

<b>Item No:</b> 6.1	<b>Classification:</b> Open	<b>Date:</b> 5 October 2021	<b>Meeting Name:</b> Planning Committee
<b>Report title:</b>		<b>Addendum report</b> Late observations and further information	
<b>Ward(s) or groups affected:</b>		St Giles	
<b>From:</b>		Director of Planning	

## PURPOSE

1. To advise members of clarifications, corrections, consultation responses and further information received in respect of the following planning applications on the main agenda. These were received after the preparation of the report and the matters raised may not therefore have been taken in to account in reaching the stated recommendation.

## RECOMMENDATION

2. That members note and consider the additional information and consultation responses in respect of each item in reaching their decision.

## FACTORS FOR CONSIDERATION

3. Late observations, consultation responses, information and revisions have been received in respect of the following planning applications on the main agenda:

**Item 6.1: 20/AP/2768 MAPOTHER HOUSE, MAUDSLEY HOSPITAL, DE CRESPIGNY PARK, LONDON, SOUTHWARK, SE5 8AF**

### Additional consultation responses received

4. Subsequent to the publication of the committee report 1 additional representation has been received raising concerns with the assessment of the application and conclusions set out in the committee report. The concerns raised relate to objections already set out in the report and addressed as part of the assessment of the application. Specifically the comments relate to the following issues
  - Concern over impact of the development on future hospital patients
  - Lack of evidence that this proposal will support hospital growth
  - Impact on the conservation area
  - Concerns over design, height and density
  - Lack of health impact assessment

- Inadequate public engagement

Corrections and clarifications on the main report

5. The following paragraphs should be replaced in the main report due to publishing issues.

Pg 19 – Proposed Site Wide Masterplan

The following image was incomplete



Pg 27–36 – Comments from Members of Public and Local Groups

The following table was difficult to read in the main report due to formatting issues

Objections	Officer Response
Land Use Issues <ul style="list-style-type: none"> <li>• Reducing land/buildings for hospital use for hospital</li> </ul>	<ul style="list-style-type: none"> <li>• NSP 33 states that the site should “Provide health, research and</li> </ul>

<p>buildings is negligent</p> <ul style="list-style-type: none"> <li>• There is an urgent need for more hospital beds – this should be the priority</li> <li>• Where will the need for increased demand for mental health facilities be met?</li> <li>• Residential units does would not support the functioning of the Denmark Hill health cluster and therefore this development is contrary to the NSP.</li> <li>• The funds to be raised from this development is a short term solution for the NHS – long term more hospital space is needed</li> </ul>	<p>education facilities or otherwise support the functioning of the Denmark Hill health cluster.”</p> <ul style="list-style-type: none"> <li>• The NHS/Trust SlaM masterplan has set out a clear strategy for the management of their portfolio of land/facilities to maximise their ability to deliver medical services and to ensure that they can meet current and future demand and support the functioning of the Denmark Hill health cluster. This has been supported by LBS through the grant of consents to help deliver the masterplan</li> <li>• The proposal complies with development plan policies by not resulting in a reduction of medical floorspace as all existing services will be re-provided elsewhere before this planning permission is commenced. This will help to support the functioning of the health cluster and will be secured in the s106 agreement.</li> <li>• As there is no reduction in healthcare floospace/facilities, and the new accommodation would be in modern fit for purpose buildings which would enhance the health care service provided within this cluster, the provision of much needed housing would be acceptable in accordance with the development plan.</li> </ul>
<p>Amenity Issues</p> <ul style="list-style-type: none"> <li>• The development will result in a loss of light, overshadowing and loss of outlook and loss of privacy for neighbours opposite</li> <li>• The development will lead to</li> </ul>	<ul style="list-style-type: none"> <li>• For the reasons set out in this report the proposal is not considered to have a significant adverse impact on neighbouring properties. Sufficient distance will be retained to prevent issues of overlooking and loss of privacy. The daylight/sunlight assessment submitted demonstrates</li> </ul>

<p>an increase in noise and traffic disturbance</p> <ul style="list-style-type: none"> <li>• Patients at the hospital will be disturbed by residents living so close</li> <li>• There are too many flat developments in this area which together will cause harm to existing residents by way of noise, disturbance and traffic</li> <li>• There have been historic issues with noise from plant at the hospital</li> <li>• The noise assessment submitted is inadequate</li> <li>• The development will remove important amenity views through the site</li> </ul>	<p>that there would not be a significant adverse impact.</p> <ul style="list-style-type: none"> <li>• This development is car free save for limited disabled parking. As such additional traffic will be limited to deliveries/servicing and those able to utilise the 6 disabled spaces. This would not give rise to significant increases in traffic and therefore disturbance in this respect would be limited.</li> <li>• The hospital is located within an urban area where various uses are required to operate side by side. Given the design of the scheme it is not considered that residential dwellings in this part of the site will disturb hospital patients.</li> <li>• The historic issues associated with plant at the hospital cannot be used to justify refusal of this un-related application. A noise assessment has been submitted to demonstrate the impact of any plant associated with the residential development and appropriate conditions recommended.</li> <li>• The noise assessment submitted was reviewed by EPT and found to be acceptable.</li> <li>• The existing blocks allow very little in the way of views through them. The new blocks have at least some visual permeability. Notwithstanding this there is no right to a view from any residential property.</li> </ul>
<p>Housing issues</p> <ul style="list-style-type: none"> <li>• All of the housing should be affordable</li> <li>• Some of the housing should</li> </ul>	<ul style="list-style-type: none"> <li>• This application includes a policy compliant level (50%) affordable housing comprising social rent and shared ownership which would be available for low income</li> </ul>

<p>be reserved for medical staff</p> <ul style="list-style-type: none"> <li>• These homes will be small and expensive</li> <li>• The submitted reports demonstrate that the flats will not have adequate daylight/sunlight</li> <li>• There are north facing single aspect units and units with poor outlook</li> </ul>	<p>households which is a significant benefit of the scheme. Key workers may well be eligible for the shared ownership units. In advertising the intermediate housing the applicant could work with their RP partner to direct their marketing at hospital staff who may be eligible.</p> <ul style="list-style-type: none"> <li>• For the reasons set out in this report the quality of accommodation is acceptable and will provide a high standard of amenity for future occupiers</li> <li>• There are no single aspect north facing units within the proposal</li> </ul>
<p>Design Issues</p> <ul style="list-style-type: none"> <li>• The TVIA is inadequate</li> <li>• The plans submitted do not sufficiently show the relationship of the proposal compared to buildings opposite the site.</li> <li>• The fenestration style and proposed materials are not reflective of this area</li> <li>• The development is too big and out of scale with the area - buildings should be limited to 4 storeys to reflect the dwellings opposite</li> <li>• The proposal will harm the Conservation Area and nearby listed buildings</li> <li>• The existing buildings are important architecturally and shouldn't be demolished</li> </ul>	<ul style="list-style-type: none"> <li>• The documents submitted are sufficient to enable full and proper assessment of the application.</li> <li>• Whilst not identified as a tall building site the scale of buildings proposed is considered to be acceptable in the context of the hospital campus (existing and emerging).</li> <li>• It is recognised that the buildings on this site would be of a greater scale than those opposite. The tallest block on this site would be 38m high. For the reasons set out in this report the height/scale of buildings are considered to be appropriate.</li> <li>• In terms of design the proposal would deliver buildings of modern design rather than replicating the existing dwellings in De Crespigny Park. Whilst of contemporary design, the architectural treatment and materials result in a series of</li> </ul>

<ul style="list-style-type: none"> <li>• The proposed buildings have no architectural merit</li> <li>• The design of the bays is not right</li> <li>• The 6<sup>th</sup> floor mansard extensions would be better as roof terraces</li> <li>• The buildings should be set back from the road to provide front gardens which would respect the character of the area</li> <li>• The ground floors will have little active street frontage so will affect safety</li> </ul>	<p>high quality buildings set within a soft landscaped environment which is appropriate to the townscape and character of the area.</p> <ul style="list-style-type: none"> <li>• For reasons set out in the heritage and design section of this report the demolition of the existing buildings is considered to be acceptable and the level of harm to the conservation area that may arise would be less than substantial and clearly outweighed by the public benefits of the scheme</li> </ul>
<p>Density and Infrastructure Issues</p> <ul style="list-style-type: none"> <li>• The density is excessive</li> <li>• The increased density in this area will put more pressure on infrastructure (roads/schools/hospitals/doctors/buses and trains)</li> </ul>	<ul style="list-style-type: none"> <li>• For the reasons set out in this report the proposed density is considered to be appropriate for this location. The recently adopted London Plan and the emerging NSP policies focus more upon successful design to optimise developments rather than setting numerical targets.</li> <li>• The provision of additional infrastructure and community facilities is key to the plan led approach of delivering growth in the borough. The council recognise the need for a significant number of new homes but also employment opportunities and infrastructure and community facilities to support additional housing. This is reflected in development plan policies and infrastructure plans for the borough.</li> </ul>

	<ul style="list-style-type: none"> <li>• New developments are subject to the payment of Community Infrastructure Levy which is used to fund additional infrastructure in the borough in addition to any site specific obligations to mitigate the impact of the development.</li> <li>• This development will be subject to the Community Infrastructure Levy as well as a range of financial obligations as set out in the relevant sections of this report.</li> </ul>
<p>Sustainability Issues</p> <ul style="list-style-type: none"> <li>• Demolition of existing buildings is not sustainable solution</li> <li>• The existing buildings could be converted to flats</li> <li>• More roof area could be used to maximise PVs</li> <li>• The sustainability strategy doesn't include any benchmarking (for example BREEAM)</li> <li>• The overheating report isn't adequate</li> <li>• It is not clear how the development addresses lifetime homes</li> </ul>	<ul style="list-style-type: none"> <li>• As set out in the sustainability section of this report the development has been designed to minimise the use of energy, water and materials. An energy strategy has been developed in accordance with the Mayor's energy hierarchy. The proposal would achieve zero carbon targets through a combination of onsite carbon reductions and an offset payment for the shortfall. The technical reports submitted to address sustainability have been reviewed and found to be robust.</li> </ul>
<p>Ecology and Landscape Issues</p> <ul style="list-style-type: none"> <li>• The ecological surveys undertaken are inadequate</li> </ul>	<ul style="list-style-type: none"> <li>• The ecology surveys submitted have been assessed by the Councils Ecologist and found to be robust</li> </ul>

<ul style="list-style-type: none"> <li>• The development will overshadow existing trees in De Crespigny Park Road affecting their health</li> <li>• The proposed planting is not suitable for this area and will also be overshadowed</li> <li>• The new north-south route won't be safe and isn't a 'green route'</li> </ul>	<ul style="list-style-type: none"> <li>• The Councils Urban Forester raises no objection to the proposal in terms of impact on trees and supports the proposed new landscaping strategy</li> <li>• The new route through the site will be designed to be a safe, accessible and pleasant public route. There will be necessary areas of hard landscaping for footpaths/vehicular access. The design and accessibility will be secured through the s106</li> </ul>
<p>Transport Issues</p> <ul style="list-style-type: none"> <li>• The traffic impact assessments submitted are inadequate</li> <li>• More parking for residents and hospital users should be included</li> <li>• More traffic will mean even more accidents in this area</li> <li>• The parking surveys are inadequate and do not reflect Covid impacts</li> <li>• The station needs another entrance to cope with increased demand</li> <li>• This area is already at capacity with traffic</li> </ul>	<ul style="list-style-type: none"> <li>• The original assessments submitted were amended to address concerns raised by the Councils Transport Policy officers. The revised assessments were found to be acceptable by Southwark and TfL.</li> <li>• All new development is required to limit on-site car parking and maximise sustainable modes of transport.</li> <li>• Only disabled parking is proposed as part of this scheme and future residents will be prevented from obtaining parking permits thus reducing the impact of parking on the local road network</li> <li>• The creation of additional access points into Denmark Hill Station would fall under the remit of Network Rail. However, routes to the station would be improved as a result of this proposal and other developments coming forward.</li> </ul>



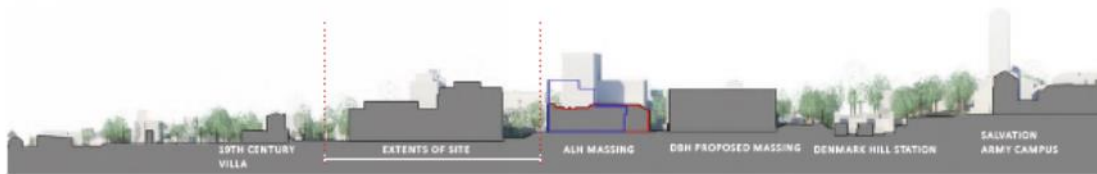
	<ul style="list-style-type: none"> <li>It is recognised that it will be necessary for the development to address the additional demand that will be created in terms of sustainable travel by virtue of travel plan incentives, and financial contributions towards improvements to highway infrastructure.</li> </ul>
<p>Construction Impacts</p> <ul style="list-style-type: none"> <li>There will be unacceptable harm and disturbance from 3 years of construction works to residents but also hospital patients and Lyndhurst School</li> <li>Air quality in this area is already poor, this will be exacerbated by the proposal</li> </ul>	<ul style="list-style-type: none"> <li>Some noise and disturbance arising from construction is inevitable. However, the adverse effects in terms of traffic, noise and air pollution will be minimised as much as possible and controlled via a Construction Environmental Management Plan</li> <li>An air quality assessment was submitted with the application and assessed by the Councils Environmental Protection Team</li> </ul>
<ul style="list-style-type: none"> <li>The tall buildings will create a wind tunnel</li> </ul>	<ul style="list-style-type: none"> <li>The scale of buildings and their relationship to existing buildings is unlikely to create a wind tunnelling effect.</li> </ul>
<ul style="list-style-type: none"> <li>There will be inadequate light to properties in neighbouring schemes</li> </ul>	<ul style="list-style-type: none"> <li>Assessments have been submitted to demonstrate the impact according to BRE guidance. The impact is considered to be acceptable for the reasons set out in the report below</li> </ul>
<ul style="list-style-type: none"> <li>There is no space within the campus for hospital for research or training</li> </ul>	<ul style="list-style-type: none"> <li>The SlaM masterplan has set out how the health cluster will be developed and how space within the hospital will be utilised to provide clinical and other necessary functions such as training/administration. This development does not result in a</li> </ul>

	<p>loss of any hospital floorspace and will help to deliver modern fit for purpose hospital accommodation</p>
<ul style="list-style-type: none"> <li>• This application should have been subject to an Environmental Impact Assessment especially considering the cumulative effects of other developments in the area</li> <li>• Lack of an EIA mean assessment relies on the documents submitted as part of the main application and those documents are inadequate</li> </ul>	<ul style="list-style-type: none"> <li>• A formal EIA Scoping Response was issued which concluded that the development was not EIA development. The reasons for this are set out in the report below.</li> <li>• Notwithstanding the fact that the development is not subject to an Environmental Statement full assessment has been made of the impacts in terms of environmental and technical matters through the submission of appropriate reports to cover issues such as noise, air quality, pollution, flood risk, transport, daylight and sunlight.</li> </ul>
<p>Engagement</p> <ul style="list-style-type: none"> <li>• Residents would have liked face to face meetings with SLAM</li> <li>• There was limited pre application consultation with residents</li> <li>• Inadequate consultation undertaken once the application was submitted</li> </ul>	<ul style="list-style-type: none"> <li>• It is understood that the applicant undertook online engagement due to Covid safety restrictions</li> <li>• The Council has consulted residents in accordance with the Councils Statement of Community Involvement and provided additional time for responses to be submitted in light of Covid implications.</li> </ul>
<ul style="list-style-type: none"> <li>• The revisions to the scheme have not overcome previous concerns as set out above.</li> </ul>	<ul style="list-style-type: none"> <li>• The amendments to the scheme have resulted in improvements to address concerns initially raised by Southwark and GLA officers.</li> </ul>
<p><b>Comments in Support</b></p>	
<ul style="list-style-type: none"> <li>• The new pedestrian pathway would be positive</li> <li>• The scale and massing on the whole is appropriate to the area</li> <li>• There is adequate space between blocks for communal gardens and childrens' play spaces</li> <li>• The development would deliver new homes to the area</li> <li>• There are equal numbers of social rented and private ownership flats.</li> </ul>	

- There is to be an on-site children's nursery.
- The historic friezes from Michael Rutter Centre are to be re-purposed.
- The development should include biodiverse roofs for ecology
- The proposal will generate funds for the NHS
- The development will bring new people to the area and help with regeneration

### Pg 58 - Massing Section to Show Context

The following image was missing from the original report



### Recommended revisions to the draft conditions

6. The following tweaks are required to conditions as published on the draft recommendation – Appendix 1

All conditions re-numbered as Condition 5 was missing.

Condition 17 title amended to “Landscape and Habitat Management Plan”.

Condition 16 and 20 (secure by design) were duplicates and therefore Condition 16 will be deleted.

Conditions 25 and 29 tweaked to enable phased delivery of disabled parking spaces and refuse storage as each residential block is built out.

An additional condition is proposed to control the appearance of the PV Panels.

(a) Prior to the commencement of above ground works plans and sectional details at a scale of 1:50 together with 1:100 cross sections of the site showing the proposed final number, location and angle of all Photovoltaic Panels to be installed on site shall be submitted to and approved in writing by the local planning authority. The plans submitted shall demonstrate the visual impact of the panels on the appearance of the building from short and mid-range views to ensure visual impacts of the panels and overall building height mass and bulk is minimised to limit the impact on the adjacent conservation area

(b) The development shall be constructed in full accordance with the approved details.

Reason: In order to ensure that the panels will not be positioned in a way that would adversely affect the character or amenity of the area in accordance with Chapter 12 (Achieving well-designed places) of the National Planning Policy Framework (2021); Policy D4 (Delivering good design) of the London Plan (2021); Strategic Policy 12 (Design and Conservation) of The Core Strategy (2011); and Saved Policies: 3.12 (Quality in Design) and 3.13 (Urban Design) of The Southwark Plan (2007)”

### **Conclusion of the Director of Planning**

7. Having taken into account the amendments to the original report and draft conditions, the recommendation remains that planning permission should be granted, subject to conditions as amended in this Addendum report, completion of a s106 agreement, and referral to the Mayor of London.

### **REASON FOR URGENCY**

8. Applications are required by statute to be considered as speedily as possible. The application has been publicised as being on the agenda for consideration at this meeting of the Planning Committee and applicants and objectors have been invited to attend the meeting to make their views known. Deferral would delay the processing of the applications and would inconvenience all those who attend the meeting.

### **REASON FOR LATENESS**

9. The corrections to the main reports and recommendations have been noted and/or received since the committee agenda was printed. They all relate to items on the agenda and members should be aware of the comments made.

### **BACKGROUND DOCUMENTS**

<b>Background Papers</b>	<b>Held At</b>	<b>Contact</b>
Individual files	Chief Executive's Department 160 Tooley Street London SE1 2QH	Planning enquiries Telephone: 020 7525 5403