised that the council should continue with any processes associated with introducing the Article 4 direction. An Article 4 direction does not require the approval of the Secretary of State in order to come into force, however, please note that the Secretary of State has the power to modify or cancel an Article 4 direction at any time before or after it is confirmed.
10. Representations received during the consultation period are outlined within the report at paragraphs 20-45 and summarised in further detail in the attached consultation report (see Appendix F).
11. No further issues have been raised, nor none identified in respect of the equalities impacts and needs analysis (Appendix D).
12. The directions must be confirmed within six months of the date in which the Direction came into force (23 March 2017) to prevent expiration of the Direction in accordance with Paragraph 2(6) of Schedule 3, of the Town and Country Planning (General Permitted Development) Order 2015 (as amended).

Legal context

Article 4 Directions

13. An Article 4 direction can be used to remove specific permitted development rights in all or parts of a local authority's area. It does not restrict development altogether, but instead ensures that development requires planning permission. A planning application for the operations outlined in Appendix 1 would need to be submitted and that would then be determined in accordance with the development plan. Development could only be undertaken lawfully with express planning consent and would otherwise be a breach of planning control and subject to enforcement action.

14. The government's national planning practice guidance (NPPG entitled 'When is permission required?') sets out guidance on the use of Article 4 directions. The NPPG states that an Article 4 direction to remove national permitted development rights should be limited to situations where this is necessary to protect local amenity or the well-being of the area. It also states that in deciding whether an Article 4 direction would be appropriate, local planning authorities should identify clearly the potential harm that the direction is intended to address (NPPG, paragraph 038).
15. Article 4 Directions can either be immediate or non-immediate depending upon when notice is given of the date on which they come into force. Immediate directions can be made where the development presents a perceived threat to local amenity or prejudices the proper planning of an area (NPPG paragraph 045). In the case of this report, the council introduced a Non-Immediate Article 4 Direction on 26th November 2024, for which the process is as follows:

Stage 1 Direction-making (complete)

The Council decides whether to go ahead and introduce a Direction setting a date in the Notice for when the Direction will come into force which must be at least 28 days and no more than 2 years after representations can first be made, which is usually after the last publication/service date;

Stage 2 Publication/Consultation stage (complete)

The council:

- i) publishes the notice of the direction in a local newspaper;
- ii) serves notice on the site owner and occupier, where practicable;
- iii) displays notices on site for a period of not less than 6 weeks; and
- iv) specifies a period of at least 21 days during which representations may be made.

Stage 3 SoS Notification (complete)

On the same day that notice is given under Stage 2 above, the council refers its decision to the Secretary of State who has wide powers to modify or cancel a Direction;

Stage 4 Confirmation Stage (current)

The council cannot confirm the Direction until after a period of at least 28 days from publication/service of the Notice. Once a Direction has been confirmed, the council must give notice of the confirmation in the same way as it gave notice of the initial Direction, and must specify the date that the Direction comes into force. A copy of the Direction as confirmed must also be sent to the Secretary of State.

Compensation

16. In some circumstances the council can be liable to compensate developers or landowners whose developments are affected by Article 4 directions. Under

sections 107 and 108 of the Town and Country Planning Act 1990 Local planning authorities are liable to pay compensation to landowners who would have been able to develop under the permitted development rights that an Article 4 direction withdraws, if they:

- Refuse planning permission for development which would have been permitted development if it were not for an Article 4 direction; or
 - Grant planning permission subject to more limiting conditions than the GPDO would normally allow, as a result of an Article 4 direction being in place.
17. The compensation may be claimed for abortive expenditure or other loss or damage directly attributable to the withdrawal of permitted development rights. 'Abortive expenditure' includes works carried out under the permitted development rights before they were removed, as well as the preparation of plans for the purposes of any work.
 18. Loss or damage directly attributable to the withdrawal of permitted development rights can include the depreciation in the value of land or a building(s) when its value with the permitted development right is compared to its value without the right.
 19. After expiry of 12 months no compensation would be payable.

KEY ISSUES FOR CONSIDERATION

Public Consultation

Issues raised by neighbours and statutory consultees

- Scope of the Proposal
 - Conflicts with Dulwich Estate Scheme of Management permissions
 - Bureaucracy
 - Convolutd
 - Benefits the woodland
 - No impact on LB Lewisham
 - Secretary of State's power to modify or cancel and Article 4 after it has been made.
20. A total of 44 neighbours and 12 internal and external consultees were consulted. The Council received six responses of which four were neutral, one letter in support and one objection.
 21. A supporting document addressing Frequently Asked Questions was included with each letter and is included within the Consultation Report at Appendix F.
 22. In terms of Support, the Sydenham Hill Neighbourhood Forum has stated that... the nurturing of woodland is a clear priority of our members, and so we support this application.
 23. The owners and occupiers of the 44 affected properties were consulted by

letter on the 3 December 2024 with representations welcomed to the 14 January 2025 in line with the statutory requirements.

24. Neutral comments were received from one neighbour, the Gunsite Allotments, Lewisham Council and the Secretary of State (MHCLG) which provided or requested further clarification from the council.
25. One objector raised questions concerning the scope of the proposal and how it affects, in particular residences at Great Brownings, and also; that permission is already required from the Dulwich Estate and so would lead to an extra layer of bureaucracy. These matters are addressed within this report, in particular within paragraphs 27-45.
26. Representations are summarised in further detail in the attached consultation report (see Appendix F).

Planning applications

27. Officers have carefully considered all of the potential operations which may be undertaken in respect of the GPDO and restricted the recommendation for the Article 4 (1) Direction to those activities which have been deemed to have the potential to be most damaging to the woodland.
28. Use classes are broad in their interpretation, i.e.; Part 1, Class E includes any building or enclosure, swimming or other pool, although in many cases a swimming pool may not be considered within a site. The Council are unable to amend the Use Classes included within the GPDO to omit certain references to distinct operations, but have restricted the Article 4 to activities with the possibility of causing the greatest harm.
29. The Article 4 direction is presented in as plain a use of English as possible to describe the type of operations which would be affected.
30. If permitted development rights are withdrawn and planning permission is required, the council would be obliged to determine the proposal in accordance with the development plan unless material considerations indicate otherwise. Policies contained within the London Plan and the NPPF are also relevant as discussed further in the policy context section of the report.
31. It should be noted that where submission of a planning application is required as a result of withdrawal of permitted development rights through an Article 4 Direction, the council cannot charge a planning application fee.
32. The Great North Wood and the properties affected by the Article 4 are also subject to the Dulwich Estate Scheme of Management. The Dulwich Estate is a statutory consultee on all applications made to the Council within the Scheme of Management Area.
33. The approval required under the Scheme of Management is separate from, and in addition to, the requirements of the local authority planning permission (Southwark, Lambeth or Lewisham), building control and other regulations. In many cases, alterations, extensions, new structures and works to trees, will

require permission from both the appropriate local authority and the Scheme of Management Office.

34. The Scheme of Management is, in effect, a Landlord Permission, rather than a planning function under the Town and Country Planning Act. (i.e.; the granting of planning consent and building regulations consent does not mean the landlord has automatically granted consent required under the lease), where the landlord 'The Estate' is merely required to act reasonably. Its decisions are not open to appeal.
35. Southwark Council is the Local Planning Authority, subject to regulation under the Town and Country Planning Act with decision making taking due regard to national, regional and local policies. Decisions of the Council on Planning Applications may be appealed to the Planning Inspectorate.

Evidence Base

36. An Article 4(1) direction can be made if the council is satisfied that it is expedient that development should not be carried out unless planning permission is granted, particularly if it contends that there is a threat to local amenity or prejudices the proper planning of an area.
37. The NPPF advises in paragraph 53 that the use of Article 4 directions to remove national permitted development rights should be limited to situations where it is necessary to protect local amenity or the wellbeing of the area. This is reiterated in the NPPG, which also states local planning authorities should identify clearly the potential harm that the direction is intended to address.
38. Officers consider The Great North Wood, comprising Sydenham Hill Woods and Dulwich Wood to constitute irreplaceable habitat which makes a significant contribution to the historic interest and visual impact of the area.
39. Standing Advice from Natural England states that unless there are wholly exceptional grounds and that adequate mitigation can be provided, development proposals within the Buffer Zone, should not be approved. The categorisation of land as an ancient woodland does not itself provide any statutory protection. However, some features in ancient woods are protected and sites can also be designated for their wildlife value.
40. For ancient woodlands, a buffer zone of at least 15 metres from the boundary of the woodland is advised (source: Natural England).
41. The affected properties are within or share a direct boundary with the woodland. Whilst some properties have extensive rear gardens, others sit in such close proximity that the rear elevations to the main properties are at or within the nominal 15m buffer zone to the woodland.
42. The NPPG states that an Article 4 direction to remove national permitted development rights should be limited to situations where this is necessary to protect local amenity or the wellbeing of the area. For the reasons outlined above it is considered this Article 4 direction should relate only to those operations and for those premises within Dulwich Wood Conservation Area

which are directly adjacent or within the Woodland proper and its nominal buffer zone (15m) to the Ancient Woodland building (extent illustrated at Appendix B) due to the heritage significance as outlined above.

43. Whilst development within Ancient Woodland is generally assumed to be strictly controlled, the limitations of the Conservation Area provisions are insufficient to guarantee that development would not adversely impact upon the woodland(s), nor adequately provide for strict adherence to standing advice from Natural England pertaining to the provision of a Buffer Zone as the categorisation of land as an ancient woodland does not itself provide any statutory protection. It should be noted, however, that some features in ancient woods are protected and sites can also be designated for their wildlife value.
44. The use of an Article 4 direction would not restrict development altogether, but instead ensure that development proposals in and adjacent to Ancient Woodland would actively form a material consideration in determining the planning application.
45. Officers have carefully considered all of the potential operations which may be undertaken in respect of the GPDO and restricted the recommendation for the Article 4 (1) Direction to those activities which have been deemed to have the potential to be most damaging to the woodland and to properties which are located within the woodland and its nominal buffer zone.

Policy Context

The National Planning Policy Framework (2024)

46. The NPPF, the country's overarching framework for planning policy, provides that LPAs should refuse applications for "*development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) ... unless there are wholly exceptional reasons and a suitable compensation strategy exists*". (para.193 (c))
47. On 26 January 2024, the Government introduced a new duty requiring local planning authorities to consult the Secretary of State regarding developments that impact ancient woodland. However, it is highly unlikely that this will apply to household applications.
48. The National Planning Policy Framework (NPPF) identifies that heritage assets contribute to the social and environmental roles of sustainable development. Southwark's Ancient Woodland is at risk from encroachment, indirect and direct harm without planning permission or an assessment of its heritage value. In the instance of this Article 4(1) direction, the requirement of removing permitted development rights for part of the Dulwich Wood Conservation Area seeks to comply with the social and environmental role of the NPPF.
49. The social role: Removing the permitted development rights will ensure that the contribution to the cultural well-being and amenity that the Ancient Woodland provides to the community can be considered within a planning application and it is not lost without consideration without the assessment for

any forthcoming scheme.

50. The environmental role: the NPPF supports the conservation and enhancement of the historic environment, recognising that heritage assets are an irreplaceable resource.
51. Paragraph 187 of the NPPF states: Planning policies and decisions should contribute to and enhance the natural and local environment by: a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan); b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;
52. Not all heritage assets are designated. Nonetheless, the NPPF expects the local planning authority to take into account the effect of an application on the significance of a non-designated heritage asset when determining a planning application.

The London Plan (March 2021)

53. The London Plan (March 2021) believes London's diverse range of designated and non-designated heritage assets contributes to its status as a world-class city. It therefore advocates the identification and sensitive management of London's heritage assets, in tandem with promoting the highest standard of architecture. This, it regards, as 'essential to maintaining the blend of old and new that contributes to the capital's unique character.' (para 7.13). It supports the creative re-use of heritage assets and the historic environment, requiring development proposals to conserve a heritage asset's significance and to promote the effective integration of London's heritage in regenerative change (policy HC1).
54. Policy G7 Trees and woodlands (A) London's urban forest and woodlands should be protected and maintained, and new trees and woodlands should be planted in appropriate locations in order to increase the extent of London's urban forest – the area of London under the canopy of trees. (B) In their Development Plans, boroughs should: 1) protect 'veteran' trees and ancient woodland where these are not already part of a protected site.

The Southwark Plan (2022)

55. The Southwark Plan requires development to conserve and enhance the significance of designated and non-designated heritage assets and their settings, and to enable the viable use of the heritage asset that is consistent with its on-going and long-term conservation (Policy P21).
56. For Ancient Woodland, Policies P60 and P61 also apply:
57. P60 Biodiversity
1.2. Protecting and avoiding damage to SINC, LNRs, populations of protected species and priority habitats / species;

58. P61 Trees
 2. Development must retain and protect significant existing trees including:
 - 2.4. Veteran, ancient and notable trees
59. The council considers The Great North Wood to be an irreplaceable habitat. This Article 4 direction is necessary to allow a full assessment of any subsequent planning application, and thereby ensuring proper protection of the site.

Policy framework implications

60. The Southwark Plan (February 2022)
 - Policy P21 - Conservation of the historic environment and natural heritage
 - Policy P60 – Biodiversity
 - Policy P61 - Trees
61. The London Plan (March 2021)
 - Policy HC1 - Heritage conservation and growth.
 - Policy G7 – Trees and woodlands
62. The National Planning Policy Framework (NPPF) 2024

Other matters

Community, equalities (including socio-economic) and health impacts

Community impact statement

63. Southwark Council is committed to achieving the best quality of life for its residents. This includes maintaining a strong local economy and revitalised neighbourhoods for the communities within Southwark. It is vital that a strong policy framework ensures the borough's heritage and community values continue to be protected for the benefit of local residents. The Article 4(1) direction seeks to protect Southwark's Ancient Woodland via a robust analysis through the planning process.

Equalities (including socio-economic) impact statement

64. Section 6 of the Human Rights Act 1998 prohibits public authorities from acting in a way which is incompatible with the European Convention on Human Rights (ECHR). Various Convention rights may be engaged in the process of making and considering this Article 4 direction, including under Article 1 of the First Protocol (Protection of property) and Article 8 (Right to respect for a private and family life). The European Court has recognised that "regard must be had to the fair balance that has to be struck between the competing interests of the individual and of the community as a whole". Both public and private interests are to be taken into account in the exercise of the council's powers and duties as a local planning authority. Any interference with a Convention Right must be necessary and proportionate.

65. The council has carefully considered the balance to be struck between individual rights and the wider public interest. The rights of those affected by the proposed Article 4 direction have been considered under the Human Rights Act 1998 and it has been determined that the Articles will not be triggered.
66. In consulting the Council's Legal and Equalities Teams upon the introduction of the Article 4 direction the council has had regard to its public sector equality duty (PSED) under s.149 of the Equality Act 2010.
67. The PSED is only one factor that needs to be considered when making a decision and may be balanced against other relevant factors. The council also took into account other relevant factors in respect of the decision, including financial resources and policy considerations. In appropriate cases, such countervailing factors may justify decisions which have an adverse impact on protected groups.
68. The council has given consideration to all the protected characteristics in the Equality Act 2010 to ensure that any potential impacts of the proposed Article 4 direction on these groups of people have been considered and where possible mitigated.
69. Generally, greenspaces express a positive impact for those experiencing socio-economic disadvantage, as the EINA demonstrates that those experiencing socio-economic disadvantage are less likely to have access to green spaces in the immediate vicinity.
70. Overall, the Directive will have no negative impacts on the equalities of residents, including groups with protected characteristics, in the Article 4 (1) area. The Direction encourages applicants to be more considerate of the very special character and setting of the Great North Wood.
71. A full and comprehensive Equalities Impacts and Needs Analysis (EINA) has been undertaken and is provided as Appendix D to this report. No further issues were raised nor any identified during the Consultation Phase, as such, the EINA is submitted as unamended.

Health Impact Statement

72. The Article 4 direction is a legal matter in requiring planning permission first be obtained for development otherwise permitted. It does not preclude development *per se* but would allow for due consideration of the impacts and any exceptional grounds, which could in themselves present health concerns and would require careful control.

Climate change implications

73. The Article 4 direction recommendation is in keeping with Priority 3 of the Council's Climate Change Strategy and with particular reference to the Southwark Nature Action Plan (SNAP) (2020) which sets out the vision and strategy for the continued protection, conservation and enhancement of nature in the borough. Southwark will continue to ensure protection of trees and

woodlands subject to Tree Preservation Orders, in Conservation Areas and Sites of Importance for Nature Conservation, with trees to be retained on development sites and to require high standards of replacement tree planting. (1.18 Biodiversity and Trees (SNAP) (2020)).

Resource implications

- 74. No further resource implications are envisaged. Such undertakings are part of the management of the historic environment and as such will be carried out by the department's conservation and design team within its existing staffing resources.
- 75. The Article 4 direction may generate some additional planning casework however this is seen as a necessity in safeguarding the Woodland, in accordance with nationally recognised advice.

Legal implications

- 76. The legal implications that arise from the Article 4 direction relate to the requirements to consider impacts to the Ancient Woodland as part of the direction-making process; and in the outcome of the Article 4 direction itself. The latter would legally require the applicant to obtain express planning consent for development, otherwise permitted, prior to the commencement any such works. The council would consider the case for development as part of the application decision-making process, weighing the planning benefits and dis-benefits of the scheme, including proximity to Ancient Woodland. There would be no additional legal implications for the council beyond these statutory processes.

Financial implications

- 77. As is noted above, should the local authority refuse planning permission for development that otherwise would have been granted by the GPDO (or grant planning permission but with more onerous conditions than would have the case under the GPDO) the council has a potential liability for compensation. Any compensation may relate either to a depreciation in the value of land or buildings which results from failure to gain planning permission or to abortive expenditure. Therefore, there is a risk that the proposed direction will make the council liable to compensation claims. Because circumstances vary widely, it is not possible to gauge the magnitude of such claims.
- 78. Any claim for compensation will be dealt with through the council's official complaints procedure and it is anticipated that any award would be contained within the planning division's budget. This position will be monitored and if the award cannot be contained within existing departmental revenue budgets will be reflected in the council's revenue budget monitoring arrangements for funding from council reserves.
- 79. Any potential drawdown from council reserves for the payment of compensation claims will be subject to agreement by the relevant cabinet member, or full cabinet in the case of claims over £50,000.

80. Staffing and any other costs connected with this recommendation will be contained within existing departmental revenue budgets.

SUPPLEMENTARY ADVICE FROM OTHER OFFICERS

Assistant Chief Executive – Governance and Assurance

81. Planning Committee is being asked to authorise the confirmation of an Article 4(1) direction to withdraw the permitted development rights granted by Schedule 2, of the GPDO to restrict certain operations without planning permission, to approve a public consultation in respect of the Article 4(1) direction, to note the equalities analysis annexed to this report and to delegate to the Director of Planning the arrangements for confirming the Article 4 Direction including compliance with the notification requirements under the Town and Country Planning (General Permitted Development) Order 1995.
82. Part 3F of the council's Constitution entitled "Matters reserved for decision by the planning committee" at paragraph 3 reserves to Planning Committee any authorisations under Article 4 of the Town and Country Planning Permitted Development Order. This confirms Planning Committee has the authority to take the decisions being asked of it.
83. The Equality Act 2010 introduced the public sector equality duty, which merged existing race, sex and disability equality duties and extended them to include other protected characteristics; namely age, gender reassignment, pregnancy and maternity, religion and belief and sex and sexual orientation, including marriage and civil partnership. In summary those subject to the equality duty, which includes the council, must in the exercise of their functions: (i) have due regard to the need to eliminate unlawful discrimination, harassment and victimisation; and (ii) foster good relations between people who share a protected characteristic and those who do not. This report notes the conclusion in the equalities analysis that the Article 4 direction is anticipated to have a positive impact on equalities. The report should however be considered in full.
84. In addition, the Human Rights Act 1998 imposed a duty on the council as a public authority to apply the European Convention on Human Rights; as a result the council must not act in a way which is incompatible with these rights. The most important rights for planning purposes are Article 8 (respect for homes); Article 6 (natural justice) and Article 1 of the First Protocol (peaceful enjoyment of property). It is important to note that few rights are absolute in the sense that they cannot be interfered with under any circumstances. 'Qualified' rights, including Article 8 and the First Protocol, can be interfered with or limited in certain circumstances. The extent of legitimate interference is subject to the principle of proportionality whereby a balance must be struck between the legitimate aims to be achieved by a local planning authority in the policy making process against the potential interference with individual human rights. In this case it is considered proportionate to remove permitted development rights in order to protect the buffer zone to Southwark's Ancient Woodland.

Strategic Director of Resources

85. This report is requesting the planning committee to authorise confirmation of

the Article 4(1) direction (Appendix A) to withdraw the permitted development rights for development granted by the General Permitted Development Order 2015 (as amended). Full details and background is provided within the main body of the report.

86. This report is also requesting the planning committee to note the equalities impact and needs analysis of the proposed Article 4(1) direction (Appendix D).
87. The strategic director of resources notes that the Article 4 direction may lead to potential compensation claims but it is not possible to gauge the magnitude of such claims. It is noted that any claim for compensation will be dealt through the council's official complaints procedure and sanctioned by the relevant cabinet member under the council's constitution as reflected in the report.
88. It is also noted that any agreed claims for compensation would be contained within the existing departmental revenue budgets where possible before funding from council's reserves are requested.
89. Staffing and any other costs connected with this recommendation to be contained within existing departmental revenue budgets.

Other officers

90. The Planning Policy Team and the Borough Ecologist have provided guidance throughout the drafting of this report.

CONCLUSION

91. For the reasons set out within the body of this report, it is hereby recommended that an Article 4(1) direction preventing certain permitted development rights, as outlined; be confirmed, unamended.

BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
Southwark Local Development Framework and Development Plan Documents	Planning and Growth 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 0254 Council website: www.southwark.gov.uk

APPENDICES

No.	Title
Appendix A	Draft Article 4(1) Direction
Appendix B	Article 4 (1) Map
Appendix C	List of Premises and Stakeholders
Appendix D	Equalities Impact and Needs Analysis
Appendix E	Photos and Photomontages
Appendix F	Consultation Report

AUDIT TRAIL

Lead Officer	Stephen Platts, Director of Planning and Growth		
Report Author	Liam Bullen, Senior Planner – Urban Forester		
Version	Final		
Dated	27 January 2025		
Key Decision	Yes		
CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER			
Officer Title		Comments Sought	Comments included
Assistant Chief Executive – Governance and Assurance		Yes	Yes
Strategic Director, Resources		Yes	Yes
Date final report sent to Constitutional Team			28 January 2025



ARTICLE 4(1) DIRECTION

TOWN AND COUNTRY PLANNING (GENERAL PERMITTED DEVELOPMENT) (ENGLAND) ORDER 2015 (AS AMENDED)

DIRECTION WITHOUT IMMEDIATE EFFECT MADE UNDER ARTICLE 4(1) TO WHICH ARTICLE 6 APPLIES

WHEREAS the London Borough of Southwark ("the Council") being the appropriate local planning authority within the meaning of article 4(5) of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) ("the Order") is satisfied that it is expedient that development of the description set out in the Schedule below should not be carried out on the land shown edged red in the attached plan as it would constitute a threat to the amenities of the Council's area, unless planning permission is granted on an application made under Part III of the Town and Country Planning Act 1990 (as amended).

NOW THEREFORE the Council in pursuance of the power conferred on it by article 4(1) of the Order hereby directs that the permission granted by article 3 of the Order shall not apply on the said land to development of the description set out in the Schedule below:

In respect of Non-Domestic Premises:

SCHEDULE A

PART 4 Temporary buildings and uses

Class A – temporary buildings and structures

Development consisting of the provision on land of buildings, moveable structures, works, plant or machinery required temporarily in connection with and for the duration of operations being or to be carried out on, in, under or over that land or on land adjoining that land.

PART 6 Agricultural and Forestry

Class E – forestry developments

Development comprising the carrying out on land used for the purposes of forestry, including afforestation, of development reasonably necessary for those purposes consisting of—

- (a) works for the erection, extension or alteration of a building;
- (b) the formation, alteration or maintenance of private ways;
- (c) operations on that land, or on land held or occupied with that land, to obtain the materials required for the formation, alteration or maintenance of such ways;
- (d) other operations (not including engineering or mining operations).

PART 9 Development relating to roads

Class A – development by highways authorities

The carrying out by a highway authority—

- (b) *on land outside but adjoining the boundary of an existing highway of works required for or incidental to the maintenance or improvement of the highway.*

Development comprising of any works required for the maintenance or improvement of the road but which are outside of the boundaries of the road.

PART 14 Renewable energy

Class L – installation or alteration etc of ground source heat pump on non-domestic premises

Development comprising the installation of ground source heat pumps, and, in particular; horizontal, pond/lake and open loop systems.

PART 18 Miscellaneous development

Class A – development under local or private Acts or Order

Development authorised by—

- (a) *a local or private Act of Parliament,*
- (b) *an order approved by both Houses of Parliament*

Development related to rights under acts of parliament and similar to undertake certain works and to Local Development Orders.

In respect of Domestic Premises:

SCHEDULE B

PART 1 Development within the curtilage of a dwellinghouse

Class A – enlargement, improvement or other alteration of a dwellinghouse

Development consisting of the enlargement, improvement or other alteration of a house.

Class E – buildings etc incidental to the enjoyment of a dwellinghouse

Development within the curtilage of a house for the construction of: (a) any building or enclosure, swimming or other pool required for a purpose incidental to the enjoyment of the dwellinghouse as such, or the maintenance, improvement or other alteration of such a building or enclosure; or (b) a container used for domestic heating purposes for the storage of oil or liquid petroleum gas.

Class F – hard surfaces incidental to the enjoyment of a dwellinghouse

Development within the curtilage of a house for - (a) the provision of a hard surface for any purpose incidental to the enjoyment of the dwellinghouse as such or (b) the replacement in whole or in part of such a surface.

PART 2 Minor operations

Class A – gates, fences, walls etc

Development consisting of the erection, construction, maintenance, improvement or alteration of a gate, fence, wall or other means of enclosure.

PART 4 Temporary buildings and uses

Class A – temporary buildings and structures

Development consisting of the provision on land of buildings, moveable structures, works, plant or machinery required temporarily in connection with and for the duration of operations being or to be carried out on, in, under or over that land or on land adjoining that land.

PART 14 Renewable energy

Class C – installation or alteration etc of ground source heat pumps on domestic premises

Development comprising the installation of ground source heat pumps, and, in particular; horizontal, pond/lake and open loop systems.

THIS DIRECTION is made under article 4(1) of the said Order and, in accordance with paragraph 1 (4)(e) of Schedule 3 of the Order, shall come into force on 30th January 2025.

1. Made under the Common Seal
of the London Borough of Southwark
this 27 day of November 2024

The Common Seal of the Mayor and
Burgesses of the London Borough of
Southwark was hereto affixed in the
Presence of

J Hopkinson

Joy Hopkinson 28 Nov 2024 12:51:59 GMT (UTC +0)

.....
Authorised Signatory



Seal ID: 29581

2. Confirmed under the Common Seal
of the London Borough of Southwark
this XXX day of XXX 202_

The Common Seal of the Mayor and
Burgesses of the London Borough of
Southwark was hereto affixed in the
Presence of

.....
Authorised Signatory

SCHEDULE 1

List of properties

Sub Area 1: Non-Domestic

Dulwich Estate

London Wildlife Trust

Dulwich and Sydenham Golf Club, Grange Lane London SE21 7LH

Grange Lane Allotments: Grange Lane, London SE21 7LH

Gunsite Allotments: Grange Lane, London SE21 7LH

Sub Area 2: Domestic (28 properties)

COTTAGE, 1 CRESCENT WOOD ROAD LONDON SE26 6RT

GARDEN FLAT, 1 CRESCENT WOOD ROAD LONDON SE26 6RT

FLAT 1, 1 CRESCENT WOOD ROAD LONDON SE26 6RT

FLAT 2, 1 CRESCENT WOOD ROAD LONDON SE26 6RT

FLAT 3, 1 CRESCENT WOOD ROAD LONDON SE26 6RT

FLAT 1, 3 CRESCENT WOOD ROAD LONDON SE26 6RT

FLAT 2, 3 CRESCENT WOOD ROAD LONDON SE26 6RT

FLAT 3, 3 CRESCENT WOOD ROAD LONDON SE26 6RT

THE COTTAGE 3A CRESCENT WOOD ROAD LONDON SE26 6RT

FLAT 4, 3 CRESCENT WOOD ROAD LONDON SE26 6RT

25 Great Brownings London SE21 7HP

26 Great Brownings London SE21 7HP

27 Great Brownings London SE21 7HP

28 Great Brownings London SE21 7HP

29 Great Brownings London SE21 7HP

30 Great Brownings London SE21 7HP

31 Great Brownings London SE21 7HP

32 Great Brownings London SE21 7HP

33 Great Brownings London SE21 7HP

34 Great Brownings London SE21 7HP

35 Great Brownings London SE21 7HP
36 Great Brownings London SE21 7HP
37 Great Brownings London SE21 7HP
38 Great Brownings London SE21 7HP
39 Great Brownings London SE21 7HP
40 Great Brownings London SE21 7HP
41 Great Brownings London SE21 7HP
42 Great Brownings London SE21 7HP

Sub Area 3: Domestic (10 properties)

109 College Road London SE21 7HN
111 College Road London SE21 7HN
21 Woodhall Drive London SE21 7HJ
23 Woodhall Drive London SE21 7HJ
25 Woodhall Drive London SE21 7HJ
27 Woodhall Drive London SE21 7HJ
29 Woodhall Drive London SE21 7HJ
31 Woodhall Drive London SE21 7HJ
33 Woodhall Drive London SE21 7HJ
35 Woodhall Drive London SE21 7HJ

SCHEDULE 2

Individual Site Maps

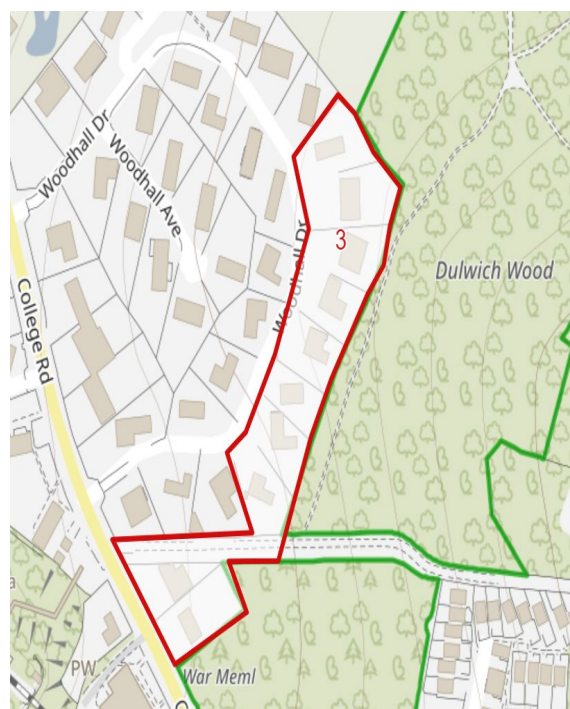
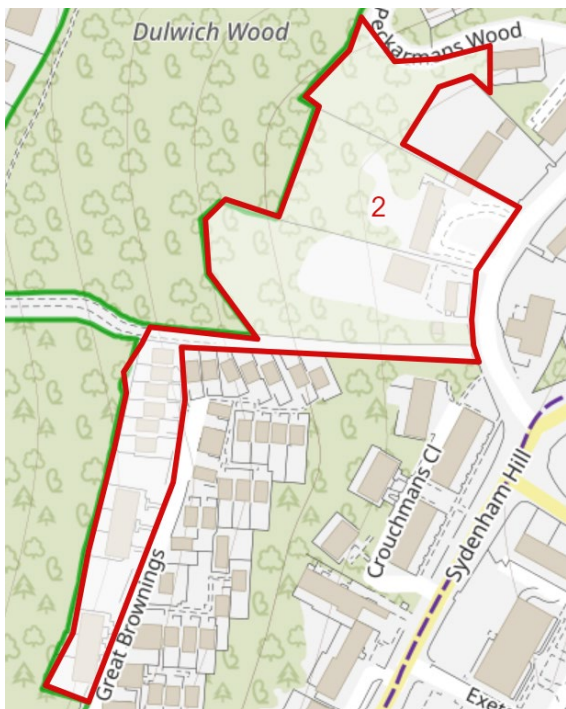
Article 4 (1) Map

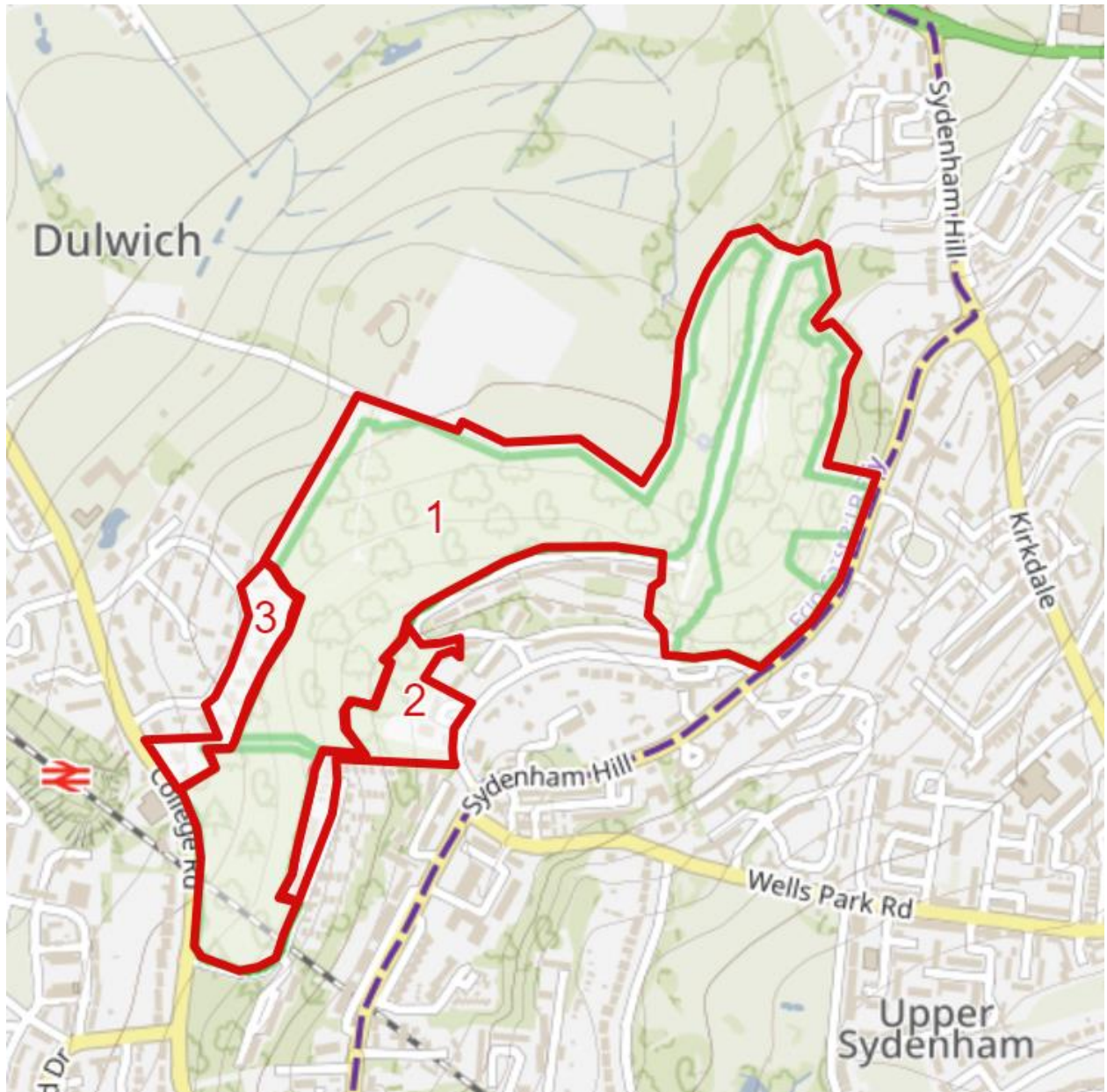
Sub Area 1



Sub Area 2

Sub Area 3



Article 4 (1) Map: Great North Wood

List of Premises and Stakeholders

Private and Domestic

Sub Area 1: Non-Domestic

Dulwich Estate

London Wildlife Trust

Dulwich and Sydenham Golf Club, Grange Lane London SE21 7LH

Grange Lane Allotments: Grange Lane, London SE21 7LH

Gunsite Allotments: Grange Lane, London SE21 7LH

South London Scout Centre, Grange Lane, London SE21 7LH

Sub Area 2: Domestic (28 properties)

COTTAGE, 1 CRESCENT WOOD ROAD LONDON SE26 6RT

GARDEN FLAT, 1 CRESCENT WOOD ROAD LONDON SE26 6RT

FLAT 1, 1 CRESCENT WOOD ROAD LONDON SE26 6RT

FLAT 2, 1 CRESCENT WOOD ROAD LONDON SE26 6RT

FLAT 3, 1 CRESCENT WOOD ROAD LONDON SE26 6RT

FLAT 1, 3 CRESCENT WOOD ROAD LONDON SE26 6RT

FLAT 2, 3 CRESCENT WOOD ROAD LONDON SE26 6RT

FLAT 3, 3 CRESCENT WOOD ROAD LONDON SE26 6RT

THE COTTAGE 3A CRESCENT WOOD ROAD LONDON SE26 6RT

FLAT 4, 3 CRESCENT WOOD ROAD LONDON SE26 6RT

25 Great Brownings London SE21 7HP

26 Great Brownings London SE21 7HP

27 Great Brownings London SE21 7HP

28 Great Brownings London SE21 7HP

29 Great Brownings London SE21 7HP

30 Great Brownings London SE21 7HP

31 Great Brownings London SE21 7HP

32 Great Brownings London SE21 7HP

33 Great Brownings London SE21 7HP

34 Great Brownings London SE21 7HP
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42 Great Brownings London SE21 7HP

Sub Area 3: Domestic (10 properties)

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27 Woodhall Drive London SE21 7HJ
29 Woodhall Drive London SE21 7HJ
31 Woodhall Drive London SE21 7HJ
33 Woodhall Drive London SE21 7HJ
35 Woodhall Drive London SE21 7HJ



Equality Impact and Needs Analysis

Article 4 Direction: The Great North Wood

Section 1: Equality impact and needs analysis details

Proposed policy/decision/business plan to which this equality analysis relates	Article 4 Direction for the removal of permitted development rights
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Equality analysis author		Liam Bullen			
Strategic Director:		Clive Palfreyman			
Department		Finance	Division	Planning and Growth	
Period analysis undertaken		24 July 2024 to 31 July 2024			
Date of review (if applicable)		July 2025			
Sign-off	S. Naveenan	Position	Equalities and Inclusion Lead Officer	Date	19.09.2024

Section 2: Brief description of policy/decision/business plan

1.1 Brief description of policy/decision/business plan

The Council proposes an immediate Article 4 Direction in respect of withdrawing Permitted Development Rights for operations within part of the Dulwich Wood conservation area, within or adjacent to Ancient Woodland.

The area affected by the proposed Article 4 Directive includes domestic and non-domestic premises immediately adjacent to the extent of Ancient Woodland, within Dulwich Wood Ward; as identified by Natural England. These have been split into sub areas.

Permitted development rights allow householders to undertake a broad range of works to improve, extend and alter their homes without the need to submit a planning application. The rights are subject to limitations and conditions to control impacts and protect local amenity. Similarly certain rights have been extended to non-domestic premises. Permitted development rights are set out in Schedule 2 of the General Permitted Development Order 2015 (as amended).

Officers consider The Great North Wood, comprising Sydenham Hill Woods and Dulwich Wood to constitute irreplaceable habitat which makes a significant contribution to the historic interest and visual impact of the area.

The use of an Article 4 direction would not restrict development altogether, but instead ensure that development proposals in and adjacent to Ancient Woodland would actively form a material consideration in determining the planning application.

Section 3: Overview of service users and key stakeholders consulted

2. Service users and stakeholders	
Key users of the department or service	<p>Externally, the key users of the Direction will be Dulwich Wood residents and businesses or individuals applying for planning permission. Other users may include planning agents, architects or those employed to manage development in the vicinity of the Woodland.</p> <p>Internally, the Direction will be used by planning officers to assess planning applications.</p>
Key stakeholders involved in this policy/decision/business plan	<p>The Direction was prepared and developed by the planning division, with input from planning policy and development management officers as well as other Council departments.</p> <p>The Direction has been reviewed by the Cabinet member for New Homes and Sustainable Development and will be taken to Planning Committee A (Majors) on the 8th October 2024 to agree the Direction for public consultation.</p> <p>Members of the public will be able to give comments on the Direction at the consultation stage.</p> <p>On the same day that notice is given under the above, the council refers its decision to the Secretary of State who has wide powers to modify or cancel a Direction.</p>

Section 4: Pre-implementation equality impact and needs analysis

This section considers the potential impacts (positive and negative) on groups with 'protected characteristics', the equality information on which this analysis is based and any mitigating actions to be taken, including improvement actions to promote equality and tackle inequalities. An equality analysis also presents as an opportunity to improve services to meet diverse needs, promote equality, tackle inequalities and promote good community relations. It is not just about addressing negative impacts.

The columns include societal issues (discrimination, exclusion, needs etc.) and socio-economic issues (levels of poverty, employment, income). As the two aspects are heavily interrelated it may not be practical to fill out both columns on all protected characteristics. The aim is, however, to ensure that socio-economic issues are given special consideration, as it is the council's intention to reduce socio-economic inequalities in the borough. Key is also the link between protected characteristics and socio-economic disadvantage, including experiences of multiple disadvantages.

Socio-economic disadvantage may arise from a range of factors, including:

- poverty
- health
- education
- limited social mobility
- housing
- a lack of expectations
- discrimination
- multiple disadvantage

The public sector equality duty (PSED) requires us to find out about and give due consideration to the needs of different protected characteristics in relation to the three parts of the duty:

1. Eliminating discrimination, harassment and victimisation
2. Advancing equality of opportunity, including finding out about and meeting diverse needs of our local communities, addressing disadvantage and barriers to equal access; enabling all voices to be heard in our engagement and consultation undertaken; increasing the participation of under-represented groups
3. Fostering good community relations; promoting good relations; to be a borough where all feel welcome, included, valued, safe and respected.

The PSED is now also further reinforced in the two additional Fairer Future for All values that we will:

- Always work to make Southwark more equal and just
- Stand against all forms of discrimination and racism

Age Where this is referred to, it refers to a person belonging to a particular age (e.g. 32 year olds) or range of ages (e.g. 18 - 30 year olds).	
Potential impacts (positive and negative) of proposed policy/decision/business plan; this also includes needs in relation to each part of the duty.	Potential Socio-Economic impacts/needs/issues arising from socio-economic disadvantage (positive and negative)
<p>The Great North Wood consists of several ancient woodland fragments, including Dulwich & Sydenham Hill Woods and Biggin Wood, as well as recent woodland that has developed on cleared land such as on One Tree Hill and New Cross Gate Cutting. The woodland habitat of the Great North Wood stands within a wider network of greenspaces including allotments, cemeteries, gardens, parks, nature reserves, and playing fields.</p> <p>The Woodland benefits residents of all ages in the borough. It may also have a particular benefit for younger children.</p> <p>Time spent outside and in contact with nature is demonstrated to bring numerous and profound long-term benefits for younger children.</p>	<p>This could be of socio-economic benefit to young children living in areas of deprivation.</p> <p>This is because young children living in areas of deprivation are less likely to live in an area with access to green space.</p>
<p>The categorisation of land as an ancient woodland does not itself provide any statutory protection. However, some features in ancient woods are protected and sites can also be designated for their wildlife value.</p> <p>Development, including construction and operational activities can affect ancient woodland, ancient and veteran trees, and the wildlife they support on the site or nearby.</p> <p>Under the current GPDO, potentially damaging operations could be undertaken with direct or indirect impacts to, and the loss of,</p>	<p>No positive or negative socio-economic impact applicable.</p> <p>The use of an Article 4 direction would not restrict development altogether, but instead ensure that development proposals in and adjacent to Ancient Woodland would actively form a material consideration in determining the planning application.</p>

<p>irreplaceable habitat; prior to the submission of or during the processing of a planning application. As such, operations could be undertaken without any consideration of local natural heritage value and standing advice from Natural England. The Article 4(1) direction seeks to avoid this.</p> <p>This will help to mitigate against unacceptable or harmful development. This will also protect heritage assets within the borough and the townscape and visual amenity of local areas.</p> <p>This will benefit residents of all ages in the borough.</p>	
<p>The Article 4(1) Direction will remove the following permitted development rights</p> <p><u>PART 1 Development within the curtilage of a dwellinghouse</u></p> <p>Class A – enlargement, improvement or other alteration of a dwellinghouse</p> <p>Class E – buildings etc incidental to the enjoyment of a dwellinghouse</p> <p>Class F – hard surfaces incidental to the enjoyment of a dwellinghouse</p> <p>Outdoor mobility is crucial for promoting active aging among seniors. Engaging in regular physical activity has numerous health benefits, including improved cardiovascular health, increased flexibility, and enhanced cognitive function. Opportunities to stay active outdoors, enhances independence and can contribute towards a higher quality of life.</p> <p>Older residents may need to adapt their homes to meet accessibility requirements and address mobility impairments.</p> <p>Access requirements relating to mobility needs would be considered wholly exceptional grounds and so likely to be acceptable, subject to mitigation.</p>	<p>No positive or negative socio-economic impact applicable.</p>

<p><u>PART 2 Minor operations</u> Class A – gates, fences, walls etc</p> <p>The use of an Article 4 direction would not restrict development altogether, but instead ensure that development proposals in and adjacent to Ancient Woodland would actively form a material consideration in determining the planning application.</p>	<p>No positive or negative socio-economic impact applicable.</p>
<p><u>PART 4 Temporary buildings and uses</u> Class A – temporary buildings and structures</p> <p>The use of an Article 4 direction would not restrict development altogether, but instead ensure that development proposals in and adjacent to Ancient Woodland would actively form a material consideration in determining the planning application.</p>	<p>No positive or negative socio-economic impact applicable.</p>
<p><u>PART 14 Renewable energy</u> Class B - installation or alteration etc of stand-alone solar equipment on domestic premises** Class C – installation or alteration etc of ground source heat pumps on domestic premises</p>	

<p>Class G – installation or alteration etc of air source heat pumps on domestic premises</p> <p>Older adults and young children are more vulnerable to the harmful effects of cold weather. Households with over-60s are also most likely to live with an excess cold hazard.</p> <p>The use of an Article 4 direction would not restrict development altogether, but instead ensure that development proposals in and adjacent to Ancient Woodland would actively form a material consideration in determining the planning application.</p>	
Equality information on which above analysis is based	Socio-economic data on which above analysis is based
<p>General data The median age in Southwark is 33, which is below that of London as a whole (35). (Source: How life has changed in Southwark: Census 2021 (ons.gov.uk)).</p> <p>Southwark has an ageing population. Between 2011 and 2021, the proportion of Southwark residents aged 0-9 fell from 12.6% to 10.5%, while the proportion aged 50 and over rose from 20.4% to 24.7%. (Source: How life has changed in Southwark: Census 2021 (ons.gov.uk)).</p> <p>A 79% increase in the population of Southwark aged 65 or more is forecast by 2039. This incorporates a 92% increase in those over 75 and 87% growth in those over 85. (Source: Strategic Housing Market Assessment Update 2019 (Source: Housing - Southwark Council)).</p> <p>Dulwich Wood Ward. (Source: ONS – Office for National Statistics. Census 2021).</p>	<p>In 2021/22 approximately 23,000 children aged 0-15 in Southwark were living in poverty, after housing costs were factored in, equating to 36% of children in the borough. This is higher than the London average of 33%. (Source: JSNA Annual Report - Southwark Council).</p> <p>Council wards with the highest proportions of child poverty (22-28%) include Old Kent Road, Faraday, North Walworth, Chaucer, and Borough and Bankside. Faraday ranks as the most deprived ward in Southwark. These areas overlap with the Old Kent Road, Elephant and Castle, and London Bridge/Bankside Opportunity Areas. (JSNA Annual Report 2023; JSNA Multiward Profiles 2023: West Central Southwark)</p>

<p>Energy efficiency Older people are more vulnerable to the harmful effects of cold weather. This is because they are more likely to have long-term health conditions that cold weather may exacerbate, and they have weaker immune systems which may be worsened by cold weather. Older adults are less likely to be aware that they are becoming too cold, so are more likely to suffer hypothermia and related conditions.</p> <p>In addition, older people and children are less able to adapt their behaviour in cold weather, for instance due to reduced mobility. (Sources: Supporting vulnerable people before and during cold weather: for adult social care managers - GOV.UK (www.gov.uk)).</p> <p>The English Housing Survey found that households with over-60s are most likely to live with an excess cold hazard. Around</p> <p>4.2% of households where the oldest person was aged 60 or over lived with an excess cold hazard, compared with 1.8% of households where the oldest person was aged under 60. (Source: Health inequalities: Cold or damp homes - House of Commons Library (parliament.uk)).</p>	<p>There is strong evidence linking poverty to heightened vulnerability to cold weather. This relates to poor quality homes and fuel poverty. (Source: Supporting vulnerable people before and during cold weather: for adult social care managers - GOV.UK (www.gov.uk)).</p> <p>People with chronic obstructive pulmonary disease are more likely to live in poverty. (Source: Estimating the number of people with cardiovascular or respiratory conditions living in poverty, England - Office for National Statistics).</p> <p>Nationally, households where the age of the oldest member is between 16 and 24 have the highest likelihood of being in fuel poverty (25%). No other adult age group exceeds 15%. (Source: Annual fuel poverty statistics in England, 2024 (2023 data) (publishing.service.gov.uk)).</p>
<p>Mitigating and/or improvement actions to be taken</p>	
<p>The use of an Article 4 direction would not restrict development altogether, but instead ensure that development proposals in and adjacent to Ancient Woodland would actively form a material consideration in determining the planning application.</p>	<p>Generally, greenspaces express a positive impact for those experiencing socio-economic disadvantage, as this EINA demonstrates that those experiencing socio-economic disadvantage are less likely to have access to green spaces in immediate vicinity.</p>

<p>Disability - A person has a disability if s/he has a physical or mental impairment which has a substantial and long-term adverse effect on that person's ability to carry out normal day-to-day activities. Please note that under the PSED due regard includes:</p> <p><i>"the steps involved in meeting the needs of disabled persons that are different from the needs of persons who are not disabled include, in particular, steps to take account of disabled persons' disabilities."</i></p> <p>This also includes the need to understand and focus on different needs/impacts arising from different disabilities</p>	
<p>Potential impacts (positive and negative) of proposed policy/decision/business plan; this also includes needs in relation to each part of the duty.</p>	<p>Potential socio-economic impacts/ needs/issues arising from socio-economic disadvantage (positive and negative)</p>
<p>For people with disabilities living on their own, or who may be socially isolated in other ways, greenspaces can provide opportunities to spend time with friends and family, with the associated wellbeing benefits of social interaction.</p> <p>The Article 4(1) Direction will help to mitigate against unacceptable or harmful development. This will also protect heritage assets within the borough and the townscape and visual amenity of local areas.</p> <p>This will benefit residents in the Borough including those with disabilities.</p>	<p>This could be of socio-economic benefit to people with disabilities.</p> <p>This is because there is a strong correlation between people who are most at risk of poor health being more likely to live in the most deprived environments, which also tend to have fewer and poorer quality local greenspace.</p>
<p>The Article 4(1) Direction will remove the following permitted development rights</p> <p><u>PART 1 Development within the curtilage of a dwellinghouse</u></p> <p>Class A – enlargement, improvement or other alteration of a dwellinghouse</p> <p>Class E – buildings etc incidental to the enjoyment of a dwellinghouse</p> <p>Class F – hard surfaces incidental to the enjoyment of a dwellinghouse</p> <p>Engaging in regular physical activity has numerous health benefits, including improved cardiovascular health, increased flexibility, and enhanced cognitive function. Opportunities to stay active outdoors, enhances independence and can contribute towards a higher quality of life.</p>	<p>No positive or negative socio-economic impact applicable.</p>

<p>Disabled residents may need to adapt their homes to meet accessibility requirements and address mobility impairments.</p> <p>Access requirements relating to mobility needs would be considered wholly exceptional grounds and so likely to be acceptable, subject to mitigation.</p> <p>The use of an Article 4 direction would not restrict development altogether, but instead ensure that development proposals in and adjacent to Ancient Woodland would actively form a material consideration in determining the planning application.</p>	
<p><u>PART 2 Minor operations</u> Class A – gates, fences, walls etc</p> <p>The use of an Article 4 direction would not restrict development altogether, but instead ensure that development proposals in and adjacent to Ancient Woodland would actively form a material consideration in determining the planning application.</p>	<p>No positive or negative socio-economic impact applicable.</p>
<p><u>PART 4 Temporary buildings and uses</u> Class A – temporary buildings and structures</p> <p>The use of an Article 4 direction would not restrict development altogether, but instead ensure that development proposals in and adjacent to Ancient Woodland would actively form a material consideration in determining the planning application.</p>	<p>No positive or negative socio-economic impact applicable.</p>
<p><u>PART 14 Renewable energy</u> Class B - installation or alteration etc of stand-alone solar equipment on domestic premises** Class C – installation or alteration etc of ground source heat pumps on domestic premises Class G – installation or alteration etc of air source heat pumps on domestic premises</p> <p>The use of an Article 4 direction would not restrict development altogether, but instead ensure that development proposals in and adjacent to Ancient Woodland would actively</p>	<p>Poverty and disability are both risk factors with regard to the harmful effects of cold weather. There is further a known link between disability and poverty.</p> <p>Disabled people are also more likely than non-disabled people to struggle to afford their energy bills.</p>

form a material consideration in determining the planning application.	
Equality information on which above analysis is based	Socio-economic data on which above analysis is based
<p>General data In 2021, 8.2% of Southwark residents identified as being disabled and limited a lot. This was a decrease from 11.1% in 2011. Almost a quarter of households (33,000) had at least one resident with a disability. (Source: How life has changed in Southwark: Census 2021 (ons.gov.uk)).</p> <p>The neighbourhoods with higher proportions of disability are Old Kent Road, South Bermondsey and Nunhead & Queen's Road. (Source: Census 2021, quoted in JSNA Annual Report - Southwark Council).</p>	<p>In the 3 years to 2021/22, 33% of families in London that included a disabled person were in poverty compared to 22% of those without a disabled household member. (Source: Nearly half of everyone in poverty is either a disabled person or lives with a disabled person Disability Rights UK</p>
<p>There is quantitative evidence that people with disabilities or long-term illness are more likely to be have infrequent contact with greenspace. (Source: Improving access to greenspace: 2020 review (publishing.service.gov.uk)).</p> <p>People living with disabilities are a cross-section of the wider UK population, so in general have similar range of preferences and values in terms of their engagement with nature, though with sometimes different methods and support needs for spending time outdoors.</p> <p>Findings from some studies have emphasised the holistic, restorative and pleasurable benefits of natural surroundings, and the importance of recognising that being outdoors is not just about physical fitness or physiotherapy, but about diverse ways of experiencing time in the open - an interest in nature or just wanting a break from a busy life. (Source: Included outside: Engaging people living with disabilities in nature (TIN182))</p> <p>Studies show that access to greenspace can be particularly beneficial for people experiencing mental health issues such as depression, anxiety, and dementia. (Source:</p>	<p>Nationally, people on low incomes are less likely to live within a 5-minute walk of a green space (46% of those with an annual household income under £15,000 compared to 70% of people with an annual household income over £35,000), and less likely to live somewhere where the streets are green (27% compared to 53%). (Source: Out of Bounds - Equity in Access to Urban Nature (Published by Groundwork UK)).</p> <p>The most deprived communities are more than twice as likely to live in areas with a low amount of natural space per person. (Source: Huge nature access gap must be bridged to meet Government's 15-minute nature promise (wcl.org.uk)).</p>

<p>The importance of greenspace for mental health - PMC (nih.gov), Green spaces do wonders for your mental health - Oxford Health NHS Foundation Trust).</p>	
<p>Energy efficiency There is strong evidence linking a range of health conditions to vulnerability to cold weather. These include cardiovascular conditions, and respiratory conditions such as chronic obstructive pulmonary disease and childhood asthma. Exposure to cold can increase the risk of blood clots forming in the body (in turn increasing the risk of heart attacks and strokes), increase susceptibility to chest infections, worsen breathing problems, and increase the risk of falls. (Source: Supporting vulnerable people before and during cold weather: healthcare professionals - GOV.UK (www.gov.uk)).</p>	<p>There is strong evidence linking poverty to heightened vulnerability to cold weather. This relates to poor quality homes and fuel poverty. (Source: Supporting vulnerable people before and during cold weather: for adult social care managers - GOV.UK (www.gov.uk).)</p> <p>According to ONS data from 2022, 55% of disabled adults in the UK reported finding it difficult to afford their energy bills. This compares with 40% of non-disabled people. (Source: Impact of increased cost of living on adults across Great Britain - Office for National Statistics (ons.gov.uk)). People with chronic obstructive pulmonary disease are more likely to live in poverty. (Source: Estimating the number of people with cardiovascular or respiratory conditions living in poverty, England - Office for National Statistics).</p>
<p>Mitigating and/or improvement actions to be taken</p>	
<p>The use of an Article 4 direction would not restrict development altogether, but instead ensure that development proposals in and adjacent to Ancient Woodland would actively form a material consideration in determining the planning application.</p>	<p>Generally, greenspaces express a positive impact for those experiencing socio-economic disadvantage, as this EINA demonstrates that those experiencing socio-economic disadvantage are less likely to have access to green spaces in immediate vicinity.</p>

<p>Gender reassignment - The process of transitioning from one gender to another.</p> <p>Gender Identity - Gender identity is the personal sense of one's own gender. Gender identity can correlate with a person's assigned sex or can differ from it.</p>	
<p>Potential impacts (positive and negative) of proposed policy/decision/business plan; this also includes needs in relation to each part of the duty.</p>	<p>Potential socio-economic impacts/ needs/issues arising from socio-economic disadvantage (positive and negative)</p>
<p>Greenspaces can provide opportunities to spend time with friends and family, with the associated wellbeing benefits of social interaction.</p> <p>The Article 4(1) Direction will help to mitigate against unacceptable or harmful development. This will also protect heritage assets within the borough and the townscape and visual amenity of local areas.</p> <p>This will benefit all residents in the borough, including those of all gender identities.</p>	<p>No positive or negative socio-economic impact applicable.</p> <p>The use of an Article 4 direction would not restrict development altogether, but instead ensure that development proposals in and adjacent to Ancient Woodland would actively form a material consideration in determining the planning application.</p>
<p>The Article 4(1) Direction will remove the following permitted development rights</p> <p><u>PART 1 Development within the curtilage of a dwellinghouse</u></p> <p>Class A – enlargement, improvement or other alteration of a dwellinghouse</p> <p>Class E – buildings etc incidental to the enjoyment of a dwellinghouse</p> <p>Class F – hard surfaces incidental to the enjoyment of a dwellinghouse</p> <p>The use of an Article 4 direction would not restrict development altogether, but instead ensure that development proposals in and adjacent to Ancient Woodland would actively form a material consideration in determining the planning application.</p>	<p>No positive or negative socio-economic impact applicable.</p>

<p><u>PART 2 Minor operations</u> Class A – gates, fences, walls etc</p> <p>The use of an Article 4 direction would not restrict development altogether, but instead ensure that development proposals in and adjacent to Ancient Woodland would actively form a material consideration in determining the planning application.</p>	<p>No positive or negative socio-economic impact applicable.</p>
<p><u>PART 4 Temporary buildings and uses</u> Class A – temporary buildings and structures</p> <p>The use of an Article 4 direction would not restrict development altogether, but instead ensure that development proposals in and adjacent to Ancient Woodland would actively form a material consideration in determining the planning application.</p>	<p>No positive or negative socio-economic impact applicable.</p>
<p><u>PART 14 Renewable energy</u> Class B - installation or alteration etc of stand-alone solar equipment on domestic premises** Class C – installation or alteration etc of ground source heat pumps on domestic premises Class G – installation or alteration etc of air source heat pumps on domestic premises</p> <p>The use of an Article 4 direction would not restrict development altogether, but instead ensure that development proposals in and adjacent to Ancient Woodland would actively form a material consideration in determining the planning application.</p>	<p>No positive or negative socio-economic impact applicable.</p>
<p>Equality information on which above analysis is based.</p>	<p>Socio-economic data on which above analysis is based</p>
<p>General data 1.23% of people aged 16 years and over in Southwark have a gender identity different from their sex registered at birth. (Census 2021)</p>	<p>No positive or negative socio-economic impact applicable.</p>

Mitigating and/or improvement actions to be taken	
<p>The use of an Article 4 direction would not restrict development altogether, but instead ensure that development proposals in and adjacent to Ancient Woodland would actively form a material consideration in determining the planning application.</p>	<p>Generally, greenspaces express a positive impact for those experiencing socio-economic disadvantage, as this EINA demonstrates that those experiencing socio-economic disadvantage are less likely to have access to green spaces in immediate vicinity.</p>

<p>Marriage and civil partnership – In England and Wales marriage is no longer restricted to a union between a man and a woman but now includes a marriage between a same-sex couples. Same-sex couples can also have their relationships legally recognised as 'civil partnerships'. Civil partners must not be treated less favourably than married couples and must be treated the same as married couples on a wide range of legal matters. (Only to be considered in respect to the need to eliminate discrimination.)</p>	
<p>Potential impacts (positive and negative) of proposed policy/decision/business plan</p>	<p>Potential socio-economic impacts/ needs/issues arising from socio-economic disadvantage (positive and negative)</p>
<p>Greenspaces can provide opportunities to spend time with friends and family, with the associated wellbeing benefits of social interaction.</p> <p>The Article 4(1) Direction will help to mitigate against unacceptable or harmful development. This will also protect heritage assets within the borough and the townscape and visual amenity of local areas.</p> <p>This will benefit all residents in the borough, including those of all marital statuses.</p>	<p>No positive or negative socio-economic impact applicable.</p> <p>The use of an Article 4 direction would not restrict development altogether, but instead ensure that development proposals in and adjacent to Ancient Woodland would actively form a material consideration in determining the planning application.</p>
<p>The Article 4(1) Direction will remove the following permitted development rights</p> <p><u>PART 1 Development within the curtilage of a dwellinghouse</u> Class A – enlargement, improvement or other alteration of a dwellinghouse Class E – buildings etc incidental to the enjoyment of a dwellinghouse Class F – hard surfaces incidental to the enjoyment of a dwellinghouse</p> <p>The Council recognises that there may be a need for residents to improve, alter or extend their home.</p> <p>The use of an Article 4 direction would not restrict development altogether, but instead ensure that development proposals in and adjacent to Ancient Woodland would actively</p>	<p>No positive or negative socio-economic impact applicable.</p>

<p>form a material consideration in determining the planning application.</p>	
<p><u>PART 2 Minor operations</u> Class A – gates, fences, walls etc</p> <p>The use of an Article 4 direction would not restrict development altogether, but instead ensure that development proposals in and adjacent to Ancient Woodland would actively form a material consideration in determining the planning application.</p>	<p>No positive or negative socio-economic impact applicable.</p>
<p><u>PART 4 Temporary buildings and uses</u> Class A – temporary buildings and structures</p> <p>The use of an Article 4 direction would not restrict development altogether, but instead ensure that development proposals in and adjacent to Ancient Woodland would actively form a material consideration in determining the planning application.</p>	<p>No positive or negative socio-economic impact applicable.</p>
<p><u>PART 14 Renewable energy</u> Class B - installation or alteration etc of stand-alone solar equipment on domestic premises** Class C – installation or alteration etc of ground source heat pumps on domestic premises Class G – installation or alteration etc of air source heat pumps on domestic premises</p> <p>The use of an Article 4 direction would not restrict development altogether, but instead ensure that development proposals in and adjacent to Ancient Woodland would actively form a material consideration in determining the planning application.</p>	<p>No positive or negative socio-economic impact applicable.</p>

Equality information on which above analysis is based	Socio-economic data on which above analysis is based
<p>General data</p> <p>The latest census found that 26.9% of Southwark residents were married or in a civil partnership. This was a fall from 29.4% in 2011. Southwark had the fourth-highest percentage of adults who had never been married or in a civil partnership of all English local authorities. (How life has changed in Southwark: Census 2021 (ons.gov.uk)).</p>	<p>No positive or negative socio-economic impact applicable.</p>
Mitigating or improvement actions to be taken	
<p>The use of an Article 4 direction would not restrict development altogether, but instead ensure that development proposals in and adjacent to Ancient Woodland would actively form a material consideration in determining the planning application.</p>	<p>Generally, greenspaces express a positive impact for those experiencing socio-economic disadvantage, as this EINA demonstrates that those experiencing socio-economic disadvantage are less likely to have access to green spaces in immediate vicinity.</p>

<p>Pregnancy and maternity - Pregnancy is the condition of being pregnant or expecting a baby. Maternity refers to the period after the birth and is linked to maternity leave in the employment context. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth, and this includes treating a woman unfavourably because she is breastfeeding.</p>	
<p>Potential impacts (positive and negative) of proposed policy/decision/business plan; this also includes needs in relation to each part of the duty.</p>	<p>Potential socio-economic impacts/ needs/issues arising from socio-economic disadvantage (positive and negative)</p>
<p>The Article 4(1) Direction will remove the following permitted development rights</p> <p><u>PART 1 Development within the curtilage of a dwellinghouse</u> Class A – enlargement, improvement or other alteration of a dwellinghouse Class E – buildings etc incidental to the enjoyment of a dwellinghouse Class F – hard surfaces incidental to the enjoyment of a dwellinghouse</p> <p>The Council recognises that there may be a need for residents to improve, alter or extend their home.</p> <p>The use of an Article 4 direction would not restrict development altogether, but instead ensure that development proposals in and adjacent to Ancient Woodland would actively form a material consideration in determining the planning application.</p>	<p>No positive or negative socio-economic impact applicable.</p>
<p><u>PART 2 Minor operations</u> Class A – gates, fences, walls etc</p> <p>The use of an Article 4 direction would not restrict development altogether, but instead ensure that development proposals in and adjacent to Ancient Woodland would actively form a material consideration in determining the planning application.</p>	<p>No positive or negative socio-economic impact applicable.</p>

<p><u>PART 4 Temporary buildings and uses</u> Class A – temporary buildings and structures</p> <p>The use of an Article 4 direction would not restrict development altogether, but instead ensure that development proposals in and adjacent to Ancient Woodland would actively form a material consideration in determining the planning application.</p>	<p>No positive or negative socio-economic impact applicable.</p>
<p><u>PART 14 Renewable energy</u> Class B - installation or alteration etc of stand-alone solar equipment on domestic premises** Class C – installation or alteration etc of ground source heat pumps on domestic premises Class G – installation or alteration etc of air source heat pumps on domestic premises</p> <p>The use of an Article 4 direction would not restrict development altogether, but instead ensure that development proposals in and adjacent to Ancient Woodland would actively form a material consideration in determining the planning application.</p>	<p>No positive or negative socio-economic impact applicable.</p>
<p>Equality information on which above analysis is based</p>	<p>Socio-economic data on which above analysis is based</p>
<p><u>General data</u> The total number of babies born in Southwark has been decreasing year on year over the past 10 years. The decline in the fertility rate in Southwark is seen across all age groups, but particularly among younger women. The average age of mothers giving birth in Southwark in 2022 was around 33 years. (Source: JSNA Annual Report - Southwark Council).</p>	<p>No positive or negative socio-economic impact applicable.</p>
<p>Mitigating and/or improvement actions to be taken</p>	
<p>The use of an Article 4 direction would not restrict development altogether, but instead ensure that development proposals in and adjacent to Ancient Woodland would actively form a material consideration in determining the planning application.</p>	<p>Generally, greenspaces express a positive impact for those experiencing socio-economic disadvantage, as this EINA demonstrates that those experiencing socio-economic disadvantage are less likely to</p>

	have access to green spaces in immediate vicinity.
<p>Race - Refers to the protected characteristic of Race. It refers to a group of people defined by their race, colour, and nationality (including citizenship) ethnic or national origins. N.B. Gypsy, Roma and Traveller are recognised racial groups and their needs should be considered alongside all others</p>	
<p>Potential impacts (positive and negative) of proposed policy/decision/business plan; this also includes needs in relation to each part of the duty.</p>	<p>Potential socio-economic impacts/ needs/issues arising from socio-economic disadvantage (positive and negative)</p>
<p>Greenspaces can provide opportunities to spend time with friends and family, with the associated wellbeing benefits of social interaction.</p> <p>One in eight households has no access to a private or shared garden and this is particularly likely to be true of people living in urban areas – 21% of Londoners do not have a garden. In England, Black people are nearly four times as likely as White people to have no access to outdoor space at home. Even comparing people of similar age, social grade and living situation, those of Black ethnicity are 2.4 times less likely than those of White ethnicity to have a private garden (Office for National Statistics, 2020). (Source: Copy of Access to urban green space (theaws.co.uk))</p> <p>The Article 4(1) Direction will help to mitigate against unacceptable or harmful development. This will also protect heritage assets within the borough and the townscape and visual amenity of local areas.</p> <p>This will benefit all residents in the borough, including those of all ethnicities.</p>	<p>No positive or negative socio-economic impact applicable.</p>
<p>The Article 4(1) Direction will remove the following permitted development rights</p> <p><u>PART 1 Development within the curtilage of a dwellinghouse</u></p> <p>Class A – enlargement, improvement or other alteration of a dwellinghouse</p>	<p>No positive or negative socio-economic impact applicable.</p>

<p>Class E – buildings etc incidental to the enjoyment of a dwellinghouse Class F – hard surfaces incidental to the enjoyment of a dwellinghouse The Council recognises that there may be a need for residents to improve, alter or extend their home.</p> <p>The use of an Article 4 direction would not restrict development altogether, but instead ensure that development proposals in and adjacent to Ancient Woodland would actively form a material consideration in determining the planning application.</p> <p>Overcrowding levels vary greatly between ethnic minorities and is above average for most. Black, Black British, Black Welsh, Caribbean or African households have the highest level of overcrowding.</p> <p>Those who speak English as a second language may find it challenging to understand the Direction.</p>	
<p><u>PART 2 Minor operations</u> Class A – gates, fences, walls etc</p> <p>The use of an Article 4 direction would not restrict development altogether, but instead ensure that development proposals in and adjacent to Ancient Woodland would actively form a material consideration in determining the planning application.</p>	<p>No positive or negative socio-economic impact applicable.</p>
<p><u>PART 4 Temporary buildings and uses</u> Class A – temporary buildings and structures</p> <p>The use of an Article 4 direction would not restrict development altogether, but instead ensure that development proposals in and adjacent to Ancient Woodland would actively form a material consideration in determining the planning application.</p>	<p>No positive or negative socio-economic impact applicable.</p>
<p><u>PART 14 Renewable energy</u> Class B - installation or alteration etc of stand-alone solar equipment on domestic premises**</p>	<p>No positive or negative socio-economic impact applicable.</p>

<p>Class C – installation or alteration etc of ground source heat pumps on domestic premises</p> <p>Class G – installation or alteration etc of air source heat pumps on domestic premises</p> <p>The use of an Article 4 direction would not restrict development altogether, but instead ensure that development proposals in and adjacent to Ancient Woodland would actively form a material consideration in determining the planning application.</p>	
Equality information on which above analysis is based	Socio-economic data on which above analysis is based
<p><u>General Data: Dulwich Wood Ward</u></p> <p>The main ethnic group is White British, representing 57% of the population. On average, 37% of the population in London belong to the White British ethnic group.</p> <p>The following ethnic groups have proportions higher than the average for the London:</p> <ul style="list-style-type: none"> • White British: 57% (London average: 37%) • Indian: 12% (London average: 7%) <p>Conversely, the following ethnic groups have a proportion lower than the average for London:</p> <ul style="list-style-type: none"> • Pakistani: 1.1% (London average: 3%) • Bangladeshi: 0% (London average: 4%) • Black African: 0.7% (London average: 8%) • Other Black: 0.4% (London average: 1.7%) • Other: 2.5% (London average: 5%) <p>(Source: ONS, National Census, 2021)</p>	<p>No positive or negative socio-economic impact applicable.</p>
<p><u>Languages</u></p> <p>244,000 (79%) Southwark residents reported their main language to be English. This is comparable to London, where 76% of residents recorded English as their main language, but lower than across England (88% of the population). Spanish is the most common main language other than English, spoken by 13,000 Southwark residents. 'All</p>	<p>No positive or negative socio-economic impact applicable.</p>

<p>other Chinese' is the most common Asian language, while Somali is the most spoken African language of Southwark residents. Of the 53,700 Southwark residents whose main language is not English, 10,200 (19%) cannot speak English well or have no English proficiency. (Source: Census 2021 Profile: Ethnicity, National Identity, Language and Religion – Southwark.gov.uk)</p>	
<p><u>Home ownership</u> The English Housing Survey 2017-2018 found that 68% of White British households owned their own home (outright or with a mortgage). The level of home ownership is lower among all other ethnic groups except Indian and Mixed White/Asian. The level of home ownership is lowest among Black African and Arab households (20% and 17% respectively). (Home ownership - GOV.UK Ethnicity facts and figures (ethnicity-facts-figures.service.gov.uk)).</p>	<p>Within London, owner occupiers with mortgages are significantly under-represented in the lower income quintiles. 76% of owner occupiers with a mortgage are in the top two fifths of the national household income distribution, while only 9% are in the bottom fifth. (Housing in London 2020).</p>
<p>Mitigating and/or improvement actions to be taken</p>	
<p>The use of an Article 4 direction would not restrict development altogether, but instead ensure that development proposals in and adjacent to Ancient Woodland would actively form a material consideration in determining the planning application.</p> <p>Those who speak English as a second language may find it challenging to understand the Direction.</p> <p>Of the 53,700 Southwark residents whose main language is not English, 10,200 (19%) cannot speak English well or have no English proficiency. (Census 2021 Profile: Ethnicity, National Identity, Language and Religion – Southwark.gov.uk)</p> <p>To mitigate this, the Council can translate the Direction into different languages upon request. The Direction has further adhered to Hemingway Plain English guidelines, where possible, to ensure the text is as accessible as practical.</p>	<p>Generally, greenspaces express a positive impact for those experiencing socio-economic disadvantage, as this EINA demonstrates that those experiencing socio-economic disadvantage are less likely to have access to green spaces in immediate vicinity.</p>

<p>Religion and belief - Religion has the meaning usually given to it but belief includes religious and philosophical beliefs including lack of belief (e.g. Atheism). Generally, a belief should affect your life choices or the way you live for it to be included in the definition.</p>	
<p>Potential impacts (positive and negative) of proposed policy/decision/business plan; this also includes needs in relation to each part of the duty.</p>	<p>Potential socio-economic impacts/ needs/issues arising from socio-economic disadvantage (positive and negative)</p>
<p>The Article 4(1) Direction will remove the following permitted development rights</p> <p><u>PART 1 Development within the curtilage of a dwellinghouse</u> Class A – enlargement, improvement or other alteration of a dwellinghouse Class E – buildings etc incidental to the enjoyment of a dwellinghouse Class F – hard surfaces incidental to the enjoyment of a dwellinghouse</p> <p>The Council recognises that there may be a need for residents to improve, alter or extend their home.</p> <p>Overcrowding levels vary greatly between religious and belief groups. Muslim households have the highest level of overcrowding. Overcrowding is also higher than average among Hindu, Sikh, and Buddhist households. The use of an Article 4 direction would not restrict development altogether, but instead ensure that development proposals in and adjacent to Ancient Woodland would actively form a material consideration in determining the planning application.</p>	<p>No positive or negative socio-economic impact applicable.</p>
<p><u>PART 2 Minor operations</u> Class A – gates, fences, walls etc</p> <p>The use of an Article 4 direction would not restrict development altogether, but instead ensure that development proposals in and adjacent to Ancient Woodland would actively</p>	<p>No positive or negative socio-economic impact applicable.</p>

form a material consideration in determining the planning application.	
<p><u>PART 4 Temporary buildings and uses</u> Class A – temporary buildings and structures</p> <p>The use of an Article 4 direction would not restrict development altogether, but instead ensure that development proposals in and adjacent to Ancient Woodland would actively form a material consideration in determining the planning application.</p>	No positive or negative socio-economic impact applicable.
<p><u>PART 14 Renewable energy</u> Class B - installation or alteration etc of stand-alone solar equipment on domestic premises** Class C – installation or alteration etc of ground source heat pumps on domestic premises Class G – installation or alteration etc of air source heat pumps on domestic premises</p> <p>The use of an Article 4 direction would not restrict development altogether, but instead ensure that development proposals in and adjacent to Ancient Woodland would actively form a material consideration in determining the planning application.</p>	No positive or negative socio-economic impact applicable.
Equality information on which above analysis is based	Socio-economic data on which above analysis is based
<p><u>General data</u> The latest census found that 43.3% of Southwark residents identify as Christian and 9.6% identify as Muslim. 1.1% identify as Hindu, 1% identify as Buddhist, and 0.2% identify as Sikh. 36.4% identify as having no religion. (How life has changed in Southwark: Census 2021 (ons.gov.uk)).</p>	No positive or negative socio-economic impact applicable.
<p><u>Overcrowding</u> The 2021 Census found that 4.4% of all households in England were overcrowded. The rate of overcrowding among Muslim households was 22.5%. The rate of overcrowding was also higher than average among Hindu, Sikh, and Buddhist households. (Overcrowding and under-occupancy by household characteristics,</p>	No positive or negative socio-economic impact applicable.

<p>England and Wales - Office for National Statistics (ons.gov.uk)).</p>	
<p><u>Home ownership</u> The 2021 Census found that 63% of people in England and Wales lived in households that owned their own accommodation (outright, with a mortgage, or shared ownership). Only 46% of Muslim people and 57% of Buddhist people lived in a household that owned their own accommodation. For people of no religion the figure is 59%. The figure is higher than average for people who are Sikh, Jewish, Christian or Hindu. (Religion by housing, health, employment, and education, England and Wales - Office for National Statistics (ons.gov.uk)).</p>	<p>Within London, owner occupiers with mortgages are significantly under-represented in the lower income quintiles. 76% of owner occupiers with a mortgage are in the top two fifths of the national household income distribution, while only 9% are in the bottom fifth. (Housing in London 2020).</p>
<p>Mitigating and/or improvement actions to be taken</p>	
<p>The use of an Article 4 direction would not restrict development altogether, but instead ensure that development proposals in and adjacent to Ancient Woodland would actively form a material consideration in determining the planning application.</p>	<p>Generally, greenspaces express a positive impact for those experiencing socio-economic disadvantage, as this EINA demonstrates that those experiencing socio-economic disadvantage are less likely to have access to green spaces in immediate vicinity.</p>

Sex - A man or a woman.	
Potential impacts (positive and negative) of proposed policy/decision/business plan; this also includes needs in relation to each part of the duty.	Potential socio-economic impacts/ needs/issues arising from socio-economic disadvantage (positive and negative)
<p>The Article 4(1) Direction will remove the following permitted development rights</p> <p><u>PART 1 Development within the curtilage of a dwellinghouse</u> Class A – enlargement, improvement or other alteration of a dwellinghouse Class E – buildings etc incidental to the enjoyment of a dwellinghouse Class F – hard surfaces incidental to the enjoyment of a dwellinghouse</p> <p>The Council recognises that there may be a need for residents to improve, alter or extend their home.</p> <p>The use of an Article 4 direction would not restrict development altogether, but instead ensure that development proposals in and adjacent to Ancient Woodland would actively form a material consideration in determining the planning application.</p>	<p>No positive or negative socio-economic impact applicable.</p>
<p><u>PART 2 Minor operations</u> Class A – gates, fences, walls etc</p> <p>The use of an Article 4 direction would not restrict development altogether, but instead ensure that development proposals in and adjacent to Ancient Woodland would actively form a material consideration in determining the planning application.</p>	<p>No positive or negative socio-economic impact applicable.</p>

<p><u>PART 4 Temporary buildings and uses</u> Class A – temporary buildings and structures</p> <p>The use of an Article 4 direction would not restrict development altogether, but instead ensure that development proposals in and adjacent to Ancient Woodland would actively form a material consideration in determining the planning application.</p>	<p>No positive or negative socio-economic impact applicable.</p>
<p><u>PART 14 Renewable energy</u> Class B - installation or alteration etc of stand-alone solar equipment on domestic premises** Class C – installation or alteration etc of ground source heat pumps on domestic premises Class G – installation or alteration etc of air source heat pumps on domestic premises</p> <p>The use of an Article 4 direction would not restrict development altogether, but instead ensure that development proposals in and adjacent to Ancient Woodland would actively form a material consideration in determining the planning application.</p>	<p>No positive or negative socio-economic impact applicable.</p>
<p>Equality information on which above analysis is based</p>	<p>Socio-economic data on which above analysis is based</p>
<p>General data The Census 2021 found that 51.6% of Southwark's residents are women and 48.4% are men. (Census 2021)</p>	<p>No positive or negative socio-economic impact applicable.</p>
<p>Mitigating and/or improvement actions to be taken</p>	
<p>The use of an Article 4 direction would not restrict development altogether, but instead ensure that development proposals in and adjacent to Ancient Woodland would actively form a material consideration in determining the planning application.</p>	<p>Generally, greenspaces express a positive impact for those experiencing socio-economic disadvantage, as this EINA demonstrates that those experiencing socio-economic disadvantage are less likely to have access to green spaces in immediate vicinity.</p>

Sexual orientation - Whether a person's sexual attraction is towards their own sex, the opposite sex or to both sexes	
Potential impacts (positive and negative) of proposed policy/decision/business plan; this also includes needs in relation to each part of the duty.	Potential socio-economic impacts/ needs/issues arising from socio-economic disadvantage (positive and negative)
<p>The Article 4(1) Direction will remove the following permitted development rights</p> <p><u>PART 1 Development within the curtilage of a dwellinghouse</u> Class A – enlargement, improvement or other alteration of a dwellinghouse Class E – buildings etc incidental to the enjoyment of a dwellinghouse Class F – hard surfaces incidental to the enjoyment of a dwellinghouse</p> <p>The Council recognises that there may be a need for residents to improve, alter or extend their home.</p> <p>The use of an Article 4 direction would not restrict development altogether, but instead ensure that development proposals in and adjacent to Ancient Woodland would actively form a material consideration in determining the planning application.</p>	<p>No positive or negative socio-economic impact applicable.</p>
<p><u>PART 2 Minor operations</u> Class A – gates, fences, walls etc</p> <p>The use of an Article 4 direction would not restrict development altogether, but instead ensure that development proposals in and adjacent to Ancient Woodland would actively form a material consideration in determining the planning application.</p>	<p>No positive or negative socio-economic impact applicable.</p>

<p><u>PART 4 Temporary buildings and uses</u> Class A – temporary buildings and structures</p> <p>The use of an Article 4 direction would not restrict development altogether, but instead ensure that development proposals in and adjacent to Ancient Woodland would actively form a material consideration in determining the planning application.</p>	No positive or negative socio-economic impact applicable.
<p><u>PART 14 Renewable energy</u> Class B - installation or alteration etc of stand-alone solar equipment on domestic premises** Class C – installation or alteration etc of ground source heat pumps on domestic premises Class G – installation or alteration etc of air source heat pumps on domestic premises</p> <p>The use of an Article 4 direction would not restrict development altogether, but instead ensure that development proposals in and adjacent to Ancient Woodland would actively form a material consideration in determining the planning application.</p>	No positive or negative socio-economic impact applicable.
Equality information on which above analysis is based	Socio-economic data on which above analysis is based
<p>General data In the latest census 8.08% of Southwark's residents identified as LGB+. This is the fourth highest figure of any local authority district in England and Wales. The areas with the highest proportion of LGB+ residents are in the north-west of the borough. (Census 2021)</p>	No positive or negative socio-economic impact applicable.
<p>Home ownership In the last census, 30.2% of heterosexual Southwark residents responded that they lived in a home that is owned by themselves or someone they live with (either outright, or with a mortgage, loan or shared ownership). For lesbian and gay people, this figure was 45.4%, but for bisexual people it was only 24.4%. For people who selected the 'all other sexual orientations' option, the figure was 16.7%.</p>	Within London, owner occupiers with mortgages are significantly under-represented in the lower income quintiles. 76% of owner occupiers with a mortgage are in the top two fifths of the national household income distribution, while only 9% are in the bottom fifth. (Housing in London 2020).

(Source: Office for National Statistics (ons.gov.uk))	
Mitigating and/or improvement actions to be taken	
The use of an Article 4 direction would not restrict development altogether, but instead ensure that development proposals in and adjacent to Ancient Woodland would actively form a material consideration in determining the planning application.	Generally, greenspaces express a positive impact for those experiencing socio-economic disadvantage, as this EINA demonstrates that those experiencing socio-economic disadvantage are less likely to have access to green spaces in immediate vicinity.

Human Rights

There are 16 rights in the Human Rights Act. Each one is called an Article. They are all taken from the European Convention on Human Rights. The Articles are The right to life, Freedom from torture, inhuman and degrading treatment, Freedom from forced labour, Right to Liberty, Fair trial, Retrospective penalties, Privacy, Freedom of conscience, Freedom of expression, Freedom of assembly, Marriage and family, Freedom from discrimination and the First Protocol

Potential impacts (positive and negative) of proposed policy/ decision/ business plan

The Human Rights Act 1998 imposed a duty on the council as a public authority to apply the European Convention on Human Rights; as a result the council must not act in a way which is incompatible with these rights. The most important rights for planning purposes are Article 8 (respect for homes); Article 6 (natural justice) and Article 1 of the First Protocol (peaceful enjoyment of property). It is important to note that few rights are absolute in the sense that they cannot be interfered with under any circumstances. 'Qualified' rights, including Article 8 and the First Protocol, can be interfered with or limited in certain circumstances. The extent of legitimate interference is subject to the principle of proportionality whereby a balance must be struck between the legitimate aims to be achieved by a local planning authority in the policy making process against the potential interference with individual human rights. In this case it is considered proportionate to remove permitted development rights in order to protect the buffer zone to Southwark's Ancient Woodland.

Information on which above analysis is based
<p>All data illustrated in Southwark Plan Integrated Impact Assessment (February 2022) for Strategic Policy 2 Southwark Together, Strategic Policy 5 Thriving neighbourhoods and tackling health inequalities and Strategic Policy 6 Climate Emergency.</p> <p>The Direction contributes to IIAO3 'To improve the health of the population', IIAO5 'To promote social inclusion, equality, diversity and community cohesion', IIAO6 'To reduce contributions to climate change', IIAO7 'To improve the air quality', IIAO11 'To protect and enhance quality of landscape and townscape', IIAO13 'To protect and enhance open spaces, green corridors and biodiversity'.</p>
Mitigating and/or improvement actions to be taken
<p>As there are no negative impacts, no mitigating actions are required. The Council will continue to monitor impacts on human rights. The Council will mitigate against any unforeseen issues that arise.</p>

Conclusions

Overall, the Directive will have no negative impacts on the equalities of residents in the Article 4 (1) area. The Direction encourages applicants to be more considerate of the very special character and setting of the Great North Wood.

Generally, greenspaces express a positive impact for those experiencing socio-economic disadvantage, as this EINA demonstrates that those experiencing socio-economic disadvantage are less likely to have access to green spaces in immediate vicinity.

The Council acknowledges that access requirements relating to mobility needs would be considered wholly exceptional grounds and so likely to be acceptable, subject to mitigation. For older disabled people and disabled children and adults who may need home adaptations/ and additional build requirements, these will still be possible subject to any requisite mitigations which preserve the Ancient Woodland.

The Council also recognises the impacts of fuel poverty and remains supportive of the aims of the NPPF and the Local Plan to further adaptations towards renewable energies whilst ensuring that these are designed and installed with due regard to the very special nature of local irreplaceable habitat.

Permitted development rights allow householders to undertake a broad range of works to improve, extend and alter their homes without the need to submit a planning application. The rights are subject to limitations and conditions to control impacts and protect local amenity. Similarly certain rights have been extended to non-domestic premises. Permitted development rights are set out in Schedule 2 of the General Permitted Development Order 2015 (as amended).

The Great North Wood, comprising Sydenham Hill Woods and Dulwich Wood to constitute irreplaceable habitat which makes a significant contribution to the historic interest and visual impact of the area. The woodland benefits all residents of the borough, including all protected characteristics.

The use of an Article 4 direction would not restrict development altogether, but instead ensure that development proposals in and adjacent to Ancient Woodland would actively form a material consideration in determining the planning application.

Members of the public will be able to give comments on the Direction during the consultation stage and any consultation feedback which is pertinent to the matters raised within the EINA will be taken into account for any further revisions of the Equalities Impacts and Needs Assessment.

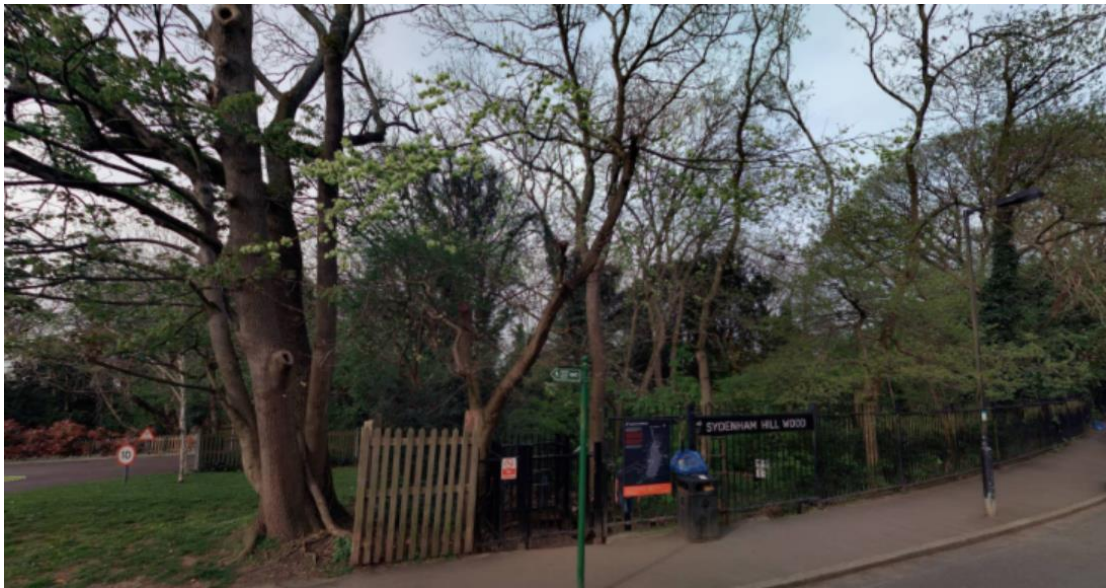
Those who speak English as a second language may find it challenging to understand the requirements of the Direction. Mitigation measures to address this concern have been set out in section 5.

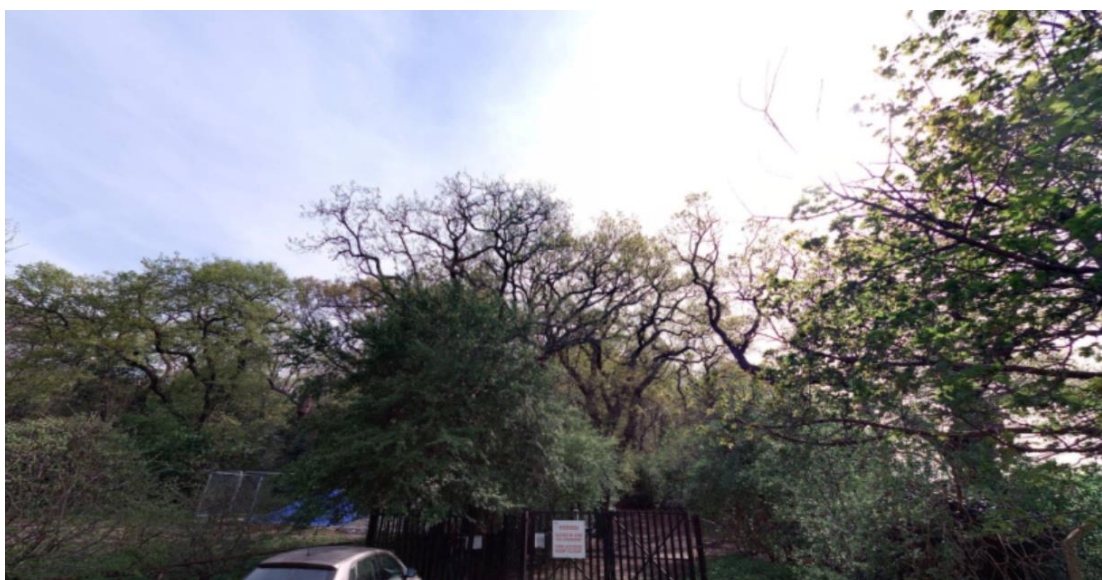
The Council will continue to monitor impacts on all protected characteristics and will mitigate against any unforeseen issues that arise.

Section 5: Further equality actions and objectives

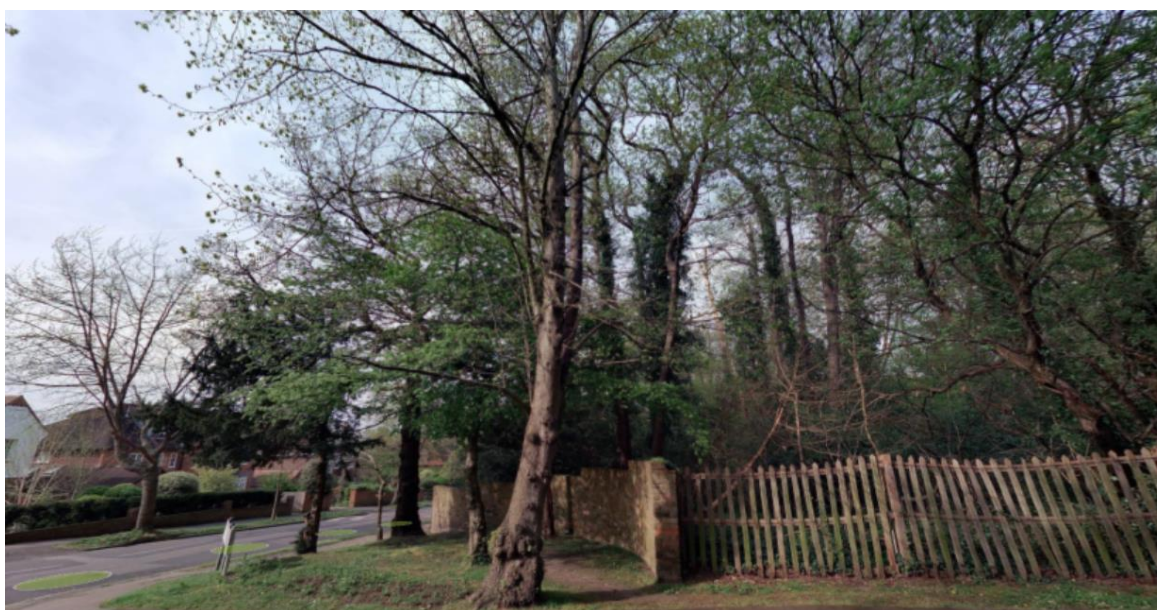
Further actions			
Based on the initial analysis above, please detail the key mitigating and/or improvement actions to promote equality and tackle inequalities; and any areas identified as requiring more detailed analysis.			
No.	Description of issue	Action	Timeframe
1	Ensure that the Article 4 (1) Direction is issued within the shortest timeframe possible by the Council so that the long term protection of the woodland can be secured.	Progress the Article 4 (1) Direction towards public consultation and then final confirmation at Planning Committee.	Public consultation proposed to be agreed at Committee on 8 th October 2024.
2	Ensure that the implementation of the Article 4 (1) Direction is monitored following issue for potential actual effects on different groups.	The outcomes of implementing the Article 4 (1) Direction will be monitored through the Authority Monitoring Report (AMR). Equality analysis is an ongoing process and that does not end once the Direction is implemented.	Monitoring will be undertaken annually.
3	Ensure that there is no language barrier preventing residents from understanding the Direction.	Upon request the Council can translate the documents into other languages.	Upon request

Photos and Photomontages













Appendix F: Consultation Report January 2025

Article 4 Direction: Great North Wood Consultation Report

Consultation report on the representation period for the Article 4 Direction to remove Permitted Development rights associated with domestic and non-domestic properties within and adjacent to the Great North Wood.

For:

Confirmation of Article 4 Direction to withdraw the permitted development rights granted under the General Permitted Development Order 2015 (as amended)

January 2025

Introduction

1. This report sets out the consultation the council undertook as a result of proposing the Non-Immediate Article 4 Direction to remove permitted development rights associated with domestic and non-domestic properties with respect to:

General Permitted Development Order 2015 (as amended)

- Schedule 2, PART 1 Development within the curtilage of a dwellinghouse

Class A – enlargement, improvement or other alteration of a dwellinghouse

Class E – buildings etc incidental to the enjoyment of a dwellinghouse

Class F – hard surfaces incidental to the enjoyment of a dwellinghouse

- Schedule 2, PART 2 Minor operations, Class A – gates, fences, walls etc
- Schedule 2, PART 4 Temporary buildings and uses, Class A – temporary buildings and structures
- Schedule 2, PART 6 Agricultural and Forestry, Class E(a), (b), (c), (d) – forestry developments
- Schedule 2, PART 9 Development relating to roads, Class A (b) – development by highways authorities
- Schedule 2, PART 14 Renewable energy, Class C – installation or alteration etc of ground source heat pumps on domestic premises, Class L – installation or alteration etc of ground source heat pump on non-domestic premises
- Schedule 2, PART 18 Miscellaneous development, Class A (a), (b)– development under local or private Acts or Order

2. Permitted development rights fall under the General Permitted Development Order 2015 (as amended).

Background information

3. The Article 4 Direction: Great North Wood was proposed on 26th November 2024. The Direction was introduced as a “non-immediate” Direction which meant that following the decision to introduce the Direction at planning committee, public consultation would take place. This would enable the impacts of the removal of permitted development right to be considered by the affected parties.

4. Introduction of the Direction curtails impacts brought about by operations carried out under permitted development within the woodland and its buffer zone. These applications must then be assessed against the policies in the development plan and any supporting guidance.

5. The Council completed an assessment of properties with a direct boundary with the woodland. The Council identified 44 land owners or occupiers of land that share a boundary or have an interest in the woodland.

6. The Great North Wood, comprising Sydenham Hill Woods and Dulwich Wood to constitute irreplaceable habitat which makes a significant contribution to the historic interest and visual impact of the area. Standing Advice from Natural England states that unless there are wholly exceptional grounds and that adequate mitigation can be provided, development proposals within the Buffer Zone, should not be approved. The categorisation of land as an ancient woodland does not itself provide any statutory protection. However, some features in ancient woods are protected and sites can also be designated for their wildlife value. For ancient woodlands, a buffer zone of at least 15 metres from the boundary of the woodland is advised (source: Natural England). Potential negative impacts resulting from inconsiderate operations are explored in further detail below.

7. In a conservation area like Dulwich Wood – where the significance of the conservation area rests mainly in its connection to this Ancient Woodland – uncontrolled development rights could potentially damage the Ancient Woodland, leading to irreversible harm to a feature of acknowledged importance and affecting the character and appearance and the significance of the Conservation Area.

8. The Planning Committee resolved to propose a Non-Immediate Article 4 Direction to protect the woodland and its buffer zone in recognition of its unique community and heritage value. The Direction was made on the 27th November 2024.

9. Any non-immediate Article 4 Direction introduced by a Local Planning Authority (LPA) requires a minimum 6 week statutory representation period to enable representations to be submitted and considered by the council in making the Direction. Representations received are considered when deciding to “confirm” the Direction.

10. Introducing a Non-immediate Direction has other implications related to compensation claims. These implications are explored in the committee report to which this consultation report is appended. Following the statutory representation period the council is obliged to consider all responses received during the period and make a decision as to whether “confirm” the direction. This decision must be taken within six months of the Direction being introduced. Should a decision not be taken to do this the Direction will lapse.

Consultation undertaken

11. The representation period on the Article 4 Direction: Great North Wood complied with the provisions set out under Article 4 (1) of the Town and Country Planning (General Permitted Development) Order 2015 (as amended) and ran from 3rd December 2024 to 14th January 2025.

Notice of the direction was made by:

- Local advertisement in Southwark News (local press) on the 5th December 2024.
- Direct hand delivered consultation letters to each of the affected premises.
- FAQs
- A dedicated planning application page (**24/AP/3487**) containing all documents for review and providing opportunity for comment.

12. Initial communications for the representation period expressed a deadline for 14th January 2025, equating to a six week period from when the Direction was introduced on 3rd December 2024. In practice, however, the council accepted late representations.

Summary of responses received

13. Across the representation period the council received 6 responses to the introduction of the Article 4 Direction. Of these:

- 1 were in support of the Direction (see paras 13 – 18 below)
- 1 objected to the Direction (see paras 19 – 22)
- 4 neutral comments
- None have been discounted as N/A

14. The responses mainly comprised of issues and points which are relevant in deciding whether to confirm the Direction. The issues and points raised have been carefully considered and have informed the recommendation to confirm the Direction in the planning committee report to which this consultation report is appended. Where an issue raised through a representation was not considered relevant to the confirmation of the Direction it has not informed the recommendation. These instances have been noted within this report, including in section 20 below, in the summary tables in Appendices E1- E3, as well as within paragraph [24] of the planning committee report.

Neutral representations – Summary

15. Neutral comments were received from one neighbour, the Grange Lane Allotments, Lewisham Council and the Secretary of State (MHCLG) which provided or requested further clarification from the council.

16. Lewisham Council have concluded that no response is required as the proposal would not affect properties within the Borough.

17. The Secretary of State advises "...you should continue with any processes associated with introducing the Article 4 direction. An Article 4 direction does not require the approval of the Secretary of State in order to come into force, however, please note that the Secretary of State has the power to modify or cancel an Article 4 direction at any time before or after it is confirmed."

18. One neighbour has questioned the extent of neighbour notifications but does not disagree with the premise that PDRs should be withdrawn from certain areas.

19. Gunsite Allotments sought clarification that the restrictions applied only to the 15m buffer zone from the boundary with the woodland.

20. These points have been duly noted and considered in the report to planning committee recommending confirmation of the Direction. A further, more detailed breakdown of the neutral responses received can be found in Appendix E1 starting on page 12.

Supporting representations - Summary

21. One supporting representation was received during the period. This representation was received from the following organisation: Sydenham Hill Ridge Neighbourhood Forum.

22. Reasons given in support of the Article 4 Direction include the benefit of nurturing the woodland, which is in their member's interest.

23. This point has been duly noted and considered in the report to planning committee recommending confirmation of the Direction. A further, more detailed

breakdown of the supporting responses received can be found in Appendix E2 starting on page 13.

Objecting representations – Summary

24. During the representation period there was one objector to the introduction of the Article 4 Direction: Great North Wood. The following is a summary of the points raised by the objectors. The council's response to each point raised by objectors can be found Appendix E3 on page 14.

25. The objections were received from one individual:

- Considers that the Article 4 is unnecessary and would introduce an extra level of Bureaucracy as permission is already required from the Dulwich Estate.
- Generally Unsupportive. Considers that the Article 4 Direction would increase costs for residents of Great Brownings due to their proximity to the woodland.

26. Each of the above points raised relevant to the confirmation of the Direction have been carefully considered in the planning committee report to which this consultation report is appended and responded to in Appendix E3.

Responses not considered

27. All of the responses received have been considered in paragraphs 15-26.

Conclusions

28. As a result of the representation period which followed the introduction of the Article 4 Direction on 27th November 2024, the council received 6 responses. 1 supporting representation which stated that the Article 4 direction would align closely with the aims of its membership.

29. The objector raises points which, where relevant, the planning committee report considers carefully in informing the recommendation. Responses are provided in Appendix E3 below.

Appendix A – Press advertisement scan published in Southwark News

Issue 1714 December 5 2024



TOWN AND COUNTRY PLANNING (GENERAL PERMITTED DEVELOPMENT) (ENGLAND) ORDER 2015 (AS AMENDED)

NOTIFICATION OF ARTICLE 4 DIRECTION

On the 26th of November 2024, Southwark Council introduced a non-immediate Article 4 Direction to protect the Ancient Woodland and its 15m Buffer Zone. This means that planning permission will be required for certain operations relating to Schedule 2, Part 1 (Classes A, E, F), Part 2 (Class A), Part 4 (Class A), Part 6 (Class E), Part 9 (Class A (b)), Part 14 (Classes C, L) and Part 18 (Class A) of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) in the area shown on the [map which accompanies the Article 4](#) Direction.

Development of the descriptions set out above should not be carried out on the land shown edged red on the map annexed to the Directions, unless planning permission is granted on an application made under Part III of the Town and Country Planning Act 1990, as amended.

A copy of the Article 4 Directions and the maps can be downloaded from the Council's website:

<http://www.southwark.gov.uk/planning-and-building-control/planning-policy-and-transport-policy/article-4-directions>

They can also be viewed on the Planning Register under case 24/AP/3487 [Comment on a planning application | Southwark Council](#) or, by appointment at the council offices at 160 Tooley Street, London, SE1 2QH, between the following hours: 9am – 4:30pm Monday to Friday. Telephone 0207 525 5471.

Representations concerning the Article 4 Direction can be made between **03 December 2024 and 14 January 2025**.

You can comment by:

- Visiting the Planning Register [Comment on a planning application | Southwark Council for case 24/AP/3487](#)
- Emailing designconservation@southwark.gov.uk; or
- In writing to Urban Forester, Design & Conservation, 5th Floor, Hub C, Southwark Council, 160 Tooley Street, PO BOX 64529, London SE1P 5LX

Appendix B – Copy of site notice put up at all entrance points and affected roads



PLANNING NOTICE

TOWN AND COUNTRY PLANNING (GENERAL PERMITTED DEVELOPMENT) (ENGLAND)
ORDER 2015 Notice of Article 4 Direction

Article 4 Direction: Great North Wood

Southwark Council made a non-immediate Article 4 Direction on 26th November 2024 under Article 4(1) of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) ('GPDO').

The Article 4 Direction removes permitted development rights granted by Schedule 2, Part 1 (Classes A, E, F), Part 2 (Class A), Part 4 (Class A), Part 6 (Class E), Part 9 (Class A (b)), Part 14 (Classes C, L) and Part 18 (Class A) of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) in the following locations in Southwark:

Sydenham Hill Woods
Dulwich Wood
Dulwich and Sydenham Golf Club, Grange Lane London SE21 7LH
Grange Lane Allotments: Grange Lane, London SE21 7LH
Gunsite Allotments: Grange Lane, London SE21 7LH
1 & 3 Crescent Wood Road SE26 6RT
25-42 (Odds and Evens) Great Brownings London SE21 7HP
109 & 111 College Road London SE21 7HN
21-35 (Odds) Woodhall Drive London SE21 7HJ

This Article 4 Direction will come into effect on **30 January 2025**.

Development of the descriptions set out above should not be carried out on the land shown edged red on the map annexed to the Direction, unless planning permission is granted on an application made under Part 3 of the Town and Country Planning Act 1990 (as amended).



Display date 3 December 2024

Full details of the Article 4 including the committee report, appendices and supporting documentation can be found via the planning register for **24/AP/3487**, here:

[Comment on a planning application | Southwark Council](#)

They can also be viewed by appointment at the council offices at 160 Tooley Street, London SE1 2QH, between the following hours: 9am – 4.30pm Monday to Friday.

Consultation is open from 3 December 2024 to 14 January 2025.

If you require any further information, please email designconservation@southwark.gov.uk or call 0207 525 5338.

Appendix C – Copy of Certificate of Site Notice display



Town & Country Planning Act 1990
Town and Country Planning (General Permitted Development)
(England) Order 2015
Planning and Compensation Act 1991

Property Site Address:	Various, Sydenham Hill Wood and Dulwich Wood Location of Notices (12) shown on MAP
Reference Number:	24/AP/3487
Description:	Proposed Article 4(1) Direction to withdraw Permitted Development Rights for operations within part of the Dulwich Wood Conservation Area, within and adjacent to Ancient Woodland

Date the notice was first displayed: 03.../...12.../ 2024

Signed:*L Bullen*

Name (in block capitals): LIAM BULLEN

Please complete and return either by post or email to:

Liam Bullen planning.applications@southwark.gov.uk

Planning & Growth

Resource Department

Southwark Council

PO Box 64529

London SE1 5LX

Appendix D – FAQs

1. Why have I not been consulted on this before?

- The decision to consult on an Article 4 is made by the Planning Committee once the Article has been introduced, and not before. This is set out in Schedule 3 of the legislation Town and Country Planning (General Permitted Development) (England) Order 2015

2. What happens now?

- We are inviting representations concerning the Article 4 Directions between 3 December 2024 and 14 January 2025. The Secretary of State is also notified and has wide ranging powers to amend or cancel a Direction. Once the Consultation period has ended, the decision to confirm the direction would be made by the Planning Committee.

3. How can I comment?

- Representations concerning the Article 4 Direction can be made between 03 December 2024 and 14 January 2025.
- You can comment by:
- Visiting the Planning Register Comment on a planning application | Southwark Council for case 24/AP/3487
- Emailing designconservation@southwark.gov.uk; or
- In writing to Urban Forester, Design & Conservation, 5th Floor, Hub C, Southwark Council, 160 Tooley Street, PO BOX 64529, London, SE1P 5LX

4. When will it come into force?

- If confirmed, it is aimed for the Article 4 Direction to come into effect on 30th January 2025.

5. Can the making of an Article 4 be appealed?

- There is no formal right of appeal against the making of an Article 4 Direction. The Secretary of State's approval is required, except where development is permitted by Parts 1 to 4 of the GPDO.

6. What types of development are being restricted?

- These are set out clearly within the Article 4 Direction, in plain English. If you require any further assistance, please contact designconservation@southwark.gov.uk

7. Will I need to remove structures already built within the buffer zone?

- No, you will not need to remove any structures previously installed under permitted development rights or as approved under a Full Planning application.

8. Can I undertake permitted development operations before the Article 4 Direction comes into effect?

- Yes, subject to any other required consents, such as works to trees (including to their roots) or approvals from the Dulwich Estate.

9. What happens when the Article 4 Direction comes into effect?

- Certain types of permitted development will require that a planning application is submitted, and consent granted by the local planning authority.

10. Is there a cost for making an application?

- No fee is payable for a planning application made in respect of what would have been permitted development had there been no Article 4 Direction. This extends only to cases where development would have been in one of the Parts of Schedule 2 of the GPDO.

11. I need to make certain adaptations due to a disability, is this allowed?

- For older disabled people and disabled children and adults who may need home adaptations/ and additional build requirements, these will still be possible subject to any requisite mitigations which preserve the Ancient Woodland. We are able to advise on suitable methods of construction in proximity to trees and woodland.

12. I wish to install a ground source heat pump, is this allowed?

- The GPDO does not distinguish between the 4 common types of ground source heat pumps available, some are less damaging than others. We are able to advise on what may be appropriate and suitable methods of construction in proximity to trees and woodland.

13. What if my planning application is refused?

- An appeal may be made in the normal way, to the Planning Inspectorate.
- In some circumstances the council can be liable to compensate developers or landowners whose developments are affected by Article 4 directions. Under sections 107 and 108 of the Town and Country Planning Act 1990 Local planning authorities are liable to pay compensation to landowners who would have been able to develop under the permitted development rights that an Article 4 direction withdraws, if they:
 - Refuse planning permission for development which would have been permitted development if it were not for an Article 4 direction; or
 - Grant planning permission subject to more limiting conditions than the GPDO would normally allow, as a result of an Article 4 direction being in place.

Appendix E – Consultation responses summary tables

The following tables provide a detailed breakdown of the comments received alongside the council's response.

- **Appendix E1** shows a summary of each **neutral response** with each issue identified and noted by the council.
- **Appendix E2** shows a summary of each **supporting response** with each issue identified and noted by the council.
- **Appendix E3** shows a summary of each of the **objecting responses** received with each point raised responded to by the council.

E1 Neutral

Responder	Comment	Council response
Secretary of State (MHCLG)	<p>I refer to your email of 3rd December 2024 notifying the Secretary of State about the Article 4 direction made on 26 November 2024. Thank you for notifying us of this direction.</p> <p>We will only contact you if any additional information is required and you should continue with any processes associated with introducing the Article 4 direction. An Article 4 direction does not require the approval of the Secretary of State in order to come into force, however, please note that the Secretary of State has the power to modify or cancel an Article 4 direction at any time before or after it is confirmed.</p>	Noted.
London Borough of Lewisham	The London Borough of Lewisham have reviewed the proposed Article 4(1) Direction to withdraw PD rights for operations within Dulwich Wood Conservation Area and are of the opinion that the introduction of Art 4 on the LB Southwark side of Sydenham Hill Ridge won't have any impact on Lewisham, and as such have no comments to make.	Noted.
Grange Lane Allotments	<p>I received your notification of a non-immediate Article 4 Direction (great North Wood).</p> <p>Please confirm that what this means in practical terms is that only area from which permitted development is to be withdrawn is indeed the 15 metre wide buffer zone referred to in the committee report and not the entire referenced property of Grange Lane Allotments.</p>	Correct, the restriction would only apply to any of the activities as listed within 15m of the boundary of the ancient woodland.
Neighbour	I could not be closer to Dulwich Wood but did not receive the consultation letter - should I have done? It is not right to rely simply on notices stuck to gates which not everyone uses. Whilst not disagreeing with the premise that PDRs should be withdrawn from certain areas I suggest that it could	In terms of meeting the reasonableness test, it was decided to restrict the article 4 to only the most potentially damaging operations and also to those properties which shared a direct rear land boundary or were sited within 15m of the woodland without any other land breaks (roads/ verges

	lead to extra bureaucracy - far better for The Dulwich Estate to act consistently	<p>etc) with Natural England's identified ancient woodland extents which does not include all of the woodland proper. It is these properties which received a consultation letter.</p> <p>Further consultation opportunities was provided through setting up numerous site notices at every entrance point and roads affected by the proposal.</p> <p>Southwark Council is the Local Planning Authority, its policies subject to examination in public and with due adherence to the National Planning Policy Framework and to the London Plan, its decisions on planning applications are open to appeal. As I understand it, the Estate works within the remit of the Commonhold and Leasehold Reform Act 2002, there is no right of appeal for decisions of the estate.</p>
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E2 Supporting

Responder	Comment	Council response
Sydenham Hill Ridge Neighbourhood Forum	<p>Commenter Type: Amenity Group Stance: Customer made comments in support of the Planning Application Comment Reasons:</p> <ul style="list-style-type: none"> - Affect local ecology - Contributes positively to surroundings - Enhancements to ecology / biodiversity - Improves the quality of the area <p>Comment: Whilst the wording of this application is convoluted and this makes it difficult to understand fully, the nurturing of woodland is a clear priority of our members, and so we support this application</p>	Noted.

E3 Objections

Responder	Comment	Council response
Neighbour	<p>Commenter Type: Member of the Public Stance: Customer objects to the Planning Application Comment Reasons:</p> <ul style="list-style-type: none"> - General dislike of proposal - Loss of privacy - Other - give details - Out of keeping with character of area - Provision of affordable homes <p>Comment: I am writing as an affected householder. I wish to object to the extension of the scope of this proposal to areas within my home and property. I believe this is not justified by the stated goal and that there is no evidence to support the suggestion that current permitted development rights in the area designated within Great Brownings have had or would have any negative impact on the ancient woodland.</p> <p>The proposal also fails to take into account the nature of the design of Great Brownings home, which were designed originally and sold so as to be integrated with the woodland, enjoying the view of and adjacency to the woodland but with very clear delineation between the boundaries of each private home and the woodland beyond, the communal areas of the street and the woodland itself.</p> <p>The requirement to seek planning permission for standard home and garden maintenance would have the impact of create onerous costs for ordinary residents of these. modest family homes.</p> <p>A third factor is that residents are already required to seek permissions from the Dulwich estate for any work beyond simple replacement which - the evidence suggests - is sufficient effective protection. In contrast removal of these standard rights risks a steep decline in upkeep of the adjacent houses and gardens, fences and supporting walls due to the additional costs, requirements for additional professional services to make applications and complexity.</p> <p>While I do not see evidence this step is required at all, a further alternative solution would be to restrict this application to the area designated as 1 on the plan.</p> <p>There is also evidence to the contrary that should be taken into account - this shows that residents in Area 2 already care greatly for the preservation of Low Cross Wood, volunteering for example for LWT in its upkeep and regularly</p>	<p>The Council is not proposing the Article 4 for anything other than due to changes to permitted development rights in 2024 and to ensure that where development management is necessary to ensure the protection of irreplaceable habitat, that restrictions apply.</p> <p>Existing structures are not subject to new controls unless it is an extension, improvement, or alteration), like for like replacements would not need planning permission.</p> <p>I have provided links where prior approval is already a requirement.</p> <p>Sadly PD is vague and we are conscious of this, hence the need for an Article 4.</p> <p>We do not have any remit over the Estate, who remain a statutory consultee on all planning applications within the scheme of management area. I am unsure how planning works at the Estate or under which regulation this sits. It would appear to me that this is simply landlord permission . (i.e.; the granting of planning consent and building regulations consent does not mean the landlord has automatically granted consent required under the lease) from the scheme of management documents, where the landlord 'The Estate' is merely required to act reasonably.</p> <p>I see from their website they state:</p> <p>The approval required under the Scheme of Management is separate from, and in addition to, the requirements of the local authority planning permission (Southwark, Lambeth or Lewisham), building control and other regulations. In many cases, alterations, extensions, new structures and works to trees, will require permission from both the appropriate local authority and the Scheme of Management Office.</p> <p>Please note that these approvals are not connected, so if consent is granted by one organisation, it does not necessarily follow that permission will be granted by the other. Certain changes may not need local authority approval but any change to the external appearance of a property does require the prior approval under the Scheme of Management.</p>

	working collectively on the adjacent common areas	<p>We have invited comment from, amongst others; the Estate, Dulwich Society, and Sydenham Hill Neighbourhood Forum along with national bodies, including the Secretary of State.</p> <p>We will be recommending the article for confirmation to committee for which your comments will be taken into consideration within the officer report.</p>
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Meeting Name:	Planning Committee (Major Applications) A
Date:	11 February 2025
Report title:	Confirmation of Article 4 Direction for the withdrawal of Part 16 permitted development rights (Communications Development) at the junction of Croxted Road and Norwood Road, London SE24 9DA.
Ward(s) or groups affected:	Dulwich Village
Classification:	Open
Reason for lateness (if applicable):	N/a
From:	Director of Planning and Growth

RECOMMENDATIONS

That the Planning Committee:

1. Authorises the confirmation of the Article 4 Direction (without immediate effect) to withdraw the permitted development rights granted by Schedule 2, Part 16 of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) ('the GPDO') for Communications Development.
2. Delegates to the director of planning and growth the arrangements for making the Article 4 Directions including compliance with the notification requirements under the GPDO.
3. Notes there have been no responses to the consultation at the date of this report.

BACKGROUND INFORMATION

4. The council made an Article 4 Direction to remove permitted development rights for communications apparatus on 17 December 2024. The council must decide whether to confirm the Direction no sooner than 28 days, and no later than 2 years, after the date of making the Direction.
5. The location of the Article 4 Direction is the junction of Croxted and Norwood Roads, at the southwest proximity of the borough on the border with Lambeth. There is a proliferation of lawfully installed equipment installed at this location and the intention of the Article 4 Direction is to return control to the council for this development type at this particular location. The plan of the site is appended at Appendix 1. Photos of the existing apparatus are appended at Appendix 2.
6. The report to recommend that the Article 4 direction be made, which sets out the background, was considered and agreed by the committee on 8 October 2024,

and is appended at Appendix 3, and the minutes of the committee that considered that report at Appendix 4.

7. The Article 4 Direction made on 17 December 2024 is appended at Appendix 5.

KEY ISSUES FOR CONSIDERATION

Article 4 direction process

8. The process for making an Article 4 Direction without immediate effect is set out at, paragraph 1, Schedule 3, of the GPDO and is summarised as follows:
 - Stage 1 - The council makes (drafts) an Article 4 Direction withdrawing permitted development rights;
 - Stage 2 – Publication/Consultation stage. The council:
 - publishes notice of the Article 4 Direction in a local newspaper;
 - places no fewer than 2 site notices within the area to which the direction relates for not less than six weeks; and
 - notifies the owners and occupiers of every part of the land within the area or site to which the Article 4 Direction relates over a period of 21 days. The notice must specify (amongst other things) a period of at least 21 days, stating the date on which that period begins, within which any representations concerning the direction may be made to the Council; and specify the date on which it is proposed that the direction will come into force, which must be at least 28 days but no longer than 2 years after the start of the 21 day period.
 - Stage 3 – Notification to the Secretary of State: On the same day that the first notice is given under Stage 2, the Council must send a copy of the Article 4 Direction to the Secretary of State (who does not have to approve the article 4 direction, and will only intervene when there are clear reasons for doing so).
 - Stage 4 –Confirmation Stage - The proposed Article 4 Direction comes into force on the date specified in the notice but does not come into force unless confirmed by the Council. Confirmation of the direction cannot take place until after the expiration of a period of at least 28 days following the latest date on which any notice relating to the direction was served or published or such longer period as may be specified by the Secretary of State.
9. In deciding whether to confirm the Article 4 direction the council must take into account any representations received during the 21-day consultation period (Stage 2). Once the Article 4 direction has been confirmed the council shall give notice of such confirmation to owners/occupiers, display site notices and advertise in a local newspaper; and send a copy to the Secretary of State.
10. Stages 1, 2, and 3 have been carried out, with the consultation period under stage 2 ending on 31 January 2025. The press notice, site notice, notification letters and notification to the Secretary of State required under Stages 2 and 3 are appended at Appendix 6. No responses have been received to the consultation to date.

Summary of evidence to support making the article 4 direction

11. There is no change to the evidence as presented in the report seeking confirmation to make the Article 4 Direction appended at Appendix 3.

Community, equalities (including socio-economic) and health impacts

Community impact statement

12. The Council is working to improve the economic wellbeing of residents and to ensure that Southwark has a strong local economy with opportunities for employment, vibrant centers to do business in and residents equipped with skills and knowledge to access employment. The Article 4 Direction seeks to protect a very discrete part of the borough and in particular local businesses from suffering from excessive communication apparatus.

Equalities (including socio-economic) impact statement

13. The Public Sector Equality Duty ("PSED") is set out in section 149 of the Equality Act 2010 which requires the Council, in the exercise of its functions, to have due regard to the need to:
 - (a) eliminate discrimination, harassment and victimisation;
 - (b) advance equality of opportunity between persons who share a relevant protected characteristic and those who do not share it;
 - (c) foster good relations between persons who share a relevant protected characteristic and those who do not share it.
14. The protected characteristics identified in the 2010 Act include race, disability, age and religion or belief.
15. Officers have considered the PSED in light of the proposed Article 4 direction. The owners of the current business negatively affected by the communication apparatuses are understood to be Caribbean and race is a protected characteristic.
16. Officers consider it is unlikely that the introduction of the Article 4 Direction will undermine any of the three needs set out in the PSED. It is likely that there will be some minor positive equalities impacts as a result of the introduction of the Article 4 Direction - in particular advancing equality of opportunity between persons sharing a relevant protected characteristic and persons who do not share it.
17. Whilst officers accept that there is already proliferation of communication equipment impacting the businesses at this location, the proposed Article 4 Direction will bring control of any further proposals to install equipment at this location back to the council and require them to be subject to the full planning application process including consultation, mitigation, and equalities assessment and conditions where appropriate.

Climate change implications

18. Officers consider that there are no climate change considerations as a result of this recommendation.

Financial implications

19. In some circumstances the council can be liable to compensate developers or landowners whose developments are affected by Article 4 Directions. Local planning authorities are liable to pay compensation to those who would have been able to develop under the permitted development rights that an Article 4 Direction withdraws, if they:
 - refuse planning permission for development which would have been permitted development if it were not for an Article 4 Direction; or
 - grant planning permission subject to more limiting conditions than the GPDO would normally allow.
20. Compensation may also be claimed for abortive expenditure or other loss or damage directly attributable to the withdrawal of permitted development rights. 'Abortive expenditure' includes works carried out under the permitted development rights before they were removed, as well as the preparation of plans for the purposes of any work.
21. Loss or damage directly attributable to the withdrawal of permitted development rights would include the depreciation in the value of land or a building(s), when its value with the permitted development right is compared to its value without the right.
22. However, the compensation arrangements differ for cases where a development order in respect of prescribed development is being withdrawn. The definition of "prescribed development" can be found in regulation 2 of the Town and Country Planning (Compensation) (England) Regulations 2015 (as amended). In cases such as these, compensation is not payable if the following procedure is followed, as set out in section 108 of the Town and Country Planning Act:
 - The planning permission withdrawn is of a prescribed description as set out in the Town and Country Planning (Compensation) Regulations 2015 (as amended).
 - The permitted development right is withdrawn in the prescribed manner.
 - Notice of withdrawal is given in the prescribed manner:
 - Not less than 12 months before it takes effect.
 - Not more than the prescribed period of two years.
23. Permitted development rights granted by Schedule 2, Part 16 are prescribed development, which means that compensation may be payable for 12 months from the date that the direction comes into force. If more than 12 months' notice of the withdrawal were given no compensation would be payable.
24. The confirmation of the Article 4 Direction will take place with less than 12 months' notice of the withdrawal of the permitted development right so there is a risk of compensation being payable in certain circumstances.
25. Compensation could be payable should a planning application for equipment covered by Part 16 be submitted, and refused or granted subject to more onerous conditions than the GPDO allows.

26. Officers consider that there is a low likelihood of an application being submitted given the amount of equipment already installed, and therefore consider there is a minimal risk, which would be limited to abortive work of preparing and submitting a planning application. Officers consider a reasonable cost of such work to be in the region of £2,500 to £5,000.

SUPPLEMENTARY ADVICE FROM OTHER OFFICERS

Assistant Chief Executive – Governance and Assurance

27. Planning Committee is asked to authorise the confirmation of an Article 4 Direction made on 17 December 2024 to remove permitted development rights for communications apparatus granted by Schedule 2, Part 16 of the GPDO and to delegate to the Director of Planning and Growth the arrangements for confirming the Article 4 Direction.
28. Officers have set out the risk of compensation at paragraphs 19 to 25 and consider the risk to be low.
29. The Council's Constitution (Part 3F, 'matters reserved by the Planning Committee,' at paragraph 10) reserves to the Planning Committee any authorisation under Article 4 of the GPDO. This confirms Planning Committee has the authority to take the decisions as set out in the proposed recommendations above.
30. Officers have considered the Council's PSED under section 149 of the 2010 Act at paragraphs 13 to 17 of this report and have concluded that the proposals are not considered to have any adverse impacts on persons with protected characteristics and will not undermine the three needs in the PSED.
31. Council Assembly on 14 July 2021 approved a change to the council's Constitution to confirm that all decisions made by the council will consider climate and equality (including socio-economic disadvantage and health inequality) consequences of taking the decision have been considered at paragraph 18.

Strategic Director, Resources

32. This report is requesting planning committee to approve the confirmation of the Article 4 Direction to withdraw the permitted development rights granted by Schedule 2, Part 16 of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) ('the GPDO') for Communications Development.
33. The report is also requesting the planning committee to delegate to the director of planning and growth the arrangements for making the Article 4 Directions including compliance with the notification requirements under the GPDO.
34. The Strategic director of resources notes that the proposed Directions may make the council liable for possible compensation claims and where these are currently estimated to be in the range of £2,500 - £5,000.

35. It is also noted that any agreed claims for compensation would be contained within the existing departmental revenue budgets where possible.
36. Staffing and any other costs connected with this recommendation to be contained within existing departmental revenue budgets.

BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
Southwark Local Development Framework and Development Plan Documents	Planning and Growth Department 160 Tooley Street London SE1 2QH	Planning enquiries telephone: 020 7525 5403 Planning enquiries email: planning.enquiries@southwark.gov.uk Council website: www.southwark.gov.uk

APPENDICES

No.	Title
Appendix 1	Plan of site
Appendix 2	Photos
Appendix 3	Report to make Article 4 Direction 8 October 2024
Appendix 4	Minutes of Committee 8 October 2024
Appendix 5	Article 4 Direction made on 17 December 2024
Appendix 6	Consultation documents

AUDIT TRAIL

Lead Officer	Stephen Platts, Director of Planning and Growth		
Report Author	Matthew Lambert, Team Leader - Planning Enforcement		
Version	Final		
Dated	28 January 2025		
Key Decision?	No		
CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER			
Officer Title		Comments Sought	Comments Included
Assistant Chief Executive – Governance and Assurance		Yes	Yes
Strategic Director, Resources		Yes	Yes
Cabinet Member		No	No
Date final report sent to Constitutional Team			28 January 2025

ANNEX 1 - ARTICLE 4 DIRECTION MAP

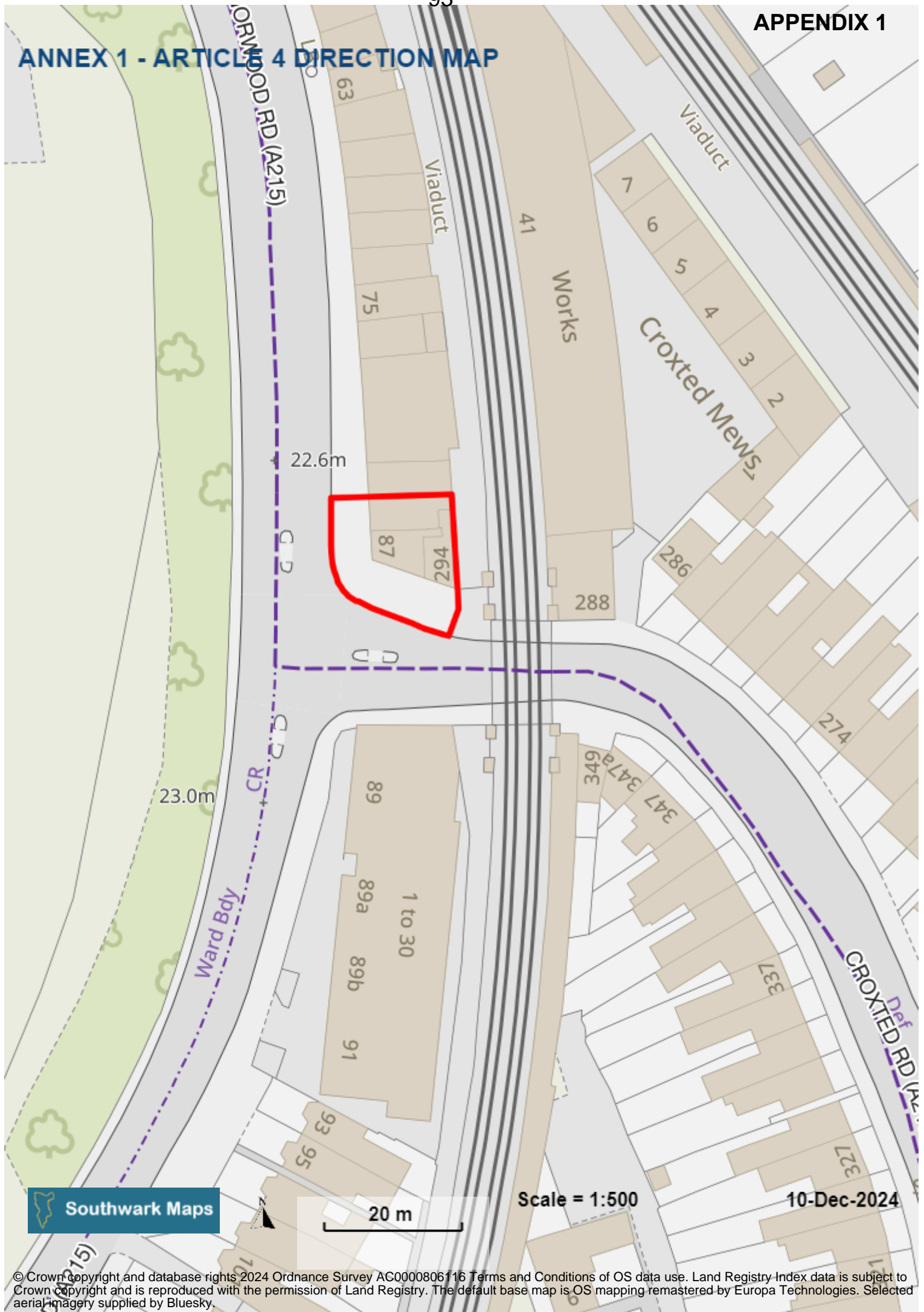


Photo 1 – Junction of Croxted Road and Norwood Road

Wide shot of the corner of Croxted Road and Norwood Road, showing the communications equipment in front of number 294 Croxted Road (outlined in red).

Photo 2 – Annotated photo of equipment



Detail of each piece of equipment:

1. Cabinet installed between May 2018 and March 2019
2. Cabinet installed between June 2014 and April 2015
3. Cabinet installed between Apr 2015 and Sep 2017
4. Cabinet installed between prior to 2008
5. Cabinet installed between prior to 2008
6. Monopole installed between prior to 2008

Meeting Name:	Planning Committee (Major Applications) A
Date:	8 October 2024
Report title:	Proposed Article 4 Direction for the withdrawal of Part 16 permitted development rights (Communications Development) at the junction of Croxted Road and Norwood Road, London SE24 9DA.
Ward(s) or groups affected:	Dulwich Village
Classification:	Open
Reason for lateness (if applicable):	N/a
From:	Director of Planning and Growth

RECOMMENDATIONS

That the Planning Committee:

1. Approves the making of an Article 4 Direction (without immediate effect) to withdraw the permitted development rights granted by Schedule 2, Part 16 of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) ('the GPDO') for Communications Development.
2. Delegates to the director of planning and growth the arrangements for making the Article 4 Directions including compliance with the notification requirements under the GPDO.

BACKGROUND INFORMATION

3. At 294 Croxted Road, at the junction with Norwood Road is the Umana Yana Caribbean Restaurant and Takeaway. It has a frontage with the street of just over 5 metres. The footway of Croxted Road in front of 294 has been progressively filled with communications apparatus, such as cabinets and a mast, details of which are set out below.
4. The junction of Croxted and Norwood Road is at the southwest proximity of the borough on the border with Lambeth. The red line of the site includes 294 Croxted Road and 85 & 87 Norwood Road. To the west of the site is Brockwell Park and to the east the railway viaduct linking Herne Hill Station to Tulse Hill Station.

Photo 1 – Junction of Croxted Road and Norwood Road



Wide shot of the corner of Croxted Road and Norwood Road, showing the communications equipment in front of number 294 Croxted Road (outlined in red).

5. The Junction is a prominent location, as both roads are A roads (Norwood A215, Croxted A2199). The buildings on the corner are single storey comprising food retailers and takeaway outlets.
6. The impact of the installed communications apparatus is such that the premises is not visible to traffic travelling north along Norwood Road.
7. The proliferation of communication equipment has had a detrimental impact on the streetscene at this location and the ability of this business to announce and advertise itself in the way that the majority of commercial premises on a shopping parade do.
8. Access to the business in this location is not affected by the communications equipment as the highway is subject to double yellow line parking protection.
9. Attempts to mitigate the impact of the communication development have not been successful. Officers have contacted the relevant communication companies by email and telephone calls to attempt to remove, consolidate or conceal the equipment, but no responses have been received.
10. The installation of the apparatus is believed to have been lawfully installed by communication companies exercising their statutory right to install certain

equipment on the public highway pursuant the GPDO. The council therefore has no ability to require the removal of the apparatus under planning powers.

11. The council can seek to remove permitted development rights so that any further development would need to go through a planning application process to be lawful. Whilst the council is not aware of any proposed further development, it is possible that some equipment may need to be renewed at some stage in the future and would be required to go through a planning application process.
12. 294 Croxted Road is the only site at present in the borough that the council is aware of where the concentration of communication apparatus has such a pronounced impact on one property.

Photo 2 – Annotated photo of equipment



Detail of each piece of equipment:

1. Cabinet installed between May 2018 and March 2019
2. Cabinet installed between June 2014 and April 2015
3. Cabinet installed between May 2018 and October 2016
4. Cabinet installed between prior to 2008
5. Cabinet installed between prior to 2008
6. Monopole installed between prior to 2008

13. The council is not aware why this location is so attractive to mobile communication and internet providing companies. It may be that the presence of the park and nearby conservation areas restricts other sites. The low-rise nature of the development possibly gives a mast particularly good coverage at this location. It is also possible that it is convenient for telecoms companies to group equipment together.
14. The Article 4 Direction is proposed to encompass the two adjoining properties at 85 and 87 Norwood Road. Currently there is one piece of equipment outside of 85 Norwood Road. The council is aware that the smallest area possible

should be selected for an Article 4 Direction. However, there is a risk that equipment could be installed outside number 85 and 87 Norwood Road if an Article 4 Direction is limited to the area immediately outside of 294 Croxted Road. Officers consider that further installations outside of 85 and 87 Norwood Road would exacerbate the situation and have a further detrimental impact on the streetscene at this location and the ability of this businesses at this junction to announce and advertise themselves in the way that the majority of commercial premises on a shopping parade do. The intention of the proposed Article 4 Direction is to return control to the council for this development type at this particular location. The council is therefore limiting the direction to the corner of Croxted and Norwood Road, which in its assessment no 85 and 87 Norwood Road forms a part of.

15. The NPPF was updated in December 2023, paragraph 53 which deals with Article 4 Directions reads:

“The use of Article 4 directions to remove national permitted development rights should:

...

- (b) in other cases, be limited to situations where an Article 4 direction is necessary to protect local amenity or the well-being of the area (this could include the use of Article 4 directions to require planning permission for the demolition of local facilities) (c) in all cases, be based on robust evidence, and apply to the smallest geographical area possible.*

16. The Government’s Planning Practice Guidance (Paragraph: 038 Reference ID: 13-038-20210820) advises that Article 4 directions should be very carefully targeted, applying only to those locations where they are necessary to avoid wholly unacceptable adverse impacts. The geographical coverage of all Article 4 directions should be the smallest area possible to achieve the aim of the Article 4 direction.
17. Part 16 is a broad category of permitted development rights covering all electronic forms of communication radio and microwave, as well as driver information systems and post boxes. To remove the part in its entirety is rare.
18. The reason for removal is because the site is currently saturated with apparatus. It is perhaps conceivable that a post box outside No 85 might be acceptable, however, on this particular corner control over infrastructure of this nature has been lost. The purpose of the Article 4 Direction is not to thwart all future development, but to regain control.

KEY ISSUES FOR CONSIDERATION

Article 4 direction process

19. An Article 4 Direction can be used to remove specific permitted development rights in all or parts of the local authority’s area. It would not restrict development altogether, but instead ensures that development requires a planning application to be submitted to the council for assessment. Such a planning application would

need to be submitted and be determined in accordance with the development plan, which include the council's planning policies, unless material considerations indicate otherwise.

20. The Government's Planning Practice Guidance (Paragraph: 038 Reference ID: 13-038-20210820) states that an Article 4 Direction to remove national permitted development rights should be limited to situations where this is necessary to protect local amenity or the wellbeing of the area. It also states that in deciding whether an Article 4 Direction would be appropriate, local planning authorities should identify clearly the potential harm that the direction is intended to address.
21. Article 4 Directions can either be made with immediate effect or made without immediate effect. The Article 4 direction proposed in this report will be made without immediate effect because it does not fall within the circumstances which allow for immediate effect (paragraph 2, Schedule 3, GPDO).
22. The process for making an Article 4 Direction without immediate effect is set out at, paragraph 1, Schedule 3, GPDO) and is summarised as follows:

- Stage 1 - The council makes (drafts) an Article 4 Direction withdrawing permitted development rights;
- Stage 2 – Publication/Consultation stage. The council:
 - publishes notice of the Article 4 Direction in a local newspaper;
 - places no fewer than 2 site notices within the area to which the direction relates for not less than six weeks; and
 - notifies the owners and occupiers of every part of the land within the area or site to which the Article 4 Direction relates over a period of 21 days.

The notice must specify (amongst other things) a period of at least 21 days, stating the date on which that period begins, within which any representations concerning the direction may be made to the council; and specify the date on which it is proposed that the direction will come into force, which must be at least 28 days but no longer than 2 years after the start of the 21 day period.

- Stage 3 – Notification to the Secretary of State: On the same day that the first notice is given under Stage 2, the council must send a copy of the Article 4 Direction to the Secretary of State (who does not have to approve the article 4 direction, and will only intervene when there are clear reasons for doing so).
 - Stage 4 – Confirmation Stage - The proposed Article 4 Direction comes into force on the date specified in the notice but does not come into force unless confirmed by the council. Confirmation of the direction cannot take place until after the expiration of a period of at least 28 days following the latest date on which any notice relating to the direction was served or published or such longer period as may be specified by the Secretary of State.
23. In deciding whether to confirm the Article 4 direction the council must take into account any representations received during the 21 day consultation period (Stage 2). Once the Article 4 direction has been confirmed the council shall give

notice of such confirmation to owners/occupiers, display site notices and advertise in a local newspaper; and send a copy to the Secretary of State.

Summary of evidence to support making the article 4 direction

24. As set out earlier in the report, the NPPF sets out that the use of Article 4 Directions to remove permitted development rights should be based on robust evidence and apply to the smallest geographical area possible.
25. Article 4 Directions can be made if the council is satisfied that it is expedient that development should not be carried out unless planning permission is granted on application.
26. The use of an Article 4 Direction would not restrict development altogether, but instead ensure that development requires permission planning application is submitted to the council. Planning permissions for communication installations and apparatus would ensure no further harm is caused to the streetscene and the ability of businesses on this corner to announce and advertise themselves through traditional forms of announcement such as a fascia sign, awning and shop window display without this being obscured by such poorly positioned development.
27. Permitted development rights for communication development are intended to assist with digital development and ensure that the infrastructure needed to support modern communication can be provided without undue delay and regulation. In many instances this provision operates smoothly without objection, but in this particular, limited and hopefully isolated instance the system has clearly failed and allowed a wholly unintended outcome of obscuration of part of a shopping parade contrary to the council's design policies and potentially to the detriment and viability of commercial units at this location.
28. No consultation beyond the consultation required by Schedule 3 of the GPDO is proposed at this stage lest it prompt a further exercise of permitted development rights during the consultation period.

Planning applications

29. If permitted development rights are withdrawn through an Article 4 Direction, planning permission is required, the Council would be obliged to determine the proposal in accordance with the development plan unless material considerations indicate otherwise. The development plan for Southwark includes the London Plan 2021 the Southwark Plan 2022 and adopted area action plans.

Community, equalities (including socio-economic) and health impacts

Community impact statement

30. The council is working to improve the economic wellbeing of residents and to ensure that Southwark has a strong local economy with opportunities for employment, vibrant centers to do business in and residents equipped with skills and knowledge to access employment. The Article 4 Direction seeks to protect a

very discrete part of the borough and in particular local businesses from suffering from excessive communication apparatus.

Equalities (including socio-economic) impact statement

31. The Public Sector Equality Duty ("PSED") is set out in section 149 of the Equality Act 2010 which requires the council, in the exercise of its functions, to have due regard to the need to:
 - (a) eliminate discrimination, harassment and victimisation;
 - (b) advance equality of opportunity between persons who share a relevant protected characteristic and those who do not share it;
 - (c) foster good relations between persons who share a relevant protected characteristic and those who do not share it.
32. The protected characteristics identified in the 2010 Act include race, disability, age and religion or belief.
33. Officers have considered the PSED in light of the proposed Article 4 direction. The owners of the current business negatively affected by the communication apparatuses are understood to be Caribbean and race is a protected characteristic.
34. Officers consider it is unlikely that the introduction of the Article 4 Direction will undermine any of the three needs set out in the PSED. It is likely that there will be some minor positive equalities impact as a result of the introduction of the Article 4 Direction - in particular advancing equality of opportunity between persons sharing a relevant protected characteristic and persons who do not share it.
35. Whilst officers accept that there is already proliferation of communication equipment impacting the businesses at this location, the proposed Article 4 Direction will bring control of any further proposals to install equipment at this location back to the council and require them to be subject to the full planning application process including consultation, mitigation, and equalities assessment and conditions where appropriate.

Climate change implications

36. Officer consider that there are no climate change considerations as a result of this recommendation.

Financial implications

37. In some circumstances the council can be liable to compensate developers or landowners whose developments are affected by Article 4 Directions. Local planning authorities are liable to pay compensation to those who would have been able to develop under the permitted development rights that an Article 4 Direction withdraws, if they:
 - refuse planning permission for development which would have been permitted

development if it were not for an Article 4 Direction; or

- grant planning permission subject to more limiting conditions than the GPDO would normally allow.
38. Compensation may also be claimed for abortive expenditure or other loss or damage directly attributable to the withdrawal of permitted development rights. 'Abortive expenditure' includes works carried out under the permitted development rights before they were removed, as well as the preparation of plans for the purposes of any work.
39. Loss or damage directly attributable to the withdrawal of permitted development rights would include the depreciation in the value of land or a building(s), when its value with the permitted development right is compared to its value without the right.
40. However, the compensation arrangements differ for cases where a development order in respect of prescribed development is being withdrawn. The definition of prescribed development can be found in regulation 2 of the Town and Country Planning (Compensation) (England) Regulations 2015 (as amended). In cases such as these, compensation is not payable if the following procedure is followed, as set out in section 108 of the Town and Country Planning Act:
- The planning permission withdrawn is of a prescribed description as set out in the Town and Country Planning (Compensation) Regulations 2015 (as amended).
 - The permitted development right is withdrawn in the prescribed manner.
 - Notice of withdrawal is given in the prescribed manner:
 - Not less than 12 months before it takes effect.
 - Not more than the prescribed period of two years.
41. Permitted development rights granted by Schedule 2, Part 16 are prescribed development, which means that compensation may be payable for 12 months from the date that the direction comes into force. If more than 12 months' notice of the withdrawal were given no compensation would be payable.

SUPPLEMENTARY ADVICE FROM OTHER OFFICERS

Assistant Chief Executive – Governance and Assurance

42. Planning Committee is being asked to confirm a non-immediate Article 4 Direction to withdraw the permitted development rights granted by Schedule 2, Part 16 of the Town and Country (General Permitted Development) Order 2015 for communications development and to delegate to the Director of Planning and Growth the arrangements for making the Article 4 Direction including compliance with the notification requirements under the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended).

43. The council's constitution (Part 3F, 'matters reserved by the Planning Committee,' at paragraph 10) reserves to the Planning Committee any authorisation under Article 4 of the Town and Country (General Permitted Development) Order 2015. This confirms Planning Committee has the authority to take the decisions as set out in the proposed recommendations above.
44. Officers have considered the council's PSED under section 149 of the 2010 Act at paragraphs 31 to 35 of this report and have concluded that the proposals are not considered to have any adverse impacts on persons with protected characteristics, and will not undermine the three needs in the PSED.
45. In addition, the Human Rights Act 1988 imposed a duty on the council as a public authority to apply the European Convention on Human Rights; as a result the council must not act in a way which is incompatible with these rights. The most important rights for planning purposes are Article 8 (respect for homes), Article 6 (natural justice) and Article 1 of the First Protocol (peaceful enjoyment of property). It is important to note that few rights are absolute in the sense that they cannot be interfered with under any circumstances. 'Qualified' rights including Article 8 and the First Protocol can be interfered with or limited in certain circumstances. The extent of legitimate interference is subject to the principle of proportionality whereby a balance must be struck between the legitimate aims to be achieved by a local planning authority in the policy making process against the potential interference with individual human rights. In this case, it is considered proportionate to remove permitted development rights in order to protect a discrete part of the council from excessive communications apparatus.
46. Council Assembly on 14 July 2021 approved a change to the council's Constitution to confirm that all decisions made by the council will consider climate and equality (including socio-economic disadvantage and health inequality) consequences of taking the decision have been considered at paragraph 30 above.

BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
None		

APPENDICES

No.	Title
Appendix 1	Site map

AUDIT TRAIL

Lead Officer	Stephen Platts, Director of Planning and Growth		
Report Author	Matthew Lambert, Planning Officer		
Dated	25 September 2024		
Key Decision?	No		
CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER			
Officer Title		Comments Sought	Comments Included
Assistant Chief Executive – Governance and Assurance		Yes	Yes
Strategic Director, Resources		No	No
Cabinet Member		No	No
Date final report sent to Constitutional Team			25 September 2024



Planning Committee (Major Applications) A

MINUTES of the Planning Committee (Major Applications) A held on Tuesday 8 October 2024 at 6.30 pm at Ground Floor Meeting Room G02 - 160 Tooley Street, London SE1 2QH

PRESENT: Councillor Richard Livingstone (Chair)
Councillor Kath Whittam (Vice-Chair)
Councillor Ellie Cumbo (Reserve)
Councillor Gavin Edwards
Councillor Darren Merrill
Councillor Reginald Popoola
Councillor Emily Tester (Reserve)

OFFICER SUPPORT: Colin Wilson (Head of Strategic Development)
Ravinder Johal (Specialist Planning Lawyer)
Dipesh Patel (Group Manager - Major Applications and New Homes Team)
Matt Harris (Team Leader, Design Conservation and Transport)
Matthew Lambert (Team Leader, Planning Enforcement)
Paul Ricketts (Planning Team Leader)
Gerald Gohler (Constitutional Officer)

1. APOLOGIES

There were apologies for absence from Councillors Esme Hicks and Nick Johnson.

2. CONFIRMATION OF VOTING MEMBERS

Those members listed as present above were confirmed as the voting members for the meeting.

3. NOTIFICATION OF ANY ITEMS OF BUSINESS WHICH THE CHAIR DEEMS URGENT

The chair drew members' attention to the members' pack and addendum report which had been circulated before the meeting.

4. DISCLOSURE OF INTERESTS AND DISPENSATIONS

The following members declared an interest in item:

7.1 6-12 Verney Road, London, Southwark SE16 3DH

Councillor Richard Livingstone, non-pecuniary, as this application was in his ward. He had, however, not taken a view on this application and would be approaching it with an open mind.

7.2 City Business Centre (St Olav's Court), Lower Road, London SE16 2XB

Councillor Kath Whittam, non-pecuniary, as she wanted to speak on this item in her capacity as a ward councillor, she would not take part in the discussion and decision making on this item.

5. MINUTES

RESOLVED:

That the minutes for Planning Committee (Major Applications) A meeting held on the 31 July 2024 be approved as a correct record and signed by the chair.

6. PROPOSED ARTICLE 4 DIRECTION FOR THE WITHDRAWAL OF PART 16 PERMITTED DEVELOPMENT RIGHTS (COMMUNICATIONS DEVELOPMENT) AT THE JUNCTION OF CROXTED ROAD AND NORWOOD ROAD, LONDON SE24 9DA

Report: see pages 6 to 16 of the agenda pack.

The committee heard the officer's introduction to the report. Members put questions to the officer.

RESOLVED:

1. That the making of an Article 4 Direction (without immediate effect) to withdraw the permitted development rights granted by Schedule 2, Part 16 of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) ('the GPDO') for Communications Development be approved.

2. That the arrangements for making the Article 4 Directions be delegated to the director of planning and growth.

7. DEVELOPMENT MANAGEMENT

RESOLVED:

1. That the determination of planning applications, or formal observations and comments, the instigation of enforcement action and the receipt of the reports included in the attached items were considered.
2. That the decisions made on the planning applications be subject to the conditions and/or made for the reasons set out in the attached reports unless otherwise stated be agreed.
3. That where reasons for decisions or conditions were not included or not as included in the reports relating to an individual item, they be clearly specified and agreed.

7.1 6-12 VERNEY ROAD, LONDON, SOUTHWARK SE16 3DH

Planning Application Number: 23/AP/0948

Report: see pages 22 to 165 of the agenda pack and page 1 of the addendum report.

PROPOSAL:

Demolition of existing buildings and structures on the site and redevelopment to provide an up to four storey building to accommodate industrial and logistics (Use Class B2, B8 and Class E(g)) plus part ground floor flexible Ea and/or Eb together with plant, landscaping, the formation of new accesses and alterations to existing accesses, associated vehicle and cycle parking and other associated works (as revised on 29.02.2024 and 29.04.2024).

The committee heard the officer's introduction to the report and addendum report. Members put questions to officers.

Representatives of the objectors addressed the committee and responded to questions put by members of the committee.

The applicant's representatives addressed the committee and answered questions put by members of the committee.

A representative of supporters of the application living within 100 metres of the development site addressed the committee. The committee did not ask questions of the representative of the supporters.

There were no ward councillors who wished to address the meeting.

The committee put further questions to officers and discussed the application.

A motion to grant planning permission as on paper was moved, seconded, put to the vote and declared carried.

RESOLVED:

1. That planning permission be granted subject to the conditions set out in the report, the applicant entering into an appropriate legal agreement, and referral to the Mayor of London.
2. That in the event that the requirements of paragraph 1 above are not met by 7 April 2025, the director of planning and growth be authorised to refuse planning permission, if appropriate, for the reasons set out in paragraph 216 of the report.

The meeting then took a ten-minute comfort break and resumed at 19:56. At this point Councillor Kath Whittam left the top table and sat with the audience.

7.2 CITY BUSINESS CENTRE (ST OLAV'S COURT), LOWER ROAD LONDON SE16 2XB

Planning Application Number: 23/AP/3487

Report: see pages 166 to 256 of the agenda pack and pages 1 to 19 of the addendum report.

PROPOSAL:

Demolition of existing buildings and redevelopment to provide one mixed-use building of up to 17 storeys in height, with a single basement, comprising 216 purpose-built shared living units and communal amenity space (Sui Generis) and 1,517 square meters of commercial floorspace (Use Class E), and one mixed-use building of up to 10 storeys in height, with a single basement, comprising 24 homes and communal amenity space (Use Class C3) and 149.6 square meters of commercial floorspace (Use Class E); and public realm, including play space, as well as other associated works.

The committee heard the officer's introduction to the report and addendum report. Members put questions to officers.

Representatives of the objectors addressed the committee and responded to questions put by members of the committee.

The applicant's representatives addressed the committee and answered questions put by members of the committee.

A representative of supporters of the application living within 100 metres of the development site addressed the committee, and responded to questions put by members of the committee.

Councillor Kath Whittam addressed the committee in her capacity as a ward councillor and responded to questions from members of the committee. After this Councillor Whittam left the meeting room.

The committee put further questions to officers and discussed the application.

Members asked for the following to be included in the Section 106 agreement:

- That the co-living part of the development not be opened until the affordable housing element has been delivered
- That the co-living element of the development be used exclusively as a co-living space.

A motion to grant planning permission as on paper was moved, seconded, put to the vote and declared carried.

RESOLVED:

1. That planning permission be granted subject to the conditions set out in the report and addendum report, the applicant entering into an appropriate legal agreement, and referral to the Mayor of London.
2. In the event that the requirements of paragraph 1 above are not met by 28 February 2025 the director of planning and growth, be authorised to refuse planning permission, if appropriate, for the reasons set out in paragraph 133 of the report.

The meeting ended at 21:42.

CHAIR:

DATED:

**TOWN AND COUNTRY PLANNING (GENERAL PERMITTED DEVELOPMENT)
(ENGLAND) ORDER 2015 (AS AMENDED)**

**DIRECTION WITHOUT IMMEDIATE EFFECT MADE UNDER ARTICLE 4(1) TO
WHICH ARTICLE 6 APPLIES**

WHEREAS the London Borough of Southwark being the appropriate local planning authority within the meaning of Article 4(5) of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) are satisfied that it is expedient that development of the description(s) set out in the Schedule A below should not be carried out on the land as described in Schedule B and shown edged red (for identification purposes only) on the attached plans, unless planning permission is granted on an application made under Part III of the Town and Country Planning Act 1990 (as amended).

NOW THEREFORE the said Council in pursuance of the power conferred on them by Article 4(1) of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) hereby direct that the permission granted by Article 3 of the said Order shall not apply to development on the said land of the description(s) set out in the Schedule A below.

SCHEDULE A

Development comprised within Classes A-E of Part 16 of Schedule 2 of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended):

Class A – electronic communications code operators

Development by or on behalf of an electronic communications code operator for the purpose of the operator's electronic communications network in, on, over or under land controlled by that operator or in accordance with the electronic communications code, consisting of—

- (a) the installation, alteration or replacement of any electronic communications apparatus,*
- (b) the use of land in an emergency for a period not exceeding 6 months to station and operate moveable electronic communications apparatus required for the*

replacement of unserviceable electronic communications apparatus, including the provision of moveable structures on the land for the purposes of that use, or
 (c) development ancillary to radio equipment housing.

Class B – other telecommunications development

The installation, alteration or replacement on any building or other structure of a height of 15 metres or more of a microwave antenna and any structure intended for the support of a microwave antenna.

Class C – other telecommunications development: microwave antenna

The installation, alteration or replacement on any building or other structure of a height of less than 15 metres of a microwave antenna.

Class D – driver information systems

The installation, alteration or replacement of system apparatus by or on behalf of a driver information system operator.

Class E – universal postal service providers

Development required for the purposes of a universal service provider (within the meaning of Part 3 of the Postal Services Act 2011(6)) in connection with the provision of a universal postal service (within the meaning of that Part) consisting of—

- (a) the installation of posting boxes or self-service machines,
- (b) any other development carried out in, on, over or under the operational land of the undertaking.

SCHEDULE B

Land on the corner of Croxted Road and Norwood Road, in front of number 294 Croxted Road, and numbers 85-87 Norwood Road, as shown edged in red for identification purposes only on the map attached at **Annex 1**.

THIS DIRECTION is made under article 4(1) of the said Order and, in accordance with paragraph 1(4)(e) of Schedule 3 of the Order, shall come into force on **21 February 2025**.

1. Made under the Common Seal of the London Borough of Southwark this
 ...17th.....day of...~~December~~...2024...

The Common Seal of the Mayor
 and Burgesses of the London Borough
 of Southwark was hereto
 affixed in the presence of



[Handwritten signature]

.....
 Authorised Signatory

KAREN MOORE

2. Confirmed under the Common Seal of the London Borough of Southwark this
day of.....20.....

The Common Seal of the Mayor
 and Burgesses of the London Borough
 of Southwark was hereto
 affixed in the presence of

.....

Authorised Signatory



**TOWN AND COUNTRY PLANNING (GENERAL PERMITTED DEVELOPMENT)
(ENGLAND) ORDER 2015 (AS AMENDED)**

NOTIFICATION OF ARTICLE 4 DIRECTION

On the 17 December 2024, Southwark Council made a non-immediate Article 4 Direction removing permitted development rights granted by Schedule 2, Part 16 of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) at Land on the corner of Croxted Road and Norwood Road, in front of number 294 Croxted Road, and numbers 85-87 Norwood Road, London, SE24 9DA as shown on the map which accompanies the Article 4 Direction.

Development of the descriptions set out above should not be carried out on the land shown edged red on the map annexed to the Directions, unless planning permission is granted on an application made under Part III of the Town and Country Planning Act 1990, as amended.

A copy of the Article 4 Direction and the maps can be downloaded from the Council's Planning Register under case reference 24/AP/3639 at <https://planning.southwark.gov.uk/online-applications> or, by appointment at the council offices at 160 Tooley Street, London, SE1 2QH, between the following hours: 9am – 4:30pm Monday to Friday. Telephone 0207 525 5471.

Representations concerning the Article 4 Direction can be made between **20 December 2024** and **31 January 2025**.

You can comment by:

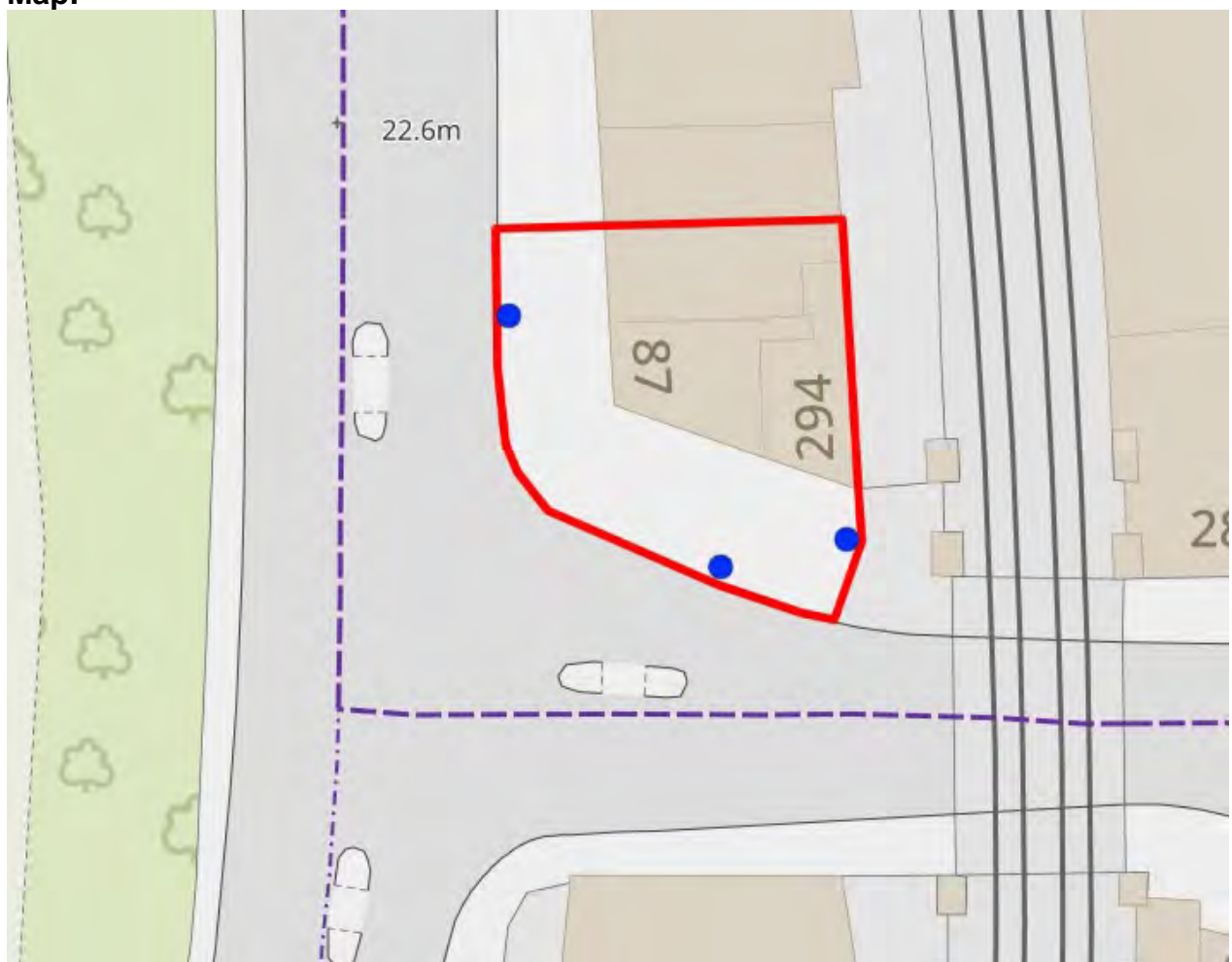
- Visiting the Planning Register <https://planning.southwark.gov.uk/online-applications> and searching for case 24/AP/3639
- Emailing planning.enforcement@southwark.gov.uk; or
- In writing to Planning Enforcement, 5th Floor, Hub C, Southwark Council, 160 Tooley Street, PO BOX 64529, London SE1P 5LX

The Article 4 Direction shall come into force, subject to confirmation by the Council, on **21 February 2025**.

Record of site notice display

Reference No.:	24/AP/3639
Proposal:	Proposed Article 4(1) Direction to withdraw permitted development rights granted by Schedule 2, Part 16 of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended)
Site Address:	Land on the corner of Croxted Road and Norwood Road, in front of number 294 Croxted Road, and numbers 85-87 Norwood Road, London, SE24 9DA

Site notice(s) display date: 20 December 2024

Map:

Pictures:





Planning & Growth Directorate

Planning Division

Our ref: 24/AP/3639

Contact: Matthew Lambert

Tel: 020 7525 7451

Email: matthew.lambert@southwark.gov.uk

Website: <https://planning.southwark.gov.uk>

Date: 18 December 2024

SAMPLE

Dear Sir/Madam

TOWN & COUNTRY PLANNING ACT 1990 (as amended) **Notification of a non-immediate Article 4 Direction**

Reference No.:	24/AP/3639
Proposal:	Proposed Article 4(1) Direction to withdraw permitted development rights granted by Schedule 2, Part 16 of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended)
Site Address:	Land on the corner of Croxted Road and Norwood Road, in front of number 294 Croxted Road, and numbers 85-87 Norwood Road, London, SE24 9DA

We are writing to inform you that on 17 December 2024, the Council made a non-immediate Article 4 Direction proposing to remove permitted development rights granted by Schedule 2, Part 16 of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) at the above land, as shown on the map which accompanies the Article 4 Direction.

Development of the descriptions set out above should not be carried out on the above land, unless planning permission is granted on an application made under Part III of the Town and Country Planning Act 1990 (as amended).

Full details of the Article 4 Direction can be viewed on the Planning Register under case reference 24/AP/3639 at <https://planning.southwark.gov.uk/online-applications> or, by appointment at the council offices at 160 Tooley Street, London, SE1 2QH, between the following hours: 9am – 4:30pm Monday to Friday.

Representations concerning the Article 4 Direction can be made between **20 December 2024** and **31 January 2025**. You can comment by:

- Visiting the Planning Register <https://planning.southwark.gov.uk/online-applications> and searching for case **24/AP/3639**
- Emailing planning.enforcement@southwark.gov.uk; or
- Writing to Planning Enforcement, 5th Floor, Hub C, Southwark Council, 160 Tooley

Street, PO BOX 64529, London SE1P 5LX.

The Article 4 Direction shall come into force, subject to confirmation by the Council, on **21 February 2025**.

Yours faithfully

Matthew Lambert
Team Leader - Planning Enforcement

Title	First Name	Surname	Company Name	Address Line 1	Address Line 2	City	County	Postcode	Country or Region	Home Phone	Work Phone	Email Address
	The Owner(s)			294 Croxted Road		London		SE24 9DA				
	The Occupier(s)			294 Croxted Road		London		SE24 9DA				
				294 Croxted Road		London		SE24 9DA				
				294 Croxted Road		London		SE24 9DA				
	The Owner(s)			85 Norwood Road		London		SE24 9AA				
	The Occupier(s)			85 Norwood Road		London		SE24 9AA				
				85 Norwood Road		London		SE24 9AA				
	The Owner(s)			87 Norwood Road		London		SE24 9AA				
	The Occupier(s)			87 Norwood Road		London		SE24 9AA				
				87 Norwood Road		London		SE24 9AA				
	Director of Highways, Environment & FM		London Borough of Lambeth	PO Box 80771		London		SW2 9QQ				
	The Company Secretary		ST. MARYLEBONE PROPERTY COMPANY LTD	5 Harley Place		London		W1G 8QD				
	The Company Secretary		Telefonica UK Limited	500	Brook Drive	Reading		RG2 6UU				
	The Company Secretary		Telefonica O2 UK Limited	Highdown House	Yeoman Way	Worthing, West Sussex		BN99 3HH				
	The Company Secretary		Vodafone Ltd	Vodafone House	The Connection	Newbury, Berkshire		RG14 2FN				
	SAMPLE											

Lambert, Matthew

From: Lambert, Matthew
Sent: 20 December 2024 11:59
To: PCU@communities.gov.uk
Subject: Notification of a non-immediate Article 4 Direction to Secretary of State - London Borough of Southwark
Attachments: Article 4 First Seal 17 December 2024.pdf; ANNEX 1 - ARTICLE 4 DIRECTION MAP.pdf

Dear Sir/Madam,

Notification of a non-immediate Article 4 Direction to the Secretary of State.

We are writing to inform you that on 17 December 2024, Southwark Council made a non-immediate Article 4 Direction proposing to remove permitted development rights granted by the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended).

The Article 4 Direction removes permitted development rights granted by Schedule 2, Part 16 of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) at **Land on the corner of Croxted Road and Norwood Road, in front of number 294 Croxted Road, and numbers 85-87 Norwood Road, London, SE24 9DA** as shown on the map which accompanies the Article 4 Direction.

A copy of the Article 4 Direction and related documents can be downloaded from the Council's Planning Register under case reference **24/AP/3639** at <https://planning.southwark.gov.uk/online-applications/applicationDetails.do?activeTab=summary&keyVal=ZZZV1CKBWR518>

Notification was made today **20 December 2024**, by site notice, press notice and notice to owners and occupiers of the land affected. We have invited representations concerning the Article 4 Directions between **20 December 2024** and **31 January 2025**.

The Article 4 Direction shall come into force, subject to confirmation by the Council, on **21 February 2025**.

Please let me know if you require any further notification.

Yours faithfully

Matthew Lambert

Team Leader - Planning Enforcement
 Planning and Growth Directorate
 Resource Department | London Borough of Southwark
 160 Tooley Street, London SE1P 5LX
 Tel: 020 7525 7451
 Mobile: 07947 919 577
 Email: Matthew.Lambert@southwark.gov.uk
<http://www.southwark.gov.uk>

Please note I do not work on Thursdays

Please consider the environment before printing this e-mail

Meeting Name:	Planning Committee (Major Applications) A
Date:	11 February 2025
Report title:	Development Management
Ward(s) or groups affected:	All
Classification:	Open
Reason for lateness (if applicable):	Not applicable
From:	Proper Constitutional Officer

RECOMMENDATIONS

1. That the determination of planning applications, or formal observations and comments, the instigation of enforcement action and the receipt of the reports included in the attached items be considered.
2. That the decisions made on the planning applications be subject to the conditions and/or made for the reasons set out in the attached reports unless otherwise stated.
3. That where reasons for decisions or conditions are not included or not as included in the reports relating to an individual item, they be clearly specified.

BACKGROUND INFORMATION

4. The council's powers to consider planning business are detailed in Part 3F which describes the role and functions of the planning committees. The matters reserved to the planning committees exercising planning functions are described in part 3F of the Southwark Council constitution.

KEY ISSUES FOR CONSIDERATION

5. In respect of the attached planning committee items members are asked, where appropriate:
 - a. To determine those applications in respect of site(s) within the borough, subject where applicable, to the consent of the Secretary of State for Levelling Up, Housing and Communities and any directions made by the Mayor of London.

- b. To give observations on applications in respect of which the council is not the planning authority in planning matters but which relate to site(s) within the borough, or where the site(s) is outside the borough but may affect the amenity of residents within the borough.
 - c. To receive for information any reports on the previous determination of applications, current activities on site, or other information relating to specific planning applications requested by members.
- 6. Each of the following items are preceded by a map showing the location of the land/property to which the report relates. Following the report, there is a draft decision notice detailing the officer's recommendation indicating approval or refusal. Where a refusal is recommended the draft decision notice will detail the reasons for such refusal.
- 7. Applicants have the right to appeal to Planning Inspector against a refusal of planning permission and against any condition imposed as part of permission. Costs are incurred in presenting the council's case at appeal which maybe substantial if the matter is dealt with at a public inquiry.
- 8. The sanctioning of enforcement action can also involve costs such as process serving, court costs and of legal representation.
- 9. Where either party is felt to have acted unreasonably in an appeal the inspector can make an award of costs against the offending party.
- 10. All legal/counsel fees and costs as well as awards of costs against the council are borne by the budget of the relevant department.

Community impact statement

- 11. Community impact considerations are contained within each item.

SUPPLEMENTARY ADVICE FROM OTHER OFFICERS

Assistant Chief Executive – Governance and Assurance

- 12. A resolution to grant planning permission shall mean that the director of planning and growth is authorised to grant planning permission. The resolution does not itself constitute the permission and only the formal document authorised by the committee and issued under the signature of the director of planning and growth shall constitute a planning permission. Any additional conditions required by the committee will be recorded in the minutes and the final planning permission issued will reflect the requirements of the planning committee.

13. A resolution to grant planning permission subject to legal agreement shall mean that the director of planning and growth is authorised to issue a planning permission subject to the applicant and any other necessary party entering into a written agreement in a form of words prepared by the assistant chief executive – governance and assurance, and which is satisfactory to the director of planning and growth. Developers meet the council's legal costs of such agreements. Such an agreement shall be entered into under section 106 of the Town and Country Planning Act 1990 or under another appropriate enactment as shall be determined by the assistant chief executive – governance and assurance. The planning permission will not be issued unless such an agreement is completed.
14. Section 70 of the Town and Country Planning Act 1990 as amended requires the council to have regard to the provisions of the development plan, so far as material to the application, and to any other material considerations when dealing with applications for planning permission.
15. Section 38(6) of the Planning and Compulsory Purchase Act 2004 provides that where, in making any determination under the planning Acts, regard is to be had to the development plan, the determination shall be made in accordance with the plan unless material considerations indicate otherwise. The development plan is currently the Southwark Plan which was adopted by the council in February 2022. The Southwark Plan 2022 was adopted after the London Plan in 2021. For the purpose of decision-making, the policies of the London Plan 2021 should not be considered out of date simply because they were adopted before the Southwark Plan 2022. London Plan policies should be given weight according to the degree of consistency with the Southwark Plan 2022.
16. The National Planning Policy Framework (NPPF), as amended in July 2021, is a relevant material consideration and should be taken into account in any decision-making.
17. Section 143 of the Localism Act 2011 provides that local finance considerations (such as government grants and other financial assistance such as New Homes Bonus) and monies received through CIL (including the Mayoral CIL) are a material consideration to be taken into account in the determination of planning applications in England. However, the weight to be attached to such matters remains a matter for the decision-maker.
18. "Regulation 122 of the Community Infrastructure Levy regulations (CIL) 2010 as amended, provides that "a planning obligation may only constitute a reason for granting planning permission if the obligation is:
 - a. necessary to make the development acceptable in planning terms;
 - b. directly related to the development; and
 - c. fairly and reasonably related to the scale and kind to the development.

A planning obligation may only constitute a reason for granting planning permission if it complies with the above statutory tests."

19. The obligation must also be such as a reasonable planning authority, duly appreciating its statutory duties can properly impose i.e. it must not be so unreasonable that no reasonable authority could have imposed it. Before resolving to grant planning permission subject to a legal agreement members should therefore satisfy themselves that the subject matter of the proposed agreement will meet these tests.

BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
Council assembly agenda 23 May 2012	Constitutional Team 160 Tooley Street London SE1 2QH	Virginia Wynn-Jones 020 7525 7055
Each planning committee item has a separate planning case file	Development Management 160 Tooley Street London SE1 2QH	Planning Department 020 7525 5403

APPENDICES

No.	Title
None	

AUDIT TRAIL

Lead Officer	Chidilim Agada, Head of Constitutional Services		
Report Author	Alex Godinet, Lawyer, Finance and Governance Gerald Gohler, Constitutional Officer		
Version	Final		
Dated	30 January 2025		
Key Decision?	No		
CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER			
Officer Title		Comments sought	Comments included
Assistant Chief Executive – Governance and Assurance		Yes	Yes
Director of Planning and Growth		No	No
Cabinet Member		No	No
Date final report sent to Constitutional Team			30 January 2025

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COMMITTEE:

NOTE:

PLANNING COMMITTEE (MAJOR APPLICATIONS) A

Original held in Constitutional Team; all amendments/queries to Gerald Gohler, Constitutional Team, Tel: 020 7525 7420

MUNICIPAL YEAR 2024-25

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		COMMUNICATIONS TEAM (Electronic) Eddie Townsend	
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		CONSTITUTIONAL TEAM Gerald Gohler (incl. chair's copy) 2nd Floor, Hub 2	4
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