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| Item No. 6.3 | Classification: OPEN | Date: 2 July 2013 | Meeting Name: Planning Committee |
| Report title: | Development Management planning application: Application 13/AP/0876 for: Full Planning Permission Address: WOOD DENE, SITE BOUNDED BY QUEENS ROAD, MEETING HOUSE LANE AND CARLTON GROVE SE15 Proposal: Demolition of remaining structures and erection of three buildings between two and nine storeys in height to provide 333 residential units and 450sqm (GIA) of flexible retail (Classes A1-A3) / Office (Class B1) / Non-Residential Institution (Class D1) space together with the provision of access, car and cycle parking, plant, landscaping and an energy centre. | | |
| Ward(s) or groups affected: | Livesey | | |
| From: | Head of Development Management | | |
| Application Start Date 25/03/2013 | | Application Expiry Date 24/06/2013 | |
| | | PPA Expiry Date 30/07/2013 | |

RECOMMENDATION

- 1 That planning permission be granted subject to conditions, the applicant first entering into an appropriate legal agreement, and subject to referral to the Mayor of London.
- 2 In the event that the legal agreement is not entered into by 30 July 2013, the head of development management be authorised to refuse planning permission for the reasons set out in paragraph 167 of this report.

BACKGROUND INFORMATION

Site location and description

- 3 The site is located on the northern side of Queens Road and bounded by Carlton Grove to the east, Meeting House Lane to the west and Hollydene to the north. The site has an area of 1.91 hectares.
- 4 The site is the location of the former Wood Dene housing estate which comprised 323 homes within two interlocking concrete buildings of seven storeys. The estate buildings were demolished in 2007. Currently, the site is vacant with the exception of two sub-stations and an energy centre that serves the Acorn housing estate to the north. There are 32 existing trees on the site and on surrounding footpaths. The entire site is enclosed by a perimeter fence.
- 5 The site is located east of Peckham Town Centre and is surrounded by a mixture of land uses, with predominantly residential to the north and east, mixed residential and commercial to the south and community uses in the east. To the north lie the 2-3 storey Acorn Estate and to the east four storey 1960s/1970s properties on Carlton Grove. To the south is a six storey residential block with ground floor commercial use,

a four storey housing block and Grade II listed Georgian terraces of three-four storeys. To the west, on the corner of Meeting House Lane and Queens Road, is the three storey Peckham Police Station and further north along Meeting House Lane is the Nell Gwynn Nursery School and East Peckham Children's Centre.

Details of proposal

- 6 The application has been submitted by Notting Hill Housing Association. The proposal involves the demolition of remaining site buildings and complete redevelopment of the site with three blocks of residential accommodation and 450sqm (GIA) of ground level flexible retail (Classes A1-A3) / Office (Class B1) / Non-Residential Institution (Class D1) space. The residential element will comprise 333 residential units of 1 to 5 bedrooms, including 117 affordable housing units (35%).
- 7 The development would be in the form of three blocks set around podium courtyards ranging from 2 x 7 storeys in height across the site with an 8-9 storey element on the corner of Meeting House Lane and Queens Road. Generally the proposed height steps up towards the site's western end and reduces in height to the north. The proposed blocks are identified from west to east as blocks A to C. Block A (north of Queens Road and east of Meeting House Lane) ranges from 4 to 9 storeys in height; Block B (north of Queens Road and south of the Acorn Estate) would be between 2 and 6/7 storeys; and Block C (north of Queens Road, west of Charlton Grove and south of the Acorn Estate) would be 2 to 5/6 storeys in height.

The breakdown of the proposed residential units is described in the table below:

8 **Table 1: Tenure of accommodation.**

| | 1 bed | 2 bed | 3 bed | 4 bed | 5 bed | Total |
|---------------------|------------|------------|-----------|----------|----------|------------|
| Block 1 | | | | | | |
| Market | 24 | 42 | 13 | 0 | 0 | 79 |
| Social Rented | 2 | 7 | 5 | 1 | 1 | 16 |
| Shared Ownership | 15 | 12 | 8 | 0 | 0 | 35 |
| Sub- total | 41 | 61 | 26 | 1 | 1 | 130 |
| Block 2 | | | | | | |
| Market | 35 | 39 | 18 | 0 | 0 | 92 |
| Social Rented | 0 | 0 | 0 | 0 | 0 | 0 |
| Shared Ownership | 3 | 11 | 2 | 0 | 0 | 16 |
| Sub-total | 38 | 50 | 20 | 0 | 0 | 108 |
| Block 3 | | | | | | |
| Market | 14 | 24 | 7 | 0 | 0 | 45 |
| Social Rented | 17 | 11 | 9 | 1 | 0 | 38 |
| Shared Ownership | 3 | 6 | 3 | 0 | 0 | 12 |
| Sub-total | 34 | 41 | 19 | 1 | 0 | 95 |
| Scheme Total | 113 | 152 | 65 | 2 | 1 | 333 |

- 9 Across the development, there are 33 (10%) designated wheelchair accessible units (11x 1 bed, 15x 2 bed and 7x 3bed), of which 5 are social rented, 5 are shared ownership and 23 private.

- 10 Private and communal garden areas will be provided at podium level and a new open space created to the north of Block A as a publically accessible pocket park. The proposal also comprises new landscaping, including works to surrounding public realm on Queens Road and Hollydene. New tree planting is proposed within and surrounding the site.
- 11 Pedestrian and cycle permeability are provided by two new public routes running north to south through the site linking Hollydene to Queens Road. A further east-west route would connect Meeting House Lane with Hollydene. Vehicular entry points to the site would be from Carlton Grove, Hollydene and Meeting House Lane for residential parking, servicing, waste collection and emergency access. Parking will be provided within the centre of each courtyard block at ground level. In total, 115 car parking spaces are proposed, of which 33 are designated disabled parking bays. 401 cycle storage spaces are also proposed.
- 12 It is proposed that the existing on-site energy centre will be decommissioned and demolished and a new combined heat and power (CHP) energy centre is proposed. The energy centre will be located in the north-east of the site and within the northern elevation of Block C. Along with roof mounted photovoltaic panels (PVs); the energy centre will help meet the energy demands of the Wood Dene development.

Planning history

- 13 Application ref: 12-AP-4078 for: Screening opinion in order to establish whether the construction of approximately 332 residential units and 470 sqm of commercial space in buildings up to 9 storeys in height would require an Environmental Impact Assessment (EIA). Decision – EIA not required.
- 14 Advertisement consent (ref: 08-AP-1812) for the erection of 6 freestanding illuminated advertisement panels signs was refused 02/10/2008.
- 15 Prior Approval application (ref: 07-PA-0002) for the demolition of 1-319 Wood Dene, 1-11 and 15 Carlton Grove, the Tenants Association Hall, the car park and garages by Meeting House Lane/Peckham High Street and the gardens behind 1-9 Wood Dene was approved 07/02/2007.

Planning history for adjoining sites

- 16 None relevant

KEY ISSUES FOR CONSIDERATION

Summary of main issues

- 17 The main issues to be considered in respect of this application are:
 - a] the principle of the development in terms of land use;
 - b] density;
 - c] the impact of the development on adjoining occupiers;
 - d] the impact of adjoining uses on the proposed development;
 - e] design issues, including impacts on heritage assets;
 - g] housing mix and affordable housing provision;

- h] quality of the accommodation proposed;
- i] the impact of the development in relation to traffic;
- j] sustainability and energy;
- k] section 106 implications.

Planning policy

18 Designations

Under the Southwark Core Strategy, the site is situated in the Urban Density Zone, an Air Quality Management Area, Peckham Village Archaeological Priority Zone, Peckham Major Town Centre, Peckham Action Area Core, Peckham and Nunhead Action Area and is within an area where a minimum of 35% of new units are required to be affordable and at least 35% of new units are required to be private. The site has a Public Transport Accessibility Level (PTAL) of 6a which indicates a high level of access to public transport.

The local Plan:

Core Strategy 2011

19 The relevant strategic policies of the Core Strategy include:

- 1 – Sustainable development
- 2 – Sustainable transport
- 5 – Providing new homes
- 6 – Homes for people on different incomes
- 7 – Family homes
- 10 – Jobs and businesses
- 11 - Open spaces and wildlife
- 12 – Design and conservation
- 13 – High environmental standards

Southwark Plan 2007 (July) - saved policies

20 The council's cabinet on 19th March 2013, as required by para 215 of the NPPF, considered the issue of compliance of Southwark Planning Policy with the National Planning Policy Framework. All policies and proposals were reviewed and the Council satisfied itself that the policies and proposals in use were in conformity with the NPPF. The resolution was that with the exception of Policy 1.8 (location of retail outside town centres) in the Southwark Plan all Southwark Plan policies are saved. Therefore due weight should be given to relevant policies in existing plans in accordance to their degree of consistency with the NPPF.

21 The relevant Policies of the saved Southwark Plan include:

- Policy 1.1 - Access to employment opportunities
- Policy 1.7 – Development within town and local centres
- Policy 2.2 – Provision of new Community Facilities
- Policy 2.5 – Planning Obligations;
- Policy 3.1 – Environmental effects;
- Policy 3.2 – Protection of amenity;
- Policy 3.3 – Sustainability assessment;
- Policy 3.4 – Energy efficiency;
- Policy 3.6 – Air quality;

Policy 3.7 – Waste reduction;
 Policy 3.9 – Water;
 Policy 3.11 – Efficient use of land;
 Policy 3.12 – Quality in design;
 Policy 3.13 – Urban design;
 Policy 3.14 – Designing out crime;
 Policy 3.15 – Conservation of the historic environment
 Policy 3.18 - Setting of Listed Buildings Conservation Areas and World Heritage Sites
 Policy 3.19 – Archaeology;
 Policy 3.20 – Tall Buildings
 Policy 3.28 – Biodiversity;
 Policy 4.1 – Density of residential development;
 Policy 4.2 – Quality of residential accommodation;
 Policy 4.4 – Affordable housing;
 Policy 4.5 – Wheelchair affordable housing;
 Policy 4.6 – Loss of residential accommodation;
 Policy 5.1 – Locating developments;
 Policy 5.2 – Transport Impacts;
 Policy 5.3 - Walking and Cycling;
 Policy 5.6 – Car parking;
 Policy 5.7 – Parking and standards for disabled people and the mobility impaired.

London Plan 2011

- 22 The relevant policies for the London Plan include:
- Policy - 2.15 Town Centres
 - Policy - 2.18 Green infrastructure
 - Policy 3.3 - Increasing housing supply
 - Policy 3.4 - Optimising housing potential
 - Policy 3.5 - Quality and design of housing developments
 - Policy 3.6 - Children and young people's play and informal recreation facilities
 - Policy 3.7 - Large residential developments
 - Policy 3.8 - Housing choice
 - Policy 3.9 - Mixed and balanced communities
 - Policy 3.10 - Definition of affordable housing
 - Policy 3.11 - Affordable housing targets
 - Policy 3.12 - Negotiating affordable housing
 - Policy 3.13 - Affordable housing thresholds
 - Policy 3.14 - Existing Housing
 - Policy 4.1 - Developing London's economy
 - Policy 4.3 Mixed Use Development and Offices
 - Policy 4.7 - Retail and town centre development
 - Policy 4.8 - Supporting a Successful and Diverse Retail Sector
 - Policy 5.1 - Climate change mitigation
 - Policy 5.2 - Minimising carbon dioxide emissions
 - Policy 5.3 - Sustainable design and construction
 - Policy 5.6 - Decentralised energy in development proposals
 - Policy 5.7 - Renewable energy
 - Policy 5.8 - Innovative energy technologies
 - Policy 5.11 - Green roofs and development site environs
 - Policy 5.12 - Flood risk management
 - Policy 5.16 - Waste self-sufficiency
 - Policy 5.17 - Waste capacity
 - Policy 6.1 - Strategic approach
 - Policy 6.3 - Assessing effects of development on transport capacity
 - Policy 6.4 - Enhancing London's transport connectivity
 - Policy 6.5 - Funding Crossrail and other strategically important transport infrastructure

Policy 6.7 - Better streets and surface transport
Policy 6.9 - Cycling
Policy 6.10 - Walking
Policy 6.13 - Parking
Policy 7.1 - Building London's neighbourhoods and communities
Policy 7.2 - An inclusive environment
Policy 7.3 - Designing out crime
Policy 7.4 - Local character
Policy 7.5 - Public realm
Policy 7.6 – Architecture
Policy 7.7 – Location and design of tall and large buildings
Policy 7.8 – Heritage Assets and Archaeology
Policy 7.13 - Safety, security and resilience to emergency
Policy 8.2 - Planning obligations

Supplementary Planning Documents

- 23 Relevant documents include:
Residential Design Standards (2011)
Affordable Housing (2008) and draft Affordable Housing SPD (2011)
Sustainability Assessment (2009)
Sustainable Design and Construction (2009)
S.106 Planning Obligations (2007)
The Peckham and Nunhead Area Action Plan (Submission version) September 2012

National Planning Policy Framework (NPPF)

- 24 Relevant documents include:
Section 1 'Delivering Sustainable Development'
Section 2 'Ensuring the vitality of town centres'
Section 4 'Promoting Sustainable Transport'
Section 6 'Delivering a wide choice of high quality homes'
Section 7 'Requiring good design'
Section 11 'Conserving and enhancing the natural environment'
Section 12 'Conserving and enhancing the historic environment'

Principle of development

- 25 Work to produce a Peckham and Nunhead Area Action Plan (PNAAP) is well advanced, and in September 2012 the Peckham and Nunhead Area Action Plan: Development Plan Document (Publication/Submission) was published, having been agreed by Council Assembly for publication. The PNAAP, together with supporting documents, were submitted to the Secretary of State in March 2013 and an Examination in Public (EiP) is due to be held in July 2013, the final step before adoption. Given the advanced nature of the document the PNAAP has considerable weight as a material consideration in the assessment of appropriate development on this site.
- 26 The PNAAP sets out the planning framework that will help bring long lasting improvements to Peckham and Nunhead over the next 15 years. In Policy 16, the PNAAP indicates a minimum of 2000 net new homes will be provided in Peckham and Nunhead between 2011 and 2026, with at least 1500 of these located within the Peckham Core Action Area. It indicates the majority of the new homes will be supplied on proposal sites such as the former Wood Dene estate. The PNAAP designates the application site as proposal site 5, and sets out that residential (Class C3) and retail (A use classes) are the required uses. Other acceptable land uses are; leisure/community (Class D), student accommodation (Class Sui Generis) and

business (Class B). An indicative residential capacity of 360 units and 500sqm retail (A Use Class) is identified.

- 27 Southwark Council have signed a contract with Notting Hill Housing Group to redevelop the predominately vacant Wood Dene site. The proposal includes the creation of 333 residential units and 450sqm of flexible non-residential floor-space. The proposed 450sqm non-residential space is designed to be capable of multiple uses - retail (Classes A1-A3) / Office (Class B1) / Non-Residential Institution (Class D1) which is in accordance with the draft PNAAP. This mix of land uses is considered consistent with saved policy 1.7 of the Southwark Plan, Strategic Policies 3 & 5 of the Core Strategy and the land uses identified for this site in the PNAAP. The site is located within Peckham Major Town Centre and Peckham Action Area Core, an appropriate location for a mix of uses including retail, business and community uses. Both retail and business offer employment opportunities and contribute to the vitality of centres. Community use would help to meet diverse and local community needs and should the flexible space be Use Class D1 it will be subject, by condition, to the tests contained within saved Policy 2.2 of the Southwark Plan.
- 28 The site specific guidance in the PNAAP requires active frontages along the majority of Queens Road and states a potential for a taller building of up to 15 storeys in height. The proposal incorporates a taller element of 9 storeys in the southwest corner, and achieves active frontages through a combination of residential and commercial openings. The provision of public space and improved public realm required by the PNAAP would be afforded by a new pocket park and access in the northwest corner of the site, an increase in footway width along Queens Road and two new publicly accessible north-south routes. Further, a new combined heat and power (CHP) energy centre will be provided to meet with the PNAAP guidance and 7 trees along Queens Road will be maintained together with additional planting. In light of this, and the contribution towards public facilities in the section 106 agreement, it is considered that the proposed development is consistent with the aims and aspirations of the PNAAP.
- 29 The former housing estate is now demolished, former tenants relocated and the site has been vacant for around 5 years. Despite this, the loss of former housing provision on the site would need to be considered against the amount of housing now being proposed. Saved policy 4.6 'Loss of residential accommodation' in the Southwark plan 2007 seeks to resist the net loss of residential floorspace. However more specifically in relation to affordable housing, Policy 3.14 'Existing Housing' in the London Plan 2011 resists the loss of housing and in the case of estate renewal, where redevelopment of affordable housing is proposed, it should not be permitted unless it is replaced by better quality accommodation, providing at least an equivalent floorspace of affordable housing. Paragraph 3.82 of the London Plan provides further guidance stating that estate renewal should take into account the regeneration benefits to the local community and the proportion of affordable housing in the surrounding area and elsewhere in the borough.
- 30 The site was previously developed with two interlocking housing blocks of seven storeys comprising 323 homes, of which 316 were council homes and 7 owned by leaseholders. The current proposal to redevelop the site would provide 333 units across a mix of unit sizes and tenures. This would represent an increase over the total number of previous residential units, but a loss in terms of the number of affordable units given that 35% of proposed units (117 units in total) will be affordable. The loss of affordable housing, therefore, would need to be balanced against the benefits of the new development in terms of housing quality, mix, and the quality of the townscape that it would produce, which are all material considerations.
- 31 Currently Southwark has one of the highest amounts of affordable housing in the

whole country, with 45% of our 123,948 dwellings being affordable homes. Historically, parts of the borough have been dominated by large housing estates, offering units primarily within the social rented sector. Current policy in the London Plan and Core Strategy seeks to create mixed and balanced communities and emphasises that developments should provide a range of housing choice. This is reflected in Policy 6 of the Core Strategy 2011 that identifies the Livesey Ward, in which the site is located, and neighbouring wards as having high concentrations of affordable housing. Indeed, the PNAAP indicates that 65% of Livesey Ward comprises social rented housing, with the majority of new developments within Peckham consisting of 100% social housing. Accordingly, to promote a range of housing types in this area Strategic Policy 6 requires developments to provide a minimum of 35% private housing to facilitate a choice of housing types. In light of the Council's aim to seek mixed and balanced communities, and given the existing levels of affordable housing in the area, the net loss of affordable housing is considered acceptable.

- 32 The site is vacant and has been for around 5 years, with the former tenants decanted to other stock in the borough. If the site were to be considered solely as vacant 'brownfield' land, then the expectation under the development plan would be for a development which included a minimum of 35% affordable housing and at least 35% private housing, as provided in this application. The need to bring this empty site back into housing use is a significant factor and the proposed mix of affordable and private housing would make a substantial contribution to meeting housing needs, including the need to attract those aspiring to home ownership in Southwark.
- 33 The former housing consisted of 2 substantial blocks up to 7 storeys in height with poor relationships to the street. Re-provision of a mix of flats and maisonettes with amenity spaces is considered a significant benefit of the proposed scheme in terms of meeting the needs of the borough and providing housing choice. Further, the proposed development would introduce a blocked street pattern, using predominantly low and medium rise buildings, which would knit together with the surrounding streets, improving permeability and creating lasting improvements for the area.
- 34 Overall, the redevelopment of the site to create a high quality, mixed tenure community is considered a sustainable form of development that would meet existing and future housing needs in line with Southwark policy. The proposed scheme would enhance the appearance of the area and make efficient use of land bringing a vacant site back into use. Given the nature of the location and the current proportion of social rented accommodation within the area, it is considered the benefits of developing the currently vacant site and providing a mixed tenure scheme would help meet the aspirations of the wider area, and contribute to creating a mixed and balanced community.

Density

- 35 The Council's Core Strategy identifies the site as being within the Urban Density Zone, where a density of between 200 and 700 habitable rooms per hectare is expected. Based on the site area of 1.91 hectares, the development of 1028 habitable rooms and a total 450sqm of non-residential floor-area equates to a density of 547 (558 as calculated by the applicant) habitable rooms per hectare. The density sits within the required density range, which is considered acceptable in principle, subject to all other material considerations being found acceptable.

Environmental impact assessment

- 36 A request for a Screening Opinion was submitted under Regulation 5 of the Environmental Impact Assessment (EIA) regulations, in order to determine whether the redevelopment of the site at the former Wood Dene estate would be considered

EIA development. The request was received on 19 December 2012. According to the Regulations, the site could be classified as a Schedule 2 'urban development project' by virtue of its site area 1.91ha. An assessment was then made as to whether the development is likely to have a significant effect upon the environment by virtue of its nature, size or location, based on a review of the Schedule 3 selection criteria for screening Schedule 2 Development.

- 37 It was determined that the proposed development would not be likely to have significant effects upon the environment by virtue of factors such as its nature, size or location. It is therefore concluded that an Environmental Impact Assessment is not required.

Impact of the proposed development on the amenity of adjoining occupiers and the surrounding area

- 38 Saved policy 3.2 'Protection of amenity' of the Southwark Plan, states that planning permission will not be granted for developments that result in a loss of amenity to surrounding occupiers.

Daylight and Sunlight

- 39 The applicant submitted a daylight and sunlight report with the application prepared by GVA Schatunowski Brooks dated March 2012. The report assesses the impact of the proposed development on the daylight and sunlight of surrounding residential properties against the relevant BRE guidelines 'Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice' (1991). The BRE guidelines are a recognised mechanism within Southwark's Residential Design Standards SPD to establish the impact of development in terms of daylight and sunlight. It should be noted however, that the BRE criteria are not fixed standards and should be applied flexibly to take account the local context of the area within which the site is located.
- 40 It should be noted that due to site currently being vacant, it is likely that any form of development on the site would give rise to some impacts on daylight when compared to the existing situation. To provide baseline lighting conditions relative to the former estate buildings the pre-demolition site was modelled and assessed within the report.
- 41 The submitted report advises that the BRE tests are usually limited to habitable rooms in residential buildings. As such, the impacts upon non-residential properties were excluded from assessment. The nature of the commercial and non-domestic uses, it contends, relies on supplementary artificial lighting during the day, and therefore is not reliant on natural light for amenity. In relation to residential properties, the retention of daylight to windows serving habitable rooms is preferred, along with good overall access to daylight into large, family sized kitchens. However, lighting levels to circulation areas, bathrooms and WCs are not considered to be of importance.
- 42 In terms of daylight three tests have been carried out to assess the impacts of this scheme. Vertical Sky Component (VSC) assesses the level of daylight entering existing rooms by considering the amount of available daylight from the sky reaching a window and is measured on the outside of that window. If the VSC achieves 27% or more the BRE advises the windows have the potential to provide good levels of daylight. If however, the light received by an affected window, with the development in place, is both less than 27% and would be reduced by 20% of its original value then the occupiers are likely to notice the change.
- 43 The VSC calculation only measures light reaching the outside plane of the window under consideration, which means that existing windows with balconies above, or projecting wings either side, would typically receive less daylight. The second edition

(2011) of the BRE guidelines acknowledges this anomaly and suggests carrying out the daylight and sunlight calculations both with and without the balconies in place to see if the presence of the balconies, rather than the size of the development, is the main factor in the relative light loss

- 44 An internal daylight distribution test has also been carried out via the 'No Sky Line' (NSL) contour which considers the areas of the room with direct sky visibility from a horizontal working plane. It also accounts for the size of window and room.
- 45 The Average Daylight Factor (ADF) calculation assesses the quality and distribution of light within a room served by a window and is interpreted in conjunction with the VSC. The ADF values recommended by the BRE guide are 2% for family kitchens, 1.5% for living rooms and 1% for bedrooms.
- 46 In considering the impact upon sunlight, the test is based upon a calculation of annual probable sunlight hours (APSH) for all window faces within 90 degree of due south. BRE guidelines require that a window should receive a minimum of 25% of the annual probable sunlight hours, of which, 5% should be received in winter months. Where window sunlight levels fall below this recommendation, the window should not lose more than a 20% loss of its former value.
- 47 The report identifies the following residential buildings within the vicinity of the site that require testing:

131-157 Meeting House Lane; 1-2 Holly Dene; 3-10 Holly Dene; 1-20 Beech Dene; 11-18 Holly Dene; 6-76 Carlton Grove; 2b-2c Carlton Grove; 44-46 Queens Road; 42 Queens Road; 40 Queens Road; 38 Queens Road; 36 Queens Road; 34 Queens Road; 32 Queens Road; 30 Queens Road; Cherry Tree Court; 8-10 Queens Road; 4b Queens Road; 4a Queens Road; 2 Queens Road; and Lambrook House.

Daylight

- 48 The analysis within the report shows the majority of neighbouring windows tested where either the VSC criteria are met or the Daylight Distribution criteria are met, are in accordance with the BRE guidelines. Of the 423 windows listed in Appendix III of the report, 21 windows are identified as not meeting the BRE guidelines using VSC. The transgressions against BRE guidelines, however, mainly occur to windows beneath projecting balconies or located in recesses. The properties affected are discussed in greater detail below.
- 49 1-20 Beech Dene – An anonymous objection has been received from a resident of Beech Dene objecting to on the grounds of a loss of light. Also, the Acorn Tenants and Residents Chair highlight the loss of light for some residents of the Acorn Estate.
- 50 This is a 2-3 storey residential building located to the north of the Wood Dene site. The modulated facade ensures south facing windows are arranged both on the exterior plane of the building and within deeply recessed bays and balconies.
- 51 From the submitted report none of the windows in this part of Beech Dene experienced the BRE target VSC of 27% as a result of the previous development. Of the 48 windows tested, only 1 ground floor window in 1-20 Beech Dene would experience a reduction in VSC beyond the 20% recommended BRE guidelines. The window (labelled W45/50) is a secondary unit set within a deep recess. The room that it serves, however, is also lit by a second window that would experience an improved VSC and increased quality and distribution of light of 15.02% under ADF. Further, the NSL contour indicates an improved internal daylight distribution. Therefore, despite the reduction in VSC to a single window the room itself would experience an overall

improvement to the lighting conditions. Given the compliance of the remaining windows tested the impact on the properties in Beech Dene is acceptable.

- 52 11-18 Holly Dene - This is a 2 storey residential building located to the north of the Wood Dene site. The modulated facade ensures south facing windows are arranged both on the exterior plane of the building and within deeply recessed bays and balconies.
- 53 In terms of daylight, the former estate buildings ensured all windows in this part of Holly Dene experienced relatively low light levels on ground and first floors as none of the windows reached the BRE target of 27%. Out of the 28 windows tested, 6 windows would be reduced by 20% or more and would not meet the recommended BRE guidelines. The reduction in VSC values range from just over the BRE guidelines at 21.62% up to 57.35%. All of the windows that breach the BRE guidelines sit within deep recesses which limit daylight penetration due to the 'canopy' effect. The actual loss of daylight to these rooms, however, is small in real terms even though the percentage loss is high due to the existing low figures.
- 54 At first floor the 2 windows affected are secondary to a main principal window each of which meets the BRE tests. Accordingly, the room would receive an acceptable alternative source of daylight from other windows.
- 55 At ground floor, 3 of the four windows affected will experience ADF levels of between 1.07-1.23 which is above the minimum standard for bedrooms but below the level expected for living rooms and kitchens. The fourth room (W56/60 in the report) would have an ADF of 1.60 which is less than the 2% suggested for family kitchens. It is unfortunate that these windows will experience a difference in daylight level and distribution; however the main factors for their poor lighting levels are their recessed positions. Indeed, the submitted report indicates that should these obstructions be omitted these rooms would satisfy the guidelines.
- 56 In any case, the failure of individual properties to meet the advisory standards in absolute terms must be balanced against the overall benefits of the proposed development and advantages enjoyed by those who reside in close proximity to the centre of Peckham. On balance, therefore, it is not considered reasonable to withhold planning permission on the basis of reduced daylight to these windows.
- 57 2b and 2c Carlton Grove - This is a vacant 2 storey residential building located to the east of the Wood Dene site. Although the building is currently unoccupied given its previous residential use it was tested.
- 58 Of the windows tested 2 at ground floor will experience a marginal reduction in VSC beyond the 20% permitted under the BRE guidelines at between 20.96-22.32%. Each of the ground floor windows would continue to receive VSC levels between 21.02 and 21.84 and receive an ADF of 2.64 & 2.65 which is in excess of the BRE recommendation for habitable rooms. As such, it is considered that overall the rooms served by the windows would continue to receive a good level of daylight within the urban context.
- 59 Cherry Tree Court – This is a part three-part four storey flatted block located on the south side of Queens Road. The elevation tested is north facing.
- 60 In terms of daylight, all windows tested from ground to second floor levels currently experience low light levels due to their location beneath projecting access balconies. Even so, only 4 windows were identified as having a reduction in VSC beyond the 20% advised under the BRE guidelines. The windows identified as experiencing a shortfall were to high level 'slot' windows, 2 at ground and 2 at first floors. Given their location directly below projecting access balconies the windows would receive

between 0.04 - 0.18% VSC, which is virtually no natural daylight. As such, any impact on these windows is not material. Significantly, the majority of the windows in Cherry Tree Court would experience improvements to daylight under VSC and ADF figures.

- 61 Lambrook House – This is a six storey residential block with ground floor commercial use.
- 62 The results in Appendix III show that a total of 38 rooms tested at Lambrook House would adhere to BRE guidelines; however 8 rooms would experience daylight distribution losses in excess of the 20% guideline, at a level between 21.67-38.31%. As with Cherry Tree Court above, this is due to their position below existing projecting access balconies over-sailing the windows in such a way that sky visibility from above is obscured, and 2 of which serve entrance doorways. As a consequence, these windows already receive low levels of daylight, and are vulnerable to new development registering a greater impact than would normally be expected for windows with no balcony above the window.
- 63 This is reflected in the results which demonstrate that in the existing situation those windows at second and fourth floors, which are not over-sailed by a balcony, experience VSC levels in excess of 35 (above BRE guidance), whilst those beneath the balconies and overhangs at first, third and fifth floors experience a range between 2.61-9.05. This reveals the main factor in the variance of daylight incident on the window face is due to the presence of balconies and without the obstruction these rooms would satisfy the guidelines.
- 64 The main purpose of the guidelines in the Building Research Establishments Report 'Site Layout Planning for Daylight and Sunlight - a guide to good practice 2011' is to assist in the consideration of the relationship between new and existing development and the potential for development to retain good daylight and sunlight levels. The guidelines have been drafted for use in both suburban and urban areas, and therefore need to be applied flexibly, particularly in urban areas where the character of higher density accommodation will inevitably have different impacts to lower density suburban areas.
- 65 The application site is designated for residential development, and the scale of the proposed development is acceptable for the area, with density levels and heights that would be expected here. Any development on this site will impact lighting levels to surrounding properties, particularly to those windows sited within recesses or below balconies. Therefore, it is considered that the benefits that this development scheme offers, providing much needed housing on a site designated for such, would outweigh the impacts upon the lighting levels to a limited number of surrounding residential properties.

Sunlight

- 66 In relation to sunlight, a test of the APSH has been carried out to determine if surrounding properties are adversely impacted by the proposed development. The table below describes those properties where there is an impact from the proposal upon sunlight levels to rooms.

67 Table 2: Sunlight

| Address | No. of rooms APSH tested | No of rooms failed APSH test |
|------------------|---------------------------------|-------------------------------------|
| 1-2 Holly Dene | 17 | 1 |
| 1-20 Beech Dene | 48 | 4 |
| 11-18 Holly Dene | 28 | 7 |
| Total | 93 | 12 |

- 68 The results show a spread of values, many of which comfortably exceed the BRE guidelines AP5H. As such, the majority of windows surrounding the site would continue to receive adequate sunlight as defined by the BRE guidance, with many windows achieving significant increases in the level of sunlight. Indeed, the overall trend is for an improvement relative to existing conditions.
- 69 Nevertheless, the three blocks noted in the table above, all contain at least 1 room that fails the AP5H test with the proposed development in place. The windows identified in the report are within recessed or obstructed positions with restricted sun-light penetration and therefore receive the lower values. The report states that without the obstruction these rooms would satisfy the BRE guidelines for sunlight therefore the obstruction is the main source of sunlight loss not the proposed development.
- 70 Overall, the impacts upon the sun-lighting levels to a limited number of surrounding residential properties are outweighed by the overall benefits afforded by the proposed development. On balance, therefore, it is not considered reasonable to withhold planning permission on the basis of reduced sunlight to these windows.

Overshadowing

- 71 Whilst not specifically tested in the daylight and sunlight report, it is not considered that the proposal would cause unacceptable overshadowing to nearby public open spaces. There would be some overshadowing for part of the day to the proposed new pocket park in the north-western corner of the site and open spaces to the rear of 131-145 Meeting House Lane. However, these areas are located in an already constrained site with existing 2-3 storey buildings located on three sides in a courtyard type layout. The proposed 5-6 storey buildings located approximately 11m further south, as part of Block A, will reintroduce development nearby. However given the existing arrangement of buildings, and that some overshadowing is a reasonable expectation at this urban site, the overall impact would not be sufficient to cause significant concern.

Overlooking

- 72 Southwark's Residential Design Standards SPD recommends that developments achieve a minimum distance of 12 metres between facing buildings across a highway and a minimum of 21 metres as a back to back distance, to avoid unacceptable overlooking.
- 73 The proposal would mainly exceed the 12m minimum across surrounding highways to neighbouring buildings, which is acceptable. The only distance less than 12m to neighbouring buildings would be in the northwest corner of the site between the northern elevation of Block A and southern flank elevation of 157 Meeting House Lane and 1 Holly Dene. The separation distance here ranges between 10.2m and 10.4m, but would not result in overlooking given there are no windows on these existing flank elevations. On the upper levels of the proposed buildings, balconies have been positioned, or have a sufficient separation distance, to avoid direct overlooking into existing or future homes.
- 74 Within the proposed development, minimum back to back distances where windows directly overlook each other are met in Blocks B and C. Within Block A the separation distance between buildings are between 19.5m to 38.6m. Whilst there are instances where the back to back measurement falls below 21m, this is a result of the new access created from Meeting House Lane to the north and constraints posed by existing services on Queens Road. Given the distance is not significantly below the 21m recommended, it is not considered that this would result in an unacceptable level of overlooking or result in a substantial loss of privacy or poor amenity.

- 75 The proposed openings in the massing that break up the built volumes do increase the potential for overlooking from windows and terraces sited in and alongside flank elevations. Where the blocks are side on, separation distances of between 5.5m to 18.7m are proposed. Notwithstanding this, the internal arrangement and position of windows have been designed to minimise direct overlooking so that habitable windows are obliquely positioned, or face towards secondary windows and circulation spaces. Similarly, doors and windows serving terraces do not appear to directly face and are somewhat screened by the separation balustrades – the details of which should be submitted via condition. In any case, when balanced against the broader benefits of the scheme, the marginal infringement to a small number of units is not considered significant.

Sense of enclosure

- 76 Given the scale of the building and distance from neighbouring occupiers, which broadly meets the minimum separation distances set out in the Residential Design Standards SPD, the proposal is considered acceptable in terms of outlook and sense of enclosure and would not have an unacceptable impact on neighbouring residential amenity. Within the development itself, the layout and scale is considered appropriate and would not give rise to unacceptable outlook or sense of enclosure to future occupiers.

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

- 77 The area surrounding the site is a mixture of land uses, with predominantly residential to the north and east, mixed residential and commercial to the south and community uses in the east. The surrounding uses currently sit alongside residential accommodation and are not of a scale or type that is likely to give rise to unacceptable noise levels or nuisance to proposed units. Given that the application site was a former housing site, the impact on future occupiers is considered acceptable.

Design and Heritage issues

- 78 Strategic policy 12 'Design and conservation' of the Core Strategy states that development should 'achieve the highest possible standards of design for buildings and public spaces to help create attractive and distinctive places which are safe, easy to get around and a pleasure to be in'. The policy goes on to assert that development should conserve or enhance the significance of Southwark's heritage assets their settings and wider historic environment. Saved policy 3.13 'Urban design' of the Southwark Plan asserts that the principles of good urban design must be taken into account in all developments. This includes height, scale and massing of buildings, consideration of the local context, its character and townscape as well as the local views and resultant streetscape. Saved policy 3.12 'Quality in design' asserts that developments should achieve a high quality of both architectural and urban design, enhancing the quality of the built environment in order to create attractive and high amenity environments people will choose to live in, work in and visit.
- 79 The supporting text for policy 7.7 of the London Plan acknowledges that tall buildings should generally be limited to sites in the Central Activity Zone, opportunity areas, and areas of intensification or town centres that have good access to public transport. Also, tall and large buildings should not have an unacceptably harmful impact on their surroundings. Saved policy 3.20 of the Southwark Plan states that any building over 30 metres tall should ensure that it:

- Makes a positive contribution to the landscape; and

- Is located at a point of landmark significance; and
- Is of the highest architectural standard; and
- Relates well to its surroundings, particularly at street level; and
- Contributes positively to the London skyline as a whole consolidating a cluster within that skyline or providing key focus within views.

80 The draft PNAAP sets out an indicative capacity for the site in terms of residential and commercial accommodation, which is broadly met by this application. It also indicates the on-site potential for a taller building of up to 15 storeys to mark the entrance to Peckham Town Centre and improve legibility, alongside meaningful public space and improved public realm. The PNAAP requires active frontages along Queen's Road.

Site layout

81 The site layout has been arranged as three courtyard blocks, separated by north-south (non-vehicular) streets, linked by a similar 'street' on the northern edge of the site. This is considered to be a rational sub-division of a broadly rectangular site, which ensures good permeability and integration with the surrounding streets. The sub-division of the site also establishes a scale of block and streetscape that is both responsive to the wider area and will create a more 'human-scaled' townscape than the previous blocks which occupied this site. The three blocks create private 'podium-courtyards' at first floor level which should provide good amenity space for the development's residents. Additional public space is provided by a pocket park sited in the north-western corner of the site.

82 The buildings are designed to provide active frontages on all sides of the blocks through maisonettes with front doors onto the street, communal entrances and commercial use on Queens Road and Meeting House Lane. This would increase street activity and create a finer urban grain. The Queens Road frontage will be widened creating a strong building line that defines the southern edge and provides a landscaped ribbon. Given the outward facing design that provides active frontages, provides public open space in the form of a pocket park and publicly accessible streets, the site layout is considered acceptable.

Scale and massing

83 A general quantum of 5/6-storeys is proposed across the development site with other elements ranging from 2-4-storey and two set-back elements that rise to a 7th storey. At the corner of Meeting House Lane and Queens Road the proposal would rise to 8-9 storeys reaching a maximum 31.125m in height. A new 30m flue would serve the energy centre. As a general quantum this scale is considered to be responsive to the immediate and wider context, dropping down to the smaller-scale housing to the north and rising towards the Queens Road southern frontage.

84 The main concentration of height is in the south-western corner of the site on the corner of Meeting House Lane and Queens Road. This area is demarked by a taller element which rises to 8 and 9-storeys and is incorporated into the corner of the perimeter block. This marker building gives the site development an urban focal-point and acts as a 'gateway' structure on the eastern approach to Peckham town-centre. The proposed height is consistent with the draft PNAAP which indicates a taller building of up to 15 storeys would be acceptable.

85 The taller element responds to the geometry of the junction in plan, following the line of Queens Road and Meeting House Lane. It is formed of inter-linked 5, 8 and 9-storey volumes that serve to modulate its bulk into a stepped mass and provides a more interesting form. As the building would be located at a busy junction at the entrance of Peckham Town centre, a point of landmark significance with excellent public transport

accessibility, and providing the building has high architectural quality, the scale is considered appropriate.

- 86 In the wider development the height distribution across creates a cohesive whole that is appropriate to the context. The proposed height range of 2-7 storeys broadly respects the wider context and is comparable to the previous Wood Dene blocks. Taking into account the lower rise Acorn Estate, the proposed height generally steps downwards on its northern edge incorporating lower heights to facilitate larger openings for light penetration.
- 87 The proposed massing is considered well modulated with a variety of blocks around the three courtyards, each of which has two or three 2-storey breaks to allow better daylight into the courts. Also, the blocks vary in length and in height which adds a degree of variety without undermining the principle of continuity or harmony. This variety in the block-form is especially important on the long frontage to Queens Road, where the rhythm of blocks and breaks enliven this urban edge while providing a level of consistency and order to the streetscape. Significant depth is also given to the elevations with projecting and inset balconies, the latter notable on the taller block to the south west corner. As such, the proposed scale and massing is considered a balanced composition and acceptable at this location.

Detailed design

- 88 The application site is located within a varied context of differing building types, periods and materials. With no dominant characteristic to match, the proposed architectural expression has been based upon a simple palette of materials, window openings, panels and balconies. The palette will be varied, together with the fenestration pattern, throughout the development depending on the context of each block. The approach reflects the minimalist nature of contemporary architecture balancing variety and harmony.
- 89 The buildings across the scheme are predominantly brick, which is considered appropriate. Four types of complimenting bricks would be used (buff, red/purple, orange or brown) with the buff brick common across all of the blocks and the other brick types giving variation and identity to each block. Given the reliance of brick to express built volume and character it is crucial that the physical and aesthetic qualities of these bricks have a richness and variety in their surface colour and texture. For this reason the proposed brick will be subject to samples secured by condition.
- 90 The facades will be successfully articulated by a combination of feature brick panels employing various styles of detailing and texturing; etched metal and glazed balconies; punched windows and doors and both metal and coloured panelling to add visual interest. Where set back top floors are proposed, cladding will be with treated metal panels. The deck accesses proposed to Blocks B & C will have a separate expression based on colour and layering. Coloured opaque glass panels will form the elevation while vertical translucent glass panels and vertical landscaping provide depth and interest. Subject to conditions, the materials are considered acceptable.
- 91 The proposed taller building on the corner of Queens Road and Meeting House Lane requires a special quality to ensure it is a successful local marker. Each of the inter-linked 5, 8 and 9-storey volumes will be expressed by the different brick types, which are considered an acceptable approach and is likely to be more successful than panelling or render, to achieve quality finish and distinguish this corner. Significant depth is given to the elevations with inset balconies to create a more sheltered environment at upper floors. The ground floor is defined by its extensive glazing onto both street elevations. This design approach is considered acceptable subject to material details mentioned above.

- 92 Notable 'signature' elements of this proposal are the energy centre and chimney which sit on the north-east sector of the site. While these are not on a primary frontage their treatment and detailing would express its function with extensive glazing to the street elevation revealing the interior workings of the plant. At 31m the flue would be significantly shorter than the 46m tall chimney on site; however its treatment with graduated wide-gauge metal mesh and illumination from its base will emphasize its presence. There is no objection to this approach provided detailed drawings of the chimney, details of materials and lighting are secured via condition.

Design Review Panel (DRP)

- 93 The scheme was reviewed by the Southwark Design Review Panel (DRP) in December 2013. The Panel welcomed the proposal and found many aspects of the scheme encouraging, including the master-plan for the site and the rich scale, mix and diversity of accommodation. However, they raised questions over the relationship of the scheme with the neighbouring properties to the north, the universal typology and singular architectural expression of the scheme.
- 94 The proposal has been developed and improved since it went to the DRP. The distribution of scale and massing across the site is well resolved, successfully unifying the development to the surrounding context. The proposal steps down to the northern edge and incorporates lower heights which bring light into Holly Dene. The design approach, while using a limited palette of materials and detailing, skilfully varies the palette to each block providing a distinct appearance but a common character. For these reasons, the current proposal addresses the issues raised at DRP.

Impact on heritage assets

- 95 The site is not located in a conservation area and does not include any listed buildings, however it is situated opposite a number of Grade II listed buildings (Nos 2-10, 30-42, 44 and 52 Queens Road evens) on the southern side of Queens Road which statute requires special regard to be had to the desirability of preserving the setting. In accordance with Section 12, paragraph 129 of the NPPF the significance of these listed buildings are in their group value with neighbouring properties and noteworthy contribution to the street scene.
- 96 As noted previously, the scale of the proposed development is considered to be generally appropriate to its context. Other than the tall building, the scale of development is similar to the scale and height to these listed buildings given their enhanced Georgian proportions. The architectural expression of the proposal is relatively simple and will sit unobtrusively within the wider townscape with an aesthetic that is not considered to compete with the heritage assets or detract from their setting.
- 97 The taller element on the corner of Queens Road and Meeting House Lane would be located approximately 50m from the closest Listed Building at 2 Queens Road. Its scale, however, is not considered to impinge on views towards the building nor detract from their significant contribution within the townscape. Indeed, the impact of this element is more likely to the Police Station on the opposite corner, which is a notable undesignated heritage asset. However, while the proposed height may be somewhat over-dominant to this building in terms of scale, the Police Station would remain visually prominent due to its corner location, finely composed facades and the richness in its architectural detailing.
- 98 The closest boundary of the Rye Lane Conservation area is situated approximately 215m west of the site. Between the conservation area and the proposed development are a number of relatively tall buildings at 5-6 storeys. Given the presence of these buildings and substantial separation distance, it is concluded that there would be no

harmful impacts on the setting of the conservation area.

- 99 For the reasons stated above it is concluded that the development would not have a harmful impact on designated and undesignated heritage assets. As such, the setting of these assets has been adequately preserved by this proposal.

Design Conclusions

- 100 Overall, the proposed scale and design is considered to makes a positive contribution to the landscape, subject to details. The taller element is located within an area identified as being appropriate for a tall building and at a point of landmark significance where it will provide an urban focal point. The proposed site layout, scale, massing and design approach is to a high architectural standard, both responding to the context and meeting the aims of the PNAAP. Further details regarding materials, detailed finishes, lighting and landscaping will be secured by condition to ensure the anticipated and required design quality to ensure the scheme is successfully achieved.

Mix of dwellings and tenure

Mix

- 101 Strategic Policy 7 'Family homes' of the Core Strategy 2011, requires that developments of 10 or more units provide at least 60% 2 or more bedrooms and at least 20% 3, 4 or 5 bedrooms in the urban density zone. This reinforced by policy 18 of the draft PNAAP which indicates a minimum 20% 3, 4 or 5 bedroom properties in Peckham core action area.
- 102 The table below shows the number of family sized units that are included in the scheme, as well as the breakdown of accommodation according to tenure.
- 103 Table 3: Percentage of units by bedroom number and tenure

| | Private | Social rented | Shared ownership | Total | Percentage by mix |
|--------------------|------------|---------------|------------------|------------|-------------------|
| 1 bedroom | 73 | 19 | 21 | 113 | 33.93% |
| 2 bedroom | 105 | 18 | 29 | 152 | 45.65% |
| 3 bedroom | 38 | 14 | 13 | 65 | 19.52% |
| 4 bedroom | | 2 | | 2 | 0.6% |
| 5 Bedroom | | 1 | | 1 | 0.3% |
| Total units | 216 | 54 | 63 | 333 | 100% |

- 104 The proposal provides 66.07% of units with 2 or more bedrooms and 20.42% of units with 3 or more bedrooms, which complies with policy expectations for this site.

Wheelchair Accommodation

- 105 Saved policy 4.3 'Mix of dwellings' of the Southwark Plan requires all major residential development to provide at least 10% wheelchair accessible units.
- 106 The proposed development would provide 33 wheelchair accessible units which amounts to 10% of the development. There are 11 one bedroom, 15 two bedroom, 7 three bedroom wheelchair units proposed across the development. The proposal provides 66.66% of units with 2 or more bedrooms which is a positive aspect of the proposed development. All wheelchair accessible units would have a wheelchair accessible car parking space located within the podium. The provision is acceptable in accordance with policy, and would provide good quality wheelchair housing.

Affordable Housing

- 107 In terms of policy requirement Strategic policy 6 'Homes for people on different incomes' of the Core Strategy 2011 requires a minimum of 35% affordable housing on developments with 10 or more units and 35% private housing units in the Livesey Ward. The affordable housing should then be split between social rent (50%) and intermediate (50%) units according to policy 17 in the draft PNAAP. This differs from the 70:30 split expected by saved policy 4.4 of the Southwark Plan 2007 but is considered a more contextual value for Livesey Ward and would help address the balance of housing types in the area.
- 108 It is recognised in the draft Affordable Housing SPD that affordable housing provision should be calculated on a habitable room basis. The proposal would provide a total of 362 affordable habitable rooms which equates to 35.21% of total habitable room provision. The proposal would also supply in excess of 35% private housing which complies with the requirements for the site.
- 109 The split between the social rented:intermediate accommodation is 50:50 based on habitable rooms (181 habitable rooms respectively). This is in accordance with the PNAAP (which expects a 50:50 split). The affordable housing level and tenure will be secured within the s.106.
- 110 Overall the proposal would provide a good mix of housing type and levels of affordable housing provision that accords with the Core Strategy and draft PNAAP. The proposal would achieve the PNAAP aim of addressing the balance of housing types in the area and increasing the range of housing types on offer and is therefore considered acceptable.

Quality of residential accommodation

- 111 Saved policy 4.2 'Quality of residential accommodation' states that planning permission will be granted for residential development, where it achieves good quality living conditions, and includes high standards of accessibility, outlook, privacy, natural daylight, ventilation, outdoor amenity space, safety, security and protection from pollution including noise and light.

Daylighting analysis

- 112 The applicant submitted a daylight and sunlight report prepared by GVA Schatunowski Brooks dated March 2012. The report examines the daylight adequacy for the proposed new dwellings. According to the report BRE guidelines and the Building Standard Code of Practice for Daylighting (BS8206 part 2) require a minimum Average Daylight factor (ADF) of 1.5% for living rooms and 1 % for bedrooms. In the application proposal, where units are designed with open plan living room / kitchen /dining areas, the assessment set a target minimum daylight factor target of 1.5%. Each proposed room at ground, first and second floor levels were tested across all blocks because these units will receive the least amount of daylight. The rooms proposed for upper levels were not tested as the daylight from third floor as they reportedly meet the design standards.
- 113 It can be seen from the submitted report that 87 rooms were identified as not meeting the minimum ADF standards described above. On further examination, of those 87 rooms, 63 achieve lower results due to the 'canopy' effect of projecting balconies over-sailing windows and obstructing light. This mitigating factor is justified by the flexible nature of the BRE guidance and taken without the balcony those windows would satisfy the target standard. Although it could be argued that the balconies are a daylight limiting factor inherent in the design, the impact on a limited number of units is outweighed by the need for outside amenity space and wider benefits of the scheme.

- 114 The remaining 24 windows below the target standards are principally bedrooms located along the new internal streets. The assessment indicates that these breaches are marginal such that occupiers would still receive a reasonable level of amenity. Out of a total of 1028 habitable rooms a relatively small 2.3% of windows would not meet the guidelines.
- 115 For a development of this size, in an urban area where large-scale development is required by policy, it is not unexpected that full compliance could not be achieved. In general the results of the assessment show a good level of daylighting across the proposed development. The failure rate of 2.3% is very minor relative to the scale of development and on balance the impact on the amenity of the occupiers is not considered so significant as to warrant the refusal of the application given the wider benefits of the scheme.

Outdoor amenity space

- 116 Policy 4.2(ii) of the Southwark Plan and Section 3.2 of the SPD on Residential Design Standards states that development should provide high standards of outdoor/green amenity space. The draft SPD advises that development should meet and seek to exceed the following standards:
- 50m² of communal space per development;
 - For units containing 3 or more bedrooms, 10m² of private amenity space;
 - For units containing 2 or less bedrooms, ideally 10m² of private amenity space, and where this is not possible the remaining amount should be provided to the communal amenity space requirement.
- 117 The proposed development provides a mixture of both private and communal amenity space. All units will benefit from private amenity space in the form of private gardens, terraces or balcony areas ranging between 5.09sqm and 88.68sqm in size.
- 118 Of the family units with 3 or more bedrooms or more just 50% of units would benefit from 10sqm or more of private amenity space, although this rises to 59% if secondary amenity space is included. An explanation of this shortfall is provided by the submitted planning statement, which states larger balconies were restricted by the internal arrangement of units, potential impact on daylight/sunlight to neighbouring units and impact on the design. It further states that the shortfall below the 10sqm is compensated for by provision within the communal amenity areas. As a result, the secondary amenity spaces, in the form of second balconies or ground floor amenity spaces for maisonettes, ensure the smallest area provided for outdoor amenity space for larger units would be 8.15sqm, a relatively minor shortfall of 1.85sqm. In the context of the generous 1745sqm communal area proposed, the provision of a pocket park and proposed section 106 contributions to provide off-site public amenity and play space, the shortfall in private amenity space, in this instance, is considered acceptable.
- 119 Two external balcony sizes predominate across the development giving a standardized size and appearance, and facilitating off-site production of components. For the majority of one bedroom flats the balconies would provide between 5.25-5.38sqm private outdoor amenity area; the majority of two to four bedroom units would benefit from a larger balcony providing between 7.12-8.15sqm. Whilst it is acknowledged that many properties benefit from secondary amenity spaces, the standardized balcony system has nevertheless resulted in 232 units with less than 10sqm of private amenity space. The shortfall in amenity space of each unit with less than 10sqm amounts to 722.47sqm has been added to the required 50sqm of communal amenity space. Therefore, the development is required to provide a minimum of 772.47sqm communal amenity space across the site. This is significantly

exceeded by the 1745sqm communal area proposed in addition to the 270Sqm Pocket Park.

- 120 The proposed development exceeds the minimum requirements for communal amenity space for the site and also reduces surface water run-off (discussed further below). This is a particular benefit of the scheme and is appropriate for this site given its town centre location. The proposal also exceeds the required children playspace for 0-10 year olds in accordance with the London Plan and Southwark's Supplementary Planning Guidance. Over 11's playspace, calculated to be 190m² will be provided off site as part of the section 106 agreement. The submitted Landscape Strategy document includes a calculation of the required level of playspace according to the number of units and confirms play will be integrated within the landscaping. In the event that planning permission is granted, a detailed landscaping scheme with itemised planting and surface treatment should be required by condition, and this should also include the specifics of the playspace to be included.

Internal space standards

- 121 Supplementary Planning Document for Residential Design Standards 2011 details minimum space standards for residential units.
- 122 The table below shows the minimum sizes in the Residential Design Standards compared with the range of unit sizes in the scheme:

123 Table 4: Size of units

| Unit size | Minimum standard (sqm) | Proposed size range (sqm) |
|-------------------|-------------------------------|----------------------------------|
| 1 bed (2 persons) | 50 | 50-65 |
| 2 bed (3 persons) | 61 | 70-103 |
| 2 bed (4 persons) | 70 | |
| 2 bed (average) | 66 | |
| 3 bed (4 persons) | 74 | 88-130 |
| 3 bed (5 persons) | 86 | |
| 3 bed (6 persons) | 95 | |
| 3 bed (average) | 85 | |
| 4 bed (5 persons) | 90 | 122-136 |
| 4 bed (6 persons) | 99 | |
| 4+ bed (average) | 95 | |
| 5 bed | - | 144 |

- 124 The scheme proposes unit sizes that meet the minimum standards, and in many cases comfortably exceed the standards set out in the Design Standards. This is a positive aspect of the proposal.

Aspect

- 125 Southwark's Supplementary Planning Document for Residential Design Standards includes guidance on the standards that developments should achieve, and includes the requirement that a majority of proposed residential units have a dual aspect. This allows solar gain and a daylight capture from a minimum of 2 directions. The application proposal has approximately 69% of units with a dual aspect, which is a majority of the proposed units. Of the 31% that are single aspect none are north facing single aspect units. This indicates that the layout has considered layout and orientation to reduce any amenity impacts arising from the aspect.

Impacts from air quality

- 126 The majority of the borough is within an Air Quality Management Zone, and as a result

developments are required to take account of any impacts upon air pollution as a result of, or during construction of, a proposed development. An Air Quality Assessment has been prepared by SLR Consulting and submitted with the application. It concludes that the concentrations of particulate matter across the site are within the air quality objectives; however the concentrations of nitrogen dioxide will be above the annual mean objectives at points on the ground, first and second floor of the proposed development. The report recommends that to mitigate elevated baseline concentrations of nitrogen dioxide the installation of mechanical ventilation/forced extraction is necessary to a number of residential units. The Council's Environmental Protection Officer concurs with this conclusion and recommends that the mitigation by way of mechanical ventilation is secured by condition in the event that planning permission is granted.

Impact from noise

- 127 A noise assessment has been prepared by SLR Consulting and submitted with the application. The assessment was based on the results of weekday and weekend noise measurements taken at locations around the site. It was found that road traffic was the main noise source along with one-off events such as police sirens or pedestrians. The report categorised properties facing Meeting House Lane, Queens Road and southern end of Carlton Grove into the high noise exposure categories (NEC) C and D, while units to the northern end of Carlton Grove would be a lower NEC B. It is not yet known the plant that will be installed on site therefore a detailed assessment of this was not performed.
- 128 Notwithstanding the noise categorisation detailed above, the proposed development is considered to provide suitable residential use subject to appropriate noise mitigation measures. The Council's Environmental Protection Officer has requested a number of conditions to mitigate the identified impacts and ensure that occupiers and users of the proposed development do not suffer a loss of amenity by reason of excess noise. These relate to internal ambient noise levels of residential units, protection for residential premises against sound from adjoining commercial properties, protection for residential premises against sound from adjoining residential properties, plant noise and servicing hours. Subject to the acceptability of these conditions, and accounting for the site's previous residential use, the residential units will not experience undue noise as a result of the development.

Potential disturbance during construction period

- 129 In the event of planning permission being granted, it is considered appropriate that mitigation measures are employed to minimise disturbances to surrounding occupiers during the construction period. As such, a condition with requiring a Construction Management Plan is recommended.

Secured by design

- 130 The landscaping strategy for the development distinguishes between public and private spaces through a hierarchy of defined private, communal and public spaces. Along the street frontage residential units overlook the public footpath providing passive surveillance and an active frontage. New pedestrian and cycle through routes are expected to be lit throughout the night and any lighting design should be mindful of pedestrian security. The Metropolitan Police have confirmed that they have no objections to the proposal on secure by design grounds, although a condition requiring the development to be secure by design is requested. Further, it is reasonable that an external lighting strategy for the development proposal is conditioned.
- 131 In summary, this scheme has potential to achieve good residential standards of

accommodation, and this is an important feature of the proposed development.

Trees and Landscaping

- 132 An 'Arboricultural Implications Report' dated March 2013, has been prepared for the site by Broad Oak Tree Consultants. This report explains that the development would require the removal of 24 trees. Twenty of the trees are located within the proposed footprint of buildings and landscaping and therefore could not be retained as part of the site's development. Four are to be removed for safety. Of the trees that would be lost none are of particularly significant amenity value (BS5837 A category) therefore, with suitable mitigation in the form of replacement planting, removal of these trees is acceptable.
- 133 Within the site up to 26 trees are proposed at grade, including 3 on Queen's Road and at least 15 within the podium landscapes. New tree planting will result in net gain of tree numbers across the site that will be beneficial to the character of the street-scape and wider area. An indicative tress species selection is described within the submitted Landscape Strategy document by Allen Pyke Associates dated March 2013. It proposes new avenue planting along Queen's Road, smaller tress to the new north-south access road, larger trees to soften car parking in Holly Dene to the north and ornamentals to the podiums. New trees will allow sufficient pavement widths and distances from stems to building facades to allow the growth of mature trees and to maintain a 1.5m separation between the tree canopy and adjacent elevations. The detailed specification and location of new planting will be recommended as part of a landscaping condition.
- 134 The tree strategy shows a welcome retention of the Plane tree T1 of highest amenity, with other retained trees predominantly set at the roadside. All retained trees will be subject to robust protection measures including fencing, stem boxes and ground protection as detailed in the submitted information. To ensure these measures are followed, and to prevent damage from vehicles and stacking of building supplies, a condition is recommended.
- 135 The Landscape Strategy by Allen Pyke Associates sets out the indicative landscaping design across three private communal garden spaces, the publicly accessible pocket park and areas of public realm. The communal podium gardens comprise landscaped areas of planting and lawn, pathways, seating, informal naturalistic children's play areas and climber wall to the Energy centre. The podium roof gardens will also incorporate a sustainable urban drainage system (SUDs) with water attenuation system and a mix of bio-diverse green and brown roofs. Given the podium location it is reasonable that planting specifications requested by condition will include trench design in combination with the proposed drainage to attenuation tanks to ensure sufficient rooting space is made available. Similarly, soil volumes will need to be specified so that the quality and sustainability of the raised gardens is attained.
- 136 In the submitted Landscape Strategy indicative cross sections have been provided for public realm throughout the development. Generally, these signify the provision of low level street greening and street trees to soften built edges and provide visual interest. The proposed use of hedging and other low level planting is a good response to define and enclose defensible space particularly to residential entrances. The significant set-back of the Queens Road frontage leaves a deep space for public realm as well as an environmental buffer to the new development from the traffic. This area will be treated with an avenue of tress and bands of paved concrete to provide distinctive identity. An area for a light or sculptural installation is defined and feature bollards will be positioned at key nodes.
- 137 The pocket park would be sited at the north-eastern corner of the site and will

measure approximately 270m². It will be publically accessible and comprise a lawn and toddler play area interspersed with planting. The perimeter of the park will be enclosed by railings.

- 138 It is noted that the Public Realm team has raised concerns over the widths of proposed interior pedestrian and cycle streets not meeting minimum street widths for new streets. The Council, as Highway Authority, specifies a minimum 12.7m width in Town Centre locations. The proposed northern 'promenade' at 10.21m would fall below this width and proposed 12.7m distance between buildings along the north-south streets would not meet when accounting defensible thresholds and planting. This may, without revised detail, restrict the level of replacement planting and impact on cycle/pedestrian access. As the submitted landscaping is indicative, it is considered this issue can be resolved by a planning condition to ensure the proposed streets can be constructed to appropriate standards.
- 139 Overall, the indicative landscaping strategy provides a combination of communal and public spaces. The loss of trees through redevelopment will be mitigated through replacement tree planting and additional planting to communal garden areas, pocket park and street edges which is acceptable in principle. Additional details are required to ensure that the type and quality of landscaping is sustainable and achieves a reasonable level of maturity and longevity. Also, to ensure proposed streets meet adoptable standards. As such, full details will be secured by condition.

Ecology and Biodiversity

- 140 An ecological assessment has been prepared by SLR Consulting dated March 2012 for the site. The assessment concludes that the site had no intrinsically valuable habitats to support any protected species and during the field assessment no protected species were identified by the Ecologist. As such, there will be no significant impact on species or habitats as a result of this proposal. The report indicates that the proposed increase in green space resulting from the development will benefit local wildlife and makes a number of recommendations relating to the potential for ecological enhancements. In particular, it advocates the provision of habitat boxes for birds and invertebrates within the scheme. These measures can be secured by condition in the event that planning permission is granted.
- 141 The council's ecology officer reviewed the application and submitted ecology assessment, and is satisfied with the findings. It is advised that as the development is in an area of natural deficiency any ecological features that enhance the area would help meet the targets of the Southwark Biodiversity Action Plan. Natural England also encouraged opportunities to incorporate biodiversity in and around the development. As such, it is recommended that in the event that permission is granted for the application, that conditions are attached to secure the measures outlined in the report and the conditions specified by the council's ecology officer.

Traffic Issues

- 142 Saved policies 5.1 'Locating developments', 5.2 'Transport impacts', 5.3 'Walking and cycling', 5.6 'Car parking' and 5.7 'Parking standards for disabled people and the mobility impaired' of the Southwark Plan, require the impacts that a development may have upon the transport network, be taken into account in the determination of planning applications. Strategic policy 2 'Sustainable transport' of the Core Strategy details that developments should seek to encourage walking, cycling and the use of public transport rather than travel by car.
- 143 A Transport Assessment and Travel Plan Framework prepared by Mayer Brown and dated March 2013 were submitted in support of the application.

Access and permeability

- 144 It is proposed that previous vehicular access points from Carlton Grove and Meeting House Lane are retained and to remove vehicular access from Queens Road. The site access for vehicles, therefore, will be from Carlton Grove for Blocks B (Via Hollydene) and C and Meeting House Lane for Block A. Visibility splays have been provided for the accesses and these are acceptable. The Hollydene estate road to the north will be reconfigured to allow formal parking to be retained for Hollydene residents while providing access to the site.
- 145 Access to the site for pedestrians and cyclists will be from Queens Road, Carlton Grove and Meeting House Lane. Permeability for cyclists will be through a new north-south route via the western lane and east-west via Holly Dene and the new northern 'promenade'. A pedestrian route is provided through the eastern lane, and although this restricts cycling, it does contain cycle parking for visitors who may arrive by bike and walk down the lane. The pedestrian lane is within close proximity to an existing bus stop on Queens Road.

Car Parking

- 146 The application proposal is located within an area with a Public Transport Accessibility Level (PTAL) of 6a, which indicates a high level of access to all forms of public transport. Developments in areas with this level of PTAL rating are set a maximum of 1 space per unit within saved policy 5.6 of the Southwark Plan. Following an amendment to accommodate additional cycle parking, the applicant has proposed a total of 115 off-street car parking spaces at grade within each courtyard block. This level of parking equates to a ratio of 0.35 spaces per unit across the development which is significantly below the maximum allowed and reflects the site's high accessibility to public transport. Of the 115 car parking spaces proposed, 33 will be disabled parking which equates to 1 space per wheelchair accessible unit. Disabled parking facilities are located within close proximity to lift cores with little obstruction for disabled users. All residential disabled parking facilities are located in an off street location.
- 147 A total of 23 spaces have electric charging points and a further 23 spaces will have passive provision for electric vehicles. This meets with London Plan policy 6.13 which require 1 in 5 parking spaces to provide an electrical charging point (both active and passive) to encourage the uptake of electric vehicles.
- 148 The Transport Assessment indicates that the existing parking to Hollydene to the north will be formalised with an improved parking arrangement including the provision of 3 new disabled spaces. The proposed scheme re-provides 32 new parking spaces on Hollydene which broadly equates to the number of spaces that currently exist.
- 149 The proposed development is not located within a CPZ, however is located within an immediate proximity to the Peckham B CPZ, bounding the development site on Meeting House Lane and the southern side of Queens Road. The location of the development next to a CPZ and fronting Queens Road, a red route, will assist in preventing potential overspill parking from the site. Also, other measures to reduce car ownership are also to be incorporated into the scheme, including promotion of local car clubs, cycle parking and an information package to residents to raise awareness of car free journey types.

Cycle parking

- 150 Following amendment during the course of the application, the proposed development now includes 401 cycle spaces, an increase of 68 spaces over the original proposal.

This equates to 1.20 spaces per unit which exceeds Southwark's minimum cycle storage standards and better reflects London Plan policies. Two cycle storage spaces are associated with the 450sqm flexible space. Cycle storage for residents is located within the courtyard areas of each block, cycle parking provision for visitors and for the flexible retail/office/non-residential space will be provided within the public realm. Further details of cycle storage should be required by condition in the event that planning permission is granted.

Servicing and refuse vehicle access

- 151 The dedicated waste storage areas are considered appropriate and allow convenient access for residents. A waste collection vehicle will be able to enter and exit the development in a forward gear and turning heads in the northern end of the two new streets demonstrate a suitable arrangement for service and refuse vehicles.
- 152 The commercial unit would be serviced from an on-street location on Queens's road or Meeting House Lane. Any impact of service vehicle movements for this use can be mitigated by a robust service management plan which not only reduces the impact on the surrounding highway network but also the impact of noise and disruption to local residents. Also, the Energy centre will require a level of servicing, but this will be on a sporadic nature and can be managed through the service management plan. Accordingly, a Construction Management Plan should be secured by condition to include measures to mitigate the environmental and road safety impact of the development.

Travel Plan

- 153 A Travel Plan has been submitted with the application, it describes how the development will promote the use of non-car forms of transport when the development is occupied. The plan currently requires additional information and therefore in the event that planning permission is granted, a revised Travel Plan should be requested by condition.

Sustainable development implications

- 154 Strategic policy 13 'High environmental standards' of the Core Strategy 2011 requires developments to meet the highest possible environmental standards, including targets based on the Code for Sustainable Homes and BREEAM (Building Research Establishment Environmental Assessment Method) standards. This includes requiring residential development to achieve a minimum of Code for Sustainable Homes Level 4, and other non-residential development to achieve at least a BREEAM 'excellent' except community uses which should achieve a minimum BREEAM level of 'very good'.
- 155 A BREEAM pre-assessment estimate report and code for sustainable homes pre-assessment estimate report has been submitted by SLR Consulting both dated March 2013. These reports state that residential dwellings will achieve a Code for Sustainable Homes level 4 and that the flexible retail (Classes A1-A3) / Office (Class B1) / Non-Residential Institution (Class D1) space will meet BREEAM 'very good'. The BREEAM 'very good' rating is appropriate in policy terms for community facilities, but not for retail and office uses where BREEAM 'Excellent' rating should be achieved. Further clarification on the proposed flexible unit can be required by way of condition in the event that permission is granted.
- 156 The London Plan 2011 requires developments to make the fullest contribution to the mitigation of, and adaptation to, climate change, and to minimise carbon dioxide emissions. In the consideration of energy efficient measures, application proposals should apply the Mayors energy hierarchy, using passive design and energy efficient

measures to reduce heating and cooling loads, and feasibility assessments for low and zero carbon energy systems described in the London Renewable 'Toolkit'.

- 157 An Energy Strategy has been prepared by NIFES dated March 2013 which adopts the Mayor's energy hierarchy and sets out how the proposal will achieve a 33.1% saving in carbon dioxide (CO₂) emissions above the Building Regulations (2010) from energy efficiency, efficient energy supply and renewable energy generation. This exceeds the London Plan Policy 5.2 which requires a 25% reduction.
- 158 A new CHP system and photovoltaic panels are proposed as the feasible option for incorporating low and zero carbon sources of energy into the development. Both the proposed residential dwellings and flexible retail/office/non-residential institution space will be connected to the site wide CHP system. The CHP has been sized to meet the estimated demands of the proposed development and will also be designed to allow future connection to a district heating network should one become available. This is consistent with London Plan (2011) policies 5.6 and 5.7 which state that developments should evaluate the feasibility of connecting to existing CHP systems and provide a reduction in expected carbon dioxide emissions through the use of on-site renewable energy generation, where feasible.
- 159 It is noted that there were concerns raised by the Acorn Estate Tenants and Residents Association that the existing district heating system will be demolished and not reconnected to the proposed Wood Dene CHP system. Although the Acorn estate will not be connected to the new CHP system, the estate will benefit from an alternative system. Indeed, it is understood Southwark Council's Housing Department are currently consulting with the estate on a proposed solution. The decision over this matter is not related to consideration of the proposed development.
- 160 The submitted Energy Strategy indicates that the installation of roof mounted photovoltaics would achieve a renewable energy reduction 20% which would meet the 20% carbon reduction target for on-site renewables. The report also provides a considered review of the feasibility of the use of the technologies of solar hot water, ground source/air source heat pumps or biomass boilers on the site concluding that these would not be particularly suitable for this site. Overall, the sustainability measures proposed are considered acceptable for the site, subject to detail.

Planning obligations (S.106 undertaking or agreement)

- 161 Saved policy 2.5 of the Southwark Plan and Policy 6A.5 of the London Plan advise that planning obligations should be secured to overcome the negative impacts of a generally acceptable proposal. Saved policy 2.5 of the Southwark Plan is reinforced by the Supplementary Planning Document (SPD) on Section 106 Planning Obligations, which sets out in detail the type of development that qualifies for planning obligations, and Circular 05/05, which advises that every planning application will be judged on its merits against relevant policy, guidance and other material considerations when assessing planning obligations.
- 162 The table below demonstrates the standard contributions proposed by the applicant:

| Planning Obligation | Amount of planning gain calculated by toolkit | Applicant contribution |
|---|--|---|
| Education | 564,491 (Reduced to £270,788 if grant funded) | 564,491 (Reduced to £270,788 if grant funded) |
| Employment during construction | 247,661 | In lieu* |
| Employment during construction management fee | 19,409 | 19,409 |
| Public open space, Childrens' play equipment and sports development | 104,710 44,445 255,525 | 104,710 44,445 255,525 |
| Transport strategic | 167,063 | 167,063 |
| Transport site specific | 166,500 | 166,500 |
| Public realm | 249,750 | 249,750 |
| Archaeology | 16,135 | 16,135 |
| Health | 375,922 | 375,922 |
| Community Facilities | 54,097 | 54,097 |
| Sub total | 2,265,707 | 2,018,046 (1,724,343) |
| Admin charge | 45,314 | 40,360.92 (34,486.86) |
| Total | 2,311,022 | 2,058,406.92 (1,758,829.86) |

*The applicant will provide its own employment training scheme during construction.

163 The community infrastructure levy regulations came into force on 6 April 2010. The regulations state under 122 – “Limitation on use of planning obligations” that it is unlawful for a planning obligation to be taken into account when determining a planning application for a development, or any part of a development, that is capable of being charged CIL if the obligation does not meet all of the following tests:

- necessary to make the development acceptable in planning terms;
- directly related to the development; and
- fairly and reasonably related in scale and kind to the development.

164 It is the opinion of the council that the planning obligations sought meet the planning tests CIL regulations (122 and 123). The contributions would be spent on delivering new school places as a result of the development, job creation, improvements to open spaces and sports facilities, improvements to increase the capacity of transport provision across the borough, improvements to the public realm, funds to secure new health and community facilities. These are necessary in planning terms, directly related to the development, and fairly and reasonably related to the impacts of the development. Therefore no objections are raised relating to the terms of the section 106 agreement for this site. In the case of an appeal against a refusal or any future resubmission, the council would seek a completed S.106 agreement.

165 The legal agreement will also include an obligation for the development to connect to a district heat network, should one become available for connection, within a suitable radius to the site.

166 In order to replace the former tree canopy levels on-site the council has requested an off-Site Tree Planting Strategy for the planting of a minimum of 10 trees (to a minimum value of £1000) via the section 106 agreement. At the time of writing this report, this contribution has not been agreed by the applicant. Discussions are currently ongoing, and therefore any update on this matter will be provided in an addendum report to committee.

- 167 The Greater London Authority stage I report indicates that Transport for London (TFL) considers that as the site benefits from the new London Overground service at Queens Road Peckham it is appropriate to seek s106 funding to install additional waiting shelters on the platforms. The applicant, however, did not agree to this given the limited additional demand on the rail system created by the minor uplift in residential units over the former estate. Indeed, the submitted Transport Assessment indicates a minimal net transport impact on the rail network. Given the limited additional demand on train services resulting from the development the funding of the new platform shelters does not appear reasonable or necessary having regard to the three tests contained within the Community Infrastructure Levy Regulations 2010.
- 168 In accordance with the recommendation, if the Section 106 Agreement is not signed by 30 July 2013, the application should be refused for the reason below:
- 169 'In the absence of a signed Section 106 Agreement, there is no mechanism in place to avoid or mitigate the impact of the proposed development on the public realm, public open space, health care service, the transport network, and employment and the proposal would therefore be contrary to Policy 2.5 of the Southwark Plan and Policy 8.2 of the London Plan'.

Other matters

Archaeology

- 170 The application site is located within the Peckham Village Archaeological Priority Zone. An Archaeology Desk-Based Assessment Report has been submitted with the application. This outlines the known historic environment for the site and its surroundings, focussing on archaeological finds to assess the potential for buried remains that might be disturbed during construction. It is apparent from a survey of the historic maps included in this document that the site of the Wood Dene has undergone two significant phases of development, firstly the construction of 19th century terraced housing across much of the site, secondly the demolition and clearance of these buildings for the construction of the former Wood Dene estate. While these development phases may have destroyed archaeological remains it is nonetheless recommended that a programme of archaeological observation and recording is maintained during ground-works on site. It is apparent from examining the historic maps that there will be discrete areas that may not have been impacted by Victorian housing and the later Wood Dene Estate. It is these areas that should be targeted for recording rather than a generalised approach to the entire site.

Flood risk

- 171 A Flood Risk Assessment (FRA) dated March 2013 has been prepared by RSK. It indicates the development site is located within Flood Zone 1, outside the area of flooding associated with the river Thames and Ravensbourne River; therefore flood risk from this source is low.
- 172 Strategic policy 13 of the Core Strategy requires major developments to reduce surface water run-off by at least 50%. A Sustainable Urban Drainage System is provided across the site employing a combination of green roofs, podium decks and modular storage to attenuate or divert surface water run-off. The Flood Risk Assessment states the development will provide a total storage volume of 485m³ which would all retain all surface water runoff in a 1 in 100 year storm plus 30% allowance for climate change. As such, flood risk is reduced even accounting for climate change. The Environment Agency raised no objections to the development, subject to conditions.

Contaminated land

- 173 A Land Contamination Assessment was prepared by RSK dated March 2003. Within the assessment is a Ground Investigation by Hydrock (ref: R/10079W/002, dated June 2010). The report describes that the site has a history of residential housing including terraces followed by the wood Dene estate buildings. It identifies lead and hydrocarbons within the upper made ground layers and proposes remedial options. The report recommends further Gas monitoring, and conditions should be attached in the event that planning permission is granted to ensure further monitoring on the site and mitigation of contaminants where required.

Sports Development

- 174 A consultee response submitted from Sport England seeks to ensure that sports facilities can meet the demand generated by the proposed development. Sport England considers that new development should contribute towards meeting the demand by providing on-site facilities and/or providing capacity off site. However, given the former estate was occupied by 323 residential units the proposed development at 333 units would create only limited additional demand on sports facilities. Notwithstanding this, the development will make a Section 106 financial contribution towards sports development.

Radio Communication Capacity

- 175 The Mayor's Office for Policing and Crime (MOPAC) and Metropolitan Police Service seeks to ensure the proposed development would not have a negative impact on the radio communication capacity (or 'airwave') of the Peckham Police Station. Although the previous estate buildings were a maximum of 7 storeys in height, the altered footprint of the proposed scheme and additional height at the junction of Queens Road and Meeting House Lane ensures any impact on 'airwaves' would reasonably need to be assessed. Accordingly, conditions are recommended that requires an assessment of the development impact on 'airwaves' and appropriate mitigation scheme if this is demonstrated.

Mayoral Community Infrastructure Levy (CIL)

- 176 S143 of the Localism Act 2011 states that any financial sum that an authority has received, will, or could receive in the payment of CIL is a material "local financial consideration" in planning decisions. The requirement for Mayoral CIL is a material consideration. However, the weight to be attached to a local finance consideration remains a matter for the decision-maker. Mayoral CIL is to be used for strategic transport improvements in London, primarily Crossrail. The levy is applied to all developments at a rate of £35 per square metre in Southwark.
- 177 The site is currently cleared other than an energy centre and substations that will be demolished. The development proposed 32,919sqm of residential floor-space and 450sqm of flexible retail/business/non residential institution space. As such the CIL contribution is based on the additional floorspace created. Based on the areas provided, this would be £1,167,915.

Conclusion on planning issues

- 178 The proposed development is considered acceptable in land use terms. It would provide an appropriate and sustainable development providing much needed housing in the borough and a high proportion of affordable housing. The housing proposed is considered to be of a good quality, with a good mix of dwelling sizes and housing types across the site, addressing recognised housing need.

- 179 The quality of proposed accommodation is considered to be good, with generous internal space standards, although private amenity space standards aren't fully met. This is offset by the significant levels of communal outdoor amenity space and publically accessible pocket park. The scheme has a high proportion of dual aspect units, providing good outlook, light and ventilation. Ground floor maisonettes would have front doors directly onto the street, increasing activity and natural surveillance.
- 180 The proposal is considered acceptable in terms of scale and design. The taller element is located within an area identified as being appropriate for a tall building and at a point of landmark significance where it will provide an urban focal point. The layout will improve permeability across the site and its detailed design responds to the context. Whilst 24 trees will be lost from the site and surrounds this is mitigated by 26 replacements ensuring a net increase across the site.
- 181 The amenity impacts have been considered, and overall the proposal would not result in significant harm to residential amenity of neighbouring occupiers in terms of daylight and sunlight, outlook, sense of enclosure and overlooking.
- 182 Taking into account London Plan policy, Core Strategy policy and draft PNAAP requirements, the approach to sustainability and energy provision is considered acceptable. The proposal has appropriately mitigated against the impacts of the development by securing appropriate financial contributions and mitigation measure in accordance with Southwark Plan policies.
- 183 The transport impacts of the proposal have been assessed and concluded that the proposal would not have a significant impact on the surrounding highway network. To ensure there is not an unacceptable impact on parking pressures within the local area, the majority of units would be excluded from applying for on-street parking permits. This would be secured within the s.106 agreement.
- 184 Therefore it is recommended that the application is approved subject to the completion of a legal agreement and referral to the Greater London Authority.

Community impact statement

- 185 In line with the council's community impact statement the impact of this application has been assessed as part of the application process with regard to local people in respect of their age, disability, faith/religion, gender, race and ethnicity and sexual orientation. Consultation with the community has been undertaken as part of the application process. In addition to this, the applicant has undertaken their own consultation prior to lodging the application. The consultation is described in the 'Statement of Community Involvement' prepared by Local Dialogue and dated March 2013 which accompanied the application.
- 186 Activities undertaken as part of the consultation and presented in the Statement of Community Involvement included:
- 187 -Several rounds of letters setting out the proposals and inviting key political stakeholders and community groups to drop-in sessions.
-Meetings were held with Ward Councillors, Acorn Estates residents' association and other stakeholders.
-A total of 7000 leaflets were hand-delivered to local residents and businesses introducing the scheme and providing the details of the exhibitions.
-A public drop-in session was held on the 19/07/2012. At the drop-in display boards were used to explain the proposals and feedback forms were provided. A second exhibition was held on the 06/12/2012 with an updated scheme.
-A consultation website was launched in December 2012 which allowed stakeholders

and residents opportunity to view the proposal and offered feedback routes.
 -A workshop was held for potentially returning Wood Dene residents to explore a right to return to the new development.

188 The submitted report describes the responses received, the method of consultation undertaken and how the responses informed the development of the proposal.

Consultation

189 Details of consultation undertaken in respect of this application are set out in Appendix 1.

Consultation replies

190 Details of consultation responses received are set out in Appendix 2.

191 Summary of consultation responses
 A total of 7 responses were received from local residents / residents association; 5 objecting to the application and 2 responses in support of the application.

192 Main planning objections raised: concerns over the loss of district heating system, loss of daylight/sunlight, extent of parking, promised non-residential institution, excessive height of building, no civic element, not enough commercial space, needs a taller building, requires additional green roof, loss of openness and improved soft landscaping.

193 Main issues in support: deliver much needed homes to the borough, vacant site is an eyesore, the design and height is appropriate for the location, the scheme will greatly contribute to the regeneration of Queens Road.

Human rights implications

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

195 This application has the legitimate aim of providing a housing development. The rights potentially engaged by this application, including the right to a fair trial and the right to respect for private and family life are not considered to be unlawfully interfered with by this proposal.

BACKGROUND DOCUMENTS

| Background Papers | Held At | Contact |
|--|--|---|
| Site history file: TP/2445-A Application file: 13/AP/0876 Southwark Local Development Framework and Development Plan Documents | Chief executive's department 160 Tooley Street london SE1 2QH | Planning enquiries telephone: 020 7525 5403 Planning enquiries email: planning.enquiries@southwark.gov.uk Case officer telephone: 020 7525 5657 Council website: www.southwark.gov.uk |

APPENDICES

| No. | Title |
|------------|---------------------------------|
| Appendix 1 | Consultation undertaken |
| Appendix 2 | Consultation responses received |
| Appendix 3 | Images |
| Appendix 4 | Recommendation |

AUDIT TRAIL

| | | |
|---|---|--------------------------|
| Lead Officer | Gary Rice, Head of Development Management | |
| Report Author | David Lane, Conservation Officer, Buildings at Risk | |
| Version | Final | |
| Dated | 19 June 2013 | |
| Key Decision | No | |
| CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER | | |
| Officer Title | Comments Sought | Comments Included |
| Strategic Director of Finance and Corporate Services | No | No |
| Strategic Director of Environment and Leisure | No | No |
| Strategic Director of Housing and Community Services | No | No |
| Director of Regeneration | No | No |
| Date final report sent to Constitutional Team | | 21 June 2013 |

APPENDIX 1

Consultation Undertaken

Site notice date: 25/04/2013

Press notice date: 25/04/2013

Case officer site visit date: 22/05/2013

Neighbour consultation letters sent: 27/07/2012

1496 neighbouring occupiers were consulted, including addresses on Burchell Road, Montpelier Road, Queens Road, Kings Grove, Carlton Grove, Woods Road, Colmore Mews, Meeting House Lane, Consort Road, Staffordshire Street, Peckham High Street, Clayton Road, Goldsmith Road, Hanover Park, Marmont Road, Pennethorne Road, Yardfield Square, as shown on the map below:



Internal services consulted: 27/07/2012

Archaeology Officer
Design and Conservation Team
Ecology Officer
Environmental Protection Team [Noise / Air Quality / Land Contamination / Ventilation]
Planning Policy
Public Realm – Project Design
Public Realm – Asset Management
Transport Planning Team
Urban Forester
Waste Management
Economic Development and Strategic Partnerships Team

Statutory and non-statutory organisations consulted:

Greater London Authority
London Fire and Emergency Planning Authority
Metropolitan Police Service
Sport England
Environment Agency
Natural England - London Region & South East Region
Transport for London
Thames Water Development Planning
Arquiva Digital Communications
EDF Energy
Housing Regeneration Initiatives
Southwark PCT

Neighbours and local groups consulted: N/A

Re-consultation: N/A

APPENDIX 2

Consultation Responses Received

Internal services

Archaeology -

Wood Dene is located within the Peckham Village Archaeological Priority Zone. The applicants have provided a desk-based assessment. It is apparent from a survey of the historic maps included in this document that the site of the Wood Dene has undergone two significant phases of development, firstly the construction of terraced housing across much of the site, secondly the demolition and clearance of these buildings for the construction of the former Wood Dene estate.

It is therefore recommended that a programme of archaeological observation and recording is maintained during groundworks on site. It is apparent from examining the historic maps that there will be discrete areas that may not have been impacted by Victorian housing and the later Wood Dene Estate. It is these areas that should be targeted for recording rather than a generalised approach to the entire site.

Ecology

- Agree with the findings of the submitted Ecology Report. The ecology report recommends some ecological enhancement. The site has good potential to enhance an area of poor ecological value for the benefit of residents and visitors alike. The development is in an area of natural deficiency so any ecological features that enhance the area help meet the targets of the Southwark Biodiversity Action Plan.

- The majority of the roofs are set aside for PV panels. I recommend that any of the roof with PV panels also have brown roofs on them as this combination optimises the performance of the PV tiles.

Environmental Protection

Air Quality

- Modelled concentrations illustrate that the NO₂ annual mean air quality objective is predicted to be exceeded at a number of locations and therefore forced extraction is required to be installed at a number of residential units. As such, mechanical ventilation is proposed to be included within the design in the stated units within section 8.1. Reassurances are needed that inlet vents are to be positioned away from the main roads/areas poor AQ, ie taking in air for the rear/courtyard areas, and thus further information is needed to be submitted for approval via a condition when full details of the scheme of residential ventilation are known.

- CHP – Energy Centre: No detailed information is provided on the likely dispersion of exhaust gasses from the gas boilers/CHP plant. The LPA will require clarification regarding this as CHP is not recommended in this location due to poor background air quality. The Boiler/CHP plant will need full 3d dispersion modelling detail as any stack is highly likely to impact laterally on high buildings both on and off-site adversely affecting residents. It is anticipated worst case scenarios will be explored by the developer. Recent nearby developments with similar plants that have gained permission have had abatement technology for the CHP/Boiler plant conditioned, this is strongly recommended in this location. There is draft guidance regarding CHP plants in London which is currently out for consultation which may be of

interest to the developer called 'The Mayor's combined heat and power emissions standards for Nitrogen Oxides'

Noise

- Residential Internal Levels - Night time hours have been measured over a full weekend in March 2013. Relatively high noise levels were measured and bedrooms will need to be appropriately protected from the high LAmax levels recorded throughout the night. Glazing is available to adequately mitigate against these high levels to protect future inhabitants at night and provide acceptable internal levels.

-Daytime levels testing is adequate but requests that internal noise levels are not exceeded due to environmental noise via condition.

-External Balconies - The balconies which face out onto Meeting House Lane, Carlton Grove and Queens Road do not meet the WHO external noise guideline limit of 55dB for acceptable external amenity areas with regards to noise. It is appreciated that this is part of the design however these 'amenity' areas should not be used for any planning gain.

-External Plant Noise - the exact details any fixed plant are not yet known. Proposed target rating levels are proposed however these are disregarded as it assumes a level of 5dB over lowest background levels is acceptable which is not acceptable. BS4142 states that to ensure complaints are unlikely plant must not emit a level above 10dB below the lowest background levels at the closest residential property, thus these assumed rating levels are 15dB above acceptable limits. The plant noise condition is requested to be attached onto any planning permission granted and in due course when plant specifications, locations, operating times etc are all known then a full BS4142 report can be undertaken.

- Internal plant rooms, Energy Centre, Refuse Stores and Commercial Premises - It is at present unknown what plant will be installed within the plant rooms within this development and within the energy centre. However it is acknowledged that appropriate insulation is to be provided to ensure internal transmission of noise is controlled. EP request that all residential units that share a party wall/ceiling with any plant rooms, refuse store rooms, the ground floor commercial premises and the energy centre are adequately insulated so as to the party element shall be sufficient to ensure that NR25 is not exceeded in residential premises due to noise from the commercial premises. This will ensure good internal limits are met in those habitable rooms which border spaces used for commercial/servicing uses.

-To ensure adequate insulation is also provided between neighbouring residential units, EP request that these party divides are insulation to Building Regulations Part E standards +5dB (A) to ensure good internal levels of living amenity.

-New CHP energy centre to serve the development. Not yet known what plant will be installed in the energy centre, however it is claimed that every effort will be made to ensure existing surrounding residents and new residents as part of this scheme will not be affected by any noise from the operation of the energy centre. Further assurances are requested when plant and full plans of the energy centre are known to ensure noise is not going to cause a disturbance/nuisance in the future – details can be incorporated within condition suggested in point above.

- Servicing Operational Phase - It is recommended to prevent any servicing/deliveries/refuse collections associated with the commercial units and the residential element of the proposal occurring at unsociable times.

Land Contamination Assessment

-Contaminants (lead and PAHs) were identified within the upper made ground layers at the application site which are deemed to pose as a threat to the proposed sensitive residential end user being brought onto site. The Hydrock report offers generic remedial options (section 6.7) for landscaped areas to remove the Source-Pathway-Receptor linkage and thus the risk to public health.

-Gas monitoring has not been fully assessed and a further assessment, as stated in section 6.5.2, will be required in order to demonstrate whether gas protection measures within the building foundations will be required. Additional assessment is required with regards to gas monitoring and a comprehensive remedial strategy needs to be drawn up to remove the existing underlying risks.

Construction Management Plan

-It is predicted that construction related activities at the site will breach the maximum of 70dB Laeq guideline value at the closest residential neighbours and as such it is recommended to erect a 3m high acoustic barrier around the entire boundary as well as localised hoardings whilst construction operations are being undertaken. Full details of which are expected to be included within a comprehensive Environmental Construction Management Plan which will be expected to be complied with for the entirety of the redevelopment project.

-Vibration levels through proposed piling activities are predicted to cause potential complaints also. The type of piling method to be used, selection of rig, location of piles etc are not finalised however and these details can therefore be submitted to the LPA for comment/approval in due course.

Lighting

-Following development there will be many pedestrian through routes under use at all times of day, the development is expected to be well lit throughout the night at ground level. The lighting design should be mindful of pedestrian security and the ILE Guidance notes on obtrusive lighting. Lighting of commercial hoardings, advertisements and residential entrances should contribute to street scene without causing glare or adverse impacts on road users. Further information to demonstrate this is required by way of condition.

Transport

Access

- Vehicular access to the development is proposed from both Carton Grove and Meeting House Lane. No through access between the two roads is proposed. The access on Meeting House Lane will be retained, while the access on Carlton Grove will be new, visibility splays have been provided for the new access, and are of a suitable nature. Pedestrian access to the development will be from Queens Road, Carlton Grove and Meeting House Lane.

-The location of the access on Meeting House Lane has been discussed with members of the transport planning team and public realm through out the pre application process. The final decision on the location was approved with Public realm to reduce the impact on the operation of Meeting House Lane, in particular the police station and the crossing which is used in connection with the school. The TA does not suggest that the location of the existing crossover will be changed.

-Applicants are advised that any alterations to the boundary/footway on Queens Road will need to be discussed with TfL as the above section of Queens Road forms part of the TLRN.

Cycle parking (Policy 5.3)

- Table 15.4, of the Southwark Plan, states that the minimum secure parking standard for cycles is 1.1 per residential unit. Table 15.3, the Southwark Plan also states that the minimum secure parking standard for a B1 use cycles is 1 space per 250sqm (minimum of two spaces) For reasons of convenience, cycle storage must be of dimensions as stated in Manual for Streets, sections 8.2.21-8.2.24 and should comply with best practice guidance. The applicant is required to submit to the Council, for approval, detailed and scaled drawings to demonstrate the provision of cycle storage.

-The type of cycle storage should be accessible to users regardless of physical strength or ability (i.e. children and the elderly should be able to use them) and therefore should involve a minimal amount of effort to store and retrieve the cycle. Should the applicants have any queries regarding cycle storage facilities please do not hesitate to contact the transport team for advice on suitable cycle storage possibilities.

-The mayors transport strategy suggests an ambitious 400% increase in cycling by 2026, cycle trips will also count for a 5% mode share. These plans plus the fact that Cycle super highway 5 will pass along the above section of Queens Road to increase reinforce the need to provide above the minimum cycle parking standard.

-The storage areas for residential and commercial uses must be separate, for reasons of security. Policy requires that cycle parking is secure, weatherproof and convenient for all users of the development. High quality cycle parking and cycle related facilities can significantly contribute toward modal shift away from private vehicle usage and ownership.

-The applicants have proposed 366 cycle parking spaces for 333 residential units which just comply with the council minimum cycle parking standards, but does not exceed. Two cycle parking spaces are associated with the 450sqm of mixed use development. For a development of this nature in the above location a provision significantly above minimum standards would be expected. Given that the development is located on a future cycle super highway and is within a reasonable cycling proximity to key employment area's (the West End and the City) high levels of cycle usage can reasonably be expected in association with the proposed development, However the application conforms with the councils minimum cycle parking standards and would not warrant a reason for refusal.

-The applicants have located cycle stores in areas within a reasonable proximity to lift cores and "street" access's these locations are deemed convenient. Cycle store areas look to be of a suitable size to house the proposed level of cycle parking associated with the proposed development. Should space efficient cycle parking need to be provided the transport team suggest that "double stackers" or "josta" stands are not used. Cyclepods semi vertical cycle storage facilities have been demonstrated to be suitable for all types of cyclists; they require minimal effort and no lifting of a cycle to place and retrieve a cycle from the storage position.

-The proposed levels of cycle parking meets Southwark's minimum standards however it is not compliant with the minimum cycle parking standards listed within the London Plan.

Car parking (Policy 5.6)

-The proposed development is not located within a CPZ, however is located within an immediate proximity to the Peckham B CPZ, it bounds the development on Meeting House Lane and the southern side of Queens Road.

-The parking team has recently suggested that there is the possibility that the existing CPZ could be extended to cover the proposed development (and further east along Queens Road). Should this happen the residents will be exempt from eligibility for on street parking permits. A contribution will be required toward the CPZ extension conciliation. Given the area's High PTAL and currently on street parking stress derived from commuter parking, a CPZ extension is highly likely to be adopted by residents of the area.

-This proposal is located in an area with a high TfL PTAL rating (6a) reflecting the area's high level of access to all forms of public transport, in this instance a high level of Bus and Train service's are provided within a close proximity to the development. Given the high level of public transport provision available to users of the proposed development, and the possibility of CPZ fully covering the surrounding area, a lower level of car parking will be needed in association with the above application.

-The development proposes 116 spaces which equates to 0.35 spaces across the development. This level of off street parking will be acceptable in association with the above application. The likelihood of over spill parking from the development, in the worst case scenario that the CPZ is not extended, is unlikely. The applicants are proposing three years car club membership to all residents of the development. The provision of a car club bay and free membership is a well documented successful mitigation tool to reduce car ownership, overspill parking and surrounding on street parking stress levels.

-During the pre application discussion the applicants were advised that census car ownership figures should correlate with the developments off street parking provision. Census Car ownership data (2011) for the livey ward shows that 30% of households own vehicles. The level of off street car parking provided more than caters for the number of vehicles which will be associated with the development; as a result any over spill car parking from the development will be highly unlikely.

Disabled parking (Policy 5.7)

-Disabled parking is required in association with the above application. As the development will be built from a cleared site, all disabled parking bays should be located off the existing highway network. Disabled parking facilities should be located in area which are within an immediate proximity of wheel chair accessible units, entrances and lift cores.

- As the development is not located within a town centre area, with no immediate amenities, and is served by two modes of public transport. Disabled parking should be provided in line with transport SPD stated levels, one per unit. The applicant has provided 33 disabled parking spaces, on parking space for each wheel chair accessible unit. Disabled parking facilities have been thoughtfully located within a close proximity of lift cores. Disabled users typically have to pass through only one door for pass from a parking space to a lift core, levels or passage look to be of a shallow nature and provide no obstruction for disabled users. All residential disabled parking facilities are located in an off street location.

Servicing and refuse vehicle access

-The proposed developments residential aspect will be serviced from within the confines of the developments red line boundary. All vehicles will be able to enter and exit the development in a forward gear. Turning heads have been proposed in the northern sections of the two avenue area's this a suitable arrangement for service and refuse vehicles. Swept paths have been shown for a ridged refuse type truck navigating the vehicular areas of the development and entering and exiting the development in a forward gear. A Refuse truck is likely to be the largest/ most immobile vehicle that will be associated with the development.

- The Energy centre will require a level of servicing, but this will be on a sporadic nature (once a month) and can be managed through the service management plan to eliminate the impact of the service vehicle on the surrounding highway network, the operational development and local residents.

- The commercial unit has been proposed to be serviced from an on street location on Queens road or Meeting house lane. This is not an ideal situation as the development has been built out of a cleared site, and all servicing should be off street. However the on street servicing of the commercial unit will not constitute a stand alone reason for refusal, the impact of service vehicle movements for this use can be mitigated by a robust service management plan which not only reduces the impact on the surrounding highway network but also the impact of noise and disruption to local residents.

Trip Generation/Highway impacts

Trip generation by the development will not be of a significant level to impact significantly on the operation and safety of the surrounding highway network. The figures taken from trip generation data bases show that the number of trips added to the network will have no significant impact, when added as *new* trips. The cleared site was previously a residential development. When the proposed development is compared to the scale of development previously found on the site there would be no preserved increase in trip generation from either the proposed residential or commercial elements.

- Alterations to the junction of meeting house lane and Queens Road in aid of CS5 will result in the junction operating above capacity when 2016 traffic flow is added. The change in operation of the junction is associated with the remodelling for the cycle super highway, with out the junction realignment associated with the cycle super highway works, the trips from the development exiting onto meeting house lane would have no perceived impact on the operation of Meeting house lane and Queens Road junction.

- The TA shows that bus capacity is approximately 75% on busses which serve the development. The over ground rail links also have abundant capacity which can easily cater for residents of the development. The proposed development will have no noticeable impact on the operation or capacity of the surrounding public transport services.

Travel Plan

A Residential Travel Plan is required for this development as it exceeds our thresholds and despite the comments relating to the car club and public transport information; there is still potential via a travel plan to promote these as well as the use of walking and cycling. The travel plan must comply with Transport for London's Guidance for Travel Planning for New Developments in London,

Southwark Council's Sustainable Transport SPD (see in particular Section 5.2 and Appendix 3 for guidance on travel plans), and the ATTrBuTE tool.

- London Borough of Southwark currently set a travel plan monitoring fee of £3,000, this is usually secured through the Section 106 agreement. Additionally, developments that require a 'strategic level' travel plan (as defined by TfL) are also required to fund independent monitoring via TRAVL, the costs for this can be found on the TRAVL website at: <http://www.travl.org.uk/>

Public realm has in summary objected to the above proposal on the following items.

- Tree planting
- Clarification of Adoption stance
- Widths of Interior ped/cycle Streets.

- The transport planning team support public realm in relation to their comments on tree planting in the footway. The transport planning team also typically request that the adoption process and details about the future status of internal roads be clarified at application stage.

- Given that public realm have suggested that they are willing to meet the applicants and negotiate a positive outcome I believe that this can be rectified outside of the planning process so that a pedestrian/cycle street can be constructed to adoptable standards. Plans show that the disparity between the proposals and the widths required within the Streetscape Design manual is approximately 1.5 m.

- The proposed development does not represent an intensification in use when compared with the previous residential site. The site is well served by public transport (PTAL 6a) and has provided a suitable level of off street parking, which along with Car club membership will mitigate the possibility of over spill parking, should a CPZ extension not be implemented. The level of cycle parking provided in association with the above application is disappointing as it does not vastly exceed Southwark's minimum secure cycle parking guidance.

-Overall, no objections are raised to the above application as there will be no significant negative impact on the performance and safety of the surrounding highway network.

Urban Forester

-Overall, the landscape design is indicative and lacks the degree of detail and quality assurance to be considered of significant merit. A specific landscape condition is therefore required. Surfaces are not proposed to be permeable due to the presence of services. Whether or not this is reasonable the planting specifications will require trench design in combination with the proposed drainage to attenuation tanks such that sufficient rooting space is made available. Similarly, soil volumes will need to be specified so that the quality and sustainability of the three large raised gardens will be attained.

-A total of 24 trees require removal in order to facilitate development, none of particularly significant amenity value (BS5837 A category). Excluding U category specimens which would not be expected for retention the total stem diameter to be removed equates to 2563 cm girth.

The 5 trees proposed for retention on Queen's Road are of low amenity value and likely to require removal in the short term. Their replacement should be agreed with TfL. Within the site up to 26 trees are proposed at grade including 3 on Queen's

Road and at least 15 on podiums. In order to replace adequate canopy cover and other benefits minimum girth sizes are required.

-The tree strategy shows a welcome retention of the Plane tree T1 of highest amenity value and a continuation of new avenue planting along Queen's Road. The proposed use of hedging is a good response to define and enclose defensible space to residential entrances and as street greening. Indicative cross sections have been provided for public realm throughout the development. Generally, these need to show how the provision of street greening, and in particular street trees, will be adoptable by housing.

-Sufficient pavement widths and distances from stems to building facades will be required to allow the growth of mature trees, such that a minimum of 1.5m is maintained between the tree canopy and adjacent elevations. Fastigate tree species are acceptable, however, for large trees which have the most beneficial effects; highways are likely to insist on a minimum of 4.5 metres (including the 1.5m distance requirement as above). Cross sections are therefore needed to confirm this is achievable along Meeting House Lane.

-The close proximity of the large retained Plane tree will require pruning and a specific method statement to ensure it is not damaged. Amendments are required to species which can be controlled via condition. Based on the disparity between number and amount of trees removed and replaced offsite planting should be agreed via s106 payment.

-Proposed specimen planting of trees on roofs, other exposed planting and that within enclosed soil units will require suitable irrigation, which may be provided by recycled grey water or via attenuation tanks. Alternatively, where these are provided for private amenity space, for example on balconies, suitable irrigation methods should be designed, especially where extensive vertical planting is specified.

Public Realm

-The site is located within the Town Centre Specification Area. The main consequences of this are that the SSDM/SER/Surfacing Material palette requires granite natural stone slab paving to footways and high quality precast concrete block paving to modular unit surfaced carriageway areas. The later is required to have a granite imitation finish and to be laid in a mottled mix of colours (e.g. silver grey/mid grey/dark grey). Also, -SSDM/DSR standard DS.208 sets out minimum effective footway width requirements. Minimum widths for the Town Centre Specification Area vary in respect to whether streets include commercial frontage. Where they do then the required width is 2.4m in most instances. Where they don't then 1.8m is acceptable. As explained in the standard, additional widths apply in certain circumstances and need to be added to these minimums.

-No information has been found in the application in respect to whether it is proposed that the various new and existing streets (and any set-backs from the later) are to be offered for adoption as Highways maintainable at public expense. Therefore clarification from the Applicant is requested. At present, the only parts of the application site that are adopted Highway are the Meeting House Lane and Carlton Grove (though parts of these fall within the jurisdiction of Transport for London). As per section 2 the Highway Authority proposes to adopt all public areas within the site, excluding the following:

- i. Internal block courtyards and parking areas.
- ii. The pocket park off of the promenade and any associated ramp or step

structures leading to this.

-The Applicant is reminded that the Highway Authority will be unable to adopt any areas of proposed amenity landscaping without provision of commuted sums.

-The proposals will require the creation of two significant new junctions with the existing Highway for which Southwark Council is the Highway Authority – one on Meeting House Lane by the existing zebra crossing, the other on Carlton Grove just south of Holydene. Both will provide access to car parks within the proposed new development blocks. Both the proposed new junctions will require works outside of the Applicant's red-line boundary. These will require Highway Authority Approval under section 278 of the Highway Act 1980. A Precommencement obligation to agree section 278 works with the Highway Authority prior to on-site Implementation of any works (as defined in the Town and Country Planning Act) is requested to secure these. The Highway Authority's provisional view is that creation of the proposed new accesses is unlikely to prove problematic in respects to design or statutory/constitutional approvals.

- It is proposed to shift the existing Holydene junction slightly southwards to accommodate a proposed revised parking arrangement on Holydene itself. As per '3.2c', raised table(s) and associated footway build outs as well as Waiting Restrictions that are enforceable at any time will need to be provided in association with those works. These improvements can be secured by the same pre-commencement Obligation

-The Highway Authority has concerns about overall widths of interior pedestrian and cycle streets. The promenade falls short of the adoptable standards through:

- i. Provision of continuous footways (or other pedestrian only routes to both sides of the vehicle access areas.
- ii. Provision of adequate delineation between pedestrian only areas and vehicle access areas
- iii. Meeting overall minimum street widths for new streets (and related minimum widths for subcomponents within this such as footways/carriageway/planting verges).
- iv. Provision of street tree planting on new streets.

-These could have a serious safety and accessibility impacts for pedestrians and pedal cyclists and would undermine efforts to achieve the Application's stated aim of creating a 'pedestrian and cycle friendly environment'. These short-comings all appear to follow from the close proximity of the proposed Block A building line. The effect of this is to squeeze the street width unacceptably.

-The overall street width to Lane 1 (cycle access) is a concern and insufficient information has been provided in the Application from which to properly understand the likely street-section and associated proposed widths within this. DRG.2365-PL-109 suggests a 12.7m width between facades (excluding balconies which would restrict distances and opportunities for tree growth) - though this is not entirely clear owing to the limited information on the drawing. Scaling off of DRG.2365-PL-100 suggests an even narrower width of 12.0m. Assuming the loss of a further 1.2m from either side of the street for defensible thresholds this would leave only a residual 10.3-9.6m. Whether measured between building lines or the limits of public space, these dimensions are substantially less than the required minimum width values for new streets and spaces set out in standard DS.127. In addition, there is concern about how emergency response vehicle access to this lane would be accommodated. Highway Authority Officers are willing to meet with the Applicant to discuss how their proposals could be resolved such that the above Objection can

be lifted.

- Lane 2 (pedestrians only) - Whilst the widths of this street are less than the minimum width values required as SSD/DSR standard DS.127 this is of lesser concern in this instance given the absence of pedal cycle access. Though restricting access for pedal cyclists is not ideal, officers are satisfied that this is sensible in this instance given likely safety and accessibility conflicts between cyclists, pedestrians and buses at the junction of the lane and Queen's Road given the bus stops located there. It is not clear how emergency response vehicle access to the lane would be accommodated however Officers are generally satisfied that it is likely to be possible to resolve other access and landscaping issues (including emergency response vehicle access) at the post-Planning Permission stage during detailed Highway design discussions.

-Holydene - The Highway Authority is broadly supportive of the proposals for this street. However, it should be noted by the Applicant that:

- i. They will ultimately need to design-in raised tables and other traffic calming features to adequately restrict vehicle speeds – both at the junction with Carlton Grove (see '3.2d') and elsewhere along the street.
- ii. Planting beds/pits for proposed new street trees are likely to require substantial enlargement.
- iii. Given the narrow width of the proposed southern footway, all street lighting and signage will need to be wall mounted. Suitable way-leaves will need to be agreed to provide for access for Council maintenance staff.

-The first two of the above points are likely to require reconfiguration of existing proposed parking arrangements (with potential minor reduction in numbers). However, it is considered that this can all be adequately dealt with at post-Planning Permission during detailed Highway design discussions as part of the section 278/section 38 approvals process.

- It is proposed to remove several existing street trees that are on the adopted Highway. Two are on Carlton Grove and a further two on Meeting House Lane. This will not be permitted by the Highway Authority without the introduction of alternative compensatory planting to those streets within the adopted Highway. However, given the limited width of existing footways on both Meeting House Lane and Carlton Grove and the proximity of the proposed new building lines, it will not be possible to locate compensatory planting within the existing footway width on either street without significant works. Either these footways will need to be substantially widened else substantial build-outs will need to be introduced at kerb edge. In either case, the necessary works will be outside of the Application Red Line boundary.

Design review panel – comments made at pre-application stage.

- The Panel welcomed the opportunity to review this important proposal and thanked the applicants for their clear and considered presentation. The presentation included a contextual analysis, massing diagrams for the site, a landscape strategy, and elevations of principle streets, bay studies and CGIs of the scheme in its context. The Panel were encouraged by the prospect of regenerating this vacant site but raised a number of detailed questions of the relationship of the scheme and its context, the proposed typology for the design and the identity of the distinct parts of the development. They asked the designers to review their proposals to take on their concerns.

- Firstly, the Panel raised questions over how the proposal related to its immediate

context particularly in relation to the Acorn Estate to the north. They noted that the architects had not presented cross sections of the site or CGIs of the relationship between the new development and the Acorn Estate. They were aware that the northern edge of the site has existing residential properties at low level and they wanted to understand how this proposal will relate to this sensitive context. A cross section of the site will help the Panel to gain a better understanding of the relationship between the proposed development and the existing estate as well as the nature of the new blocks and the streets between them. Further, the proposed design locates the tallest buildings at the Queens Road to the south and steps down towards the northern boundary of the site and cross sections of the site and CGIs of the street will present a clearer view of the development in its context.

- Next, the Panel raised questions over the typology proposed for the site. This is a substantial site with enormous potential close to an important town centre and two transport hubs. The Panel questioned the proposed typology for the development which is based around a car park at the ground level which is encircled by single aspect residential accommodation and includes an elevated communal courtyard above the car park. They felt this proposal not only raised issues over security for future residents and in particular disabled residents using the car park, but also further concerns over the quality of the residential accommodation around the edge of the car park, the quality of the elevated courtyard and the associated landscaping as well as the ventilation requirements for the car park which would need to appear as vents in the courtyard. They requested detailed sections across the blocks together with detailed plans of every level to demonstrate how these implications of this typology have been resolved in the design. They felt a better typology could be developed where parking could be incorporated into the internal streets with residential blocks that include a landscaped courtyard at the ground level.

- Finally, the Panel questioned the singular identity of the development. Given the substantial proportions of the site and its direct relationship with Queen's Road, Meetinghouse Lane and Carlton Grove they raised questions over the proposed universal approach to the design. The Panel felt this site offered a unique opportunity to capture some of the interest and vitality of the area and of these distinctive streets which include a number of listed buildings and buildings of townscape merit. This was not a question that could be resolved by architectural detailing or brick colour alone. Whilst they broadly endorsed the masterplan for the site, the mix of residential types and the proposed distribution of building mass and height across the site, they felt the scheme could benefit from an overarching design code and the involvement of a number of designers to give each block or perhaps parts of a block – like the energy centre – their own identity. They felt the arrangement of accommodation on the site offered the potential for greater diversity in design especially with the double-height maisonettes arranged around the perimeter and the gaps separating the buildings above. However, they felt the detailed design presented to them did not articulate this diversity adequately or give the residential blocks above their own identity or character.

- In conclusion, the Panel welcomed the proposal and found many aspects of the scheme encouraging, including the masterplan for the site and the rich scale, mix and diversity of accommodation. However, they raised questions over the relationship of the scheme with the neighbouring properties to the north, the universal typology and singular architectural expression of the scheme and they challenged the applicant to address these concerns before they submit a planning application on this site.

Statutory and non-statutory organisations

Environment Agency

- Note the presence of some hydrocarbons and lead (Pb) in the soil, but that these are not considered to represent a risk to Controlled Waters.
- Raise no objection to the planning application as submitted, subject to conditions being imposed on any planning permission granted. Without these conditions, the proposed development on this site poses an unacceptable risk to the environment and we would wish to object to the planning application.

Greater London Authority

-Recommendation – That Southwark Council be advised that the application generally complies with the London Plan but that account should be taken of the comments.

-Strategic issues – The high quality estate renewal scheme is supported and the new loss of affordable housing is acceptable in this instance. A viability assessment and further discussion is needed on housing, child play space, noise, inclusive design, climate change mitigation and adaption and transport.

- Land use principle – The site is allocated in the Peckham and Nunhead AAP which sets out that residential and retail is the required land uses and that leisure/community, and student accommodation may also be acceptable. An indicative capacity of 360 units and 500sqm of retail is set out. The proposal is broadly in line with the aspirations of the AAP.

-Housing and Affordable Housing -The proposal provides 333 units and approximately 32,000 sqm of floor-space as such there is no overall loss of housing on site. However, there is a net loss of 197 affordable units. The applicant sets out the site is within Livesey Ward which has one of the highest concentrations of affordable housing in the borough. The Core Strategy requires a minimum of 35% market housing Peckham to reflect this. Given the high level of affordable housing in the local area and given it would not be desirable to increase density on this constrained site and taking account of the fact that the units were demolished in 2007 (and are understood to have been largely bedsits and one bed units) and the extent of the council's affordable housing programme, the net loss of affordable housing is acceptable in this instance.

-The applicant has demonstrated that it could not provide any more affordable housing if the social rented housing was replaced by affordable rented. Taking into account this and the fact the site was previously a housing estate and given the needs to rehouse previous tenants within the scheme, in this instance this is acceptable.

-The applicant has provided a viability assessment which justifies that the maximum reasonable amount of affordable housing has been provided.

-The level of 3 bed family sized social rented units falls short of the levels set out in the Housing Strategy. Further justification should be provided for this shortfall.

-Density – The applicant calculates the density as 558 habitable rooms per hectare which is within the density range set out in the London Plan. The applicant should confirm this has been calculated using net residential area.

-Childs play-space – The application has a child yield of 91 calculated using the Mayor's child play-space SPG. As such 910 sqm of play-space should be provided. 1745 sqm of child space is provided in the podium courtyards and over 12's play-

space will be provided off-site. The application should provide details of the off-site provision and whether upgrades are required to accommodate additional capacity.

-*Noise* -Properties will fall into noise exposure category (NEC) C and D which is acceptable given the site was previously used for residential use. The number of single aspect units has been minimised, although a small number are located in NEC C and D. Given the high overall residential quality and the constraints of the site and provided sufficient mitigated is provided this is acceptable in this instance. The Council should ensure suitable measures are secured to ensure noise mitigation.

-*Urban design* —The proposed design is consistent with London Plan Policy and relevant supplementary planning guidance and is wholly supported.

-*Inclusive access* – All units have been designed to comply with Lifetime Homes Standards and 33 (10%) wheelchair accessible units are proposed in line with London Plan Policy. The wheelchair accessible units are provided close to the cores and each core has two lifts. The applicant should confirm that the wheelchair housing split and range of bedrooms has been agreed with the Council and responds to identified need.

-*Climate change mitigation* – The applicant has followed the energy hierarchy and is proposing to reduce carbon emissions by 68%, thus exceeding the London Plan requirement. Roof plans showing the photovoltaic panels should be provided. Confirmation that all uses are connected to site wide networks and a commitment should be made to ensure the development is designed to allow connection to a district heating network should one become available. This together with the commitment to a single site wide energy network and provision of the photovoltaic panels should be secured by condition.

-*Climate change adaption* – Water usage will be reduced to 105 litres of water per person per day and roof-space incorporates green/brown roofs or roof gardens which are welcomed. The applicant should confirm rainwater harvesting or grey-water recycling is proposed.

- The Flood risk assessment (FRA) confirms the site is within Zone 1 and as such the principle of development is acceptable.

-The FRA states that development will provide 485 cubic meters of attenuation which will limit the surface water discharge to 90 litres/second in a 1 in 100 year storm. This is the minimum acceptable approach to comply with the London Plan Sustainable Drainage hierarchy contained within policy 5.13. This will be achieved a combination of green roofs and modular storage within the podium deck, under road and within the pocket park. The applicant is encouraged to examine opportunities for further attenuation or diversion of surface water given nearby risk areas. All measures should be secured via an appropriate planning condition.

- *Transport* – TfL has no objection in principle to the development proposal addressing the transport issues prior to the Council determining the application.

-Trip generation; it is unlikely that the trip generation from the development will have an adverse impact on either public transport or the TLRN.

- Parking; 116 proposed car parking spaces equates to around one space per three residential units and is inline with London Plan standards. Disabled parking provision equates to 10 % of residential units and electric vehicle (EV) charging infrastructure also accords with London Plan standards. The 366 cycle parking spaces are lower than the London Plan Standards which would require a total of 413 spaces. The applicant should therefore increase parking provision.

- Servicing and construction; The commercial unit will be serviced from Queens Road, in which case, only the loading bay can be used of lawful servicing during the red route 'no stopping' restriction period. With the CS5 proposals, in order to provide an uninterrupted cycle and bus land eastbound the loading bay will only be available from 10am to 4pm within the red route restriction period. In either scenario it is likely the loading bay would have to be lengthened is larger vehicles are to use it. As such, the service management strategy should be agreed with the Council and secured as a condition of any planning permission to accord with London Plan policy 6.3. A construction management plan (CMP) should be submitted and agreed in writing by the Council in consultation with TfL and secured by way of condition.

-Urban Realm; The urban realm proposals should be discussed further with TfL prior to implementation and the detail of the urban realm scheme should be secured by way of a condition. The proposed planting of new trees in the public highway is, in principle, supported subject to approval from TfL. The existing trees in the public highway appear to be retained and will not need pruning from the development which is supported. These trees should be protected during construction through the imposition of a condition.

-*Pedestrian and cycle permeability* – The site is generally permeable to pedestrians and cyclists, however design features seek segregation and the eastern 'pedestrian Lane' appears to exclude cyclists, even though it contains cycle parking. This is not an appropriate response given there is unlikely to be a high cycle or pedestrian flow through the site of high cycle speeds. This should be reconsidered by the applicant.

-The central north-south 'Cycle Lane' exits the site near to the existing pedestrian crossing. As such it may be appropriate to convert this crossing to a 'Toucan' to improve cycling connectivity west and south and can be considered as part of the urban realm detailed design.

- Improvements at Queens Road Peckham Station; TfL feel it appropriate to seek section 106 funding from this development to provide one or both of two new platform shelters (£45,000 each).

Transport For London

Trip generation

Due to the high PTAL, range of public transport, local facilities and relatively low parking levels, it is unlikely that the trip generation from the development will have an adverse impact on either public transport capacity or the TLRN.

It is noted that the Transport Assessment (TA) 'nets off' the trips from the previous 320 unit development that was demolished in 2007. TfL considers this to be a potentially flawed approach, for example the public transport network or traffic flows could have changed substantially in five years, however it is not considered an issue in this instance.

It is also noted that the TA suggests that a small number of people will access the site using the Underground, yet the nearest Underground station (Bermondsey) is over 2.5km away from the site.

Parking

The proposed level of car parking (116 spaces) equates to around one space per three residential units. This is in line with London Plan standards (Policy 13: Parking), which states that 'all development in areas of good public transport accessibility should aim for significantly less than one space per (residential) unit'. Disabled parking provision equates to 10% of residential units, in line with London

Plan guidance. The provision of electric vehicle (EV) charging infrastructure is also accords with the London Plan standards.

Proposed levels of cycle parking are lower than London Plan (early minor alterations) standards. The applicant proposes 333 residents spaces and 33 visitor spaces, a total of 366 spaces. The London Plan (early minor alterations) standards would require 401 residents' spaces, 8 residential visitor spaces and approximately 4 spaces for staff/visitors to the retail/office space, a total of 413 spaces. The applicant should therefore consider how the cycle parking provision can be amended to better reflect the London Plan (early minor alterations) standards.

Servicing and construction

The TA states that the commercial unit on the corner of Meeting House Lane and Queens Road will be serviced from Queens Road. However, Queens Road is a 'red route', with extensive waiting and loading restrictions, for example 'no stopping' is allowed on Queens Road eastbound Monday to Friday 7am to 7pm.

If servicing is to take place from Queens Road, only the loading bay can be used for lawful servicing during the red route 'no stopping' restriction period. TfL recently consulted on plans to introduce a cycle superhighway (CS5) along Queens Road. With the CS5 proposals, the hours of lawful use of the loading bay will be significantly curtailed in order to provide an uninterrupted cycle and bus lane eastbound during peak hours. In either scenario, it is likely that the loading bay will have to be lengthened if larger vehicles are likely to use it. As such, the service management strategy should be agreed with the Council, in consultation with TfL and secured as a condition of any planning permission. This accords with London Plan policy 6.3.

Prior to implementation, a construction management plan (CMP) should be submitted and agreed in writing by the Council in consultation with TfL, secured by way of a condition of planning approval and be enforceable under appropriate s106 obligations. Any construction activity that may affect the TLRN will require agreement with TfL. This accords with London Plan policy 6.3.

Urban realm

The applicant proposes significant alterations to the urban realm along the Queens Road frontage of the site. Indeed, it is noted that the application 'red line' includes the existing footway on Queens Road, which is highway land for which TfL is the highway authority. Whilst improvements to urban realm are supported in general terms, the proposals raise a number of issues.

TfL would be unwilling to extend the current extent of public highway along the northern footway of Queens Road, between Meeting House Lane and Carlton Grove. It is not felt that there is a capacity constraint here, in terms of pedestrian movement, and therefore there is no compelling reason why the public highway needs to be extended. As such, TfL would require a clear delineation between the public highway, maintained as now by TfL (along the existing 'back of footway') and privately maintained area to the north, which would logically form part of the Wood Dene estate.

TfL would be willing to consider improved surface treatment, funded by the applicant, for the footway within the existing highway land in order to 'tie in' better with the applicants landscaping proposals. However any materials would have to be approved by TfL, the scheme should accord with TfL Streetscape Guidance and could be subject to consideration and approval by the TfL Streetscape Review Group. Also any works proposed by the applicant on highway land will require a s278 agreement with TfL.

There are a number of utilities covers and boxes on the footway along Queens Road, often sited along the existing back edge of the footway. Any alteration to the existing footway and the 'tying in' of the scheme could require some of these to be relocated, which would be the responsibility of the applicant.

Planting new trees in the public highway is, in principle, supported, subject to approval from TfL. The final tree positions, as well as species, size, planting method, pit design, pit materials etc, will need to be approved at reserved matters stages. The existing trees in the public highway along Queens Road, adjacent to the site, appear to be retained and will not need pruning, which is supported. These should be protected during construction.

In light of the above issues, it is essential that the detail of the urban realm scheme is submitted for approval by the Council and TfL prior to implementation, and this should be secured by way of a condition of any planning permission. TfL also feel more could be made of the widened frontage on Queens Road, for the benefit of residents, pedestrians and cyclists, particularly when coupled with the CS5 proposals and in light of the recently published Mayoral Vision for Cycling, which seeks a 'step change' in cycle superhighway design. As such, TfL would welcome dialogue with the Council and applicant when developing the urban realm scheme in this area.

Pedestrian and cycle permeability

The site layout is generally permeable to pedestrians and cyclists, however it is noted that there are design features that seek segregation and the eastern 'Pedestrian Lane' appears to exclude cyclists, even though it contains cycle parking. It is questioned if this is an appropriate approach, given that there is unlikely to be a high cycle or pedestrian flow through the site. In particular there is unlikely to be 'fast' cyclists going through the site, especially given CS5.

The central north south 'Cycle Lane' exits the site near to the existing pedestrian crossing. As such, it may be appropriate to convert this crossing to a 'Toucan' to improve cycling connectivity the west and south. This can be considered as part of the detailed design of the urban realm.

Improvements at Queens Road Peckham Station

The site benefits greatly from the new London Overground service at Queens Road Peckham and this high frequency service wasn't enjoyed by the previous residents on the site. The station environment however does not meet the high standards of other London Overground stations.

Step free access is already being provided for delivery by 2014, funded by the DfT and TfL has recently agreed to fund new cycle parking, but the platform waiting environment is poor, being high up and exposed to the weather. As such, TfL would like to install two additional waiting shelters on the platforms, each shelter costing £45,000. TfL feel it would be appropriate to seek s106 funding from this development to provide one or both of the new shelters, as the residents using London Overground services would greatly benefit from them.

Conclusion

In summary, TfL has no objection in principle to the development proposal; however the transport issues below must be addressed prior to the Council determining the application, in order to satisfy the concerns of TfL and so that the Mayor can be advised that the application accords with London Plan transport policy.

- Reconsider cycle parking provision to better reflect London Plan (early minor alterations) standards;
- Securing an agreed (in consultation with TfL) service management plan and construction management plan by way of condition of any planning approval;
- Securing an agreed (by TfL for the elements effecting Queens Road) urban realm scheme by way of condition of any planning approval;
- Providing the s106 'heads of terms'.

Metropolitan Police (Secure by Design)

-Discussed Secured by Design requirements with the architects and requests that the application has a condition that it achieves SBD.

Mayor's Office for Policing and Crime (MOPAC) and Metropolitan Police Service (MPS)

Airwave

Wishes to raise concerns in respect of the proposed development on the grounds of potential impact to radio communication capacity (or Airwave). The height and mass of the proposed buildings, in particular the tallest element of the scheme on the corner of Queens Road and Meeting House Lane could potentially impact the functionality of the existing airwave at the Police Station. It is possible that the existing Air Wave equipment may require upgrading and/or management to mitigate any impact. As such, it is requested that the Local Planning Authority to enter into a legally binding obligation or secure appropriate planning conditions to:

- Provide a baseline and post construction Airwaves interference study, and a scheme of mitigation as necessary; and/or
- Meet the cost of reinstating the level of Airwave in building reception to that which existing prior to development.

Potential disturbance during construction period

There is potential for temporary adverse impact on the Police Station during construction. It is expected that appropriate mitigation measures will be agreed and implemented in consultation with the MOPAC/MPS including for instance construction noise management, limits of morning and night-time working and site access controls.

Land Use conflict

The MOPAC/MPS are of the opinion that noise generating operations at the Police Station e.g. vehicle sirens could lead to future complaints from residents. However, notwithstanding this we consider that there is potential for future land use conflict relating to noise and on that basis we expect a 'Noise Assessment' will be subjected to the most rigorous assessment during consideration of the application with appropriate conditions put in place as part of any planning permission to ensure these concerns are addressed.

Summary

MOPAC/MPS generally consider the development acceptable subject to the issues and concerns being appropriately addressed.

London Fire and Emergency Planning Authority

- Requests plans to be sent to a further address.
- The development should comply with requirements of B5 approved document B.
- A full building consultation will take place with Southwark Building Control (or approved inspector) when the application is received from them.

Natural England

- Under section 40(1) of the *Natural Environment & Rural Communities Act 2006* a duty is placed on public authorities, including local planning authorities, to have regard to biodiversity in exercising their functions. This duty covers the protection, enhancement and restoration of habitats and species. The National Planning Policy Framework (NPPF) expects local authorities to prevent harm to biodiversity and geological interests. Paragraph 118 makes it clear how the government expects the council to consider planning decisions that could lead to harm to biodiversity and geological interests and Paragraph 109 identifies the importance of establishing coherent ecological networks that are more resilient to current and future pressures.

- The ecological survey submitted with this application has not identified that there will be any significant impacts on statutorily protected sites, species or on priority Biodiversity Action Plan (BAP) habitats as a result of this proposal.

- When considering this application the council should encourage opportunities to incorporate biodiversity in and around the development (Paragraph 118 of the NPPF). Examples of biodiversity enhancements that can be widely incorporated into development proposals include: Green/brown roofs, Landscaping, Nesting and roosting sites, Sustainable urban drainage systems, Local wildlife sites.

Sport England

- The site is not considered to form part of, or constitute a playing field as defined The Town and Country Planning (Development Management Procedure) (England) Order 2010 (Statutory Instrument 2010 No.2184), therefore Sport England has considered this a non-statutory consultation.

-Assessed the application against its adopted planning policy objectives. The focus of these objectives is that a planned approach to the provision of facilities and opportunities for sport is necessary in order to meet the needs of local communities. The occupiers of any new development, especially residential, will generate demand for sporting provision. The existing provision within an area may not be able to accommodate this increased demand without exacerbating existing and/or predicted future deficiencies. Therefore, Sport England considers that new developments should be required to contribute towards meeting the demand they generate through the provision of on-site facilities and/or providing additional capacity off-site. The level and nature of any provision should be informed by a robust evidence base such as an up to date Sports Facility Strategy, Playing Pitch Strategy or other relevant needs assessment.

- This requirement is supported by the government's National Planning Policy Framework, which states: "Within the overarching roles that the planning system ought to play, a set of core land-use planning principles should underpin both plan-making and decision-taking. (Principle 12 is) that planning should:

Take account of and support local strategies to improve health, social, and cultural wellbeing for all, and deliver sufficient community and cultural

facilities and services to meet local needs.” [Paragraph 17]

“To deliver the social, recreational and cultural facilities and services the community needs, planning policies and decisions should:

- Plan positively for the provision and use of shared space, community facilities (such as local shops, meeting places, sports venues, cultural buildings, public houses, and places of worship) and other local services to enhance the sustainability of communities and residential environments...*
- Ensure an integrated approach to considering the location of housing, economic uses and community facilities and services.” [Paragraph 70]*

- No sports facilities are currently proposed as part of the development.

- The population of the proposed development is 833 (based on the national average occupancy rate of 2.5 people per dwelling). This additional population will generate additional demand for sports facilities. If this demand is not adequately met then it may place additional pressure on existing sports facilities, thereby creating deficiencies in facility provision. In accordance with Circular 05/05, Sport England seeks to ensure that the development meets any new sports facility needs arising as a result of the development.

- You may be aware that Sport England’s Sports Facilities Calculator (SFC) can help to provide an indication of the likely demand that will be generated by a development for certain facility types. The SFC indicates that a population of 833 will generate a demand for 0.04 swimming pools (£151,647), 0.07 sports halls (£211,457), 0.01 indoor bowls centres (£10,054) and 0.03 artificial turf pitches (£30,166 3G or £26,575 Sand). Furthermore, the requirement for natural turf playing pitch provision arising from the proposed population should be considered.

- Securing planning obligations towards the provision of indoor and outdoor sports facilities would be supported by Southwark Plan (2007) policy 2.5 Planning Obligations. Furthermore, the requirement of this provision is also supported by Southwark Core Strategy (2011) policies SP9 Meeting Community Needs, SP10 Development Impacts, SP15 Open Space and Biodiversity and 2.5 Planning Obligations.

Thames Water

- Waste Comments

With the information provided Thames Water, has been unable to determine the waste water infrastructure needs of this application. Should the Local Planning Authority look to approve the application ahead of further information being provided, we request a condition for the drainage strategy to be submitted to the Local Planning authority to ensure that sufficient sewage capacity is made available to cope with the new development.

- Surface Water Drainage

With regard to surface water drainage it is the responsibility of a developer to make proper provision for drainage to ground, water courses or a suitable sewer. In respect of surface water it is recommended that the applicant should ensure that storm flows are attenuated or regulated into the receiving public network through on or off site storage. When it is proposed to connect to a combined public sewer, the site drainage should be separate and combined at the final manhole nearest the

boundary. Connections are not permitted for the removal of Ground Water. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. Reason: to ensure that the surface water discharge from the site shall not be detrimental to the existing sewerage system.

-Thames Water would recommend that petrol / oil interceptors be fitted in all car parking/washing/repair facilities. Failure to enforce the effective use of petrol / oil interceptors could result in oil-polluted discharges entering local watercourses.

-Recommends a condition for a piling method statement to be submitted to the Local Planning Authority given it's potential to impact on local underground sewerage utility infrastructure.

Water Comments

The existing water supply infrastructure has insufficient capacity to meet the additional demands for the proposed development. Thames Water therefore recommends a condition be imposed to ensure a impact study of the existing water supply infrastructure have been submitted to, and approved in writing by, the local planning authority (in consultation with Thames Water). The studies should determine the magnitude of any new additional capacity required in the system and a suitable connection point. Reason: To ensure that the water supply infrastructure has sufficient capacity to cope with the/this additional demand.

Neighbours and local groups (summary)

In Support:

Letter from Flat 18, 9 Evan Cook Close, supporting the application for the following reasons:

- The proposed development is a well designed scheme which will deliver much needed homes and construction jobs to the Borough.

- This vacant site has been an eyesore for several years and its redevelopment is strongly welcomed. The appearance, scale and layout of the proposed development are appropriate for this location. The scheme will greatly contribute to the continuing regeneration of Queen's Road and as such should be approved by the council.

Letter from anonymous respondent supporting the application for the following reasons:

- Resides in one of the properties that may be demolished. The building is derelict and in disrepair, there is currently scaffolding outside the building (brickwork surrounding windows have been wearing away and there are huge gaps between them). For years experienced heating and hot water shortages and for the past 2 months and had no heating or hot water at all. Now there is still no heating and hot water in this property resulting in terrible living conditions.

Objections:

Letter from anonymous Beech Dene resident raising the following objections:

- Object to anything higher than 3 floors on the Woodene site facing Beechdene. Been here since 1995 and only moved here as informed Woodene was being

demolished and houses were going to replace the flats.

- The old Woodene was 5 or 6 stories high and blocked the day light into flat. Application is for a building 2 to 9 stories high and unhappy if the light to my house is blocked again. Tall building would result in poor television signal and reduced day-light. This would result in using additional (artificial) lighting during the days in the winter months.

Letter from 9 Blenheim Grove raising the following objections:

- There is no civic element to benefit the local area except a tiny park. For a development of this size it should have tennis courts or sports facilities a swimming pool or a decent sized park. This current design misses the opportunity to add something to improve this much neglected bit of Southwark with a long history of poverty and social problems.

- Insufficient commercial space. The local area needs more small shops, office space and studios to encourage the local creative enterprises. The commercial space is badly thought out and does not suit the demands of the area, promote local enterprise or provide any significant employment opportunities.

- No tall landmark building which wastes an opportunity to create something exciting for Peckham's skyline. The high end private housing should be in a taller tower. There are very few places in Peckham where this would be suitable and we should make the best use of the sites that we have.

- The green roof should be extended over a larger area. The tiny area proposed is a token gesture. There is a real lack of greenery and biodiversity in the area and this should cover a more significant space to create habitat for wildlife.

- Community infrastructure levy and section 106 payment monies needs to be spent locally and not in an already more prosperous part of the borough.

Letter from anonymous respondent raising the following objections:

- Objects on the basis of height. A nine storey block on the corner of Meeting House Lane would create a dark, dismal and unpleasant corner. Meeting House Lane already has the height and bulk of the police station and to add a nine storey block directly opposite would create a tunnel effect. Meeting House Lane is just not wide enough to accommodate two such big buildings.

- Concerned the proposal will create a planning precedent for other hideous, high density buildings along Queens Road.

Letter from anonymous respondent raising the following objections:

- Object to this application on the basis of its townscape impact particularly upon views from Meeting House Lane and Queens Road. The proposed erection of the tall building would fail to respect the prevailing building height of neighbouring buildings.

- Objection is raised to the lack of provision of a soft landscaping buffer zone between the public pavement along Meeting House Lane and the front elevation of the buildings along this site. This can only turn this already heavily vehicular street into a more inhospitable and unpleasant street unsuitable for pedestrian use.

- Considers the sense of openness of this stretch of Meeting House Lane will be lost by the introduction of this bulk and tall structure here. This building should be both, reduced in height and set back from the boundary line with the provision of a soft landscaped strip of land (following the style of the one already in place on the

adjacent state to the north of the site).

Acorn Tenants and Residents Chair - - Since the Wooddene site is so close to public transport perhaps Notting hill could revise the amount of parking space (apart from the disable bays). Less cars means safer neighborhood. There is enough pollution in Peckham so it is best to discourage more pollution.