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Item No. 6.1	Classification: Open	Date: 8 September 2020	Meeting Name: Planning Committee
Report title:	Development Management planning application: Application 19/AP/0864 for: Full Planning Application Address: Valmar Trading Estate, Valmar Road, London, SE5 9NW Proposal: Redevelopment of the site to include the demolition of the existing buildings and construction of three buildings of: 7 storeys (plus single storey basement), 6 storeys and 4 storeys across the site providing employment space with ancillary screening room and gallery space (Use Class B1), 127 hotel rooms (Use Class C1), 43 residential units (Use Class C3) and a café (Class A3); together with associated landscaping works and provision of refuse storage, cycle parking, disabled car parking and amenity space.		
Ward(s) or groups affected:	Camberwell Green		
From:	Director of Planning		
Application Start Date: 16/04/2019		Application Expiry Date : 16/07/2019	
Earliest Decision Date 09/11/2019		Planning Performance Agreement Date: 8 March 2021	

RECOMMENDATION

1. a) That planning permission be granted, subject to conditions and the applicant entering into an appropriate legal agreement.

b) In the event that the requirements of (a) are not met by 8 March 2021, that the director of planning be authorised to refuse planning permission, if appropriate, for the reason set out at paragraph 271 of this report.

EXECUTIVE SUMMARY

2. This is a major application which seeks to redevelop an industrial trading estate to provide employment space, a 127 room hotel, a cafe and 43 residential units. The existing trading estate is not a designated employment site in the current adopted Local Plan, but is a proposal site in the draft New Southwark Plan (NSP) which requires replacement employment floorspace and new routes through the site, and also allows for the provision of new housing.
3. Following consultation, there have been 30 representations in support of the application, 27 objecting to it and two comments, and following re-consultation a further 8 representations in support and 7 objections have been received; the reasons for these are set out later in the report.

4. There would be a loss of B class floorspace as a result of the proposal, but this is considered to have been adequately justified through the submission of marketing evidence in accordance with both adopted and emerging policy. Whilst some of the industrial units were occupied when the planning application was submitted, the entire site is now vacant and a number of the units have been so for a considerable period. The proposal would deliver good quality workspace including affordable workspace, an increase in the number of jobs at the site, and a contribution towards employment and training schemes in the borough. The proposed hotel would generate footfall which would help to support Camberwell Town Centre, and the employment space would include facilities such as a screening room and exhibition space which would be open to the public and hotel guests outside of working hours.
5. All of the existing buildings on the site would be demolished, and part of one of the buildings sits within the Camberwell Green Conservation Area but it is considered to be of low quality and officers raise no objection to its demolition. New buildings on the site would be up to 7 storeys in height and would be of a high standard of design which would preserve the character, appearance and setting of this part of the conservation area. There would be new public routes through the site which would be secured through a s106 agreement.
6. The proposal would provide 14 affordable residential units which would equate to 35% by habitable room, with a policy compliant tenure split. The residential accommodation would be of a very high standard and a policy compliant mix of unit types and wheelchair accessible units would be provided. The proposal would require the removal of one tree from the site but 18 new trees would be planted which would supplement new, high quality landscaping. The daylight/sunlight and outlook impacts of the proposal development are noted, but these are not considered to be so harmful that they would outweigh the benefits of the proposal.
7. The development would provide four accessible parking spaces and a car club space, and future occupiers would be prevented from obtaining parking permits in the surrounding streets. Whilst the proposal would result in some additional vehicle trips, these would not be significant and would not adversely impact upon the surrounding road network. Cycle parking would be provided in accordance with the draft London Plan, and a condition to secure this has been included in the draft recommendation. The proposal would incorporate measures to reduce its carbon dioxide emissions and a contribution to the Council's Carbon off-set green fund would be provided. The proposal would be air quality neutral, and conditions are recommended to ensure that ground contamination, surface water drainage, archaeology and ecology would be adequately dealt with. A range of planning obligations would be secured, and overall the proposal is considered to be acceptable. It is therefore recommended that planning permission be granted, subject to conditions and a s106 agreement.

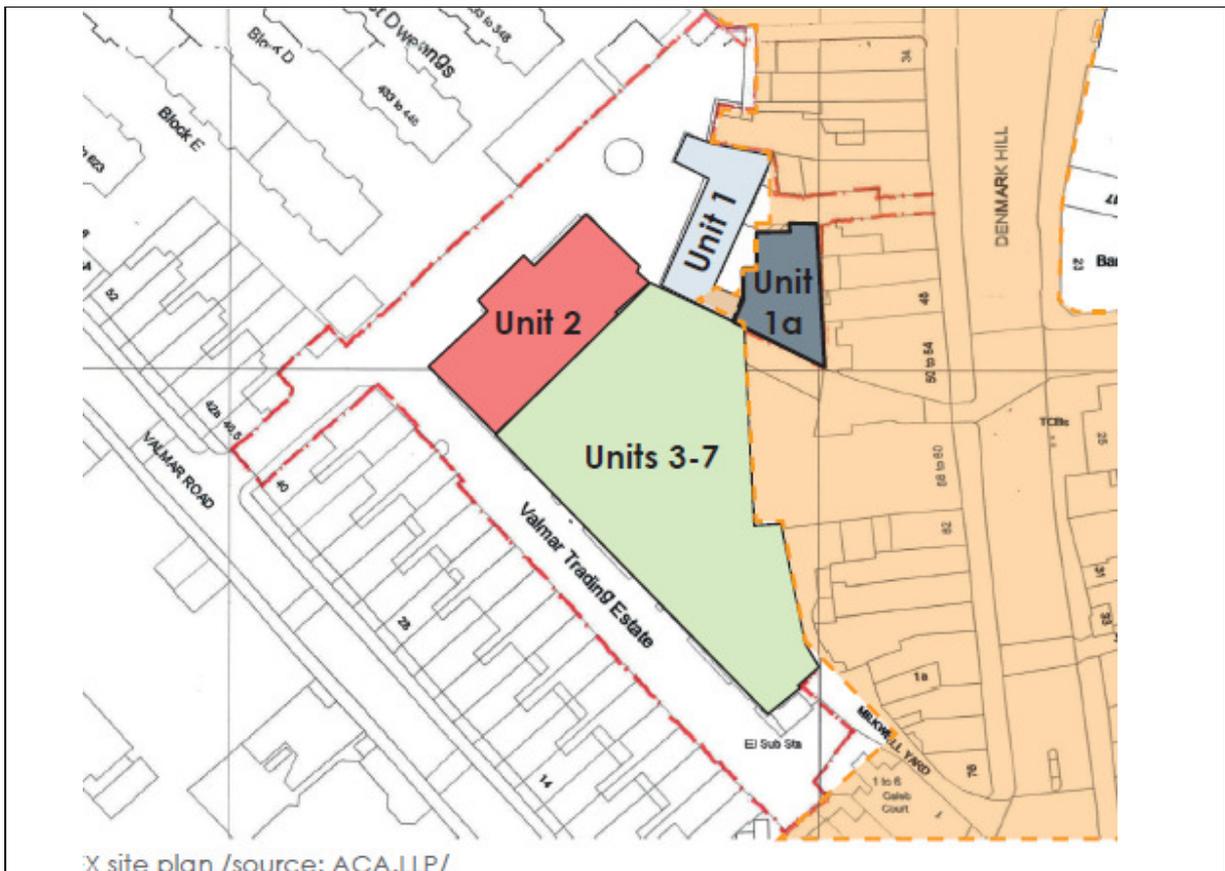
BACKGROUND INFORMATION

Site location and description

8. The application relates to the Valmar Trading Estate which is a 0.6 hectare, broadly triangular shaped site located behind Denmark Hill. It contains eight industrial units (units 1, 1a and 2-7) and when the planning application was submitted in March 2019 units 3-6
-

were occupied. The entire site is now vacant however. Unit 1 is a 3-storey brick building and unit 1a is a single-storey warehouse building with brick walls and a corrugated metal roof; unit 2 is a brick building which spans basement, ground and first floor levels, and units 3-7 are a terrace of 2-storey industrial units. All of the buildings date from the 20th century.

Existing units



9. The only vehicular access into the site is via a gated access from Valmar Road, a predominantly residential street which also contains Crawford Primary School which has entrances from Valmar Road. There is a pedestrian access from Denmark Hill via a gated passage at 42 Denmark Hill which sits between a charity shop and a recruitment agency. It is the site's only street frontage and it leads to units 1 and 1a. There is another pedestrian entrance into the site from Milkwell Yard to the south. Milkwell Yard is effectively a cul-de-sac and also provides access to the rears of numbers 62-76 Denmark Hill.
10. To the north and east of the site are the rear of 2-3-storey properties on Denmark Hill which comprise commercial uses on the ground floor and a mix of residential and commercial uses above; the rear of 3-storey residential properties on Valmar Road adjoin the site to the south-west, and the 5-storey residential blocks of the Samuel Lewis Trust Dwellings adjoin the site to the north-west including a play area and sports court.

11. The site is subject to the following designations on the Proposals Map:

- Camberwell Green Archaeological Priority Zone;
- Urban Density Zone;
- Air Quality Management Area;
- Camberwell Action Area
- Camberwell District Town Centre (Units 1, 1a and the Denmark Hill access only);
- Camberwell Green Conservation Area (most of Unit 1a and the Denmark Hill access only).

Map showing town centre boundary



12. The site does not contain and is not within close proximity to any listed buildings.

Details of proposal

13. Full planning permission is sought for demolition of the existing buildings on the site and erection of a mixed-use development comprising employment space (use class B1), a 127 room hotel, and 43 residential units. It would be laid out as three blocks which are described in the application as the Main Block, Block A and Block B. Pedestrian access to the site would be from Denmark Hill and Milkwell Yard, and vehicular and pedestrian access from Valmar Road.

Proposed site layout plan



14. Main Block – This block would be located in the centre of the site and would adjoin the rear of properties on Denmark Hill. It would be three to seven storeys high (maximum height 24.6m above ground) and would sit above a single-storey basement.
15. This block would contain 2,752.9sqm of employment space, the hotel and the café. At ground floor level there would be a shared hotel and workspace reception, co-working space and the café, and the intention is that the open plan co-working area and breakout space would be open to the public and hotel guests during the evenings and at weekends and this is described further in the amenity section of this report. At basement level there would be ancillary workspace facilities comprising a photography studio, meeting rooms,

a screening / conference room with capacity for around 60 seats, kitchen and plant space and again the intention is that these would be available to the public and hotel guests outside of working hours. At mezzanine level there would be 597.2sqm of artist studios to one side and hotel rooms on the other side. There would be hotel rooms on the floors above this, and work / exhibition space and a terrace on the top floor which would also be available to the public and hotel guests outside of working hours.

Materials for this block would comprise dark and light grey brick, with metal screens incorporating artwork which would be illuminated at night. The top floor would be glazed and its terrace would be enclosed by a glass balustrade.

Proposed front elevation of Main Block



16. Block A - This block would be located on the north-western part of the site, parallel with the boundary with the Samuel Lewis Trust Dwellings. It would be part 5, part 6-storeys high (a maximum of 18.74m above ground level) and would contain 694.2sqm of employment space at ground floor and mezzanine levels, and 15 residential units on the upper floors.

Proposed front elevation of Block A



17. Block B – This block would be located on the south-western part of the site, running parallel with the rear of the residential properties on Valmar Road. It would be part 3, part 4-storeys high (14m above ground) and it would contain 28 residential units.

Partial extract of proposed front elevation of Block B



18. The materials proposed for blocks A and B comprise dark grey brick with feature brick banding and metal balcony balustrades.
19. Five accessible parking spaces would be provided, two of which would be located near to the Valmar Road access and three towards Milkwell Yard.

Existing and proposed land uses

Land use	Existing GIA sqm	Proposed GIA sqm	Net difference GI sqm
B Class	4,847	3,447.1	-1,399.9
C1 (hotel)	0	3,717.4	+3,717.4
A3 (café / restaurant)	0	54.8 sqm	+54.8sqm
Total	4,847	7,219.3	+2, 372.3

Proposed residential unit mix

Unit Type	Private Units	Affordable Units		Total
		<i>Social rent</i>	<i>Intermediate</i>	
1-bedroom	7	-	-	7
2-bedroom	4	-	3	7
3-bedroom	17	9	2	28
4-bedroom	1	-	-	1
Total	29	9	5	43

20. Amendments

A number of amendments have been made to the proposal requiring two rounds of re-consultation. The amendments broadly comprise:

21. Main block

- Removal of one storey and reduction in mezzanine height resulting in a 3.8m height reduction overall;
- Internal reconfiguration to increase the employment floorspace;
- Introduction of a café / restaurant on the ground floor and subsequent relocation of this space;
- Removal of a car parking space for the hotel;
- Removal of one storey closest to 44-52 (evens) Denmark Hill resulting in a 3.07m reduction in height in this location.

Block A

- Ground floor changed from residential to employment space;
- Increase in the height of the block by 1.4m following insertion of mezzanine.
- Ground floor building footprint increased to provide additional employment space;
- Enlargement of balconies;
- Windows enlarged.

General – amendments to playspace provision within the scheme.

22. These changes have resulted in a 440.1sqm increase in employment floorspace, a reduction in the number of hotel rooms from 134 to 127, and a reduction in the number of residential units from 47 to 43. The second round of re-consultation also clarified the storey heights to reflect that mezzanine levels which would be provided within the Main Block and Block A would effectively be full storeys.

Relevant planning history

23. 19/AP/0239 - Screening Opinion under Regulation 6 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017, for the redevelopment of the site for a mixed use building up to 8 storeys in height, comprising co-working space, artist studios, 142 hotel rooms, 45 residential units and a new public route. Environmental Impact Assessment (EIA) not required.
24. 18EQ0176 - Redevelopment of the site to create a new makers quarter comprising co-working space, artist studios, new public route and 315 shared living units. Officers raised

concerns regarding a loss of employment floorspace, the principle of shared living residential accommodation, building heights and site layout / plot coverage, quality of accommodation and lack of information regarding amenity impacts and servicing.

25. 18EQ0354 - Redevelopment of the site to create a new creative hub comprising co-working space, artist studios, 161 hotel rooms, 52 residential units and a new public route. Officers noted that the site designation in the draft New Southwark Plan (NSP) does not include provision of a hotel but recognised that the site adjoins a town centre, that there are no other hotels in close proximity, and that the benefits of a hotel would need to be shown to outweigh a loss of B class floorspace. Concerns were raised regarding the height of the proposed development, amenity and transport impacts.
26. Unit 1 - 12/AP/3126 - Change of use of the ground floor unit 1 Valmar works from B1/B8 to A1/A3, involving a single storey side extension, the remodelling of the facades at ground floor level including new fenestration and a canopy, and the relocation of an existing cut through to the works. Planning permission was GRANTED in December 2012. This permission was not implemented.
27. Unit 1A - 09/AP/1849 - Erection of additional floor and external alterations including balconies to west, north and south facing elevations, in connection with change of use from antique warehouse (use class B8) to artist studios (use class B1), providing 10 No. artist studios (5 no. on each floor), and associated cycle parking and refuse storage. Planning permission was GRANTED in February 2010. This permission was not implemented.
28. Unit 2 - 11/AP/0616 – Erection of two additional floors to building, 2-storey rear extension, extension at basement level to front of building and refurbishment / remodelling of facades of existing office building (Use Class B1a), all to provide additional office floor space. Planning permission was GRANTED IN July 2011. This permission was not implemented.
29. 11/AP/3603 - Change of use from B1(c) (Light Industrial) to a micro brewery (use class B2 General Industrial), erection of two additional floors to building, 2-storey rear extension, extension at basement level to front of building and refurbishment / remodelling of facades. Planning permission was GRANTED in March 2012. This permission was implemented, but the additional 2-storeys were not constructed.

Relevant planning history of adjoining sites

30. 1A Milkwell Yard and 56-70 Denmark Hill (excluding 62 Denmark Hill)

19/AP/2230 - Construction of part 2, part 3 storey extension to existing buildings to provide 24 new residential units (4 x studio, 6 x 1-bed, 8 x 2-bed, 4 x 3-bed and 2 x 4-bed) on the upper floors of the ground floor commercial units with communal and private amenity space'. This application was WITHDRAWN.
31. The majority of the properties along the Valmar Road terrace have planning history relating to ground floor or roof extensions. Similarly, many properties along Denmark Hill which adjoin the site have been altered in some way, either by rear extensions or changes to signage.

KEY ISSUES FOR CONSIDERATION

Summary of main issues

32. The main issues to be considered in respect of this application are:
- a) Principle of the proposed development in terms of land use;
 - b) Environmental impact assessment
 - c) Design of the proposal and impact upon the character and appearance of the Camberwell Green Conservation Area
 - d) Trees and landscaping
 - e) Density;
 - f) Affordable housing;
 - g) Mix of dwellings;
 - h) Wheelchair accessible housing;
 - i) Quality of accommodation;
 - j) Impact of proposed development on amenity of adjoining occupiers and surrounding area;
 - k) Transport;
 - l) Air quality;
 - m) Contamination;
 - n) Flood risk and drainage;
 - o) Sustainable development implications;
 - p) Archaeology;
 - q) Ecology;
 - r) Planning obligations (s.106 undertaking or agreement);
 - s) Mayoral and Borough Community Infrastructure Levy;
 - t) Statement of Community Involvement.

Legal Context

33. Section 38(6) of the Planning and Compulsory Purchase Act (2004) requires planning applications to be determined in accordance with the development plan, unless material considerations indicate otherwise. In this instance the development plan comprises the London Plan 2016, the Core Strategy 2011, and the Saved Southwark Plan 2007.
34. There are also specific statutory duties in respect of the Public Sector Equalities Duty which are highlighted in the relevant sections below and in the overall assessment at the end of the report.

Planning policy

National Planning Policy Framework (2019)

35. The revised National Planning Policy Framework ('NPPF') was published in February 2019 which sets out the national planning policy and how this needs to be applied. The NPPF focuses on sustainable development with three key objectives: economic, social and environmental.

36. Paragraph 212 states that the policies in the Framework are material considerations which should be taken into account in dealing with applications.
37. Chapter 2 - Achieving sustainable development
 Chapter 5 - Delivering a sufficient supply of homes
 Chapter 7 – Ensuring the vitality of town centres
 Chapter 8 - Promoting healthy and safe communities
 Chapter 9 - Promoting sustainable transport
 Chapter 11 - Making effective use of land
 Chapter 12 - Achieving well-designed places
 Chapter 14 - Meeting the challenge of climate change, flooding and coastal change
 Chapter 16 - Conserving and enhancing the historic environment

London Plan 2016

38. The London Plan is the regional planning framework and was adopted in 2016. The relevant policies of the London Plan 2016 are:
39. Policy 2.15 - Town Centres
 Policy 4.1 Developing London's economy
 Policy 4.4 Managing industrial land and premises
 Policy 3.1 - Ensuring Equal Life Chances For All
 Policy 4.5 – London’s visitor infrastructure
 Policy 4.7 - Retail and Town Centre Development
 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 3.8 - Housing choice
 Policy 3.9 - Mixed and balanced communities
 Policy 3.11 - Affordable housing targets
 Policy 3.12 - Negotiating affordable housing on individual private residential and mixed use schemes
 Policy 3.13 - Affordable housing thresholds
 Policy 5.1 - Climate change mitigation
 Policy 5.2 - Minimising carbon dioxide emission
 Policy 5.3 - Sustainable design and construction
 Policy 5.7 - Renewable energy
 Policy 5.10 - Urban greening
 Policy 5.11 - Green roofs and development site environs
 Policy 5.12 - Flood risk management
 Policy 5.13 - Sustainable drainage
 Policy 5.15 - Water use and supplies
 Policy 5.21 - Contaminated land
 Policy 6.3 - Assessing effects of development on transport capacity
 Policy 6.9 - Cycling
 Policy 6.10 - Walking
 Policy 6.13 - Parking
 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 7.14 - Improving air quality
 Policy 7.15 - Reducing and managing noise, improving and enhancing the acoustic environment and promoting appropriate soundscapes
 Policy 7.19 - Biodiversity and access to nature
 Policy 7.21 - Trees and woodlands
 Policy 8.2 - Planning obligations
 Policy 8.3 - Community infrastructure levy

Core Strategy 2011

40. The Core Strategy was adopted in 2011 providing the spatial planning strategy for the borough. The strategic policies in the Core Strategy are relevant alongside the saved Southwark Plan (2007) policies. The relevant policies of the Core Strategy 2011 are listed below, and the Core Strategy also sets out the vision for Camberwell Action Area which includes protecting the town centre, encouraging the reputation of the area as a creative place, and protecting and supporting small businesses.
41. Strategic Policy 1 - Sustainable development
 Strategic Policy 2 - Sustainable transport
 Strategic Policy 3 – Shopping, leisure and entertainment
 Strategic Policy 5 - Providing new homes
 Strategic Policy 6 - Homes for people on different incomes
 Strategic Policy 7 – Family homes
 Strategic Policy 10 – Jobs and businesses
 Strategic Policy 11 – Open spaces and wildlife
 Strategic Policy 12 - Design and conservation
 Strategic Policy 13 - High environmental standards
 Strategic Policy 14 – Implementation and delivery

Southwark Plan 2007 (saved policies)

42. In 2013, the council resolved to 'save' all of the policies in the Southwark Plan 2007 unless they had been updated by the Core Strategy with the exception of Policy 1.8 (location of retail outside town centres). Paragraph 213 of the NPPF states that existing policies should not be considered out of date simply because they were adopted or made prior to publication of the Framework. Due weight should be given to them, according to their degree of consistency with the Framework. The relevant policies of the Southwark Plan 2007 are:
43. Policy 1.1 – Access to employment opportunities
 Policy 1.4 – Employment sites outside the preferred office locations and preferred industrial locations
 Policy 1.5 – Small business units
 Policy 1.7 – Development within town and local centres
 Policy 1.2 – Hotels and visitor accommodation
 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 3.9 - 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 3.16 – Conservation areas
 Policy 3.18 – Setting of listed buildings, conservation areas and world heritage sites
 Policy 3.19 - Archaeology
 Policy 3.28 - Biodiversity
 Policy 3.31 - Flood defences
 Policy 4.2 - Quality of residential accommodation
 Policy 4.3 - Mix of dwellings
 Policy 4.4 - Affordable housing
 Policy 4.5 - Wheelchair affordable housing
 Policy 5.2 - Transport impacts
 Policy 5.3 - Walking and cycling
 Policy 5.6 - Car parking
 Policy 5.7 - Parking standards for disabled people and the mobility impaired

Supplementary Planning Guidance and Documents

44. Sustainable Design and Construction SPD February (2009)
 Sustainable Transport SPD (2010)
 Camberwell Green Conservation Area Appraisal (2010)
 Affordable Housing SPD (2008) and Draft Affordable Housing SPD (2011)
 GLA Shaping Neighbourhoods: Play and informal recreation SPG 2012
 GLA Sustainable Design and Construction SPG 2014
 2015 Technical Update to Residential Design Standards SPD (2015)
 Section 106 Planning Obligations and Community Infrastructure Levy (CIL) SPD (2015)
 Development Viability SPD (2016)
 GLA Affordable Housing and Viability SPD (2017)
 GLA Energy Assessment Guidance (2018)

Emerging planning policy

Draft New London Plan

45. The draft New London Plan was published on 30 November 2017 and the first and only stage of consultation closed on 2nd March 2018. Following an Examination in Public, the Mayor then issued the Intend to Publish London Plan, which was published in December 2019.
46. The Secretary of State responded to the Mayor in March 2020 where he expressed concerns about the Plan and has used his powers to direct changes to the London

Plan. The London Plan cannot be adopted until these changes have been made.

47. The draft New London Plan is at an advanced stage. Policies contained in the Intend to Publish (ItP) London Plan published in December 2019 that are not subject to a direction by the Secretary of State carry significant weight. Paragraph 48 of the NPPF states that decision makers may give weight to relevant policies in emerging plans according to the stage of preparation of the emerging plan, the extent to which there are unresolved objections to the policy and the degree of consistency with the Framework.
48. New Southwark Plan
- For the last 5 years the Council has been preparing the New Southwark Plan (NSP) which will replace the saved policies of the 2007 Southwark Plan and the 2011 Core Strategy. The Council concluded consultation on the Proposed Submission version (Regulation 19) on 27 February 2018. The New Southwark Plan Proposed Submission Version: Amended Policies January 2019 consultation closed in May 2019. These two documents comprise the Proposed Submission Version of the New Southwark Plan.
49. These documents and the New Southwark Plan Submission Version (Proposed Modifications for Examination) were submitted to the Secretary of State in January 2020 for Local Plan Examination. The New Southwark Plan Submission Version (Proposed Modifications for Examination) is the Council's current expression of the New Southwark Plan and responds to consultation on the NSP Proposed Submission Version.
50. In April 2020 the Planning Inspectorate provided their initial comments to the New Southwark Plan Submission Version. It was recommended that a further round of consultation take place in order to support the soundness of the Plan. Consultation is due to take place on this version of the NSP between June and August 2020. The final updated version of the plan will then be considered at the Examination in Public (EiP).
51. It is anticipated that the plan will be adopted in early 2021 following the EiP. As the NSP is not yet adopted policy, it can only be attributed limited weight. Nevertheless paragraph 48 of the NPPF states that decision makers may give weight to relevant policies in emerging plans according to the stage of preparation of the emerging plan, the extent to which there are unresolved objections to the policy and the degree of consistency with the Framework.
52. Proposal site designation NSP24 in the draft NSP covers the application site, but does not include the pedestrian route into the site from Denmark Hill. NSP24 advises that the existing uses comprise 3,982sqm of B1(c) floorspace (light industrial) and that redevelopment of the site must:
- Provide at least the amount of employment floorspace (B1 use class) as currently on the site; and
 - Provide a new east-west green link from Denmark Hill to Valmar Road.
- Redevelopment of the site should:
- Provide new homes (C3).
53. The detailed guidance advises that the site is suitable for a mixed use development which provides at least as much employment floorspace as currently exists on the site.

Redevelopment should create a new walking route between Valmar Road and Denmark Hill to enhance accessibility to the proposed Camberwell Station. It advises that Milkwell Yard provides an opportunity to provide improved connectivity for pedestrians.

54. Also of note is that it is proposed to amend the boundary of Camberwell Town Centre through the NSP, and the entirety of NSP24 would sit within the new town centre boundary.

Summary of public consultation responses

55. A total of 59 representations were received in response to the first round of consultation, carried out in May 2019.

56. 30 representations were received in support of the application for the reasons set out below:

57. Land uses

- Provision of affordable housing and would help to address housing shortage;
- Job creation;
- Provision of affordable workspace;
- Lack of high quality hotels in the area;
- Artist studios, gallery and community space included;
- Lack of artist studios in the area;
- The developer would operate the site and not let it out to chains;
- Local artist who wishes to rent one of the studios;
- Will bring more visitors, residents and consumers to the area which will boost the high street which has vacant units;
- Better than other proposals in the area and more aligned with the Camberwell area plan.

58. Design

- Similar to existing heights in the area and would not be particularly visible;
- High quality design;
- Site is currently derelict and unattractive;

59. Amenity

- Will improve security in the area including for the houses backing onto the site and in Milkwell Yard which experiences anti-social behaviour;
- Support the proposal but have concerns regarding loss of light and privacy.

60. Transport

- Could help with the case for re-opening Camberwell Station;
- Support car - free development;
- Would improve pedestrian links;

- Would reduce industrial traffic on Valmar Road;
- Support the proposal but traffic and deliveries must be restricted;

61. Consultation

- Good community consultation undertaken before planning application submitted;

62. Submission from Camberwell Arts

- Proposal will enhance Camberwell Art's aims of supporting the work of local artists and bringing art to local people;
- Will have significant cultural and public benefits and will improve Denmark Hill by bringing more visitors to the area;
- Camberwell is well known for arts but lacks affordable space for local artists;
- Hotel will boost local businesses;
- Camberwell Arts will work with the developer to help curate the arts space within the development.

63. Submission from Theatre Peckham

- Positive addition to the creative and cultural landscape of the area;
- Will provide opportunities for local people including young people;
- Proposed workspace will allow for partnerships with local entrepreneurs rather than those from further afield;
- Will help to make Camberwell a destination rather than a thoroughfare;
- Theatre Peckham will be able to direct theatre-goers to the proposed hotel accommodation which aligns with the theatre's creative values and which will showcase the work of local artists.

64. Submission from Black British Female Artists Collective (who have worked with the developer on the design of the artist studios in the scheme).

- Would help to address the lack of affordable and comfortable workspace in the area;
- The applicant has sought input from the Collective on the design of the proposal, demonstrating their commitment to the scheme;
- Proposal would help artists to foster long term careers;
- Proximity to the South London Gallery, University of the Arts London and Camberwell Arts;
- Would help to promote Black and Minority Ethnic artists;
- Opportunities for workshops with the community and local schools;
- Working on the design of the hotel interior would help artists within the Collective to build sustainable careers;
- Hotel brings opportunities for cultivating art sales and new business opportunities.

65. 27 representations were received objecting to the application for the reasons set out

below:

Land uses

- Should include more facilities for the local community;
- Lack of demand for housing in the area and all the housing should be affordable;
- Impact on schools and GP surgeries;
- Hotel not listed in the NSP site designation;
- There are many hotel rooms in the area with limited demand, and the proposal would put other hotels out of business;
- The Mayor's target for hotel rooms has already been exceeded;
- Question how the hotel would be used if there were low demand, including as emergency residential accommodation for the Council;
- Contrary to an Article 4 Direction in place which prevents change of use from light industrial space to residential;
- Site should be used to expand Crawford primary school;
- No need for a cinema as there are cinemas at Peckham and Brixton;

66. Design

- Buildings too high and out of keeping with the area;
- Grey brick not in keeping with the area;
- Proposal is too dense;
- Impact upon protected view to St Pauls;

67. Amenity

- Loss of daylight, sunlight and overshadowing including to play area within Samuel Lewis Trust Dwellings;
- Loss of privacy;
- Would build on boundary wall and block redevelopment potential of 46 Denmark Hill;
- Anti-social behaviour and information required as to how this would be managed;
- Music in the outside areas around the hotel must be prevented;
- Increase in litter and fly tipping;
- Request a 24 hour on-site contact during construction and operation of the development;
- Noise and odour from plant;
- Loss of property value (officer response- this is not a material planning consideration);

68. Transport

- Increased traffic and parking demand and including at school drop-off / pick up times;
- Pressure on public transport;
- Transport Assessment is flawed because it assumes the trading estate is operating at full capacity but it has been underused for a long time;

- Impact of construction traffic including potential vehicle waiting area;
- Inadequate vehicular access including for servicing requirements and emergency vehicles;
- Question whether the site could be accessed from Coldharbour Lane;
- Servicing hours should be restricted;
- Use of coaches;
- Refuse storage locations impractical in terms of collections;
- No defined servicing area so the site would become cluttered with vehicles;
- Access routes must be lit and maintained to a high standard;
- Pavement required into the site from Valmar Road;
- Controlled Parking Zone (CPZ) hours should be extended to cover evenings and weekends.

69. Environmental impacts

- Increased pollution;
- Sewers unlikely to be able to cope with additional waste;
- Impact upon water pressure;
- Impact upon gas and electricity supplies;
- Proposal likely to cause flooding.

70. Consultation

- Council did not consult hotel operators in the area.

71. Two comments have been received on the application as follows:

- Welcome the proposal but have concerns regarding traffic generation, question whether vehicle trips are one or two way, congestion on Valmar Road, another hotel is planned in the area, lack of parking, loss of light and privacy and construction impacts.
- Residents on Milkwell Yard should be given priority for using services on the estate;

72. Re-consultation

Following the first set of amendments to the application re-consultation was undertaken on 19th September 2019 and 8 representations in support and 7 representations objecting to the proposal were received, with the reasons as set out above.

Following the second set of amendments to the application re-consultation was undertaken on 13 July 2020. Three further representations were received in support of the application and the only new issue raised is that the new routes through the site would reduce commuting time for local residents.

Five further objections were received which raised the following new issues:

- Lack of demand for a hotel due to Covid-19 and it could be used as a House in Multiple Occupation;
- The area cannot sustain two new hotels in an area which previously had no hotels of

this size;

- Insufficient housing on the site;
- The scheme is not viable which could lead to corners being cut, including in relation to the removal of asbestos from the existing buildings;
- Construction impacts when more people are likely to be working from home due to Covid-19;
- Land contamination.

Principle of the development in terms of land use

73. Section 6 of the NPPF 'Building a strong, competitive economy' states that planning policies and decisions should help to create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses, and address the challenges of the future.
74. Policy 4.1 of the London Plan sets out the Mayor's requirements for developing London's economy, including promoting and enabling the continued development of a strong, sustainable and diverse economy across all parts of the city. Policy 4.4 relates to the management of industrial land and premises including undesignated industrial sites such as the application site. Policy E7 of the draft London Plan relates to mixed-use development on non-designated industrial sites.
75. At borough level the Core Strategy vision for the Camberwell Action Area is to protect the town centre by improving current shops, encouraging its reputation as a creative place clustering around Camberwell College of Arts to provide employment, protecting and encouraging small businesses, and improving sustainable modes of transport. Strategic policy 10 of the Core Strategy seeks to protect existing business floorspace and supports the provision of around 25,000sqm - 30,000sqm of additional business floorspace to help meet general demand for office space in a number of locations, including town and local centres and in the Camberwell Action Area. Saved Southwark Plan policy 1.4 seeks to protect undesignated employment sites in certain locations and sets out criteria for assessing applications where there would be a loss of employment floorspace. Saved policy 1.5 is also relevant which encourages the provision and requires the replacement of small business units.
76. As set out in the planning policy section of this report, site designation NSP24 in the draft NSP requires at least the amount of existing employment space to be re-provided which is given as 3,982sqm of B1 (c) space (light industrial), and it states that redevelopment of the site should provide new homes. Also of relevance is policy P29 'Office and business development' of the draft NSP which seeks to protect existing employment space in locations including town and local centres. It only allows the loss of employment floorspace following a marketing evidence and further justification, and subject to a contribution towards the provision of jobs and training schemes in the borough.
77. Concerns have been raised following public consultation on the application that the proposal would conflict with an Article 4 Direction which is in force which prevents a change of use from B1(c) light industrial uses to C3 residential uses under permitted

development rights i.e. without the need for planning permission. The Direction was confirmed by the Council in March 2018 and includes the application site. However this Direction simply removes the right to change the use without applying for planning permission; in this case, an application is being made to redevelop the site so a conflict with the Article 4 Direction does not apply. It is also noted that the site is designated for mixed use purposes in the draft NSP.

78. Loss of B class floorspace - There is currently 4,847sqm of B class floorspace on the site which is higher than the figure given in the draft NSP site designation which is based on estimates taken from GIS mapping. The NSP site designation also states that the existing floorspace is B1 (c) 'light industrial', but the application documents state that units 3-6 which were the only units occupied when the planning application was submitted were predominantly used for storage. A permission for B2 use (general industrial) was implemented in unit 2, although this unit is now in a very poor condition.

79. The breakdown of the existing space across the site is as follows:

Existing B class floorspace

Unit	Floorspace (GIA)	Occupier when application submitted	No. of employees when application submitted
1	661.8sqm	Vacant	0
1a	257.2sqm	Vacant	0
2	1,486.1sqm	Vacant	0
3	448.8sqm	Mitie Cleaning and Environment	16 warehouse operatives at units 3-6.
4	804.2sqm	Ad Events International	As above
5	469.3sqm	Rocket Van	As above
6	351.8sqm	Kings College Hospital NHS Trust	As above
7	367.8sqm	Vacant	0
Total	4,847sqm		

80. The proposed development would provide 3,447.1sqm of employment floorspace which would be 1,399.9sqm less than the existing, or a 71% re-provision. This loss of B class floorspace would not comply with the draft NSP site designation, and the applicant has sought to justify this through the submission of marketing evidence in accordance with saved policy 1.4 of the Southwark Plan and policy P29 of the draft NSP.

81. Saved policy 1.4 of the Southwark Plan affords protection to existing B class floorspace in certain locations, including on sites which front or have direct access to a classified road. The site has direct access (albeit through a narrow and headroom-restricted passageway) to Denmark Hill which is classified, therefore this policy is applicable. The policy sets out the circumstances in which a loss of B class floorspace will be permitted including where there is evidence of 24 months of marketing to seek to dispose of the premises for continued B class use or mixed-use including B class; where the site would be unsuitable for continued B class use or redevelopment

including B class; or where the site is located in a town centre whereby A class uses can replace B class space.

82. A marketing report has been submitted with the application in respect of units 1, 1a and 2 which together provide 2,405sqm of floorspace. The report has been compiled by One Click Commercial which it advises has over 20 years experience of commercial lettings in London, including Southwark. The report advises that the units have been vacant since 2012, and were purchased by the current owner in October 2014. Since that time they have been continuously marketed, initially by Changing Properties until March 2016 and then jointly with One Click Commercial up until the present time. The units were offered individually or together, and on a long lease or short-term flexible basis with an emphasis on the ability to redevelop them to suit a range of B class occupiers given their current poor condition.
83. Both marketing companies employed a range of measures to secure a tenant including:
- Marketing boards displayed on the site and at the site entrance;
 - Use of commercial property portals such as Zoopla, Rightmove, property link and estatesgazette.com,
 - Direct approaches to existing clients looking for premises via telephone and email;
 - Listing the units on the company websites from April 2016;
 - Premium online advertisements to raise the profile of the units;
84. The marketing report advises that the units are dilapidated and in a very poor condition, requiring extensive refurbishment and / or redevelopment. Issues identified include flood damage, rotting, rusting, mould and structural damage. A steel staircase within Unit 1 is showing signs of corrosion, Unit 1a has poor loading access through a single panel door, and most of the ground floor of Unit 2 was removed during its previous use as a brewery. The marketing agents advised the owner that rather than refurbish the units which could limit the pool of potential occupiers, they should be offered on attractive terms to enable occupiers to fit them out to meet their own requirements. The terms on which they were offered included a rent-free period of up to two years, with the owner paying basic refurbishment costs and the tenant to provide the fit out.
85. In spite of marketing the units for 35 months, only 23 enquiries were received. The only tenant found was Deliveroo which occupied some of the external yard to Unit 1 in 2017, but subsequently vacated the site following enforcement action by the Council. The conclusion of the marketing report is that in spite of the terms offered, a significant investment is required in order to bring the units back into useable condition and that it would be commercially unviable for the owner to do this given the relatively low rental values which could be expected.
86. The marketing report has been reviewed by the Council's Regeneration Division and the advice received is that the size and location of the units are such that potential tenants (start ups and very small businesses) are unlikely to have the capital to invest in bringing the units up to occupational standards, and rather than accepting a lease with the risk of refurbishment costs, they would likely opt to pay a higher rent for premises from which they can trade immediately. As rents are likely to fall as a result of the current Covid 19 emergency and economic risk will be higher, the refurbishment

of the units from an owner's perspective would not be viable, and small businesses would be even less likely to invest in refurbishment costs.

87. Given the extensive marketing of these units for a period well in excess of the 24 month policy requirement, the reduction in B class floorspace is considered to have been adequately justified in this instance. It is noted that unit 7 has been vacant since March 2018. This unit is in different ownership and was last used for storage and distribution. It is in a useable condition and has been marketed through on site boards, email campaigns and online listings as per units 1, 1a and 2 but no tenant has been found. To mitigate the loss of B class floorspace a s106 contribution of £6,645.45 would be secured through the s106 agreement towards employment and training schemes in the borough, in accordance with the Council's adopted Section 106 Planning Obligations and Community Infrastructure Levy SPD.
88. Retention of existing businesses - Policy P30 of the draft NSP 'Affordable workspace' requires development to retain small and independent businesses on a site and where they are at risk of displacement, to provide suitable affordable workspace for them within the completed development. Policy P32 of the draft NSP 'Business Relocation' requires applicants to provide a business relocation strategy in consultation with affected businesses which must set out viable relocation options.
89. As stated units 3-6 were occupied when the planning application was submitted, and the applicant has provided a Draft Business Relocation Strategy; details of the businesses which formerly occupied these units are set out below:
- Unit 3 – This unit was used by Mitie Cleaning and Environment for storage and distribution. Mitie Cleaning is one of the UK's largest cleaning companies, servicing several private and public sector companies. It has several premises around the country, including in London. After an initial letter in April 2019 the applicant contacted the business again in May 2019, and the business advised that they did not wish to extend their lease.
90. Unit 4 - This unit was occupied by Ad Events which makes booths and sets for exhibitions. Discussions with this business took place in May 2019 and the business advised that of the 804sqm of space which they occupied, around a third was used for making props / stands and the remainder was used for storage. The business advised that they were planning on moving their storage outside the M25, and required a much smaller space for making the sets. This could potentially be accommodated within one or two of the units in Block A, and the applicant offered to assist the business in finding temporary accommodation in the interim. During further discussions in June 2019 the business advised that they had found a new premises and would vacate the site at the end of the lease term, but would consider a potential move back to the site closer to practical completion of the proposed development. The applicant intends to contact the business around this time and it is recommended that this be secured through the s106 agreement. In the event that this business wishes to return to the site the s106 agreement should ensure that it is prioritised for affordable workspace which is detailed further below.
91. Unit 5 – This unit was used for storage by Rocket Van, a van hire and courier service, and the office element of the business could be accommodated within the proposed development. Rocket Van appointed an agent to assist them in finding a new

premises and in May 2019 the agent advised that Rocket Van was expanding and would require a lot more space for vehicles in the future. This could not be accommodated in the proposed development as it would require large amounts of hardstanding and shed space. As Rocket Van had appointed their own agent they did not take up the applicant's offer of help to find a new premises or to extend their lease, and the business has not expressed any interest in returning to the site.

92. Unit 6 – This unit was occupied by King's College Trust which used it for storage. The applicant received no response to an initial letter sent in April 2019 and was unable to reach anyone at the Trust to discuss their business requirements. The lease subsequently expired and the unit was vacated.
93. The intention of the business relocation policy is that space is designed with existing businesses in mind, to enable them to remain on a site. In this instance the businesses were contacted after the planning application had been submitted, i.e. when the scheme had already been designed. However, whilst this is noted, the units were predominantly used for storage and re-providing storage space on the site would limit the potential number of jobs which the scheme could support. Only one of the former occupiers has expressed a desire to potentially return to the site within completed development, and this could be facilitated through the s106 agreement.
94. Proposed B class floorspace - The proposed development would provide three types of B1 space comprising 1,324sqm of co-working space (B1a), 597.2sqm of artist studios (B1c) and 831.7sqm of ancillary facilities within the Main block, and 694.2sqm of maker space (B1c) within Block A and these are described in more detail below. The submission advises that the workspace within the development has been designed in consultation with Camberwell College of Arts and the Black British Female Artist Collective.
95. The co-working space would be provided at ground and top floor level within the Main block and could accommodate desks for up to 100 people. It would comprise a mix of individual rooms which could be rented by businesses, banks of communal desks and breakout spaces. The desks would be let on a flexible basis for an all inclusive monthly fee or a day pass, and this would include Wifi, furniture, printers and access to meeting rooms and break out spaces.
96. An earlier iteration of the plans showed the café in the back corner of the ground floor with no separation from the workspace, and officers raised concerns that this could lead to the co-working break out space becoming a large café / bar and not a genuine workspace. In response to this the applicant has identified a number of examples where large hotel lobbies are used jointly as work and hotel space including Citizen M on Lavington Street and Green Rooms in Wood Green, although these hotels do not appear to have rentable co-working space, only meeting rooms and large café/bars where people are able to work. Revisions to the plans to relocate the café to the outer edge of the building to enable it to be physically separated from the workspace have helped to allay these concerns, although part of the of the co-working break out space could still need to be used to serve hotel breakfasts given that the café could only accommodate 40-50 covers and the proposed layout would allow for this. It is recommended that the s106 agreement requires a workspace marketing and

management plan to be submitted for approval which would allow the breakout space to be used by hotel guests and members of the public up until 10am and after 5pm on weekdays, with priority for this space for people working at the site during working hours. The workspace marketing and management plan should also prioritise the basement ancillary facilities for people working on the site during the working week, whilst enabling it to be used by the local community and hotel guests during the evenings and at weekends. Whilst the shared nature of some of the spaces would lead to a blurring of some of the hotel and workspaces, it would allow the space to be used efficiently throughout the day, and in the spirit of the more flexible use classes being promoted in recent legislative changes.

97. The artist studios would be provided at mezzanine level. They are shown laid out as 14 separate units ranging from 18.1sqm to 57.5sqm in size, although the sizes could be adapted to suit end user requirements.

Proposed mezzanine floorplan



98. The proposed maker space would be provided at ground floor and mezzanine level within Block A. It would comprise four individual units ranging from 80.2sqm to 133.2sqm in size which would incorporate a kitchenette, WC and internal cycle storage. They would have floor to ceiling heights of 2.5m which would not be particularly high for a commercial unit, although the mezzanines could potentially be omitted if not required by a specific end user, although this would reduce the overall amount of floorspace. The plans show double doors into the units and these could be

made larger to make them more suitable for moving goods and materials in and out if required. The middle two units would also include knock-out panels so they could be changed to a single, larger unit if required by future occupiers and these design features should be secured through the s106 agreement.

99. Ancillary facilities would be provided in the basement of the Main Block including a photography studio, recording rooms, a conference / screening room and a number of meeting rooms. These facilities would be available to those working within the three different types of workspace across the site, not just the co-working space and this should be secured through the s106 agreement. These facilities would also be available to the public outside of working hours, and this is considered further later in the report. Overall the proposed workspace is considered to be of a good standard, and the different types of spaces proposed would comply with policy P29 of the draft NSP which requires employment floorspace in allocated sites to include a range of employment spaces. In order to secure this policy requirement a condition is recommended requiring the specified quantum of B1c floorspace to be delivered and for details of the fit out to be provided. The s106 agreement should require all of the workspace to be completed before the hotel can be occupied.
100. Job creation - At the time the application was submitted there were 16 people employed at the site, all of whom were warehouse operatives working in units 3-6; this relatively low number is on account of these units having been used predominantly for storage. The Council's Local Economy Team (LET) has advised that the likely number of jobs which the proposal would generate would be 303 full time equivalent jobs, with 260 from the workspace and 43 from the hotel and café; although temporary, around 360 construction jobs would be created. Clauses in the s106 agreement would secure a proportion of construction jobs and jobs within the completed development for unemployed Southwark residents.
101. Provision of affordable workspace – Policy E3 of the draft London Plan supports the use of planning obligations to secure affordable workspace. Policy P30 of the draft NSP states that developments proposing 500sqm GIA or more employment floorspace (B class use) must:
- Deliver at least 10% of the proposed gross employment floorspace as affordable workspace on site at discount market rents; and
 - Secure the affordable workspace for at least 30 years; and
 - Provide affordable workspace of a type and specification that meets current local demand;
and
 - Prioritise affordable workspace for existing small and independent businesses occupying the site that are at risk of displacement. Where this is not feasible, affordable workspace must be targeted for small and independent businesses from the local area with an identified need; and
 - Collaborate with the Council, local businesses, business associations and workspace providers to identify the businesses that will be nominated for occupying affordable workspace.

If it is not feasible to provide affordable workspace on site, an in lieu payment will be

required for off site affordable workspace.

102. Policy P30 has been informed by a number of studies which form part of the evidence base for the NSP. Of particular note is the 'London Borough of Southwark Affordable Workspace Support – Evidence of Needs' study by Avison Young dated December 2019. This report considers the different types of affordable workspace needed in different parts of the borough, and considers the viability impacts of delivering affordable workspace and what rent levels would be considered affordable. In the Camberwell area the report advises that studios, maker space, light industrial space and the retention of existing space would be appropriate. It advises that there should be peppercorn rents on 10% of the space staircasing up to £20 per square foot, and that this would be viable for most schemes. To that end, the following has been agreed for the affordable workspace and this would be secured through the s106 agreement:
103. - 10% affordable workspace (345sqm) would be provided comprising maker space within Block A;
- The affordable workspace would be secured for a 30 year term and the same occupier could remain for the entire period;
- Rent would be 48% of market rent inclusive of service charge for the 30 year term, which currently equates to £12 per square foot;
- Flexible leases;
- Applicants must either have an existing business in Southwark or be a resident of Southwark and the proposed use must be from a specific sector which has a social, cultural or economic development purpose;
- During the construction period, a database of interested parties will be compiled and maintained;
- On completion, the units will be marketed using a website, newspapers, agencies, managing agent, database, and external signage. Units would be actively marketed for nine months to Southwark businesses and residents. Only if the units remain unoccupied after this period of marketing will the units be made available to the same types of businesses outside of Southwark which would be permitted to remain in the affordable space, paying affordable rent, for up to five years. After those five years, the process would start again. During this time the existing tenant could remain until a suitable Southwark tenant is found;
- The day to day management of the units would be carried out by a suitably competent management company.

A condition would secure the fit out of the affordable workspace including mechanical and electrical fit-out of the units, heating and cooling provision, sprinklers, and the provision of kitchen and toilet facilities

104. **Provision of residential use**

Section 5 of the NPPF sets out the government's approach to the delivery of new homes which includes requiring housing policies to deliver a broad range of housing types needed by different groups. London Plan Policy 3.3 'Increasing Housing Supply' sets a minimum target of 27,362 additional homes to be provided in Southwark between 2015-2025. Strategic policy 5 of the Core Strategy seeks high quality new homes in attractive environments. It states that development will provide as much housing as possible, whilst also making sure that there is enough land for other types of development. The draft NSP sets a target of 23,550 net new homes by 2028/2029 in line with the draft London Plan, and a key objective of the overall development plan is to provide as much new housing as possible and to create places where people would want to live.

Concerns have been raised during public consultation on the application that there is no need for more housing in the area, and that the site would be better used for expanding Crawford Primary School. However, there is a pressing need for more housing in the borough and London, hence the need for housing targets as set out in the policies outlined above. The provision of residential units on the site would also be in accordance with the draft NSP site designation and as such is considered to be acceptable in principle. The need for additional primary school places has been considered through the draft NSP preparation and informed by regular monitoring of the demand for school places. A Cabinet report entitled 'Pupil Place Planning' dated 29th October 2019 forms part of the NSP evidence base and advises that Southwark currently has sufficient places to meet demand in the primary and secondary phases of education, and that demand for primary school places will continue to decline, but will slowly increase towards the end of the next decade.

105. **Provision of a hotel** - The proposed development would include a 127 room hotel which would occupy the majority of the Main Block. A number of representations have been received in support of the hotel on the basis of job creation, a boost to existing businesses, and a lack of high quality hotels in the area. Representations received objecting to the proposed hotel include a lack of demand, it would put other hotels in the area out of business, and the draft NSP site designation does not include a hotel. A concern has also been raised that other hotel operators in the area were not consulted on the planning application, but consultation on planning applications is based on proximity to the site, and it there are no hotels within close proximity to the site.
106. Units 1 and 1a within the estate are located in Camberwell District Town Centre; the remainder of the site sits outside of it. Section 7 of the NPPF 'Ensuring the vitality of town centres' requires Local Planning Authorities to apply a sequential test to planning applications for main town centre uses (which includes hotels) which are neither in an existing centre nor in accordance with an up-to-date plan. Main town centre uses should first be located in town centres, then in edge of centre locations, and only if suitable sites are not available or expected to become available within a reasonable period should out of centre sites be considered. When considering edge and out of centre proposals, preference should be given to accessible sites which are well connected to the town centre.
107. Policy 2.15 of the London Plan 'Town Centres' sets out the strategic requirements for town centres, including sustaining and enhancing the vitality and viability of the centre.

Policy 4.5 of the London Plan relates specifically to hotels and sets a target of 40,000 net additional hotel bedrooms by 2036, of which at least 10% should be wheelchair accessible. It advises that new visitor accommodation should be in appropriate locations including town centres where there is good access to public transport, and that further intensification of hotel provision in areas of existing concentration should be resisted, except where it would not compromise local amenity or the balance of local land uses. The draft London Plan revises this figure upwards and advises that an additional 58,000 bedrooms of serviced accommodation will be required in London by 2041, to be directed towards the Central Activities Zone (CAZ) and town centres. This figure is informed by Working Paper 88 'Projections of demand and supply for visitor accommodation in London to 2050 (April 2017) which estimates that 1,795 of the rooms will be required in Southwark.

108. At borough level strategic policy 10 of the Core Strategy advises that hotels will be permitted in town centres, the strategic cultural areas and places with good access to public transport services provided they do not harm the local character. Saved policy 1.12 of the Southwark Plan advises that hotels and other visitor accommodation will be encouraged in areas with high public transport accessibility; hotels and visitor accommodation will not be permitted where they would result in a loss of existing residential accommodation or an over dominance of visitor accommodation in the locality. Policy 40 of the draft NSP states that development for hotels and other forms of visitor accommodation must ensure the design, scale, function, parking and servicing arrangements respond positively to the local character and protect the amenity of the local community and visitors to the hotel. Of note is that this draft policy does not require hotels to be located in town centres.
109. With regard to its location, based on the current adopted plan most of the hotel would occupy an edge of centre site, sitting just outside the town centre designation. Whilst there are three other NSP proposal sites which are within the existing town centre boundary, none of these are within the applicant's ownership. The first is Butterfly Walk Shopping Centre (NSP23). This site is being brought forward for development by others, and is subject to a planning application for redevelopment including a 101 room hotel which is currently being assessed. The second is the Abellio Walworth Depot (NSP26), part of which sits within the current town centre boundary. This site is still in active use as a depot and there is currently no indication as to if and when it may be brought forward for redevelopment. The third site is Camberwell Magistrates Court (NSP32) which sits wholly within the current town centre boundary. Whilst this site is likely to be brought forward for redevelopment by others, there is no current planning application.
110. Where a site is located at the edge of a town centre it should be well connected to it, and in this instance the site has direct access to the town centre via the Denmark Hill route. Although the hotel would not have a direct street frontage, most hotel bookings are undertaken online and less frequently rely on passing trade. It would also benefit from a quieter location which could make it more attractive to some guests than if it were on a main road. The site has a high PTAL and the proposal would not result in a loss of existing residential accommodation, so in these respects the proposal would comply with saved policy 1.12 of the Southwark Plan. As set out in the planning policy section of this report, it is proposed to amend the town centre boundary through the

New Southwark Plan, and the entirety of the application site would then sit within the new town centre boundary.

111. With regard to the number of hotel rooms in the borough, an objection has been received raising concerns that the Mayor of London's 2006 Hotel Demand Study required 2,500 rooms in Southwark and that this was already exceeded by 2015, with more consented hotel rooms in the pipeline. The objection advises that there are already 350 hotel rooms in the area, with limited demand, and that the proposed hotel would put other hotels out of business.
112. Given that Southwark has already exceeded the draft London Plan requirement for hotel rooms in terms of permissions granted, none of the proposal sites in the draft NSP include hotel use, with the expectation being that hotel proposals will be considered on a case by case basis assessed against the policies outlined above. The Background Paper concludes that Southwark should remain supportive of new hotels, as long as other plan commitments and the requirements of site allocations and development management policies can be met.
113. In this instance the proposed hotel would not compromise the ability to deliver the other objectives set out in the NSP site designation, including the provision of employment space, routes through the site and new housing. Whilst there would be a reduction in employment space, this is considered to have been justified through marketing evidence. The site allocations methodology report for the NSP gives an indicative amount of residential floorspace on the site of 3, 515sqm (GIA). The proposal would deliver 4,302.6 sqm GIA which would exceed the floorspace expectation.
114. The policies outlined above also require consideration of whether there would be an over dominance of visitor application in the locality, and this issue is considered in a Hotel Market Study which has been submitted with the application. The study considers existing and consented hotels within a one and a half mile radius of the site which extends across a large area from New Kent Road in the north to Herne Hill in the south.
115. The study shows that there are currently 18 hotels in this area providing 865 rooms; 15 of these hotels (490 rooms) are in Southwark and the remainder are in Lambeth. There are two hotels in Camberwell Town Centre, the closest of which is the Church Street Hotel which is a 3 star, 31 room hotel approximately 270m to the north east of the site on Camberwell Church Street; this hotel includes a restaurant and bar which are open to the public. The second is also on Camberwell Church Street, the OYO New Dome Hotel which is a 2 star, 25 room hotel approximately 315m to the north-east of the site and it is understood that it does not provide any public facilities.
116. As for consented hotels, the study advises that there are 8 developments within a 1.5 mile radius of the site which would deliver 482 bedrooms. Of these, five of the developments are within Southwark, providing 266 rooms. The closest to the application site is an existing 213 room hotel at 110 Peckham Road which is approximately 900m away from the site and has consent for 86 additional bedrooms.
117. Given that there are currently only two hotels in Camberwell Town Centre which are

both some distance from the site and there are no consented hotels in the town centre, there is not considered to be an over-concentration of visitor accommodation in the locality. Although Southwark has a large number of existing and consented hotel rooms overall, these are predominantly concentrated in the north-western part of the borough. The Hotel Market Study anticipates that demand for the hotel would arise mainly from displaced demand from central London and from the nearby hospitals in the short term, including people visiting the hospitals for training courses. With the redevelopment of nearby Elephant and Castle and Camberwell's increasingly well recognised status for arts and creativity, it is anticipated that more visitors would be attracted to stay in the area in the longer term. Concerns have been raised during public consultation on the application that there will be less demand for a hotel due to Covid-19, and whilst this is noted and tourism has been impacted this year, it is not known what the effects will be in the longer term. The applicant could not use the hotel as a hostel or House in Multiple Occupation (HMO) without first obtaining planning permission.

118. The proposed hotel would add to the range of uses available in this part of the borough, and would help to support existing businesses in the town centre by generating footfall. It is estimated that hotel guests would contribute some £4.95m per annum to the local economy, and as set out above the proposed hotel would generate employment opportunities. Policy 40 of the draft NSP requires hotel developments to provide a minimum of 10% of the total floorspace as ancillary facilities which incorporate a range of daytime uses and offer employment opportunities. In this case the hotel would be part of a mixed use development which would also provide employment and café / restaurant space, as well as public access to facilities such as meeting and screening room, thus meeting the requirements of this policy.
119. The proposed development would also help to deliver the NSP Camberwell Area Vision which requires development to complement and improve the town centre with more large and small shops, entertainment, leisure, workspaces for smaller enterprises, particularly creative industries, cultural activities and well designed public spaces for visitors to linger. The development would be well connected to the town centre and the landscaped area outside the hotel would provide external seating, both incidental and linked to the café.
120. The submission advises that the hotel would be retained and operated by the applicant, and that the Black British Female Artist Collective (BBFAC) would be involved with the design of the hotel interiors and façade. A number of the public comments on the application are supportive of the applicant operating the hotel rather than a chain, but Members must bear in mind that there would be no requirement in planning terms for the applicant to operate the hotel, and if permission is granted and implemented, the hotel could be run by any operator.
121. Land uses conclusion - The proposed development would result in a loss of B class floorspace on the site, but this is considered to have been adequately justified in this instance through the provision of marketing evidence. When the application was submitted only four of the units on the site were occupied and were mainly used for storage, supporting only 16 jobs. The proposed development would provide good quality workspace and would support approximately 303 jobs which is a very positive aspect of the scheme. The provision of low cost affordable workspace would support the creative industries in Camberwell. There is significant demand for housing in the

borough and the provision of new housing would comply with the site designation in the draft NSP. Whilst the hotel would sit just outside the town centre, it would be well connected to it and has a PTAL. It would not result in an overconcentration of visitor accommodation in the locality, and would support the town centre by generating footfall and spending in the local economy, creating jobs, and providing facilities which would be available to the local community. Whilst a hotel is not listed as one of the acceptable uses under the emerging NSP site allocation, it could have positive benefits for Camberwell both in supporting institutions such as the hospitals and driving footfall to support the viability of the town centre, and these material considerations can be given weight. The principle of the proposed development is therefore considered to be acceptable in land use terms in this location.

Environmental impact assessment (EIA)

122. In February 2019 the Council adopted a negative Screening Opinion confirming that an EIA was not required for the redevelopment of the site for a mixed use building up to 8 storeys in height, comprising co-working space, artist studios, 142 hotel rooms, 45 residential units and a new public route (reference: 19/AP/0239). The proposal now under consideration is for the same land uses but smaller in scale than that for which the Screening Opinion was issued, therefore it is concluded that no EIA is required for this proposal.

Design of the proposal and impact upon the character and appearance of the Camberwell Green Conservation Area

123. Section 12 of the NPPF 'Achieving well-designed places' advises that the creation of high quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development which creates better places in which to live and work. Policy 7.4 of the London Plan requires development to have regard to the form, function, and structure of an area, place or street and the scale, mass and orientation of surrounding buildings. Policies 7.4 and 7.5 are also relevant which require developments to provide high quality public realm and architecture. Policy SP12 of the Core Strategy states that "Development will 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." Saved policies 3.12 and 3.13 of the Southwark Plan require developments to be of a high standard of architectural and urban design and saved policy 3.18 seeks to preserve or enhance the settings of heritage assets. Representations have been received both in support of and raising concerns regarding the height and design of the proposed development.
124. The existing buildings on the site date from the mid 20th century and are of little historic or architectural interest, and have been remodelled and extended over time. All of the buildings on the site would be demolished and most of unit 1a sits within the Camberwell Green Conservation Area – the impact upon the character and appearance of this part of the conservation area is considered further below. The nearest listed buildings are approximately 350m to the north of the site and there are further listed buildings fronting Camberwell Green.
125. Layout - The site is a tight backland site, roughly triangular in shape and surrounded

by buildings, and the access from Denmark Hill currently only leads to units 1 and 1a. Within this context, the proposed layout of a large, centrally placed workspace and hotel building bounded by linear residential blocks (Block A- adjacent to the main entrance from Denmark Hill and Block B at right angles) would be logical. It would define the routes through the site and would create an attractive landscaped area described as 'The Hub' upon entering the site from Denmark Hill.

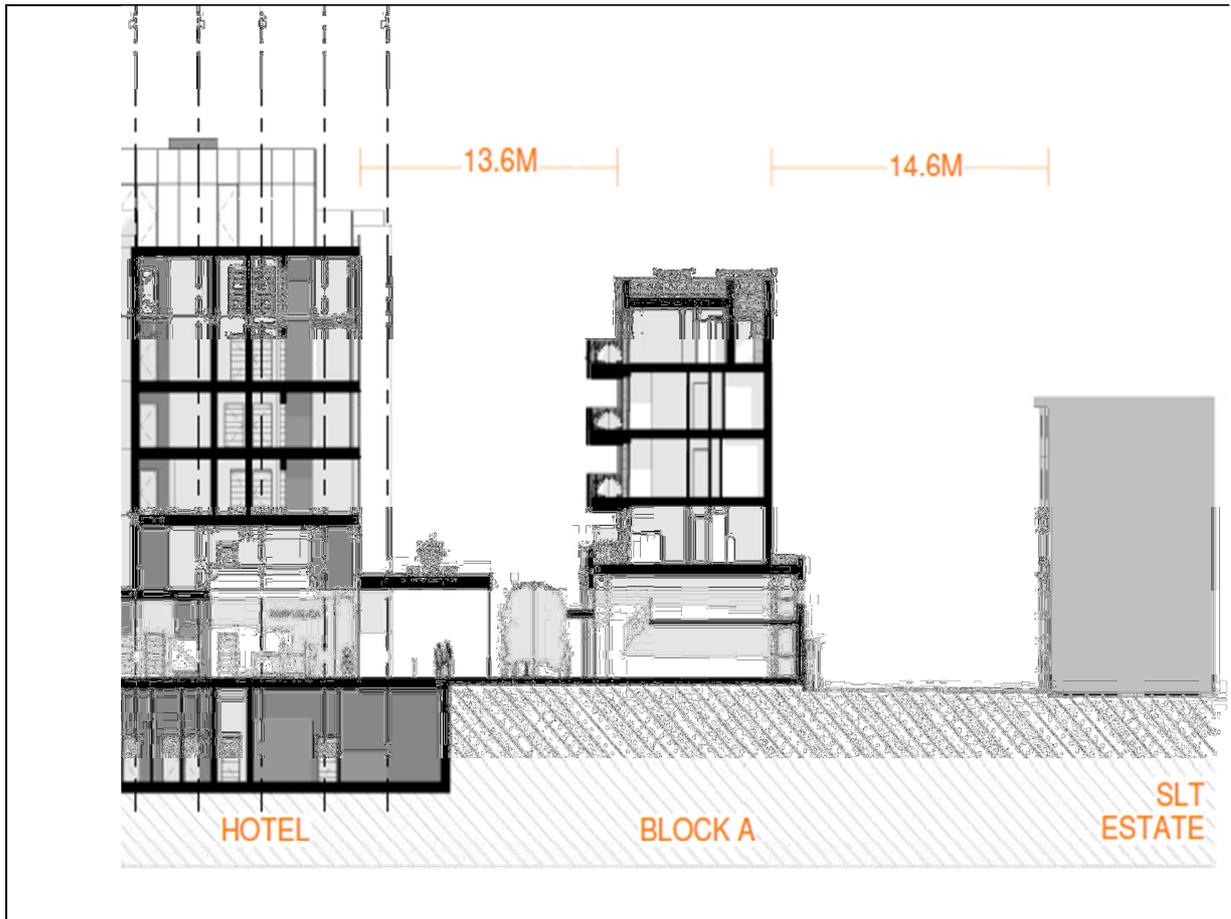
126. The new routes would connect Valmar Road with Denmark Hill and Milkwell Yard which would comply with the requirement in the draft NSP site designation. The Denmark Hill route would be approximately 3.2m wide upon entering the site from the town centre, and would open out into the Hub. This route would be enhanced with landscaping and lighting and the hotel entrance canopy would be visible beyond, all of which would help to draw people into the site. At present there are bins and external stairs belonging to the adjoining properties along this route. Whilst the external stairs would have to remain, the applicant has contacted these properties with a view to improving the refuse storage arrangements, including potentially relocating the bins or enclosing them. Milkwell Yard is adopted highway therefore improvements to this area can be secured through the s106 agreement, including resurfacing it and other environmental and security improvements. The s106 agreement would also secure public access through these routes and a condition would secure the removal of the existing gates across the Valmar Road access to keep this route open.
127. Although the routes past Blocks A and B would be a similar width (10.5m and 12.5m respectively at ground floor level), they would feel quite different. The route leading to Denmark Hill would be lined with workspace and the hotel which would create an active, urban feel to this route. This would be in contrast to the softer landscaping elements and a more domestic feel to the secondary route which would lead past Block B to Milkwell Yard. This difference would be further reinforced by the taller building of Block A along the east-west route. In short there would be a hierarchy to the layout which would create spaces of different characters according to their function, and this is considered to be a positive element of the proposal. Moreover the distribution of land uses across the site would be logical, with the predominantly residential elements located closest to existing residential properties, and the workspace and hotel closest to Denmark Hill which contains a mix of commercial and residential uses.

Proposed route between the Main Block and Block A, looking towards Valmar Road



128. Height, scale and massing – Concerns have been raised following public consultation on the application regarding the impact upon the NSP protected linear view of St Paul's Cathedral along Camberwell Road. However, the site does not sit within or near to the proposed viewing corridor, and as such would have no impact upon this view.
129. The application has been amended to reduce the height of the Main Block and to minimise views of it from outside the site, although this building would nonetheless still appear quite tall for the backland space it would occupy. However, the degree of enclosure that this would impart is not without precedent when considering large warehouse typologies, of which there are many examples in the borough. As set out further later in the report this Main block would only be minimally visible from street level along Denmark Hill. The top floor of the building would be set back so as to reduce its apparent height when viewed from within the site, and a 5-storey shoulder line would be created opposite Block B by setting the upper floors back.

Proposed section



130. Block A would also be quite tall in terms of defining the edge of the main open space of the scheme. However, the commercial ground and mezzanine floors would project forward of the residential accommodation above to provide a lower scale element which would help to create a more comfortable overall scale for this block. Given the secondary nature of the route which would connect the site with Milkwell Yard and the proximity to the dwellings on Valmar Road, the height of Block B at four storeys is considered to be appropriate and would sit comfortably alongside the 3-storey dwellings along Valmar Road.
131. Architectural design - The Main Block would have an expressed brick frame, with the infill between comprising recessed brick panels and windows. It is considered that this aesthetic would be a successful and slightly gentler derivation of the industrial 'heavy brick' buildings in the wider area. The elevations would be enlivened on the entrance façade by artwork of metal infill panels to selected openings within the frame, with the intention being that the patterns for the metal panels would be designed and made by local artists. It is noted that grey brick is proposed, and the surrounding buildings are more buff and red in tone. A condition for sample panels has been included in the draft recommendation to ensure that the final brick choice would compliment the surrounding townscape.

Proposed view of the Main Block and Block B looking towards Milkwell Yard

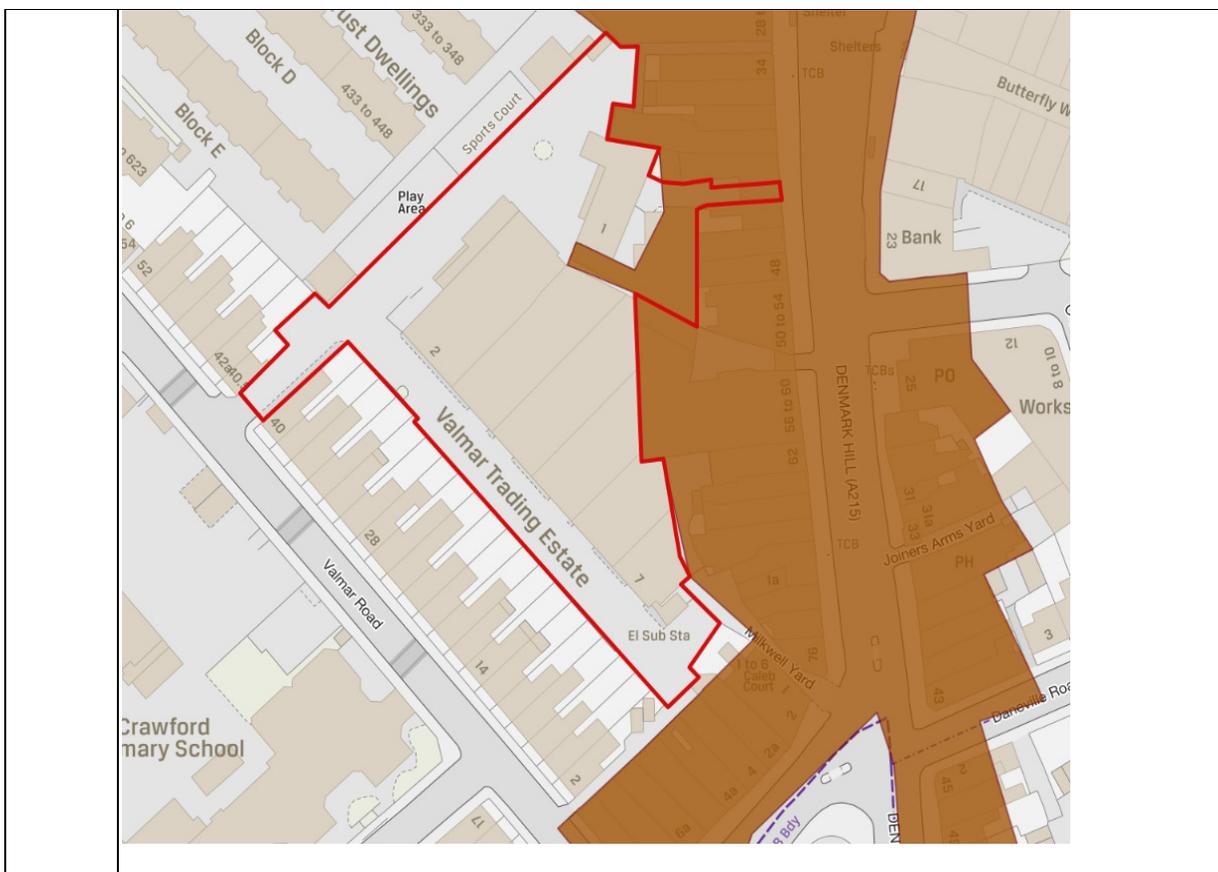


132. Both of the residential blocks would be well proportioned and would tend to be seen obliquely from within the site rather than face on. Furthermore, 'rusticated' brick panels would provide a welcome decorative feature on both blocks.
133. Owing to ground levels Block B would be set on a slight slope, with the tallest end being at Milkwell Yard. The block would step down at regular intervals reflecting this topography and in combination with recesses and projections in the plan and frequent front doors, this would help to give the impression of a series of tall town houses rather than one singular block. Conditions are recommended requiring detailed drawings of the various elements of the buildings including bay studies and sections through facades.

Impact upon the character, appearance and setting of the Camberwell Green Conservation Area

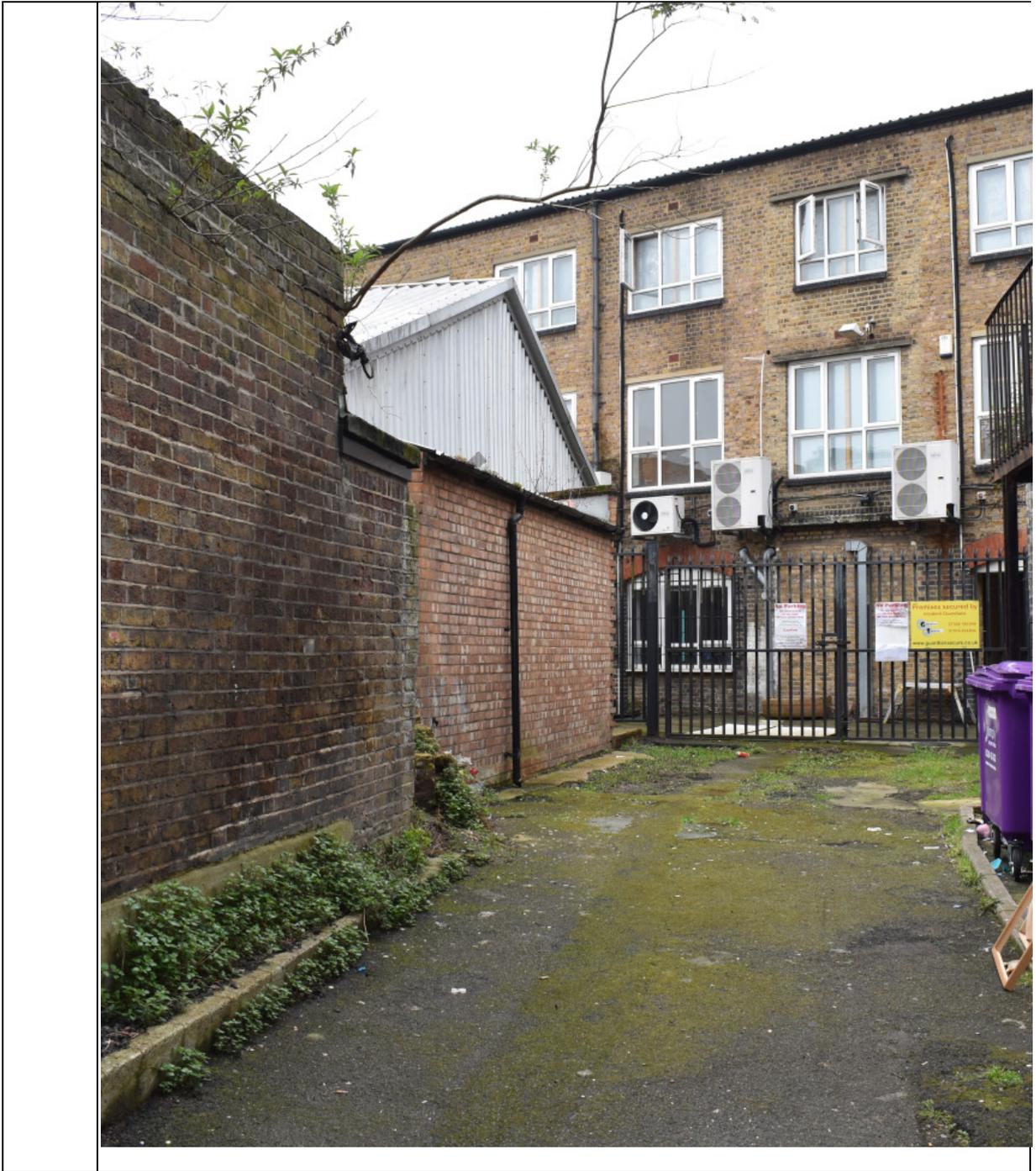
134. The NPPF and supporting National Planning Practice Guidance requires development to conserve or enhance heritage assets and their setting and to avoid causing harm. Designated heritage assets includes conservation areas, and most of Unit 1a sits within the Camberwell Green Conservation Area which was designated in 1981. The conservation area boundary runs diagonally across unit 1a and does not include two small sections of the building furthest into the site as shown on the image below. Unit 1a would be demolished along with all of the other buildings on the site. The NPPF requires the Local Planning Authorities to consider whether heritage harm is 'substantial' or 'less than substantial', and this includes harm to conservation areas and their settings.

Map showing part of the site which sits within Camberwell Green Conservation Area



135. Unit 1a is located on the eastern side of the site behind Denmark Hill, and the route into the site is also within the conservation area. It is a single-storey, 20th century warehouse / shed type building with brick walls and a corrugated metal roof which is only visible from the yard space at the end of the Denmark Hill route, from unit 1, and from the upper floors of the neighbouring properties on Denmark Hill. This building is not considered to be of any interest and does not in itself contribute to the special character or appearance of the conservation area. In the view of officers its loss, along with other utilitarian buildings on the site to make way for the scheme proposals, would not result in any harm to the special character or appearance of the conservation area.

Unit 1a on far left hand side of image



Interior of unit 1a



136. With regard to the impact of the proposed buildings, as set out above the development would be quite tall relative to the established context and therefore has the potential to affect the setting of the conservation area. This is particularly the case in views from the north across the wide and open space of the Camberwell Green / Denmark Hill/ Camberwell New Road junction. As first submitted the higher parts of the Main Block would have risen into these views above attractive Victorian commercial buildings lining the western side of Demark Hill. The top of the hotel building would have read as a large and incongruous mass which would undoubtedly have harmed the traditional townscape character of the area.
137. The scheme has subsequently been amended to remove an entire storey from the Main Block and the remaining top floor has been reduced in area and clad in more translucent materials so as to be less prominent. Revised images show that the top part of the building would now only just project above the foreground townscape buildings in one view close to the junction, and the prominence of the proposed building in this view has been reduced such that the harm to townscape and hence the setting of conservation area would be small, and certainly less than substantial. The harm can be therefore weighed against the public benefits that would be brought about by the scheme as allowed for by paragraph 196 of the NPPF. These benefits include job creation, the provision of new housing including affordable housing and new public routes through the site. In all other views from the north and south along Camberwell Road and Denmark Hill, the development would be hidden behind the Victorian buildings that line these streets.

Proposed view from near pedestrian crossing on opposite side of Denmark Hill



138. To conclude in relation to design and heritage impacts, following the revisions to the scheme it is considered to be of a high standard of design which would significantly enhance the appearance of the site, and that the character, appearance and setting of this part of the Camberwell Green Conservation Area would be preserved.

Trees and landscaping

139. Policy 7.5 of the London Plan 'Public realm' advises that London's public spaces should be secure, accessible, inclusive, connected, easy to understand and maintain, relate to local context, and incorporate the highest quality design, landscaping, planting, street furniture and surfaces.
140. An Arboricultural Impact Assessment has been submitted with the application. The only tree on the site is a Sycamore which is growing near to the entrance from Valmar Road, near the back of one of the Valmar Road houses. Although large, it has been identified as a category C tree (low quality) and its loss would be mitigated through the provision of 18 new trees within the site, and a condition to secure these is recommended.
141. Landscaping - The site would be predominantly hard landscaped using concrete paving which would provide a shared surface for pedestrians, cyclists and vehicles, with contrasting paving used to differentiate where different activities would take place. Soft landscaping in the form of new trees, shrubs and hedging would be used to form

buffers in front of blocks A and B, with pockets of soft landscaping near to the Denmark Hill and Valmar Road entrances and lawns to the rear of Block B. The Hub close to the Denmark Hill entrance would be the focus of the public open space within the development, and would incorporate permanent seating, outdoor seating for the café, planting and space for art installations. Overall the landscaping of the site is considered to be acceptable and would provide welcome greening which would be secured by way of a condition.

Density

142. The site is within in the Urban Density Zone and has a public transport accessibility level (PTAL) of 6a (excellent). Table 3.2 of the London Plan supports a density of 200-700 habitable rooms per hectare in this location which aligns with strategic policy 5 of the Core Strategy. The draft London Plan removes density ranges altogether, and instead policy D3 requires all development to make the best use of land by following a design-led approach that optimises the capacity of sites, including site allocations. Regard must be had to the form and layout, experience, quality and character of the site and the NSP adopts a similar approach, with density ranges no longer included in the plan. Concerns have been raised by neighbouring residents that the proposal would be too dense for the site.
143. Based on the current adopted policy the density of the proposed development would equate to 716 habitable rooms per hectare. This is based on the Southwark Plan methodology for mixed use developments which requires areas of non-residential space to be divided by 27.5 to create an equivalent number of habitable rooms per hectare.
144. Where developments would exceed the density ranges set out in policy, the Council's Residential Design Standards SPD requires the accommodation to be of an exemplary standard and an assessment against the exemplary criteria in the SPD is set out below.

Exemplary residential design criteria from Southwark Residential Design Standards SPD	Commentary
Provide for bulk storage	All of the units would have bulk storage, and 87% of the units would meet or exceed the SPD minimum requirement in terms of sqm. The remaining 13% (7 units) would be 3-bed private units in Block B with shortfalls in bulk storage ranging from 0.1sqm to 0.3sqm.
Exceed minimum privacy distances	Minimum privacy distances would be exceeded between habitable rooms.
Good sunlight and daylight standards	91% of the units would meet or exceed the BRE guidance for internal daylight levels. This is further explained in this report.

Exceed minimum ceiling heights of 2.3m	All rooms within the proposed dwellings would have 2.5 metre floor-to- ceiling heights.
Exceed amenity space standards (both private and communal)	The proposed amenity space is set out later in the report. Where the recommended 10 sqm private amenity space has not been met, the shortfall has been included as communal amenity space in line with the Residential Design Standards SPD.
Secure by Design certification	This scheme would be cable of achieving Secured by Design Accreditation and a condition to require this is recommended.
No more than 5% studio flats	No studio flats are proposed.
Maximise the potential of the site	The potential of this site would be maximised, delivering improved commercial floor space, new dwellings, new routes through the site and outdoor space and play space without unduly compromising local visual or residential amenity.
Include a minimum 10% of units that are suitable for wheelchair users	11.6% of the proposed units would be suitable for wheelchair users.
Excellent accessibility within buildings	The accessibility within the buildings would be excellent with lift access to all upper floors and wheelchair units located at ground floor level.
Exceptional environmental performance	The development is capable of achieving BREEAM “excellent” for the employment space and hotel. The development would need to make a carbon off set contribution to bring the development to carbon zero in accordance with the draft London Plan and this would be secured through the s106 agreement.
Minimised of noise nuisance between flats through vertical stacking of similar room types	The plans submitted demonstrate that a good level of stacking would be achieved.
Make a positive contribution to local context, character and communities	The proposed development would make a positive contribution to local context, character and community in terms of its quality of design and regeneration benefits including affordable housing, employment space and a hotel which would all help to support the town centre.

Include a predominance of dual aspects units	98% of the total units (42 units) proposed would be dual or triple aspect.
Have natural light and ventilation in all kitchens and bathrooms	All kitchens would benefit from natural light and ventilation. Bathrooms on the other hand would not achieve this as all bathrooms would be internalised but will benefit from mechanical ventilation.
At least 60% of units contain two or more bedrooms.	67.4% of the units would have two or more bedrooms.
Significantly exceed the minimum floor space standards	All units would meet the minimum space standards and 90.69% of the units would exceed the minimum standards.
Minimise corridor lengths by having additional cores	No more than 3 units per core is proposed, complying with the Mayor's Housing Design SPG which advises no more than 8 flats per core. There would be no long corridors within the residential blocks.

145. It is considered that the proposed development would provide a very good standard of accommodation with very high levels of dual aspect, good daylight penetration and excellent accessibility. It is noted that the proposal would only just exceed the density range set out in policy.

Affordable housing

146. Section 5 of the NPPF sets out the government's approach to the delivery of significant new housing including a requirement for housing of different sizes, types and tenures to meet the needs of different groups. Policy 3.11 of the London Plan sets a target of at least 17,000 affordable homes per year in London over the plan period, which is reinforced through Strategic Policy 6 of the Core Strategy. This policy requires development to meet the housing needs of people who want to live in Southwark and London by providing high quality new homes in attractive areas, particularly growth areas and sets a target of providing a minimum of 8,558 net affordable housing units between 2011 and 2026. Developments with 10 or more units should provide a minimum of 35% affordable housing, subject to viability, and a tenure split of 50% social rented and 50% intermediate housing is required in the Camberwell Action Area.
147. Policy P1 'Social rented and intermediate housing' of the draft NSP requires developments of 10 or more residential units to provide a minimum of 35% affordable housing, comprising a minimum of 25% as social rented and the remainder as intermediate. The tenure split within the draft NSP policy is currently being applied instead of the adopted policy in recognition of the updated needs assessment and the pressing need for social rented housing in the borough.
148. There would be 14 affordable units within the development which would all be located

in Block A; this block would also contain one private unit at first floor level. For developments of 15 or more units affordable housing is calculated in habitable rooms. For affordable housing purposes there would be 181 habitable rooms within the development and of these, 64 would be affordable which would equate to 35%. The tenure split of the proposed development would comply with the draft NSP policy in providing 25% social rented and 10% shared ownership (intermediate).

Mix of affordable housing by habitable room

Unit type	Private market habitable rooms	Social rented habitable rooms	Intermediate habitable rooms	Total habitable rooms
1-bed	14	0	0	14
2-bed	15	0	9	24
3-bed	82	45	10	137
4-bed	6	0	0	6
Total	117 (65%)	45 (25%)	19 (10%)	181 (100%) (64 affordable habitable rooms =35%)

Mix of affordable housing by unit type

Unit type	Social rented	Intermediate	Total
2-bed	0	3	3
3-bed	9	2	11
Total	9	5	14

149. The application is supported by a financial viability appraisal which has been independently reviewed by BPS on behalf of the Council. Following negotiations between BPS and the applicant's viability consultant the agreed position is that the proposed development would result in a deficit of -£1,151,885. This is largely on account of limited information having been provided regarding the hotel fit out specification meaning it has been valued at the lower end of the scale, and because the café / bar has been valued as a separate entity because it would be open to the public. In spite of the deficit, which would amount to a reduction of around 2% in profit, the applicant has agreed to provide a policy compliant amount of affordable housing which would be secured in the legal agreement. As the strategic target for affordable housing in the draft London Plan is 50% and 35% is a minimum, early and late stage viability reviews are required, with the late stage review being at occupation of 75% of the private residential sales or rent. This would also be secured through the legal agreement and would enable any increase in the value of the hotel to be captured once more information about its fit out becomes available, as well as recognising any other improvements to viability due to value increases or build cost savings..

Mix of dwellings

150. Strategic Policy 7 'Family homes' of the Core Strategy requires at least 60% of the units to contain two or more bedrooms and at least 20% of the units to contain three or

more bedrooms in the Urban Density Zone.

<u>Proposed unit mix</u>		
Unit size	Number of units	Percentage of units %
1-bed	7	16.3
2-bed	7	16.3
3-bed	28	65.1
4-bed	1	2.3
Total	43	100

151. The proposal would deliver 83.7% of units with 2+ bedrooms and 67.4% of the units with 3+ bedrooms which would be policy compliant, and the provision of 3+bed units above the policy requirement is welcomed.

Wheelchair accessible housing

152. Policy 3.8 of the London Plan 'Housing choice' requires 90% of new housing to meet Building Regulation requirement M4 (2) 'accessible and adaptable dwellings', and 10% of new housing to meet Building Regulation requirement M4 (3) 'wheelchair user dwellings', i.e. Designed to be wheelchair accessible or easily adaptable for residents who are wheelchair users.
153. The proposal would include five ground floor wheelchair user dwellings M4(3) comprising 4 x 1-bed and 1 x 2-bed units, all of which would comply with the larger unit sizes set out in the Residential Design Standards SPD for wheelchair user dwellings. This would equate to an 11.6% provision which would exceed the policy requirement, and a condition to secure these units is recommended. All of the remaining units would be constructed to (M4(2)) standards as wheelchair accessible and adaptable dwellings. It is noted that the wheelchair accessible units would all be private units located in Block B, and whilst the greatest need for wheelchair units is in the affordable tenure, the policy does not set a tenure requirement. Before the application was amended wheelchair accessible affordable units were shown in the ground floor of Block A, but these were subsequently omitted due to concerns about their quality, and additional employment floorspace provided instead.

Quality of accommodation

154. Policy 3.5 of the London Plan requires housing developments to be of the highest quality internally, externally, and in relation to their context and to the wider environment. They should enhance the quality of local places, incorporate requirements for accessibility and adaptability, and minimum space standards. In terms of Southwark policy, saved policy 4.2 of the Southwark Plan 'Quality of accommodation' requires developments to achieve good quality living conditions. The Council's Residential Design Standards SPD establishes minimum room and overall flat sizes dependant on occupancy levels, and units should be dual aspect to allow for good levels of light, outlook and cross-ventilation.
155. Suitability of the site for residential use - An Environmental Noise Survey and Acoustic Design Statement Report has been submitted in support of the application which

advises that the main noise sources affecting the site are air and road traffic and noise from Crawford Primary School.

156. The document has been reviewed by the Council’s Environmental Protection Team (EPT) which has recommended a number of conditions to protect the amenity of existing neighbouring occupiers and future occupiers of the site. This includes conditions to limit plant noise and to ensure that noise levels within the proposed flats would be acceptable, and these conditions have been included in the draft recommendation.
157. Privacy - The Council’s Residential Design Standards SPD recommends a minimum of 21m between the rear elevation of properties, and 12m distance between properties which face one another, including across a highway.
158. There would be a 12m separation distance between blocks A and B and the proposed hotel and as the routes within the site would essentially become new streets, this would comply with the guidance in the SPD for properties facing each other. It is noted that bedrooms at ground floor level within Block B would face towards the street, but low brick walls and hedges would be used to create defensible space in front of them.
159. Aspect - All but one of the residential units in the development would be dual or triple aspect (98%) which is welcomed. The only single aspect unit would be at top floor level within block A, and it would be a south-facing unit.

<u>Unit sizes</u>				
Units	SPD minimum sqm	Overall unit size (minimum) sqm	SPD amenity space minimum sqm	Amenity space minimum sqm (minimum)
1-bed	50	52	10	6.2
2-bed	61-70	61.9	10	10
3-bed	74-95	75	10	10
4-bed	117	151	10	59.3

160. All of the residential units would meet or exceed the minimum overall floorspace requirements set out in the Nationally Described Space Standards. Some of the individual rooms would fall short of the standards set out in the Residential Design Standards SPD, with shortfalls ranging from 0.8sqm to 2.5sqm. However, as the overall unit sizes would comply with the required standards this is considered to be acceptable and the overall quality of accommodation is not unduly compromised.
161. Internal light levels - A daylight assessment based on the Building Research Establishment (BRE) Guidance has been submitted which provides an assessment of daylight to the proposed dwellings using the Average Daylight Factor (ADF). ADF determines the natural internal light or day lit appearance of a room and the BRE guidance recommends an ADF of 1% for bedrooms, 1.5% for living rooms and 2% for kitchens.
162. All of the habitable rooms for the residential units have been tested and 91% of them

would comply with the BRE guidance in relation to ADF. There would be 14 rooms which would not comply with the guidance and 10 of these would be bedrooms, one of which would have an ADF of 0.1% owing to the window being partially obscured by a balcony, and the others would have ADFs ranging from 0.5% to 0.9%. The four other rooms would be open plan living spaces which would have ADFs ranging from 1.5% to 1.9% against a target of 2%. Whilst the daylight levels to these rooms are noted, overall there would be a very high level of compliance across the development.

163.

Amenity space and playspace - Section 3 of the Residential Design Standards SPD sets out the Council's amenity space requirements for residential developments. New houses should have a minimum of 50sqm of private garden space which should be at least 10m in length and extend across the full width of the dwelling. The standards for flats are set out in the table below together with details of the proposed provision within the development. Playspace requirements are calculated in accordance with the GLA's Play and informal recreation SPG.

Type of space	Policy requirement (sqm)	Proposed (sqm)	Difference (sqm)
Child play space	283 comprising: 0-4 years – 110 5-11 years – 92 12-15 years 53 16-17 years – 28	283 comprising: 0-4 years – 110 5-11 years – 92 12-15 years 53 16-17 years – 28	0 – policy compl
Private amenity space	10 per unit - any shortfall in 1 and 2 bed units to be added to the communal provision	<u>Block A</u> Between 10.1 and 29sqm per unit <u>Block B</u> Between 6.2 and 59.3sqm per unit (all 3- beds within the development achieving at least 10sqm)	0 – policy compl 0 – policy comp 11.4sqm shortfa private am space made up through comm provision.
Communal amenity space	50 per development + any shortfall of private amenity space (50sqm communal provision generally applied per block rather than per development).	Block A	-23sqm shortfa

	<u>Block A</u> 50sqm	27sqm next to block B plus access to communal space at the rear of block A	communal amenity space for Block A
	<u>Block B</u> 61.4sqm (50 sqm + 11.4 sqm shortfall of private amenity space)	<u>Block B</u> 64.4sqm	+3sqm. Policy complaint

164. All of the development's playspace requirements would be met on site, and a condition is recommended requiring details of the equipment to be installed and means of enclosure to the playspaces to be submitted for approval.
165. There would be a shortfall in communal amenity space for Block A; although the Residential Design Standards SPD requires 50sqm of communal amenity space to be provided per development which the scheme would deliver, the 50sqm requirement is generally applied per block. Block A residents would have access to the communal space at the rear of Block B which should be secured by way of condition, although it is recognised that they may be less likely to use it given its location. There would also be 27sqm of communal amenity space next to the play area at the end of Block B. Officers recognise that this issue is a shortcoming of the scheme, and have explored two options to increase the communal provision, including providing space on the roof of Block A, and providing space towards Milkwell Yard by relocating the three parking spaces. Neither of these options has been possible owing to overlooking concerns, the need for an additional core and a consequent reduction in affordable habitable rooms if it were provided on the roof of Block A, and the impact upon vehicle turning space if it were provided towards Milkwell Yard. The shortfall in communal amenity space must therefore be weighed in the balance when considering all other aspects of the proposal. Officers are of the view that this would not outweigh the positive impacts of the proposal and that a very good standard of accommodation would be provided nonetheless, with all of the Block A units having at least 10.1sqm of private amenity space.
166. The four bedroom unit in Block B would essentially be a townhouse and the Residential Design Standards SPD requires houses to have gardens of at least 50sqm and at least 10m in length extending across the full width of the dwelling. In this instance the house would have a full width garden measuring 29.8sqm and 5m long. Whilst this would not comply with the guidance, it is considered that this unit would provide a very good standard of accommodation nonetheless. In addition to the garden, one of the bedrooms would have a 20.2sqm terrace at first floor level, bringing the total private amenity space for this unit to 50sqm.
167. Overshadowing to the communal amenity space, playspace, new routes and the rear gardens to Block B has been assessed against the BRE guidance. The guidance advises that for an amenity area to be adequately lit it should receive at least 2 hours

sunlight over half of its area on the 21st March.

The route leading to Milkwell Yard, the hotel roof terrace, the play space / communal amenity area at the side of Block B and four of the twelve gardens at the rear of Block B would all comply with the BRE guidance. Only 24.2%% of the route leading to Denmark Hill including 'The Hub' would receive at least 2 hours of sunlight on 21st March and the areas of the remaining eight gardens at the rear of Block B which would receive at least 2 hours of sunlight would range from 30.3% to 48.4%. The same test has been undertaken on 21st June and 89.9% of the route to Denmark Hill would receive at least 2 hours of direct sunlight together with all of the individual gardens to Block B, with the areas ranging from 71.8% to 92%; it is noted that the gardens and the landscaped space around the buildings are likely to be used more frequently during the summer months.

168. The proposed hotel – There are no minimum room sizes for hotel rooms, which in this instance would range from 14sqm to 37sqm and each room would be served by at least one window. Policy 4.5 of the London Plan requires at least 10% of hotel rooms to be wheelchair accessible which the proposal would comply with by providing 13 wheelchair accessible rooms (10.2%) and a condition to secure this is recommended.
169. Secured by Design - The application has been reviewed by the Metropolitan Police and the advice received is that the development is capable of achieving Secure by Design certification which should be secured by condition. The relevant condition has been included in the draft recommendation.
170. To conclude in relation to quality of accommodation, it is considered that the proposal would deliver a very good standard of residential accommodation. Although there would be a shortfall of communal amenity space for Block A, each of the Block A units would have at least 10.1sqm of private amenity space and would be located close to the landscaped area of The Hub. All of the children's playspace requirements would be met on the site, and there would be an exceptionally high level of dual aspect units (98%) and a very high level of compliance with the BRE guidance for internal daylight levels (91%). All of the units would meet or exceed the nationally described space standards and the hotel would provide a policy compliant amount of wheelchair accessible rooms.

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

171. Strategic policy 13 of the Core Strategy 'High environmental standards' seeks to ensure that development sets high standards for reducing air, land, noise and light pollution and avoiding amenity and environmental problems that affect how we enjoy the environment in which we live and work; saved policy 3.2 of the Southwark Plan states that permission will not be granted for development where a loss of amenity, including disturbance from noise, would be caused. The adopted Residential Design Standards SPD expands on policy and sets out guidance for protecting amenity in relation to privacy, daylight and sunlight.
172. Concerns have been raised by neighbouring residents including construction impacts, daylight / sunlight impacts, loss of privacy, and noise and disturbance. The existing buildings on the site range between 8m and 11m in height, the tallest being units 1 and

2. Unit 1a is single storey, and units 3-7 are low rise units which are set approximately 11m off the boundary with the Valmar Road terrace.
173. Impact of the proposed uses - The proposal is for employment space (Class B1), a hotel, café and residential uses. Concerns have been raised regarding the potential for noise, disturbance and anti-social behaviour resulting from the proposed hotel use, including noise from plant, servicing vehicles and people.
174. Class B1 uses generally sit comfortably near to residential properties and should not result in any loss of amenity. Noise from people would be more difficult to control, although the proposed layout of the uses on the site locating residential units closest to existing residential and locating the hotel closest to Denmark Hill and the town centre would assist in this regard. It is considered likely that most people working at the site and hotel guests would enter and leave the hotel via Denmark Hill, particularly those using public transport which is predicted to be the main way in which people would travel to and from the site. The s106 agreement would require workspace and hotel management plans to be submitted for approval which would include management of the external spaces, and Secured by Design certification would require measures such as CCTV and good levels of lighting to be installed throughout the site. Conditions have also been included in the draft recommendation to limit plant noise and to restrict servicing hours and this is considered further in the transport section of this report.
175. The potential extent of the café / restaurant space does raise some concerns however, because even though it is only shown as 54.8sqm on the plans the intention is that outside of working hours the open plan co-working and breakout space could be used by hotel guests and members of the public. In effect this additional area, which is approximately 450sqm and could accommodate 300 covers, would become an extended seating area for the café / restaurant. Whilst this would make an efficient use of the space and would avoid it being left empty during the evenings and at weekends, it would need to be carefully managed to avoid any adverse amenity impacts. To this end and on the advice of EPT it is recommended that the opening hours be restricted to 7am to 11pm daily, that any external seating be required to close by 9.30pm daily, and that ventilation details be submitted for approval. Users would generally arrive and leave via Denmark Hill, which is the busy heart of the town centre, and this use could further support the vitality of this town centre. As such, the potential flexibility to extend the café into this area outside working hours is unlikely, subject to hours restrictions, to significantly harm residential amenity.
176. Impact of the proposed buildings - Saved policy 3.11 (iv) of the Southwark Plan 'Efficient use of land' advises that proposals should not unreasonably compromise the development potential of, or legitimate activities on, neighbouring sites. Concerns have been raised that the proximity of the Main Block to the rear of properties on Denmark Hill would hinder the redevelopment potential of these neighbouring buildings.
177. Concerns have been raised regarding construction impacts during the Covid-19 pandemic when more people are likely to be working from home. This is noted, although the potential impacts can be reduced through the use of construction management plans, a condition for which has been included in the draft recommendation.

178. At ground floor level the Main Block would extend right up to the boundaries with the properties on Denmark Hill, except for a small set back next to numbers 52-54. At first floor level and above most of the building would be set back a minimum of 2m from the boundary which should ensure that these neighbouring properties could be developed in the future, particularly if any future developments were similarly set back. The exception to this is at the rear of numbers 44-52 Denmark Hill where the upper floors of the building would adjoin the site boundary without any set back. Owing to concerns regarding daylight, sunlight and outlook which are considered further below, one storey has been removed from the Main Block closest to the boundaries with these properties, and the elevation in question would not contain any windows (a condition to prevent any from being inserted has been included in the draft recommendation). Whilst the space at the rear of these neighbouring properties is fairly limited, it is considered that they could still be extended in the future, and would not be unduly compromised by the proposed development.
179. Privacy and overlooking – As stated, the Council's Residential Design Standards SPD recommends a minimum of 21m between the rear elevations of properties and 12m between properties which face one another, including across a highway.
180. Main Block – The upper floor hotel windows closest to Denmark Hill would have views over the end portions of the closest Denmark Hill properties, although there do not appear to be any habitable windows which would be affected. However, given the close relationship (a minimum of 5m across the Denmark Hill route) it is recommended that a condition be imposed requiring screening to these windows to direct views into the site and away from the neighbouring properties. As set out above, no windows are proposed in the side of the hotel which would face 44-52 Denmark Hill and this should be ensured by way of a condition.
181. An objection was submitted from an architect working on redevelopment proposals at 56-60 Denmark Hill which are detailed in the planning history of adjoining sites section of this report. Following discussions between the applicant and the objector this has subsequently been withdrawn on the basis that privacy screens are installed to the hotel windows facing this boundary, and this should also be secured by way of a condition which has been included in the draft recommendation; the condition also requires details of screening of the top floor roof terrace. Given the irregular nature of the site boundary and the rear of the adjoining properties the condition has been worded to require details once the building is substantially complete, so that officers can visit the building to establish exactly which windows and which parts of the roof terrace need to be screened.
182. The roof terrace at top floor level would measure 356sqm and would be used for events; depending on the nature of the event it could accommodate approximately 51 people. The Council's Environmental Protection Team has advised that the roof terrace should be required to close at 10pm daily and a condition to sure this has been included in the draft recommendation.
183. Block A – The windows and balconies in the side (north-east) elevation of this block would face towards a Co-operative shop at 28-32 Denmark Hill and the rear of a Santander bank at 34 Denmark Hill, and as such would not result in any loss of amenity. The windows in the rear of this block would face the flank elevations of the

blocks within the Samuel Lewis Trust Dwellings. There would be a minimum separation distance of 14.7m, with the windows facing each other across a road and sports area within the estate. The windows in these neighbouring blocks appear to be either secondary or non-habitable, with their main windows at the front and back. As such it is not considered that they would experience any significant loss of privacy as a result of the proposal.

184. Block B - The rear of this block would face the rear of the Valmar Road terrace, and many of these properties have been extended by way of ground floor rear extensions and dormer windows. At ground floor level and taking the various extensions into account, there would be a minimum separation distance of 11.5m and any views would be screened by the existing boundary wall. At first floor level and above the window-to-window separation distances would be 21-22m which would comply with the Residential Design Standards SPD. Of note is that the four bedroom town house would have a first floor rear terrace, the edge of which would be 17.2m from windows in the rear of 40 Valmar Road and a condition for screening to the terrace has been included in the draft recommendation.

Daylight and sunlight - A daylight and sunlight report has been submitted with the application based on the BRE guidance. The following tests have been undertaken:

185. Vertical Sky Component (VSC) is the amount of skylight reaching a window expressed as a percentage. The guidance recommends that the windows of neighbouring properties achieve a VSC of at least 27%, and notes that if the VSC is reduced to no less than 0.8 times its former value (i.e. a 20% reduction) following the construction of a development, then the reduction will not be noticeable.
186. No-Sky Line (NSL) is the area of a room at desk height that can see the sky. The guidance suggests that the NSL should not be reduced to less than 0.8 times its former value (i.e. no more than a 20% reduction). This is also known as daylight distribution.
187. Sunlight - Annual Probable Sunlight Hours (APSH). This should be considered for all windows facing within 90 degrees of due south (windows outside of this orientation do not receive direct sunlight in the UK). The guidance advises that windows should receive at least 25% APSH, with 5% of this total being enjoyed during the winter months. If a window receives less than 25% of the APSH or less than 5% of the APSH during winter, and is reduced to less than 0.8 times its former value during either period and has a reduction in sunlight received over the whole year of greater than 4%, then sunlight to the building may be adversely affected.
188. The impacts upon the following neighbouring properties have been tested:
- 2-44 Valmar Road (evens)
 - Samuel Lewis Trust Blocks A-E
 - 38-46 Denmark Hill (evens)
 - 62 Denmark Hill
 - 66-78 Denmark Hill
 - 1a Milkwell Yard
 - Caleb Court
 - 2-8 (evens) Coldharbour Lane

189. Of the properties tested, the impacts upon the following properties would comply with the BRE guidance in relation to VSC, NSL and where relevant, APSH:

2, 4, 6, 8, 22, 30, 40, 40 ½, and 44 Valmar Road;
 38, 40, 62, 66-70, 72, 74, 76 and 78 Denmark Hill;
 1a Milkwell Yard
 Caleb Court
 2-8 Coldharbour Lane

Vertical sky component (VSC)

Address	Windows Assessed	Pass	Fail
Valmar Road	233	222	11
Samuel Lewis Trust	430	387	43
Denmark Hill	46	36	10
Milkwell Yard	6	6	0
Caleb Court	11	11	0
Coldharbour Lane	41	41	0
Total	767	703 (92%)	64 (8%)

Daylight Distribution (No sky line test - NSL)

Address	Rooms Assessed	Pass	Fail
Valmar Road	187	180	7
Samuel Lewis Trust	230	221	9
Denmark Hill	43	36	7
Milkwell Yard	3	3	0
Caleb Court	8	8	0
Coldharbour Lane	31	31	0
Total	502	479 (95%)	23 (5%)

Sunlight (annual probable sunlight hours test – APSH)

Address	Rooms Assessed	Pass Both Tests	Fail	Fail
			Total	Winter

			APSH	APSH
Valmar Road	32	30	1	2
Samuel Lewis Trust	170	142	20	28
Denmark Hill	38	35	1	3
Milkwell Yard	3	3	0	0
Total	243	210 (86%)	22 (9%)	33 (14%)

190. An assessment of the impacts which would not comply with the BRE guidance is set out below.
191. 10 Valmar Road – One room in this property would marginally breach the BRE recommendation for NSL with a reduction of 21.2%. However, all of the windows to this property would pass in relation to VSC therefore the impact can be considered acceptable.
192. 12 Valmar Road - One window within this property would experience a VSC reduction of 22.49% (with a retained VSC of 23.13%) which would be marginally beyond the BRE recommendation. However, the room is served by another window which would comply with the guidance. The impacts would comply in relation to NSL and APSH.
193. 14 Valmar Road - A conservatory window in this property would experience a 22.91% reduction in VSC (with a retained VSC of 21.67%) which would marginally exceed the BRE recommendation, but the two other windows serving the conservatory would comply with the guidance and the impacts would comply in relation to NSL.
194. 16 Valmar Road – Three windows serving the same room would experience VSC reductions of 22.1%, 21.5% and 21.6% (retained VSCs ranging from 21.469% to 23.91%). This would not significantly exceed the BRE recommendation and two other windows serving the same room would comply. The impacts would comply in relation to NSL and APSH.
195. 18 Valmar Road – Two windows in this property serving the same room would experience VSC reductions marginally beyond the BRE guidance of 24.08% and 23.75% (retained VSCs of 22.19% and 23.02%), and the room would experience a 39% reduction in NSL. These windows serve a rear extension and would directly face proposed Block B, but given that the VSC impact would not be significant this is considered to be acceptable.
196. 20 Valmar Road – A kitchen would experience a 34% reduction in NSL, although it would pass in relation to VSC and as such would not experience a significant loss of light. The kitchen would comply with the BRE guidance in relation to sunlight.
197. 24 Valmar Road - One livingroom window would experience a 23.8% VSC reduction (retained VSC of 20.91%) but another window serving the room would comply with the BRE guidance in this respect, and all of the impacts would comply in relation to NSL and APSH.
198. 26 Valmar Road – Two windows both serving the same room would experience VSC

reductions of 21.87% and 22.20% (retained VSCs of 20.4% and 20.61%) which would marginally exceed the BRE guidance, and the room would experience a NSL reduction of 44.4%. Both windows are within a ground floor rear extension and directly face the site but given that the VSC reduction would only marginally exceed the BRE guidance, the impact would not be significant.

199. 28 Valmar Road - One window to this property would experience a 20.45% VSC reduction (retained VSC of 21.79%) but four other windows serving the same room would comply with the BRE guidance, and all of the impacts would comply in relation to NSL and APSH.
200. 32 Valmar Road – The impact on this property would comply in relation to VSC and NSL. The results show that one room would experience a 25% reduction in winter sun which would marginally exceed guidance. However, this would be just a 1% actual reduction in winter sun, from 4% to 3% and the room is understood to be in use as a WC which is not deemed to have a requirement for sunlight.
201. 34 Valmar Road – one room would experience a NSL reduction of 34.6% but all of the windows would comply in relation to VSC.
202. 36 Valmar Road – Whilst one room to this property would experience a NSL reduction of 40.6%, all of the impacts would comply in relation to VSC and APSH.
203. 38 Valmar Road – one room would experience a NSL reduction of 45.5% but would comply in relation to VSC.
204. 42 Valmar Road – the impacts would comply in relation to VSC and NSL. One window would experience an APSH reduction of 21.4% which would be just beyond the BRE recommendation of 20% (retaining 22% APSH). The window would experience a 50% reduction in winter sun, although the actual reduction would only be from 2% to 1%.
205. Samuel Lewis Trust Dwellings Blocks A-E
- 90% of the habitable windows tested within these blocks would comply with the guidance in relation to VSC, 96% would comply in relation to NSL, and 84% would comply in relation to APSH. These properties have projecting bay windows and a high number of rooms which are served by more than one window. Some windows in the flank elevations facing the site are obscure glazed and therefore may serve non-habitable space.
206. Block A – Although two rooms in this block would experience NSL reductions of 30.1% and 21.7% which would exceed the BRE recommendation, all of the windows would comply in relation to VSC therefore they would not experience a significant reduction in daylight; all of the impacts would comply in relation to APSH.
207. Block B - 12 windows in this block would experience VSC reductions ranging from 20.58% to 41.08%, with retained VSCs ranging from 11.56% to 26.04%.
208. There are three rooms each served by a single window which would experience VSC reductions of 20.58%, 25.63% and 25.90% which would not significantly transgress the BRE guidance. These three rooms would pass in relation to NSL and as such

would not experience a significant reduction in daylight.

209. There are three rooms which are all served by two windows. In two of the rooms one window would not comply in relation to VSC with reductions of 22.56% and 27.06% (retained VSCs of 23.37% and 26.04%) but the two other windows would comply in relation to VSC and the rooms would comply in relation to NSL. In the third room neither window would comply in relation to VSC with reductions of 20.9% and 33.79% (retained VSCs of 19.57% and 21.69%), but the room would comply in relation to NSL and as such would not experience a significant loss of daylight.
210. There are four rooms which are each served by three windows. In two of the rooms one window would not comply in relation to VSC with reductions of 24.04% and 27.11%, but the two other windows would comply and the rooms would comply in relation to NSL. In one room one window would experience a VSC reduction of 34.30% and a NSL reduction of 26.1%, but as the two other windows serving this room would comply in relation to VSC it is unlikely to experience a significant loss of daylight. In the final room two of the windows would not comply in relation to VSC with reductions of 21.45% and 41.08% and the room would not comply in relation to NSL with a reduction of 37.8%. This ground floor room is likely to experience a significant reduction in daylight and this should be taken into account when weighing up all aspects of the proposal.
211. With regard to sunlight, seven rooms within the block would not comply with the BRE guidance. The biggest losses would occur during winter with reductions ranging from 60% to 84.2%, with the rooms receiving between 2% and 4% of the annual winter sun against a recommendation of 5% within the BRE guidance. Annual sunlight losses would range from 18.8% to 45.5% although the rooms would retain relatively high levels of annual sun ranging from 19% to 28% of the APSH against a BRE recommendation of 25%. As such, it is not considered that these impacts would be so significant that they would warrant a refusal of planning permission.
212. Block C – 13 windows in this block would experience VSC reductions ranging from 20.76% to 57.34% (retained VSCs ranging from 11.62% to 25.29%) as set out below.
213. There are five rooms which are served by two windows where at least one window would not comply in relation to VSC. In four of the rooms one window would not comply in relation to VSC with reductions ranging from 34.07% and 54.81%. These are secondary windows each located in the flank wall of the block but the other window serving the room would comply in relation to VSC and the rooms would comply in relation to NSL. As such it is not considered that a significant loss of daylight would occur. In the other room neither window would comply in relation to VSC with reductions of 21.98% and 57.34% (with the larger reduction occurring to a secondary window located within the flank wall) and it would experience a NSL reduction of 32.8%. This would have an adverse impact upon the room, although it is noted that the impact upon the window which is not located in the flank wall would only just exceed the BRE recommendation for VSC.
214. There are seven rooms which are served by three windows and in each of the rooms one of the windows would experience a VSC reduction ranging from 20.76% to 41.69%, but the other two windows serving the rooms would comply in relation to VSC and the rooms would comply in relation to NSL. As such it is not considered that there

would be a significant loss of daylight to these rooms.

215. With regard to sunlight, 11 rooms within the block would not comply with the BRE guidance for winter and total APSH. Six of the rooms would comply with the guidance in relation to annual sunlight and the remaining five would experience sunlight losses ranging from 21% to 40% and would retain levels ranging from 15% to 23% against a BRE recommendation of 25%. The biggest losses would occur during winter with reductions ranging from 55.6% to 100%, with three rooms losing all of their winter sunlight (from existing levels of 2% to 4%). The other rooms would retain between 2% and 4% of the annual winter sun against a recommendation of 5% within the BRE guidance. These impacts must be weighed in the balance when considering all aspects of the proposal.
216. Block D – 12 windows in this block would experience VSC reductions ranging from 21.48% to 54.21% (retained VSCs ranging from 12.21% to 26.51%).
217. There are five rooms each served by two windows where at least one window would not comply in relation to VSC. In four of the rooms one window would not comply in relation to VSC with reductions ranging from 30.62% to 46.03%. These are secondary windows each located in the flank wall but the other window serving the room would comply in relation to VSC and the room would comply in relation to NSL. In the fifth room neither window would comply in relation to VSC, with reductions of 23.8% which would only just exceed the BRE guidance, and 54.21% (with the larger reduction occurring to a secondary window located in the flank wall). The room would experience a 32% reduction in NSL and as such there would be noticeable impact upon this room. This must be weighed in the balance when considering all impacts of the proposal.
218. There are five rooms which are served by three windows and in four of the rooms one window would not comply in relation to VSC with reductions ranging from 21.73% to 37.15%, but the other two windows serving the rooms would comply in relation to VSC and the rooms would comply in relation to NSL. In the other room two windows would not comply in relation to VSC, with reductions of 21.48% and 43.19%. However, given that one window would only marginally transgress the VSC guidance and the room would pass in relation to NSL, it is not considered that the impact would be significant.
219. In relation to sunlight, 4 rooms within the block would not comply with the BRE guidance. The biggest losses would occur during winter with all of the rooms losing all of their winter sunlight (from existing levels of 3% to 5% APSH). These rooms would experience losses in annual sunlight ranging from 24.1% which would not significantly exceed the BRE guidance to 75%, with retained APSH ranging from 7% to 22% against a BRE recommendation of 25%. These impacts would be significant and must be taken into account when considering the positive and negative impacts of the proposal.
220. Block E – Six windows in this block would experience VSC reductions beyond the BRE guidance, ranging from 21.44% to 31.21%. The retained VSCs would range from 11.98% to 20.54%.
221. There are two rooms each served by a single window which would experience VSC reductions of 24.44% and 24.70% which would only marginally transgress the BRE

guidance. Both rooms would comply in relation to NSL and it is considered that the impacts to these rooms would not be significant.

222. There are four rooms each served by three windows where one window would not comply in relation to VSC. Two of these rooms would experience reductions of 21.44% and 21.78% which would not be significant; the two other windows serving the rooms would comply in relation to VSC and the rooms would comply in relation to NSL and as such it is not considered that the impact would be significant. In the two other rooms they would each have one window which would not comply in relation to VSC with reductions of 31.21% and 26.69%, although the two other windows serving the rooms would comply. The rooms would not comply in relation to NSL with reductions of 35.3% and 22.6%. However, given the presence of two windows in these rooms which would comply in relation to VSC it is not considered that the impact would be significant.
223. In relation to sunlight, 6 rooms within the block would not comply with the BRE guidance with losses of winter sun ranging from 33.3% to 75% and retained winter sun ranging from 1% to 2% against a recommendation of 5%. Reductions in annual sun would range from 22.2% to 50%, with retained annual sun ranging from 13% to 21% against a recommendation of 25% and these impacts must be taken into account when considering all aspects of the proposal.

Denmark Hill

224. 42 Denmark Hill – Five of the nine windows tested would fail in relation to VSC with reductions ranging from 24.74% to 30.93% which would not be significant, and they would have retained VSCs ranging from 12.81% to 24.19%. For the rooms these windows serve, three would pass in relation to NSL and the other two would experience NSL reductions of 24.51% and 40%. A further two rooms would not comply in relation to NSL, but the windows that these rooms serve would retain VSC levels which would exceed the BRE recommendation of 27%.
225. With regard to APSH, two rooms would not comply with the guidance for winter sun but would comply for annual sun (retaining 25% and 28% of APSH). Both rooms would retain 4% during winter and the impact upon this room is considered to be acceptable as it would not be significantly beyond the BRE recommendations for retained sunlight.
226. 44 Denmark Hill – Two rooms have been tested in this property, each served by a single window. The first would experience a 32.97% reduction in VSC (retained VSC of 17.14%) and a 37.4% reduction in NSL. This room currently receives 1% of winter sun which it would lose, and it would lose 76.5% of its annual sun, reducing from 17% to 4%. This would be a significant impact which must be taken into account when weighing up all aspects of the proposal. However, it should be noted that this room's access to sunlight is restricted, even in the existing condition, by the neighbouring building at 46 Denmark Hill and it does not appear to be a main habitable space. The second would experience a 26.80% reduction in VSC, although its retained VSC would be 26.27% which is only just short of the 27% recommended in the BRE guidance. The room would experience a 28.7% reduction in NSL but given the high retained VSC it is not considered that the impact upon this room would be significant; the room would comply in relation to APSH.

227. 46 Denmark Hill – One room served by a single window would experience a 30.11% reduction in VSC and a NSL reduction of 50.9%. Whilst the NSL reduction would be significant, the retained VSC would be relatively high at 23.03% against a target of 27%. In a second room tested which is served by four windows, two would comply in relation to VSC and two would experience significant reductions of 57.63% and 58.24% (retained VSCs of 13.61% and 13.35%); the impact upon the room would comply in relation to NSL. A third room would comply in relation to VSC and NSL, and the rooms would comply in relation to APSH.
228. Outlook - The separation distances between the proposed buildings and the neighbouring dwellings on Valmar Road and the Samuel Lewis Trust Dwellings would be sufficient to maintain good levels of outlook. There would be a minimum of 14.7m between the Samuel Lewis Trust dwellings and Block A, and 11.5m at ground floor and 21m at first floor level between the Valmar Road properties and Block B. There would be a much closer relationship between the Main Block and numbers 44 and 46 Denmark Hill which both contain residential units. There would be a 9.9m separation distance at 44 Denmark Hill whilst at number 46 there would be just 6.1m at first floor level and 10m at second floor level. The proposal has been amended to reduce the height of the Main Block next to these neighbouring buildings which has improved the daylight / sunlight results and outlook. Where the closest relationship would occur at number 46 this would affect two first floor windows which face the site at a distance of 6.1m. One of the windows is already obstructed by an external fire escape stair which the window looks out upon, and the other window is unobstructed but appears to be served by at least one other window facing south, away from the site. Whilst there would undoubtedly be a loss of outlook to these units, on balance it is considered that the benefits arising from the proposal would outweigh these very localised amenity impacts. Separation distances with the other adjoining properties which contain residential units would range from 17m to 53m which would be sufficient to maintain good levels of outlook.
229. Overshadowing of amenity space - As stated, the BRE guidance advises that for an amenity area to be adequately lit it should receive at least 2 hours sunlight over half of its area on the 21st March. If as a result of new development a garden or amenity area does not achieve this and the area which can receive two hours of sun on the ground is reduced by more than 20%, then the loss of sunlight is likely to be noticeable. The gardens to the houses along the Valmar Road terrace have been tested, together with a play / sports area within the Samuel Lewis Trust Estate.
230. For the gardens to the Valmar Road terrace, all of the impacts would comply with the BRE guidance. The impact upon the play / sports area within the Samuel Lewis Trust Dwellings would also comply with the guidance.
231. External lighting – A lighting concept report has been submitted with the application which advises that coloured lighting could be used to illuminate the pedestrian route into the site from Denmark Hill. Lighting could be provided within trees, attached to external furniture and within the landscaping. The hotel would be illuminated by the metal panels incorporated into the building, and lighting is proposed around Milkwell Yard.
232. The lighting strategy has been reviewed by EPT and a condition for full details is

recommended once this element of the proposals has been worked up. This would ensure that there would be no unacceptable light spillage to neighbouring properties and that any lighting columns would not have an overbearing impact upon the neighbouring properties.

233. To conclude in relation to amenity impacts, whilst there would be some significant daylight, sunlight and outlook impacts, these would be limited to a small number of properties and overall the daylight and sunlight impacts would not result in an undue loss of amenity. Good levels of privacy would be maintained and conditions and planning obligations are recommended to deal with impacts such as plant noise and noise arising from the use of the hotel and workspace.

Transport

234. Strategic policy 2 of the Core Strategy 'Sustainable transport' advises that the Council will encourage walking, cycling and the use of public transport rather than travel by car. Saved policy 5.1 of the Soutwark Plan seeks to ensure that development is located near transport nodes, and saved policy 5.2 of the Soutwark Plan seeks to ensure that developments do not result in adverse highway conditions; saved policy 5.3 requires that the needs of pedestrians and cyclists to be considered and saved policy 5.6 establishes maximum parking standards.
235. The site has a Public Transport Accessibility Level (PTAL) of 6a (excellent). The nearest bus stops are located immediately outside the site on Denmark Hill, and Denmark Hill Station is around a 10 minute walk away (750m to the south-east). As stated the only vehicular access into the site is from Valmar Road which is within a controlled parking zone (CPZ) which operates Monday to Friday (0830-1830). There is on-street parking on both sides of the road which means that the road is only wide enough for one vehicle to pass, and there are traffic calming measures along this road and double yellow lines around the Valmar Road entrance to the site. A Transport Statement (TS) has been submitted with the application which includes a Delivery and Servicing Plan and which has been updated to reflect the amendments to the proposal.
236. Access - Vehicular access to the site would be from Valmar Road as existing, controlled by retractable bollards. Concerns have been raised that this access is inadequate to serve the needs of the development, including emergency vehicles. The Council's Highways Development Management Team has advised that because it is an existing access which served the trading estate it is considered to be acceptable, provided adequate visibility splays are maintained. The s106 agreement would secure the adoption of some of the applicant's land in order to ensure that the visibility splays are maintained, even though the likelihood of them being obstructed is considered to be low.
237. Tracking diagrams have been submitted which demonstrate that all vehicles could enter and leave the site in a forward gear including an 11m refuse vehicle, emergency vehicles and rigid servicing vehicles up to 10m in length.
238. The open areas of the site would be a shared surface for pedestrians, cyclists and vehicles in a mews type arrangement. Pedestrian and cyclist access to the site would

be from Denmark Hill, Valmar Road, and Milkwell Yard which would be provided with landscaping and lighting, and there would be bollards across the access from Milkwell Yard to prevent vehicle entering from this direction. The s106 agreement would secure the pedestrian and cyclist routes through the site, together with resurfacing and lighting to Milkwell Yard. TfL have raised concerns that there is no pavement into the site from Valmar Road to provide safe access for pedestrians and whilst this is noted, traffic speeds would be low given the shared nature of the route and this is considered to be acceptable.

239. Servicing – All of the servicing for the development would take place from within the site and would be overseen by the site management. Servicing would take place along the route to Milkwell Yard, with vehicles able to turn either at the corner of the Main Block and Block A, or next to the bank of three car parking spaces. Two 10m rigid servicing vehicles could be present on the site at the same time, and there would be a waiting bay next to Block A which could accommodate a 7.5 tonne box van for smaller vehicles to wait if necessary.
240. Large deliveries to the workspace and hotel would be scheduled to take place outside of the morning and evening peaks, although it is recommended that servicing is further restricted to avoid school drop off and pick up times given that the proximity to Crawford Primary School. Hotel servicing is likely to include postal deliveries, laundry services as this would be undertaken off-site, food, drink and stationary mainly delivered by box vans or sprinter vans, whilst residential deliveries would likely be post, online purchases and removals. A condition limiting servicing hours for the non-residential uses to 9am to 3pm and 4pm-8pm Mondays to Fridays, 8am to 8pm on Saturdays and not at all on Sundays and Bank Holidays has been included in the draft recommendation together with a condition for a detailed servicing management plan, and a servicing bond would be secured through the s106 agreement.
241. Taxis would be able to drive close to the hotel entrance, and no coaches would be permitted to enter the site, including smaller coaches. A condition to this effect is recommended, and the lack of coach access could be conveyed to patrons on the hotel website and when bookings are made.
242. Separate residential and commercial refuse stores would be provided throughout the development and a condition to secure these has been included in the draft recommendation. Residential bins would be moved by the site management to a holding area next to Block A on collection days, and commercial refuse would be collected by a private contractor.
243. Trip generation – The proposed development would result in 16 and 10 net additional two-way vehicle movements in the morning and evening peak hours respectively compared to the existing site if it were fully occupied; this is for all vehicles including servicing vehicles and taxis. There would be 12 x 2-way servicing vehicle movements per day. These figures are higher than those predicted by the applicant, but would not have a noticeable adverse impact upon the surrounding road network. The applicant has also provided travel plans to encourage sustainable modes of travel, and a condition to secure these is recommended. An objector has raised concerns that the existing trip generation figures are inaccurate and overstate the number of existing vehicle movements because the trading estate has not been fully occupied for many

years. Whilst it is noted, the TS has been prepared in accordance with usual practice and it is legitimate to take all of the existing buildings into account because they are lawful uses, irrespective of their condition or the last time they were used.

244. Cycle parking - The draft London Plan requires 104 long-stay and 8 short-stay cycle parking spaces to serve the development. The proposal would exceed this by providing 109 long-stay and 13 short-stay spaces at various locations across the site, with cycle parking provided within each block and in the public realm. Transport for London (TfL) has raised concerns regarding the size and accessibility of some of the cycle stores, and the plans have been amended to address this. A condition is recommended requiring full details of the cycle parking spaces to be provided, including a requirement for a minimum of 25% Sheffield stands for the residential cycle parking as requested by TfL. The plans have also been amended to include shower facilities in the basement of the Main Block for the proposed workspace.
245. TfL has advised that if the cycle hire docking station zone is extended into Camberwell then a contribution of £110k should be provided towards the provision of a docking station within the town centre. The applicant has offered a contribution of £55k towards a docking station and officers recommend that this be accepted. A clause would be included in the s106 agreement to secure this contribution in the event that it is agreed that the cycle hire zone will be extended into Camberwell within the first two years of occupation of the development.
246. Car parking –There would be five accessible parking spaces within the development, one of which would be for a car club space, another for the employment space, and the remaining three for the wheelchair accessible housing units. All of the parking spaces would be fitted with active electric vehicle charging points which would be secured by way of a condition, and the s106 agreement would prevent future occupiers from obtaining parking permits in the surrounding streets and would secure car club membership for future occupiers. The nearest car club space is currently a 10 minute walk away on Camberwell Grove, so the proposed provision would be of benefit to the local community and over time could help to reduce parking pressure on the surrounding street.
247. Two of the parking spaces would be located near the Valmar Road entrance and three would be close to Milkwell Yard. TfL has raised concerns regarding the location of the two spaces closest to Valmar Road on the basis that there would be no crossing for pedestrians linking them to the wheelchair accessible units in Block B. Whilst this is noted, these spaces could be for the car club and employment space and in any event, vehicle movements from these parking bays are likely to be infrequent given the site's high level of public transport access and proximity to shops and services in the town centre. It is also noted that they would be located approximately 15m from the vehicular access into the site.
248. Impact on public transport – Officers consider that the number of public transport trips which would be generated by the development would be 101 and 64 additional two way public transport trips during the morning and evening peaks which are higher figures than those provided by the applicant. TfL has not raised any issues regarding impact upon public transport capacity, and the s106 agreement would secure count

down facilities at two bus stops in the vicinity of the site.

249. To conclude in relation to transport, whilst it is noted that the proposal would increase the number of vehicle trips to and from the site, the increase would be limited and would not result in any adverse impacts upon the surrounding roads. All of the servicing would take place from within the site, and the proposed cycle parking and car parking arrangements are considered to be acceptable.

Air quality

250. The site sits within an air quality management area. Policy 7.14 of the London Plan 'Improving Air Quality' seeks to minimise the impact of development on air quality, and sets a number of requirements including minimising exposure to existing poor air quality, reducing emissions from the demolition and construction of buildings, being at least 'air quality neutral', and not leading to a deterioration in air quality.
251. An Air Quality Assessment has been submitted with the application which considers the impact of the proposal on air quality and the effect of air quality on future occupiers of the development. It recommends a number of measures including a construction management plan to minimise dust, and prioritising the site for pedestrians and cyclists. The assessment concludes that the proposed development would be air quality neutral.
252. The Air Quality Assessment has been reviewed by EPT and is found to be acceptable subject to a number of conditions, including requiring a detailed construction management plan to be submitted for approval together with full details of the proposed combined heat and power plant and these have been included in the draft recommendation.

Contamination

253. Policy 5.21 of the London Plan advises that appropriate measures should be taken to ensure that development on previously contaminated land does not activate or spread contamination.
254. A Stage 2 Site Investigation Report has been submitted which advises that no ground contamination concentrations have been found at the site. The report has been reviewed by EPT and the Environment Agency (EA) which have both requested a condition to deal with unexpected contamination if it is found and this has been included in the draft recommendation. Concerns have been raised by a neighbouring resident regarding the removal of asbestos from the site and that this may not be undertaken correctly. On the advice of EPT a condition has been included in the draft recommendation to deal with this issue.

Flood risk and drainage

255. Policy 5.13 of the London Plan advises that development should utilise sustainable urban drainage systems (SUDS) unless there are practical reasons for not doing so, and should aim to achieve greenfield run-off rates and ensure that surface water runoff is managed as close to its source as possible. Strategic policy 13 of the Core Strategy sets a target that major development should reduce surface water run-off by more than

50%, and the proposal would comply with this policy. Concerns have been raised by neighbouring residents that the proposal could result in an increased risk of flooding

256. The site is located in flood zone 1 which has a low risk of flooding. A Flood Risk Assessment (FRA) has been submitted in any event and has been reviewed by the Environment Agency (EA). The EA has not raised any concerns regarding flood risk, but has requested conditions relating to ground water contamination which have been included in the draft recommendation.
257. A report detailing Sustainable Urban Drainage (SUDs) measures which could feasibly be incorporated into the development has been submitted, together with a Basement Impact Assessment. The site is entirely hardsurfaced and impermeable at present, and the proposal would include permeable paving, soft landscaping including lawns at the rear of Block B and shrub planting throughout the site and green and brown roofs. The application has been reviewed by the Council's Flood Risk and Urban Drainage Team which has no objection to the proposals in terms of flood risk, and has recommended conditions for further details of the SUDs measures and waterproofing of the proposed basement. No objections have been raised by Thames Water.

Sustainable development implications

258. London Plan Policy 5.2 sets out that development proposals should make the fullest contribution to minimising carbon dioxide emissions in accordance with the energy hierarchy **Be lean**: use less energy; **Be clean**: supply energy efficiently; **Be green**: use renewable energy. This policy requires non-residential development to achieve a carbon dioxide improvement of 35% beyond Building Regulations Part L 2013, and for residential developments to achieve carbon zero.
259. The applicant has submitted an Energy Strategy Report in support of the application, based on the Mayor's energy hierarchy.
260. **Be lean** - Measures under this category would include high levels of insulation, ventilation measures and lighting controls.
Be clean – The proposal would include Combined Heat and Power (CHP) plant for the main block and workspace within Block A which would be located in the basement of the Main Block. There are no planned district heating networks in this area, however, the s106 agreement should require the development to be future-proofed for connection in the event that a network were to come online.
Be green – It is proposed to install an air source heat pump and photovoltaic panels within the development.
261. A combination of the above measures would result in a 39.27% reduction in carbon dioxide emissions when compared with a scheme compliant with the Building Regulations. This would comprise a 35.27%% reduction for the residential element (carbon zero is required) and a 39.87% reduction for the non-residential elements which would comply with the adopted London Plan. A contribution of £73,328 would be provided towards the Council's Carbon Off-set fund and it is recommended that the achieved carbon savings be reviewed post-construction, which may require an adjustment to the s106 contribution amount.
262. Strategic policy 13 of the Core Strategy requires major development to achieve a

reduction in carbon dioxide of 20% from using on-site or local low and zero carbon sources of energy.

The proposed development would achieve a 34.84% reduction through the use of CHP, ASHPs and PVs and as such would comply with this policy.

263. A BREEAM pre-assessment has been submitted in support of the application. The proposed development would achieve BREEAM 'excellent' which would be policy compliant, and a condition to secure this is recommended. Thermal heating reports have also been submitted, and no overheating issues have been identified. It is noted that the buildings would be predominantly brick without extensive areas of glazing and could be mechanically or naturally ventilated.
264. Saved policy 3.3 of the Southwark Plan advises that planning permission will not be granted for major development unless the applicant demonstrates that the economic, environmental and social impacts of the proposal have been addressed through a sustainability assessment. The applicant has submitted a sustainability checklist to address this requirement. These issues are also considered in a number of the other planning application documents including the Energy Strategy report and sustainability checklist.
265. The proposed development would significantly increase the number of jobs at the site, would contribute to spending in the local economy and would help to support the town centre by generating footfall, all of which would have positive social and economic impacts. A number of energy efficiency measures would be incorporated to reduce the development's carbon dioxide emissions, and a contribution towards the Council's carbon off-set green fund would be provided.

Archaeology

266. Policy 7.8 of the London Plan advises that new development should make provision for the protection of archaeological resources, landscapes and significant memorials. The physical assets should, where possible, be made available to the public on-site. Where the archaeological asset or memorial cannot be preserved or managed on-site, provision must be made for the investigation, understanding, recording, dissemination and archiving of that asset. Saved policy 3.19 of the Southwark Plan is also relevant, which sets out the Council's approach to protecting and preserving archaeology within the borough.
267. The entire site is located in the Camberwell Green Archaeological Priority Zone and an Archaeological desk based assessment has been submitted in support of the application. It has been reviewed by the Council's Archaeologist, and a number of conditions have been included in the draft recommendation and a contribution would be secured through the s106 agreement.

Ecology

268. Policy 7.19 of the London Plan 'Biodiversity and access to nature' requires development proposals to make a positive contribution to the protection, enhancement, creation and management of biodiversity wherever possible. Saved policy 3.28 of the Southwark Plan states that the Local Planning Authority will take

biodiversity into account in its determination of all planning applications and will encourage the inclusion in developments of features which enhance biodiversity, and will require an ecological assessment where relevant.

269. The Council's Ecology Officer has advised that there is currently extremely limited ecological habitat present on the site. The proposed development would incorporate a number of features to increase biodiversity including new trees, planting within the landscaped areas, and green roofs. It is recommended that these be changed to biodiverse roofs by way of a condition, and that Swift bricks be incorporated into the development; the relevant conditions have been included in the draft recommendation.

Planning obligations (s.106 undertaking or agreement)

270. Saved policy 2.5 'Planning obligations' of the Southwark Plan and policy 8.2 of the London Plan advise that Local Planning Authorities should seek to enter into planning obligations to avoid or mitigate the adverse impacts of developments which cannot otherwise be adequately addressed through conditions, to secure or contribute towards the infrastructure, environment or site management necessary to support the development, or to secure an appropriate mix of uses within the development. Further information is contained within the Council's adopted Planning Obligations and Community Infrastructure Levy SPD.

Planning obligation	Mitigation	Applicant's position
Archaeology	£11,171.00	Agreed
Affordable housing	35% by habitable room, to be completed before more than 50% of the private residential units can be occupied.	Agreed
Affordable housing monitoring fee	£1,852.90	Agreed
Affordable housing review mechanism	Early and late stage review mechanisms, early review if substantial implementation has not occurred within 24 months and late stage at 75% of the private residential occupation/sales	Agreed
Employment during construction	15 sustained jobs for unemployed Southwark residents, 15 short courses and 3 construction industry apprenticeships or a payment of £71,250.00 for shortfall, and the associated employment, skills and business support plan	Agreed
Employment in the	30 sustained jobs for unemployed Southwark Residents at the end phase, or	Agreed

development	meet any shortfall through the Employment in the End Use Shortfall Contribution (the maximum Employment in the End Use Shortfall Contribution is £129,000, based on £4,300 per job) and the associated skills and employment plan	
Local procurement	During construction and in the end use	Agreed
Delivery of the employment space	All of the employment space in the Main block to be delivered before the hotel can be occupied. Employment space within Block B to be provided with knock-out panels and potential for larger door openings in accordance with the application drawings.	Agreed
Loss of B class contribution	£6,645.45	Agreed
Provision of 10% affordable workspace	In accordance with the terms provided earlier in the report including provision to enable Ad Events to return to the site should they wish.	Agreed
Provision of a workspace marketing and management plan	The plan must detail measures to ensure that employment space within the Main Block is prioritised for people working at the site during working hours.	Agreed
Hotel management plan	Management plan for day-to-day operation of the hotel including the external spaces	Agreed
Community use agreement	To secure use of the ancillary facilities in the Main Block for members of the public outside of working hours in accordance with the details provided earlier in the report	Agreed
Public access to be maintained through the site	Routes to be secured through the site in accordance with the application drawings; removal of the existing gates across the Valmar Road access and fixing open of the existing gates on the Denmark Hill route.	Agreed
Highway works	S278 to secure the following:	All agreed

	<ul style="list-style-type: none"> - Prior to works commencing on site (including any demolition) a joint condition survey to be arranged with Southwark Highway Development Team; - Resurface Milkwell Yard using materials in accordance with Southwark Streetscape Design Manual (SSDM); - Vehicle crossover on Valmar Road to be reconstructed to the current SSDM standards; - Repair any damage to the highway due to construction activities for the development including construction work and the movement of construction vehicles; - Provision of traffic calming measures in the form of a raised table on Valmar Road and a raised entry treatment at the Valmar Road / Morna Road junction. <p style="text-align: center;"><u>Other transport related works:</u></p> <ul style="list-style-type: none"> -Provision of new lighting to Milkwell Yard; - Contributions towards bus improvement measures comprising: <ul style="list-style-type: none"> - £60k for the provision of countdown facilities at two bus stops on Denmark Hill closest to the site and one on Coldharbour Lane closest to the site <p>Adoption of the land required for visibility splays at the Valmar Road entrance.</p>	
Delivery/service management plan bond	£12,036	Agreed
TfL cycle hire contribution	£110k towards a cycle hire docking station in the town centre in the event that the cycle hire zone is agreed to be extended into Camberwell within 2 years of the occupation	The applicant has offered £55k

	of the development.	and it is recommended that this be accepted.
Car club space and membership	Provision of a car club space on the site and membership for future residents and employees.	Agreed
Parking permit exemption	Future residents and businesses would be prevented from obtaining parking permits for the surrounding streets.	Agreed
Carbon off-set Green fund contribution	£73,328	Agreed
Future-proof CHP	To enable connection with a district heating network in the future if feasible	Agreed
Post installation review of energy measures installed	Review to verify the carbon savings delivered with an upwards only adjustment to the carbon off-set green fund contribution if required.	Agreed
Total financial contributions	£220,033.40	Agreed
Administration and monitoring fee	£4,400.66	Agreed
Grand total	£224,434.06	Agreed

271. In the event that a satisfactory legal agreement has not been entered into by 8 March 2021 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 for appropriate planning obligations secured through the completion of a S106 agreement, fails to ensure adequate provision of affordable housing and mitigation against the adverse impacts of the development through projects or contributions 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), policy 8.2 'Planning obligations' of the London Plan (2016) and the Planning Obligations and Community Infrastructure Levy SPD (2015).

Mayoral and Borough Community Infrastructure Levy

272. Section 143 of the Localism Act states that any financial contribution received as community infrastructure levy (CIL) is a material "local financial consideration" in planning decisions. The requirement for payment of the Mayoral or Southwark CIL is therefore a material consideration. However, the weight attached is determined by the decision maker.
273. The Mayoral CIL is required to contribute towards strategic transport investments in London as a whole, primarily Crossrail, while Southwark's CIL will provide for infrastructure to support growth. In this instance a Mayoral CIL payment of approximately £558,007.24 and a Southwark CIL payment of approximately £1,399,150.51 would be required before any CIL relief is applied. Concerns have been raised following public consultation on the application regarding impact upon GP surgeries, and it is noted that Southwark CIL can be spent on health care facilities.

Statement of Community Involvement

274. A Statement of Community Involvement (SCI) has been submitted which sets out the consultation which was undertaken on the proposal prior to the submission of this planning application.
275. The SCI advises that meetings were held with the Ward Councillors and Cabinet Member for Growth, and local groups including the SE5 Forum, the Camberwell Society, Camberwell College of Arts, Camberwell Community Council, Camberwell Arts, and Crawford Primary School. In February 2019 the applicant wrote to 2,018 residents and businesses including those on Valmar Road, Denmark Hill, the Samuel Lewis Trust Dwellings including its Tenants and Residents Association and other groups and Councillors outlining the proposal and inviting them to meet with the applicant and attend a public exhibition. A public exhibition was on 21st September (11am-2pm) and 25th September (5pm-9pm) at Camberwell Employment Academy, Peckham Road. It was attended by 35 people across the two days and when asked whether they supported various aspects of the proposal including the principle of mixed-use development on the site and provision of a hotel, overall 41% strongly agreed, 41% agreed, 12% were unsure, 0% disagreed and 6% strongly disagreed. Concerns raised by residents included the amount of B class floorspace, loss of light and privacy and transport impacts. In response to these concerns the quantum of B class floorspace on the site was increased, the height of proposed Block B was reduced and it was pulled further away from the Valmar Road properties, and cycle parking and accessible car parking has been provided.

Consultation responses from internal and divisional consultees

276. Summarised below are the material planning considerations raised by internal and divisional consultees, along with the officer's response.
277. Environmental Protection Team
Acceptable subject to conditions.

Officer response: Conditions incorporated in the draft recommendation.

278. Local Economy Team

Figures provided for loss of B class contribution and jobs and training targets.

Officer response: These would be secured through the s106 agreement.

279. Highways Development Management

- Details of visibility splay at Valmar Road entrance required;
- Vehicle tracking for a 10.5m bus is not feasible;
S278 agreement required for highway works;
- Construction management plan and servicing management plan required;
- Gates at the Valmar Road entrance must be at least 6m back from the highway;
- Informatives recommended regarding surface water and constructing to adoptable standards.

Officer response: Details of the visibility splay have been provided and on balance, are acceptable. No coaches would be permitted to enter the site, and the other matters can be secured through conditions, planning obligations and informatives.

280. Flood Risk and Urban Drainage Team

Since the site is within Flood Zone 1, the low risk zone, there are no objections to the proposals in terms of flood risk to the site. Pleased to see a range of Sustainable Drainage Systems recommended in the 'SuDSmart Pro' feasibility report dated 13/03/2019 to provide attenuation to restrict surface water discharges to greenfield runoff rates including climate change allowance. Since the drainage strategy is a feasibility report, a condition to secure drainage measures is recommended. The Basement Impact Assessment (BIA) reports that groundwater was observed at two of three boreholes at the site. It is therefore recommended that the applicant incorporates appropriate waterproofing measures to protect the basement from the potential ingress of groundwater.

Officer comments: The relevant conditions have been concluded in the draft recommendation.

281. Ecology Officer

The site currently has virtually no existing habitat. There are no records of bats in the area and the existing buildings are not suitable for bat roosts. Recommend the installation of Swift bricks and biodiverse roofs.

Officer response: The relevant conditions have been included in the draft recommendation.

Summary of consultation responses from external consultees

282. Transport for London

Concerns raised regarding the quantum and design of the proposed cycle parking, pedestrian safety in relation to two parking spaces close to the site entrance from Valmar Road, and lack of a safe pedestrian route into the site from Valmar Road. Supportive of the parking quantum and request a cycle hire docking station contribution in the event that the cycle hire zone is extended into Camberwell.

Officer response: The plans have been amended to address the cycle parking concerns. Given the low level of vehicular traffic associated with the proposed development and proximity to shops, services and public transport, use of the parking spaces is likely to be low and pedestrian safety within the site would be acceptable. A contribution towards a docking station would be secured through the s106 agreement.

283. Metropolitan Police

The proposed development would be capable of achieving Secured by Design certification and a condition to secure this is recommended.

Officer response: A condition has been included in the draft recommendation.

284. Thames Water

There will be sufficient sewerage capacity in the sewer network to serve the development. Informatives recommended regarding discharge of surface water into the sewer network.

Officer comments: Informatives have been included in the draft recommendation.

285. Environment Agency

Planning permission should only be granted subject to the imposition of conditions relating to contamination and ground water.

Officer comments: Conditions have been included in the draft recommendation.

Community impact statement and Equalities Assessment

286. The Public Sector Equality Duty (PSED) contained in Section 149 (1) of the Equality Act 2010 imposes a duty on public authorities to have, in the exercise of their functions, due regard to three “needs” which are central to the aims of the Act:

- 287.
- a) The need to eliminate discrimination, harassment, victimisation and any other conduct prohibited by the Act
 - b) The need to advance equality of opportunity between persons sharing a relevant protected characteristic and persons who do not share it. This involves having due regard to the need to:
 - Remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic
 - Take steps to meet the needs of persons who share a relevant protected

Was the pre-application service used for this application	Yes
If the pre-application service was used for this application, was the advice given followed?	Partially
Was the application validated promptly?	Yes
If necessary/appropriate, did the case officer seek amendments to the scheme to improve its prospects of achieving approval?	Yes
To help secure a timely decision, did the case officer submit their recommendation in advance of the statutory determination date?	No

Conclusion on planning issues

294. The proposed development is considered to be acceptable in land use terms and would result in a number of positive impacts including job creation, the provision of good quality employment space, a new hotel which would help to support the town centre, and much needed residential units including policy compliant affordable housing. Although there would be a reduction in B class floorspace on the site, this is considered to have been adequately justified through marketing evidence and the proposal would result in a net increase in jobs at the site. The proposed hotel would not result in an overconcentration of visitor accommodation in the locality and would provide facilities which would be open to members of the public during the evenings and at weekends. It is considered that the design of the proposal would be of a high standard which would preserve the character, appearance and setting of this part of the Camberwell Green Conservation Area, and notwithstanding a shortfall in communal amenity space, a very good standard of residential accommodation would be provided together with a policy compliant mix of units and ground floor wheelchair accessible units. Whilst there would be some amenity impacts, most of these would not be significant. The exception to this is 44 and 46 Denmark Hill and some sunlight impacts to some units within the Samuel Lewis Trust Dwellings but for the reasons set out in full earlier in the report, these are not considered to be so significant that they would outweigh the positive impacts of the proposal. The transport impacts of the proposal are considered to be acceptable, and planning conditions and a s106 agreement would ensure that issues such as carbon dioxide emissions, air quality, ground contamination, surface water drainage, archaeology and ecology would all be adequately dealt with. It is therefore recommended that planning permission be granted, subject to the completion of a s106 agreement and conditions.

BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
Site history file: Application file: 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: 0207 525 0254 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	Victoria Lewis, Team Leader (Planning) Victoria.Lewis@southwark.gov.uk	
Version	Final	
Dated	19 August 2020	
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 of Environment and Leisure	No	No
Strategic Director of Housing and Modernisation	No	No
Director of Regeneration	No	No
Date final report sent to Constitutional Team		21 August 2020