

Item No. 7.2	Classification: OPEN	Date: 3 October 2017	Meeting Name: Planning Sub-Committee A
Report title:	Development Management planning application: Council's own development Application 17/AP/1333 for: Council's Own Development - Reg. 3 Address: GOSCHEN ESTATE, BETHWIN ROAD, LONDON SE5 Proposal: Construction of a 5-storey block adjoining Causton House and a 4-storey block located adjacent to Harford House to provide 6 x 1 bed, 6 x 2 bed and 5 x 3 bed residential units (17 units) together with associated landscaping		
Ward(s) or groups affected:	Camberwell Green		
From:	Director of Planning		
Application Start Date 03/05/2017		Application Expiry Date 02/08/2017	
Earliest Decision Date 11/06/2017			

RECOMMENDATION

1. That planning permission is granted subject to completion of a Section 106 unilateral undertaking and planning conditions.
2. In the event that the unilateral undertaking is not completed by 3 November 2017, the Director of Planning be authorised to refuse planning permission for the reasons detailed in paragraph 87 of this report.

BACKGROUND INFORMATION

Site location and description

3. The application site forms part of the Goshen Estate which is a council estate in the Camberwell Green area of the borough. Bounded by the railway viaduct to the east and Bethwin Road to the south the proposed application relates to the eastern part of the estate which is composed of a large central amenity space. This is flanked by Harford House (three storeys) to the north, Horsman House (seven storeys) to the east, Causton House (four storeys) to the south and Day House (six storeys) to the east.
4. There are existing ancillary garages, car parking, cycle parking and landscaping across the site. Adjacent to the open area of amenity space there is a derelict single storey pram store and meeting room.
5. The surrounding area is predominately residential and characterised by post-war

blocks of flats to the south (five to twenty one storeys) and two/three storey dwelling houses to the north.

6. The site is located within the:
 - Urban Zone
 - Air Quality Management Area
 - North Camberwell Controlled Parking Zone
 - PTAL4/5 (good/very good)
 - Flood Risk Zone 3
7. There are no heritage assets within the site boundary. Within the wider context of the site it should be noted that the site bounds the Grosvenor Park Conservation Area to the north, with the Grade II listed buildings of 31-36 Urlwin Street being directly adjacent. On the opposite side of the railway to the east are the Grade II listed buildings of 66-92 Camberwell Road.

Details of proposal

8. This application is part of the New Homes Delivery Programme which together with other corporate programmes will deliver more affordable housing within the borough. A total of 17 units would be provided within two residential blocks. These would be a north block adjacent to Harford House that would provide nine dwellings, and a south block adjacent to Causton House and Horsman House that would provide eight dwellings.
9. The proposal would maintain the principal access from Bethwin Road but reconfigure internal the access roads to re-provide car parking spaces and enhance the landscaping and planting. Eight existing garages and the former TRA Hall (which is no longer in use) would be demolished. A total of 41 car parking spaces would be re-provided as part of the development which equates to the provision of 15 additional spaces. Two of these spaces would be dedicated for wheelchair users.
10. The new buildings will be predominantly brick built with metalwork detailing to the fenestration and balconies. Photovoltaic panels will be installed at roof level.

Planning history

11. No planning history of relevance.
12. Pre-application advice under reference 16/EQ/0125 has been previously sought. This related to the demolition of the existing garages and drying sheds and the erection of 28 new flats across two new buildings with varying storey heights between 4-7 storeys. Concerns were raised by officers with regard to the height, massing, quality of accommodation and neighbour amenity. The proposal was subsequently amended in line with officer advice and was scaled back to form the proposal currently under consideration.

Planning history of adjoining sites

13. None of relevance.

KEY ISSUES FOR CONSIDERATION

Summary of main issues

14. The main issues to be considered in respect of this application are:
 - a. The principle of development and conformity with strategic land use policies;
 - b. Affordable housing;
 - c. Impact on the amenity of existing neighbours and that of the wider area;
 - d. Design issues, including urban design impacts and the quality of accommodation;
 - e. Transport issues;
 - f. Environmental sustainability;
 - g. Any other material considerations.

Planning policy

15. National Planning Policy Framework (the Framework)
The National Planning Policy Framework (NPPF) sets out the Government's strategy for the delivery of sustainable development. Whilst its guidance does not constitute planning policy, all local policies must be in general conformity with the NPPF and it is a material consideration in the determination of planning applications. The following sections are of greatest relevance to this proposal:

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

On 19 March 2013, the council's cabinet considered whether Southwark's planning policies were consistent with guidance in the NPPF, as required by NPPF paragraph 215. All policies and proposals were reviewed and the council satisfied itself that those in use were in general conformity with the NPPF. The resolution was that with the exception of Southwark Plan policy 1.8 (location of retail outside town centres) all policies would be saved. Therefore due weight should be given to relevant policies in existing plans in accordance to their degree of consistency with the NPPF.

16. The London Plan 2016
 - 2.9 Inner London
 - 3.1 Equal life chances for all
 - 3.2 Improving health and assessing health opportunities for all
 - 3.3 Increasing housing supply
 - 3.4 Optimising housing potential
 - 3.5 Quality and design of housing developments
 - 3.6 Children and young peoples play and informal recreation facilities
 - 3.8 Housing choice
 - 3.9 Mixed and balanced communities
 - 3.10 Definition of affordable housing
 - 3.11 Affordable housing targets
 - 3.13 Affordable housing thresholds

- 5.2 Minimising carbon dioxide emission
- 5.3 Sustainable design and construction
- 5.7 Renewable energy
- 5.10 Urban greening
- 5.11 Green roofs and development site environs
- 5.13 Sustainable drainage
- 5.14 Water quality and waste water infrastructure
- 5.15 Water use and supplies
- 6.3 Assessing effects of development on transport capacity
- 6.9 Cycling
- 6.10 Walking
- 6.13 Parking
- 7.1 Building London's neighbourhoods and communities
- 7.2 An inclusive environment
- 7.3 Designing out crime
- 7.4 Local Character
- 7.5 Public Realm
- 7.6 Architecture
- 7.14 Improving air quality
- 7.15 Reducing noise and enhancing soundscapes
- 8.2 Planning obligations
- 8.3 Community Infrastructure Levy

17. Core Strategy 2011

- Strategic policy 2 - Sustainable transport
- Strategic policy 4 - Places for learning and enjoyment
- Strategic policy 5 - New homes
- Strategic policy 6 – Homes for people on different incomes
- Strategic policy 7 - Family homes
- Strategic policy 12 - Design and conservation
- Strategic policy 13 - High environmental standards
- Strategic policy 14 - Implementation and delivery

18. Southwark Plan 2007 (July) - saved policies

- Policy 2.1- Enhancement of Community Facilities
- Policy 2.2 - Provision of new community facilities
- Policy 3.2 - Protection of amenity
- Policy 3.3 - Sustainability assessment
- Policy 3.6 - Air quality
- Policy 3.7 - Waste reduction
- 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 3.18 - Setting Of Listed Buildings, Conservation Areas And World Heritage Sites
- Policy 4.2 - Quality of residential accommodation
- Policy 4.3 - Mix of dwellings
- Policy 4.4 - Affordable housing
- Policy 5.1 - Locating developments

Policy 5.2 - Transport impacts
Policy 5.3 - Walking and cycling
Policy 5.6 - Car parking

19. Supplementary Planning Documents
Section 106 Planning obligations and Community infrastructure levy SPD (2015)
2015 Technical update to the residential design standards (2011)
Draft Affordable Housing SPD (2011)
Sustainable transport SPD 2010
Sustainability assessments SPD 2009
Sustainable design and construction SPD 2009
Development Viability SPD (2016)

Summary of consultation responses

20. Nine responses were received through the first round of public consultation. The key points raised were:
- Impacts on daylight/sunlight and outlook of neighbouring properties;
 - Adequate amenity space for both existing and future residents should be secured;
 - The buildings are too high;
 - Impacts of transport construction;
 - More housing contributing to overcrowding of the area;
 - Lack of car parking and loss of existing cycle storage;
 - Potential for increases in public nuisance and anti-social behaviour;
 - Home should be genuinely affordable;
 - Lack of existing play facilities in the area;
 - Noise pollution and disturbance.
21. These issues are considered below in the relevant sections of the report.

Principle of development

22. The proposed development would introduce new homes into a predominantly residential area, making more efficient use of an existing residential estate and would bring back areas such as redundant stores into active use. The former tenant's room is in a state of decay and forms part of a derelict pram store, which would be demolished as part of this development. The estate Tenants and Residents Association meet in the Wyndham and Comber Community hall, which is located nearby and has been recently refurbished, its loss is therefore not resisted. The principle of development is consistent with the ambitions and policies of the Development Plan and guidance in the NPPF, and is consequently supported.

Environmental impact assessment

23. The scale of development proposed here does not reach the minimum thresholds established in the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 (as amended) that would otherwise trigger the need for an environmental impact assessment.

Affordable housing

24. The proposed development form part of the council's Direct Delivery Programme, one part of the council's ambition to deliver 11,000 new council homes over the period up to 2043, with 1,500 by 2018. As such, all of the units will be provided as affordable, social rented homes.
25. The proposal therefore introduces a conflict with saved policy 4.4 of the Southwark Plan which requires a tenure mix of 70:30 social rented: intermediate housing, and Core Strategy Policy 6 which requires a minimum of 35% private. The application however is made in the knowledge that the council's Strategic Housing Market Assessment (SHMA) which identifies a net affordable housing requirement of 1,472-1,824 units per year between 2013 and 2031. The SHMA states that affordable housing represents 48% of Southwark's total annual housing need. All of the units however would be retained as Council homes and as such the proposed tenure mix is considered acceptable as it meets an identified need.
26. Recent planning changes, such as the change in threshold for sites to deliver affordable housing from 10 to 11 and the permitted change of use of B class sites to residential has meant that some schemes which would previously have delivered affordable housing are no longer required to do so. In delivering an entirely affordable scheme, the proposal directly responds to the identified housing need and is in accordance with the Council Plan commitment to deliver Quality Affordable Homes.
27. A viability report has been provided to address the requirements of the council's Development Viability SPD 2016 and demonstrates that the necessary funding is in place to deliver a fully affordable scheme.

Accommodation mix

28. The proposal comprises the following:

Unit Type	Social Rent	Shared Ownership	Private	Total	
1 bed	6	-	-	6	35.3%
2 bed	6	-	-	6	35.3%
3 bed	5	-	-	5	29.4%
total	17	-	-	17	100%

29. Core Strategy Policy 7 requires that in this area 60% of units should have 2 or more bedrooms and 20% be 3+ bedrooms. At 29.4% 3 bed and 35.3% 2 bed, the split is policy compliant in both respects.
30. Saved Southwark Plan policy 4.4 states that 10% of homes should be provided as wheelchair accessible dwellings. The proposal includes 2 wheelchair accessible units being 1x3 bed and 1x2 bed, which satisfies this requirement. Both wheelchair accessible units are located at ground floor level. It is noted that the units will be designed to achieve the South East London Housing Partnership Wheelchair Housing

Design Guidelines, a standard advocated in the council's residential design standards SPD and one that is superior to the requirements of Building Regulations.

Quality of accommodation

31. Space standards and aspect

The overall unit sizes achieve the Nationally Described Space Standards. In addition, room sizes are compliant with the individual rooms sizes set out in the council's Residential Design Standards SPD.

32. Layouts

Ground floor units on the southern elevations of the blocks have their own front doors leading on to small areas of private defensible space. As well as improving the arrival to these units, this helps to provide some animation and natural surveillance of the surrounding public space. Upper floors and the rear ground floor unit within the north block are accessed via communal cores, with no more than 3 flats on any floor accessed from the same core. This ratio of flats to cores makes the development more secure and helps create a more private, personal setting. All units are designed to incorporate bulk storage, as specified in the council's residential design standards SPD as one aspect of exemplary design. All units achieve either dual or triple aspect, contributing to improved outlook and daylighting conditions for these units.

33. Internal daylight

Herrington Consulting have assessed the internal daylight conditions for the new flats. Their assessment concludes that all habitable rooms in the scheme will either meet or exceed the minimum levels of daylight recommended by the Building Research Establishment (BRE). All of the units within the development will also have direct access to a private balcony or garden area which will enhance the amenity value gained from direct sunlight. Consequently, it can be concluded that all units within the proposed development will receive good levels of direct sunlight. These results are impressive given the proximity of the site to existing properties and the railway and are likely to be attributed to the generous aspect and high level of design for the units.

Amenity space and children's play

34. Ground floor units have access to private areas of garden whilst the upper units all have generous balconies that either meet or which are in excess of required standards. The overall provision of private amenity space is a strength of the scheme.

35. Landscaping improvements will be made to the communal garden and areas of landscaping on the fringes of the estate. The new landscaped gardens will act as the communal amenity space for both existing and proposed residents and will represent a significant improvement to the existing situation.

36. Two distinct zones are proposed within the communal areas being areas of planting and a herb garden, and designated playspace for younger children (0-4 years). In accordance with the GLA play space requirement calculation this development would generate a child yield of 17 and a requirement to provide 172sqm of children's play space. 80sqm of this being required for 0-4year olds. A condition would ensure that

full details of this area were submitted for approval.

37. Given the site restraints and the characteristics of the estate it is not considered suitable to provide play space for older children on site. In accordance with the council's s106 and CIL SPD, a financial contribution of £13,892 should be required to invest in local play facilities for older children so that they are better able to absorb the additional demand created by this proposal. Full details of the hard and soft landscaping for the whole site will be required by way of a condition.

Noise and Vibration

38. A noise and vibration assessment has been prepared by KP Acoustics. This allows the assessment of daytime and night time levels and recommends a scheme of mitigation that will ensure a satisfactory noise environment for future residents. A standard condition specifying the internal noise parameters during the day and night is recommended.
39. Measurement of vibration from rail activity indicates that vibration levels are below the threshold of human perception in accordance with the relevant British Standard.
40. Overall, the accommodation can be considered to be of a high quality having regard to Southwark Plan policy 4.2 and the detailed guidance in the council's Residential Design Standards SPD.

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

Overlooking and privacy

41. The Residential Design Standards SPD states that a 12m separation distance should be achieved between buildings on opposite sides of a highway and a 21m separation distance to the rear of new buildings.
42. To the north a minimum distance of 24m is maintained between the rear elevation of the north block and the rear elevation of those dwellings on Urlwin Close. To the south, 20m is maintained across Bethwin Road. In both instances therefore suitable separation distances are maintained.
43. Within the existing estate layouts are less typical and do not follow a traditional pattern which would allow the above distances to be applied. Rather the layout of the blocks and internal room arrangement ensure no overlooking would occur. The new blocks align with those that are existing. The only area where there would be facing elevations would be across the estate road between Horsman House and the north block. Here a minimum of 19m would be maintained which is considered acceptable to retain existing levels of privacy.
44. Elsewhere the blocks are set at right angles to Causton House and Harford House, thus resulting in no direct face to face windows. Any overlooking experienced to existing private amenity spaces would be no greater than already experienced from existing windows. Officers are satisfied that the separation distances achieved,

coupled with the layouts of the new units, will ensure that the privacy of existing neighbours will not be unduly affected.

Daylight impacts

45. A daylight and sunlight assessment has been prepared to consider the impacts on neighbours around the perimeter of the site. Primarily, the assessment relies on the Vertical Sky Component (VSC) test - the amount of skylight falling on the plane of the window. The guidance states that where the reduction in VSC is less than 20% or where the remaining VSC is 27% or above, the occupier is unlikely to notice any change in lighting conditions.

Vertical Sky Component

46. The assessment was carried out for a total of 105 rooms across Causton House, Horsman House, Harford House and 3 Bethwin Road. 98 of those tested passed the BRE guidance with the resulting impact being considered negligible in that the reduction in daylight is unlikely to be noticeable.
47. Six windows, three in Horsman House and three in Harford House, would experience a minor adverse transgression and 1 in Harford House would experience a moderate adverse transgression. Whilst a reduction in VSC as shown would be experienced and does indicate a 'noticeable' change this does not necessarily mean that the degree of change is detrimental or unacceptable. The rooms would still receive VSC levels of between 26.57% and 19.33% a good absolute level for an urban location. It should be noted that this assessment only indicates the amount of skylight falling on a window, it does not give an accurate picture of the quality of light within a space. Further, the BRE emphasis that these results need to be considered in context; that the values recommended should be applied sensibly and flexibly. While some reductions in VSC would be noticeable, the resultant absolute levels would remain good.
48. Indicative layout plans for the affected dwellings shows that these units are dual aspect with relatively narrow floorplans. Any reductions in VSC on one window will not negate the benefits of having a second aspect that will contribute daylight and sunlight to a room.

No Sky Line/Daylight Distribution

49. In line with the BRE guidance, the Daylight Distribution test has also been completed to consider the extent of rooms from which the sky will be visible, before and after the development takes place. 73 windows are suitable for this form of assessment and the submitted details demonstrate that all of the rooms tested would pass; experiencing no reduction in daylight distribution. This is likely a result of the shallow floorplans and large windows for properties in the existing Goshen Estate.
50. Any reductions in daylight would not result in an adverse impact on existing residents in accordance with the BRE guidance.

Sunlight impact

51. A Daylight and Sunlight report provided also assesses the impact on the number of hours of sunlight received by existing properties in the vicinity of the development site. A total of 41 windows in 35 rooms across Causton, Horsman and Harford Houses have been tested using the Annual Probable Sunlight Hours Assessment method. This method uses three tests and for a development to be considered to have an adverse effect all three would need to fail. It has been demonstrated that all of the windows and rooms pass at least one of the tests and consequently the proposed scheme is considered to have a negligible impact on neighbouring buildings with regard to sunlight.
52. It is important to note that this assessment needs to be considered in the context of the overall design of the scheme. As described above, adequate separation distances are maintained between the new development and existing neighbours and the building height proposed is comparable to existing buildings.

Density

53. The application lies within the urban density zone and has a PTAL level of 4/5, reflecting the sites high accessibility by public transport. Strategic Policy 5 expects new development to have a density of between 200-700 habitable rooms per hectare.
54. Calculation of the proposed buildings in isolation is likely to skew the figures as they are situated within a larger than normal site area which encompasses the wider estate. It is therefore considered more appropriate to examine the whole estate as existing and compare this to the whole estate with the proposed development. The density of the existing estate has been calculated at 286 habitable rooms per hectare, this low figure is a result of the generous areas of amenity space and underused associated areas of land such as store and hard surfacing.
55. This figure would increase to 324 habitable rooms per hectare as a result of the proposed development. This sits comfortably within the expected density range for this part of the borough and is acceptable in principle, subject to detailed design as discussed below.

Design

Site Layout

56. The two proposed blocks are sited to utilise existing areas of open space within the estate. However, neither location is strategic or central to the overall design and layout of the wider estate and they constitute logical locations for the new buildings to be sited. In design terms therefore the replacement of the open space with buildings in the proposed locations is considered to be acceptable.
57. The existing estate road that runs through the site is to be landscaped with high quality paving and planting. This represents a dramatic improvement to the current landscape and general amenity for existing, and future, residents.

Scale and Form

58. At five storeys in height the southern block sits between the heights of its two adjacent existing buildings being Horsham House and Causton House. The development retains Horsham House as the highest building on this part of the estate and acts as a bridge, stepping down to Causton House which then faces onto Bethwin Road. Given the position and layout of the site, this maintenance of hierarchy is appropriate and has been successfully achieved.
59. The north block is located in a secondary position adjacent to Harford House and is maintained at four storeys in height. The secondary location of its siting is such that this lower height is also appropriate relating itself more closely in form to the Harford House and the scale of the railway viaduct. It also responds appropriately to the scale of the listed building to the north, ensuring existing height relationships are maintained.
60. Both of the proposed blocks are linear in form which picks up on the form of the existing estate buildings.

Architectural Design and Quality

61. The architecture of the existing estate is dominated by the deck access arrangements of its buildings. This produces a very linear horizontal effect and also some depth to the long facades of each building. In contrast the new blocks will have balconies on the ends of each block; these are supported by strong sculptural brick columns on the southern elevations. These have been well detailed and are carefully proportioned. The northern elevation of the south block retains a more open aspect with unsupported balconies which allows views into the central amenity area to be experienced and widens the pedestrian entrance into this part of the estate.
62. The longer flank elevations have been broken up by a series of window openings and textured brick patterns. Spandrel panels above the windows are highlighted in off white, which picks up on the subtle detailing of the existing building. Generous entrances with canopies provide clear definition and welcoming points of access into the communal areas of the buildings.
63. The architecture of the development is largely defined by the buildings confident form and relatively simple materials palette. Predominantly constructed in a brick colour similar to the existing buildings on the estate this would be paired with a lighter mortar, again, as per the existing blocks. Steel metalwork detailing and large areas of glazing will provide a decorative richness to the predominantly brick buildings.
64. In conclusion the design is undoubtedly high in quality. Overall, the height, massing and layout of the scheme is well thought through and will produce buildings of an appropriate scale, well related in form to adjacent estate buildings, along with a much improved amenity space. The quality of the building will rely to a great degree on the quality of execution in construction and for that reason the detailed architectural design and the choice of materials should be reserved by condition.

Impact on Heritage Assets character and setting of a listed building and/or conservation area

65. The application site is close to two conservation areas: Grosvenor Park Conservation Area to the north and the Addington Square Conservation Area to the east. The view of the proposal from these conservation areas therefore must be considered in order to assess the wider impact of the development on the local area. Furthermore the Grade II listed buildings of 31-36 Urlwin Street are located directly to the north and on the opposite side of the railway to the east are the Grade II listed buildings of 66-92 Camberwell Road.
66. Submitted massing diagrams demonstrate that in views from Urlwin Street to the north and from Grosvenor Park Conservation Area neither of the proposed blocks is visible. In particular the height of the north block has been kept low to avoid it projecting above the line of the listed views and therefore preserving their setting.
67. When viewed from Addington Square Conservation Area to the east, the existing estate buildings including Horsman House can be seen rising above the railway viaduct. However this is partly due to the lower form of the adjacent petrol filling station which fronts Camberwell Road in this position. The proposed development would result in views also being experienced of the south block when looking along Bethwin Road. Whilst it would be seen, it is not considered to be detriment to the wider setting of the heritage assets.
68. The Planning (Listed Buildings and Conservation Areas) Act 1990 imposes statutory duties on LPAs in sections 66 to ensure that any development shall have special regard to: the desirability of preserving the heritage asset or its setting; and in section 72 the desirability of preserving or enhancing the character or appearance of designated conservation areas. Officers are satisfied that this proposal achieves these key statutory objectives and not harm any heritage assets.

Transport issues

69. The site is located in an area of good/very public transport accessibility, with a PTAL rating of 4/5. The southern section of the site including Bethwin Road falls with zone 5, whilst the north block and Harford House are in zone 4. The site is also located in a Controlled Parking Zone (CPZ) and so kerbside parking does require a permit.

Car parking

70. The existing estate makes provision for 26 parking spaces, and a parking survey has indicated that there is a high level of parking stress on the estate roads and in the surrounding streets.
71. The wider landscaping plan for the estate involves the demolition of the existing TRA hall and the enlargement of the existing car parking areas from 6 spaces to 14 spaces. Furthermore due to the demolition of the garages and pramsheds adjacent to the railway it has been possible to adjust the path of the estate road which runs next to Horsman House. This allows for the provision of end on parking spaces on both sides of the road which would allow a total of 27 spaces to be provided. The total net

gain in spaces would be 15. Two of these would be wheelchair parking spaces located close to the new wheelchair units within the north block.

72. Saved Southwark Plan Policy 5.6 requires developments to minimise the number of spaces provided and in areas with an existing CPZ developments would be expected to be car-free. However the existing estate roads and parking bays are not covered by way of the CPZ and therefore the additional units could put further pressure on existing parking. This is a concern which has been raised by existing residents. 15 new spaces are proposed, 13 of which would be general needs for use both by new residents and existing, along with two new disabled bays.
73. Given the existing level of parking stress and concerns raised by residents the proposed provision is considered to be a suitable balance which would appropriately provide for the existing and future needs of the estate. The operation of the car parking will be subject to the management of estate.
74. In order to further restrict parking stress on surrounding streets all new occupiers of the development will be restricted from the purchase of parking permits for the surrounding CPZ; however this would not cover the estate parking. In order to further encourage more sustainable methods of transport it is proposed that 3 years' free car club membership will be made available to new residents in order to further reduce the need for private car use.
75. Furthermore, in line with the GLA published document 'Parking Standards Minor Alterations to the London Plan' 20% of all of the spaces should be for electric vehicles with a further 20% passive provision for electric vehicle in the future. This will be secured by way of a condition.

Cycle parking

76. London Plan policy 5.2 requires 1 cycle parking space for 1 bedroom flats and 2 cycle spaces for each larger flat. This leads to a total requirement of 28 cycle parking spaces. Saved Southwark Plan policy 5.3 stipulates that all cycle parking should be secure, convenient and weatherproof.
77. Cycle parking for the proposed units would be provided within internal communal storage areas for each of the blocks. The northern block would provide a minimum of 16 spaces and the southern block a minimum of 12 spaces thus meeting the required 28 spaces. Storage is via Sheffield stands which is consistent with the London Plan and Southwark Plan requirements and is therefore supported.
78. Additionally, a ratio of 1 visitor cycle space for every 40 dwellings is required. This has been applied separately for each new block with an external Sheffield stand provided close to the entrances which provide an additional four spaces.
79. In addition to providing new cycle storage for the proposed dwellings, the relocation of existing cycle facilities which would be displaced would be provided. There are currently three existing Sheffield stands next to Harford House and 20 existing cycle lockers between Causton House and Horsman House. The Sheffield stands would be re-provided in approximately the same position, whilst the existing lockers would be

split with seven located adjacent to the new South block and Causton House, and 13 re-provided on the opposite side of the estate road adjacent to the railways viaduct.

Refuse storage and servicing

80. Refuse stores are adequately sized to accommodate recycling and general waste arising from the development and have been appropriately located. Vehicle tracking diagrams have been provided to demonstrate that the new estate road can accommodate a refuse and other servicing vehicles. The diagrams demonstrate that there is sufficient manoeuvring space for these vehicles.
81. Existing bins stores for the estate which would be displaced as a result of the development have been identified and have been re-provided in appropriate locations.

Trees and ecology

82. London Plan policy 5.10 states that all major developments should incorporate sufficient green infrastructure to improve their environmental credentials and biodiversity value. An arboricultural survey has been carried out and a report prepared to inform on the suitability of proposed development with regard to the impact on trees.
83. 25 individual trees and two groups were examined as part of the survey. As a result of the development three mature trees are proposed for removal with one (T13 lime) being considered as having a significant impact on the surrounding landscape due to its prominence within the Bethwin Road street scene. The remaining two mature trees to be removed (T6 and T7 Sycamore) are categorised as having a moderate amenity value due to their size and position. A further five trees and one tree group of less value would also be removed. This total a stem girth of 832cm and details have been reviewed by the council's urban forester and ecologist, who recommend planning conditions to address the protection of trees during construction and the submission of further detail of the planting and ecological features to be incorporated within the development.
84. Extensive planting would be provided as part of the landscape plan and because this does not meet the required replacement stem girth a payment in-lieu if replacement planting would be made to provide additional planting in the locality. This figure would be £17,719.

Planning obligations (S.106 undertaking or agreement)

85. A s106 unilateral undertaking will be required to secure the affordable housing units, to identify the relevant highways improvement works and to secure payments for off-site children's play space, off site trees and to the council's carbon offset fund, as described in the relevant sections of the report. These contributions are as follows:
 - On-site affordable housing
 - Children's Play Space £13,892
 - Off site trees £17,719
 - Carbon offset fund £27,528

86. In the absence of a unilateral undertaking to secure the above, the proposal would be contrary to saved policies 2.5 'Planning obligations', 4.2 'Quality of accommodation' and 4.4 'Affordable housing' of the saved Southwark Plan 2007; Strategic Policies 7 'Homes for people of different incomes' and 13 'High environmental standards' of the Core Strategy 2011; London Plan Policies 3.12 'Negotiating affordable housing on individual private residential and mixed use schemes', 5.2 'Minimising carbon dioxide emissions' and 8.2 'Planning obligations'; and Section 6: 'Delivering a wide choice of high quality homes' of the NPPF 2012.
87. In the event that the Section 106 unilateral agreement is not in place by 3 November 2017, it is recommended that the Director of Planning be authorised to refuse planning permission, if appropriate, for the following reason:

The proposal, by failing to provide an appropriate mechanism for securing affordable housing delivery, indicative highways works and financial contributions towards children's play space, trees and carbon offset, fails to demonstrate conformity with strategic planning policies and fails to adequately mitigate the particular impacts associated with the development in accordance with saved policy 2.5 'Planning obligations' of the Southwark Plan (2007), Strategic Policy 14 'Delivery and implementation' of the Core Strategy (2011) and London Plan Policy 8.2 'Planning obligations', as well as guidance in the council's s106 planning obligations and Community Infrastructure Levy SPD (2015).

Sustainable development implications

Air quality

88. An air quality assessment has been prepared to address the potential impacts on air quality arising during demolition, construction and on occupation. The site is located within an area identified as experiencing elevated pollutant concentrations. Additionally the site is located within the vicinity of a rail line. The assessment indicates that some small impacts might arise during demolition and construction, but that the scale of work means that this can be adequately addressed via routine mitigation.
89. Results of modelling also indicated high pollutant concentrations at all levels of the development and that suitable mitigation should be included in the development. This should include a filtered mechanical ventilation system to supply clean air to all affected areas. This should be implemented for all residential units within both the northern and southern development blocks and can be secured by way of condition.
90. The London Plan states that new developments must be considered Air Quality Neutral. Pollutant emissions associated within the proposed development were compared to relevant benchmarks. This indicated both oxides of nitrogen and particulate matter transport emissions from the proposals were above the benchmarks and as such, further action will be required to tackle the excess pollutant emissions. Based on the assessment, the site is considered suitable for the proposed end use and that with appropriate mitigation measures it can be considered as Air Quality Neutral. However further information will be required to demonstrate that measures will be implemented to ensure that this standard is met, this will be secured by way of

condition.

91. Contamination

The desk based contamination assessment prepared concludes that the risk of contamination at the site is low and a remediation strategy has been prepared. Colleagues in the environmental protection team have reviewed the submitted reports and have confirmed that they are satisfied with the details. Standard conditions requiring the said remediation to be carried out and to ensure appropriate reporting and control of unexpected contamination should it be identified during construction.

Energy

92. London Plan policy 5.2 sets out that through a combination of building design measures, clean energy supply and the use of renewable technologies, all major residential developments are required to reduce their regulated carbon dioxide emissions. As of October 2016, the policy set a target of a 100% reduction relative to Building Regulations 2013.

93. An energy assessment has been provided to demonstrate that through fabric efficiency measures and the installation of photovoltaic panels at roof level, an annual saving of 35.48% of regulated carbon emissions can be achieved. In accordance with Mayoral Guidance and the council's s106 and CIL SPD 2015, the shortfall in carbon reduction can be bridged via a payment to the council's carbon offset fund. A fee of £27,528 will be secured by way of a unilateral undertaking.

Flood risk

94. The site is located in Flood Zone 3 and is at risk of tidal flooding from the River Thames. Both the Sequential and Exception Tests have been applied to determine whether suitable and appropriate mitigation can be incorporated into the development to ensure that it is sustainable in terms of flood risk.

95. Furthermore, the FRA demonstrates that the development will not increase flood risk elsewhere. Through the incorporation of appropriate mitigation measures and SUDS features within the design of the surface water drainage system, it will be possible to limit the impact with respect to surface water run-off. Details of a SUDs measures will be secured by way of condition. It has therefore been demonstrated that the development passes the required tests and will therefore meet the requirements of the NPPF.

Other matters

Community Infrastructure Levy (CIL)

96. The Localism Act 2011 states that 'local financial considerations' are material considerations in the determination of planning applications, though the amount of weight to attach is an issue for the decision maker. The delivery of new homes would normally be liable for both the Mayoral and Southwark CIL.

97. The Mayoral CIL is levied in Southwark at £35 per sqm and Southwark CIL at £50 per

sqm in this location; both charges are subject to indexation. The development would provide 1691.92sqm of floorspace amounting to approximately £59,220 of MCIL and £84,600 of SCIL. Affordable housing relief is available and in the event that planning permission is granted an application should be made to secure this prior to the commencement of development.

Conclusion on planning issues

98. The scheme would deliver high quality affordable homes in well-designed buildings that would respect the local context. The massing, height and internal configuration of the development has been carefully designed to maintain the amenity of existing residents and to provide good living conditions for future occupiers, while also making a more efficient use of the land. In particular, the demolition of existing structures and creation of a high quality landscaped space represents a significant improvement in the outlook and general amenity for existing residents.
99. Though the scheme does not provide private/market dwellings, the proposal specifically addresses an acute need for affordable homes that is identified in the council's housing market assessment and this is a significant material consideration. It is considered that the proposal is consistent with the ambitions and policies of the development plan and that planning permission should be granted.

Community impact statement

100. 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.

a) The impact on local people is set out above.

Consultations

101. Details of consultation and any re-consultation undertaken in respect of this application are set out in Appendix 1. This application was the subject of a reconsultation in August 2017 to allow for further representations to be made on detailed design amendments.
102. Details of people who replied to the consultation are set out in Appendix 2. A summary of the issues raised in responses is outlined in Paragraph 21, above.

Human rights implications

103. 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.
104. This application has the legitimate aim of providing details of new affordable housing

within an existing residential estate. 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/H1017 Application file: 17/AP/1333 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 5254 Council website: www.southwark.gov.uk

APPENDICES

No.	Title
Appendix 1	Consultation undertaken
Appendix 2	Consultation responses received
Appendix 3	Recommendation

AUDIT TRAIL

Lead Officer	Simon Bevan, Director of Planning	
Report Author	Amy Lester, Team Leader	
Version	Final	
Dated	13 September 2017	
Key Decision	No	
CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER		
Officer Title	Comments Sought	Comments included
Strategic Director of Finance and Governance	No	No
Strategic Director, Environment and Social Regeneration	No	No
Strategic Director of Housing and Modernisation	No	No
Director of Regeneration	No	No
Date final report sent to Constitutional Team	21 September 2017	

APPENDIX 1

Consultation undertaken

Site notice date: 19/05/2017

Press notice date: 18/05/2017

Case officer site visit date: n/a

Neighbour consultation letters sent: 19/05/2017

Internal services consulted:

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

Statutory and non-statutory organisations consulted:

Environment Agency
Metropolitan Police Service (Designing out Crime)
Natural England - London Region & South East Region
Network Rail (Planning)
Thames Water - Development Planning
Transport for London (referable & non-referable app notifications and pre-apps)

Neighbour and local groups consulted:

51 Horsman House Bethwin Road SE5 0YL
51 Horsman House Bethwin Road Se5 0yl
35 Urlwin Street London SE5 0NF
15e Grosvenor Park London SE5 0NH
15f Grosvenor Park London SE5 0NH
23a Grosvenor Park London SE5 0NH
15d Grosvenor Park London SE5 0NH
15a Grosvenor Park London SE5 0NH
15b Grosvenor Park London SE5 0NH
15c Grosvenor Park London SE5 0NH
31f Grosvenor Park London SE5 0NH
33a Grosvenor Park London SE5 0NH
35c Grosvenor Park London SE5 0NH
31e Grosvenor Park London SE5 0NH
23b Grosvenor Park London SE5 0NH
23c Grosvenor Park London SE5 0NH

11 86 Camberwell Road SE5 0EG
12 86 Camberwell Road SE5 0EG
13 86 Camberwell Road SE5 0EG
10 86 Camberwell Road SE5 0EG
7 86 Camberwell Road SE5 0EG
8 86 Camberwell Road SE5 0EG
9 86 Camberwell Road SE5 0EG
Unit 2 76-78 Camberwell Road SE5 0EG
Flat 1c 86 Camberwell Road SE5 0EG
Flat A 1a Bethwin Road SE5 0SJ
Flat B 1a Bethwin Road SE5 0SJ
Flat 18 1a Bethwin Road SE5 0SJ
Flat 15 1a Bethwin Road SE5 0SJ
Flat 16 1a Bethwin Road SE5 0SJ
Flat 17 1a Bethwin Road SE5 0SJ
92b Camberwell Road London SE5 0EG

23d Grosvenor Park London SE5 0NH
24a Urlwin Street London SE5 0NF
25a Urlwin Street London SE5 0NF
13 Grosvenor Park London SE5 0NH
39 Grosvenor Park London SE5 0NH
41 Grosvenor Park London SE5 0NH
29b Urlwin Street London SE5 0NF
31a Urlwin Street London SE5 0NF
34a Urlwin Street London SE5 0NF
29a Urlwin Street London SE5 0NF
25b Urlwin Street London SE5 0NF
26a Urlwin Street London SE5 0NF
26b Urlwin Street London SE5 0NF
35d Grosvenor Park London SE5 0NH
Railway Arch 279 Bethwin Road SE5 0YW
Railway Arch 280 Bethwin Road SE5 0YW
Railway Arch 281 Bethwin Road SE5 0YW
Railway Arch 278 Bethwin Road SE5 0YW
Railway Arch 270 Bethwin Road SE5 0YW
Railway Arch 271 To 272 Bethwin Road SE5 0YW
Railway Arch 276 Bethwin Road SE5 0YW
Flat 1 112 Camberwell Road SE5 0EE
Flat 1 90 Camberwell Road SE5 0EG
Flat 2 116 Camberwell Road SE5 0EE
Flat 1 90a Camberwell Road SE5 0EG
Railway Arch 282 Bethwin Road SE5 0YW
First Floor Flat 118 Camberwell Road SE5 0EE
Flat C 72 Camberwell Road SE5 0EG
24b Urlwin Street London SE5 0NF
92a Camberwell Road London SE5 0EG
31b Urlwin Street London SE5 0NF
Unit 2 90a Camberwell Road SE5 0EG
35f Grosvenor Park London SE5 0NH
37b Grosvenor Park London SE5 0NH
37e Grosvenor Park London SE5 0NH
27d Grosvenor Park London SE5 0NH
37 Urlwin Street London SE5 0NF
38 Urlwin Street London SE5 0NF
27c Grosvenor Park London SE5 0NH
34b Urlwin Street London SE5 0NF
27a Grosvenor Park London SE5 0NH
27b Grosvenor Park London SE5 0NH
36 Urlwin Street London SE5 0NF
Railway Arch 275 Bethwin Road SE5 0YW
Railway Arch 277 Bethwin Road SE5 0YW
15g Grosvenor Park London SE5 0NH
76-78 Camberwell Road London SE5 0EG
Flat 4 74 Camberwell Road SE5 0EG
Flat 5 74 Camberwell Road SE5 0EG
66-68 Camberwell Road London SE5 0EG
21b Grosvenor Park London SE5 0NH
21c Grosvenor Park London SE5 0NH
21d Grosvenor Park London SE5 0NH
21a Grosvenor Park London SE5 0NH
35g Grosvenor Park London SE5 0NH
43 Grosvenor Park London SE5 0NH
Flat 3 Harford House Goschen Estate SE5 0YN
Flat 4 Harford House Goschen Estate SE5 0YN
Flat 5 Harford House Goschen Estate SE5 0YN
Flat 24 Harford House Goschen Estate SE5 0YN
Flat 21 Harford House Goschen Estate SE5 0YN
Flat 22 Harford House Goschen Estate SE5 0YN
Flat 23 Harford House Goschen Estate SE5 0YN
Flat 1 74 Camberwell Road SE5 0EG
Flat 2 74 Camberwell Road SE5 0EG
Flat 3 74 Camberwell Road SE5 0EG
Flat 9 Harford House Goschen Estate SE5 0YN
Flat 6 Harford House Goschen Estate SE5 0YN
Flat 7 Harford House Goschen Estate SE5 0YN
Flat 8 Harford House Goschen Estate SE5 0YN

Flat C 1a Bethwin Road SE5 0SJ
Flat D 1a Bethwin Road SE5 0SJ
Basement Flat 118 Camberwell Road SE5 0EE
Unit 7 76-78 Camberwell Road SE5 0EG
Unit 8 76-78 Camberwell Road SE5 0EG
Unit 9 76-78 Camberwell Road SE5 0EG
Unit 6 76-78 Camberwell Road SE5 0EG
Unit 3 76-78 Camberwell Road SE5 0EG
Unit 4 76-78 Camberwell Road SE5 0EG
Unit 5 76-78 Camberwell Road SE5 0EG
Unit 14 76-78 Camberwell Road SE5 0EG
Flat 7a 1a Bethwin Road SE5 0SJ
Flat 7b 1a Bethwin Road SE5 0SJ
Unit 13 76-78 Camberwell Road SE5 0EG
Unit 10 76-78 Camberwell Road SE5 0EG
Unit 11 76-78 Camberwell Road SE5 0EG
Unit 12 76-78 Camberwell Road SE5 0EG
Railway Arch 276 Camberwell Road SE5 0EG
Flat 7 3 Bethwin Road SE5 0YJ
Flat 8 3 Bethwin Road SE5 0YJ
Flat 9 3 Bethwin Road SE5 0YJ
Flat 6 3 Bethwin Road SE5 0YJ
Flat 3 3 Bethwin Road SE5 0YJ
Flat 4 3 Bethwin Road SE5 0YJ
Flat 5 3 Bethwin Road SE5 0YJ
Flat 12 1a Bethwin Road SE5 0SJ
Flat 13 1a Bethwin Road SE5 0SJ
Flat 2 1a Bethwin Road SE5 0SJ
Flat 11 1a Bethwin Road SE5 0SJ
First Floor Flat 84 Camberwell Road SE5 0EG
Flat 1 1a Bethwin Road SE5 0SJ
Flat 10 1a Bethwin Road SE5 0SJ
45 Grosvenor Park London SE5 0NH
Flat 4 84 Camberwell Road SE5 0EG
Basement Rear Of 90 SE5 0EG
Flat 1 116 Camberwell Road SE5 0EE
Flat 13 3 Bethwin Road SE5 0YJ
Flat 14 3 Bethwin Road SE5 0YJ
Flat 2 3 Bethwin Road SE5 0YJ
Flat 12 3 Bethwin Road SE5 0YJ
Flat 1 3 Bethwin Road SE5 0YJ
Flat 10 3 Bethwin Road SE5 0YJ
Flat 11 3 Bethwin Road SE5 0YJ
Flat 3 1a Bethwin Road SE5 0SJ
Flat 1 1c Bethwin Road SE5 0SG
Flat 2 1c Bethwin Road SE5 0SG
Flat 3 1c Bethwin Road SE5 0SG
Unit 4 1 Bethwin Road SE5 0YJ
Unit 6 1b Bethwin Road SE5 0SN
Unit 2 1 Bethwin Road SE5 0SH
Flat 4 90a Camberwell Road SE5 0EG
Flat 14 1a Bethwin Road SE5 0SJ
Railway Arch 275 Camberwell Road SE5 0EG
Flat 7 1c Bethwin Road SE5 0SG
Flat 4 1c Bethwin Road SE5 0SG
Flat 5 1c Bethwin Road SE5 0SG
Flat 6 1c Bethwin Road SE5 0SG
Flat 8 1a Bethwin Road SE5 0SJ
Flat 9 1a Bethwin Road SE5 0SJ
1a Bethwin Road London SE5 0YJ
Flat 7 1a Bethwin Road SE5 0SJ
Flat 4 1a Bethwin Road SE5 0SJ
Flat 5 1a Bethwin Road SE5 0SJ
Flat 6 1a Bethwin Road SE5 0SJ
Flat 12 1c Bethwin Road SE5 0SG
Flat 13 1c Bethwin Road SE5 0SG
Flat 14 1c Bethwin Road SE5 0SG
Flat 11 1c Bethwin Road SE5 0SG
Flat 8 1c Bethwin Road SE5 0SG
Flat 9 1c Bethwin Road SE5 0SG

19 86 Camberwell Road SE5 0EG
20 86 Camberwell Road SE5 0EG
17 86 Camberwell Road SE5 0EG
14 86 Camberwell Road SE5 0EG
15 86 Camberwell Road SE5 0EG
16 86 Camberwell Road SE5 0EG
Flat 1b 86 Camberwell Road SE5 0EG
Unit 1 76-78 Camberwell Road SE5 0EG
Unit 1a 76-78 Camberwell Road SE5 0EG
Flat 1a 86 Camberwell Road SE5 0EG
86a Camberwell Road London SE5 0EG
Railway Arches 270 271 And 272 Camberwell Road SE5 0EG
Rear Of 88 Camberwell Road SE5 0EG
4 86 Camberwell Road SE5 0EG
5 86 Camberwell Road SE5 0EG
6 86 Camberwell Road SE5 0EG
3 86 Camberwell Road SE5 0EG
Railway Arch 277 Camberwell Road SE5 0EG
Railway Arch 278 Camberwell Road SE5 0EG
2 86 Camberwell Road SE5 0EG

Flat 24 Boundary House Goschen Estate SE5 0YB
Flat 26 Boundary House Goschen Estate SE5 0YB
Flat 25 Boundary House Goschen Estate SE5 0YB
Flat 18 Boundary House Goschen Estate SE5 0YB
Flat 17 Boundary House Goschen Estate SE5 0YB
Flat 19 Boundary House Goschen Estate SE5 0YB
Flat 21 Boundary House Goschen Estate SE5 0YB
Flat 20 Boundary House Goschen Estate SE5 0YB
Flat 27 Boundary House Goschen Estate SE5 0YB
Flat 34 Boundary House Goschen Estate SE5 0YB
Flat 33 Boundary House Goschen Estate SE5 0YB
Flat 35 Boundary House Goschen Estate SE5 0YD
Flat 37 Boundary House Goschen Estate SE5 0YD
Flat 36 Boundary House Goschen Estate SE5 0YD
Flat 29 Boundary House Goschen Estate SE5 0YB
Flat 28 Boundary House Goschen Estate SE5 0YB
Flat 30 Boundary House Goschen Estate SE5 0YB
Flat 32 Boundary House Goschen Estate SE5 0YB
Flat 31 Boundary House Goschen Estate SE5 0YB
44 Horsman House Bethwin Road SE5 0YL
72 Causton House Bethwin Road, Goschen Estate SE5 0YF

Re-consultation: n/a

APPENDIX 2

Consultation responses received

Internal services

Environmental Protection Team Formal Consultation [Noise / Air Quality / Land Contamination / Ventilation]

Statutory and non-statutory organisations

Metropolitan Police Service (Designing out Crime)
Natural England - London Region & South East Region
Thames Water - Development Planning
Transport for London (referable & non-referable app notifications and pre-apps)

Neighbours and local groups

Flat 1 112 Camberwell Road SE5 0EE
Flat 4 112 Camberwell Road SE5 0EE
Flat 44 Horsman House Goschen Estate SE5 0YL
Flat 55 Horsman House Goschen Estate SE5 0YL
35 Urlwin Street London SE5 0NF
44 Horsman House Bethwin Road SE5 0YL
51 Horsman House Bethwin Road SE5 0YL
51 Horsman House Bethwin Road Se5 0yl