

Item No: 6.2	Classification: Open	Date: 30 July 2024	Meeting Name: Planning Committee (Smaller Applications)
Report title:		Addendum report Late observations and further information	
Ward(s) or groups affected:		St Georges	
From:		Director of Planning and Growth	

PURPOSE

1. To advise members of clarifications, corrections, consultation responses and further information received in respect of the following items 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

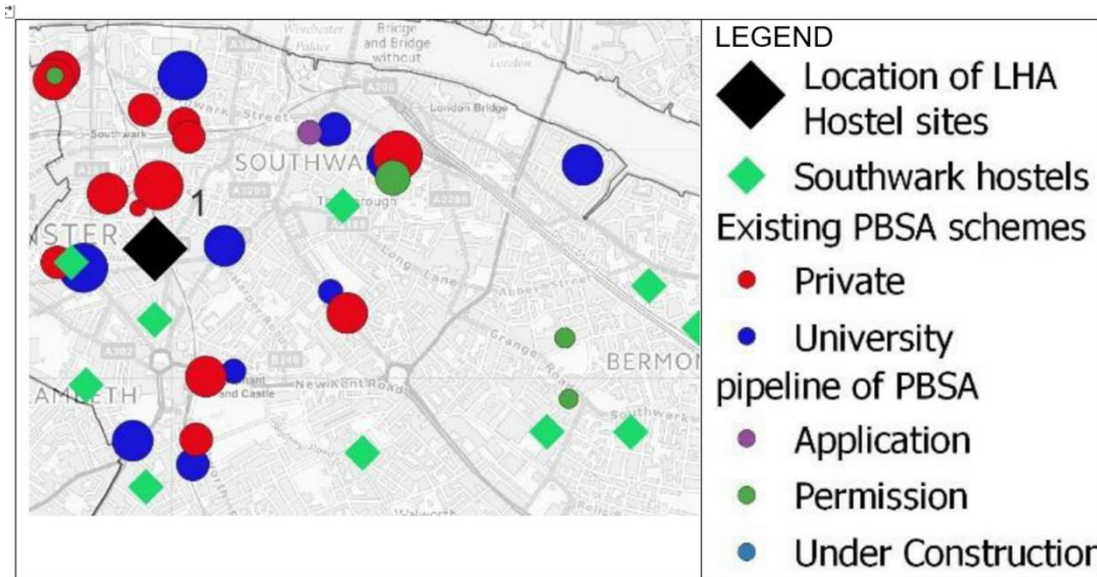
3. Late observations, consultation responses, information and/or revisions have been received in respect of the following items on the main agenda:

ITEM 6.2: 23/AP/2122 for Full Planning Application – Friendship House, 3 Belvedere Place, London, Southwark, SE1 0AD

Paragraph 35 (over-concentration of hostels):

4. A late objection re-iterates concerns previously raised by objectors with regards an over-concentration of hostels and supported housing within the local area with specific reference to Borough Road and adjacent on Southwark Bridge Road. The objector however did not provide any details of the locations of these properties.
5. The applicant submitted a Hostel Needs Assessment dated September 2021. This document contains a map, shown below, showing the site and Southwark hostels, private and university schemes in Southwark. The Hostel Needs Assessment only refer to the three addresses: (Unite Students) 268 Waterloo Road, (Porchester House) New Kent Road and (LSE) 159 Great Dover Street. Wellington Lodge is approximately 400m to the west and appears to be student accommodation. Porchester House is approximately 550m to the

southeast and also appears to be student accommodation. 159 Great Dover Street is approximately 800m to the southeast and also appears to be student accommodation. Whilst this document is almost 3 years old officers have not seen any evidence that the increase in rooms on this sui generis hostel site would lead to an over-concentration of hostel accommodation within the local area. The late objection also re-iterated anti-social behaviour concerns.



The site and Southwark hostels, private and university schemes in Southwark

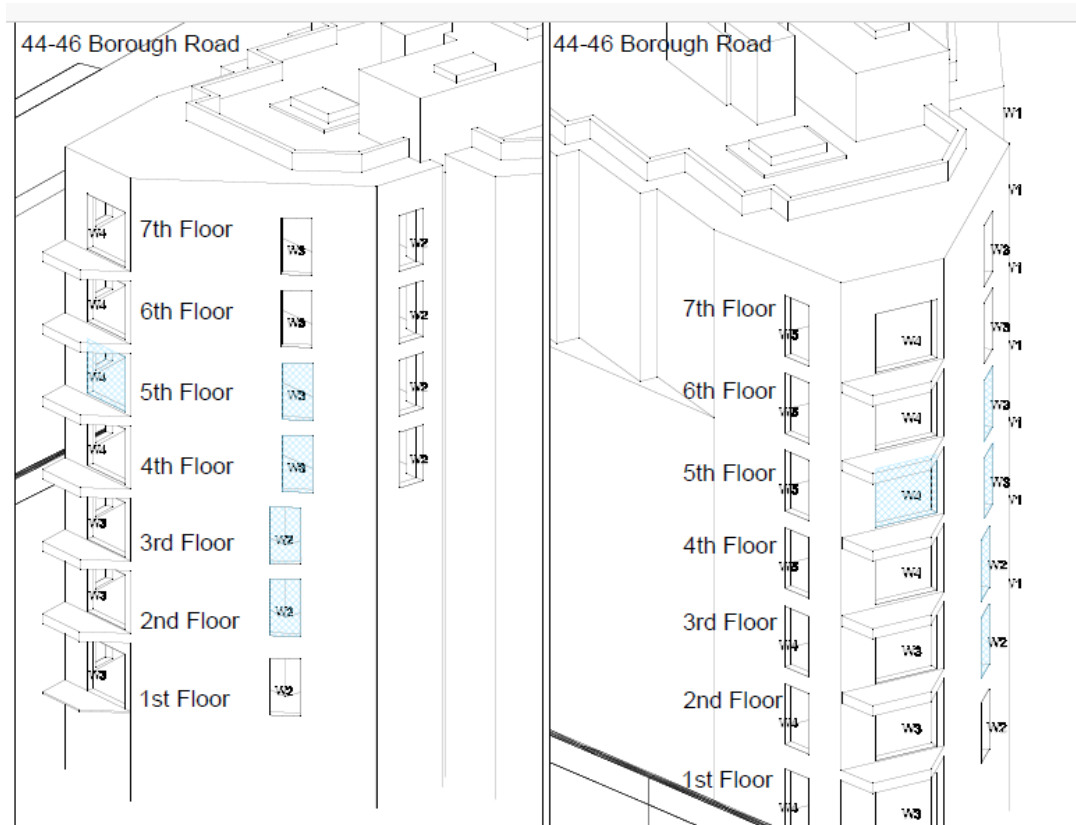
6. The council's Anti-Social Behaviour Team advised on 29.07.2024 that the last received report for Friendship House was the 20th December 2022 in relation to the noise from a dog barking. A wider Belvedere Place check revealed that the location appears considerably low for reported acts of alleged anti-social behaviour /noise.
7. With regards the repeat objection lodged in relation to alleged anti-social issues, the applicant provided some further commentary as below.
8. 'Apex Airspace instructed Savills who undertook a comprehensive piece of work which explained that with the delivery of new dwellings not meeting targets and many households priced out of housing that is available, there is a clear identified and demonstrable need for the delivery of alternative housing options in LB Southwark. Short and longer term rentals in the sui-generis use class provided by the applicant/LHA London is one such housing product that meets a clear need for households who are above the threshold for traditional social housing but cannot afford properties on the open market through the private rented sector, often in Houses of Multiple Occupancy (HMO). LHA accommodation offers affordable housing particularly for key-workers, those in the hospitality and catering industry, students and interns who are typically priced out of the wider PRS market.

9. Despite the clear need for this type of accommodation, supported by a period of circa five years with zero voids, given the quality design of the existing building and technical challenges of airspace, there have been several planning pre-application meetings over the past four years with Officers of LB Southwark, with Apex understanding significant and enhanced technical due diligence and assessment of the building and use type, including sunlight/daylight, Rights of Light, Fire Strategy, Structural Engineering, Acoustic and Vibration Dampening Assessment.
10. Whilst Apex have undertaken more than the usual technical due diligence, we recognise that a number of concerns have been raised by a neighbouring occupier(s) and the applicant team therefore invited them to a workshop on Wednesday 8th May from 3pm-4pm; where we provided them with a short tour of the existing facility, explaining the enhanced technical due diligence that we have undertaken and discussed the proposed risk mitigation and management measures relating to the neighbour's concerns.
11. The reality is that many of the issues referred to in the objector's literature concerns matters which have no relation whatsoever to Friendship House, to its users/occupiers, its staff, its management nor its operations. 'Down and out' drug and alcohol users are not guests of nor visitors to Friendship House. Problems associated with rough sleeping are outside the remit of this planning application proposal and there is a limit to what measures can be done to aid in addressing these ongoing issues that affect the wider community. The applicant has however committed to ensuring proper management of the occupiers of the site and ensuring that the site itself is kept secure and monitored to provide a safe and well-lit space within the grounds of the facility itself and its immediate surrounds from where it has the right to control these things as landowner. LHA London cannot take control of any of the spaces such as the alleyway referred to, which falls outside the boundary of LHA London's ownership.'
12. Concerns were raised in the late letter of objection with regard to the combined impact of the application and the application at Borough Triangle (application reference 24/AP/1958) on daylight and sunlight of 44-46 Borough Road.
13. The applicant provided comments in this regard – '...the proposed development at Borough Triangle (application reference 24/AP/1958) is located to the south-east of 44-46 Borough Road, whereas Friendship House is to the north / north-west. Having obtained plans and considered the dual aspect nature of the windows/rooms adjacent to Friendship House, there would be no material combined effect from Borough Triangle scheme on the results presented in the Daylight Sunlight Consulting report. This is because the dual aspect windows to the tested rooms within 44-46 Borough Road face west, north and north-west, and not taking light from over the Borough Triangle scheme.
14. Attached to this email is a PDF file showing 3D views of the 44-46 Borough Road modelling, from two different angles, with the window referencing and floor levels marked on. Also shown in blue cross hatch are where the five windows fall below the VSC tests. What has been removed from these views are the existing and proposed massing, as they will obscure the view of the windows,

due to the proximity of the buildings. As highlighted in the daylight/sunlight report, light levels are already much lower due to this close relationship.

15. As is highlighted in the summary text for 44-46 Borough Road below, whilst there are areas of non-compliance to the VSC test, the daylight distribution assessments demonstrate the occupants will maintain acceptable light levels, with no noticeable reductions in light. The 3D Views show that there will always be other windows lighting the same room, where there might be VSC reductions, which maintain the light within the rooms.

Image - 44-46 Borough Road 3D Views



16. Therefore, in summary, we can only re-iterate that the Borough Triangle scheme will have no cumulative effect on the windows/rooms tested within 44-46 Borough Road, when considering the Friendship House works. The assessments to 44-46 Borough Road show the occupants within the rooms adjacent to the proposed Friendship House works will maintain acceptable daylight levels, with no noticeable reductions in light.'
17. The application at Borough Triangle is at an early stage as it was submitted on the 8th July 2024 and is likely to be decided later this year or early next year. Each application is assessed on its own merits and officers therefore assessed the current application in isolation in terms of the impact on daylight on 44-46 Borough Road. This is shown in the first table of paragraph 101 in the officer report, included below for ease of reference:

44-46 Borough Road

101. 44-46 Borough Road is located to the south of the site and contains residential uses from first floor level above.

VSC test

	Windows tested	Pass	Fail	No. of Failures between 21% - 38% loss	No. of Failures > 38% loss
	32	27	5	3	2
Total		(84%)	(16%)	(9%)	(6%)

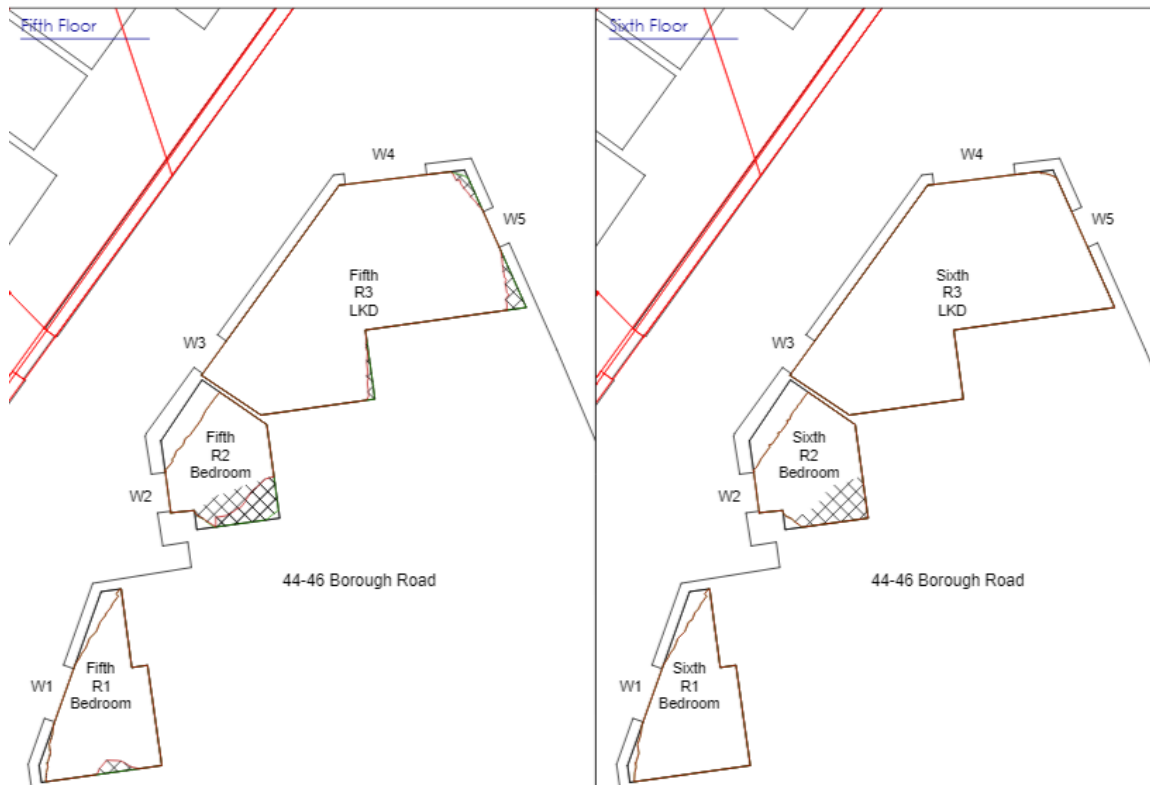
18. The daylight distribution test in paragraph 102 of the officer report shows that all 14 windows tested at 44-46 Borough Road pass the No-Sky Line test. The table is included below for ease of reference:

44-46 Borough Road

NSL test

	Rooms tested	Pass	Fail	No. of Failures between 21% - 38% loss	No. of Failures > 38% loss
	14	14	0	0	0
Total		(100%)	(0%)	(0%)	(0%)

19. The image below is taken from the daylight and sunlight report and shows the existing light contour (green) and the proposed light contour (red) on the fifth and sixth floors at 44-46 Borough Road. The hatched area indicated light reduction, none of which would be below a factor of 0.8.



20. As stated in paragraph 104 in the officer report the BRE sunlight tests should be applied to all main living rooms...which has a window, which faces within 90 degrees of due south. The table below is in paragraph 105 of the officer report and shows that only 4 windows at 44-46 Borough Road needed to be tested. The four windows tested are to a fourth floor bedroom (W2), a fifth floor bedroom (W2), a sixth floor bedroom (W2) and a seventh floor bedroom (W2). Two windows passed both the total annual and winter hours testes. All four windows passed the winter hours test, but three windows would fail the total annual test. However, two of the three windows – on the fourth and fifth floor – already received less than 25% of annual probable sunlight hours.
21. The annual probable sunlight hours of the window on the fourth floor would reduce from 19% to 18% and the annual probable sunlight hours of the fifth floor window would reduce from 23% to 18%. The annual probable sunlight hours of the third window, on the sixth floor, would reduce from 32% to 21%. The sunlight assessment has shown for 44-46 Borough Road that the sunlight levels are limited in both the existing and proposed conditions. The ratio of reduction demonstrates that there would be a noticeable, but not significant, reduction in sunlight. The table is included below for ease of reference:

44-46 Borough Road

Annual probable sunlight hours						
	Windows tested	Passes both tests	Fail Total annual	Fail Winter hours	No. of Failures between 21% - 38% loss (Total)	No. of Failures between 21% - 38% loss (Winter)
	4	2	3	0	0	0
Total		(50%)	(75%)	(0%)	(0%)	(0%)

22. The proposed development at Borough Triangle (application reference 24/AP/1958) comprise:
- Phased mixed-use redevelopment of the site comprising:
- Demolition of all existing buildings/structures and site clearance, except 82 and (part) 83 Borough Road which are to be retained, altered and refurbished for Flexible Commercial, Business and Service, and Learning and non-residential institution uses (Class E / F1);
- Construction of basement structure and vehicular access;
 - Construction of buildings to provide Dwellings (Class C3), Flexible Commercial, Business and Service and mixed food and drink and leisure uses (including drinking establishments with expanded food provision, hot food takeaways, live music performance venue and cinema) (Class E / Sui Generis) and public toilets; and
 - Provision of associated car and cycle parking, open space and landscaping, means of access and highway alterations, installation of plant and utilities and all other associated ancillary works incidental to the development.

Image – existing site and proposed massing:



Fig. 07: Future Baseline - Perspective view



Appendix 1:

23. Contact details of the Management Team of the premises shall permanently be displayed at the main front pedestrian gate.

Reason

In order to ensure that neighbouring properties can contact the Management Team to report any anti-social behaviour associated with the site in accordance with Policy P56 Protection of Amenity of the Southwark Plan 2022.

Appendix 3

24. 21/EQ/0136: Follow up Pre application advice - Construction of a part one, part two and part three storey upward extension above existing Friendship House to provide a mix of single and double ensuite bedrooms totalling 62 Sui Generis Accommodation units, 32 additional cycle parking spaces within secure storage, additional refuse storage capacity (6,600 ltrs) and removal of 1 of 3 existing car parking space (for visitors/staff/deliveries). Closed 18 August 2021.

25. 20/EQ/0055: Pre-application advice for the upward extension of existing roof space comprised of an additional three storeys to the West and South wings and an additional two storeys to the North and East wings to deliver 100 new units of sui generis accommodation. Closed 31 March 2021.

Conclusion of the Director of Planning and Growth

26. Having taken into account the additional information, following consideration of the issues raised, the recommendation remains that planning permission should be granted, subject to conditions as amended in this Addendum report and completion of a s106 agreement.

REASON FOR URGENCY

27. 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

28. The new information and 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

Background Papers	Held At	Contact
Individual files TP/1395-A	Corporate Services, Finance and Governance, 160 Tooley Street London SE1 2QH	Planning enquiries Telephone: 020 7525 5403