



**39B CONSORT ROAD, PECKHAM, SE15 2PR**  
Planning Statement

April 2019



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## 1.0 INTRODUCTION

- 1.1 This Planning Statement has been prepared by CMA Planning on behalf of Picfare Homes (“the applicant”) in support of a revised planning application submission for the redevelopment of the site at 39b Consort Road to provide 349 sqm of flexible commercial floorspace and 10 residential units.
- 1.2 Planning permission has been granted for this site previously. This permission (ref 17/AP/4480) was granted in April 2018 and proposed the demolition of some of the existing buildings together with retention and restoration of the former workshop to be converted into two new homes as well as the construction of a new part two, part three and part four storey building to provide seven new homes and commercial space and the construction of a part one, part two storey commercial building to provide a total of 330 sqm of B1 floorspace together with associated landscaping, refuse stores and cycle parking.
- 1.3 This approved scheme was developed as a result of public consultation with a number of local residents, stakeholders and community groups, to address concerns over the loss of the Victorian warehouse and the impact on the Peckham Coal line. This dialogue and engagement helped to shape these previous proposals.
- 1.4 This revised planning application retains the key elements from the approved scheme, namely helping the Peckham Coal Line to come forward, whilst making a number of minor amendments, to ensure the scheme is viable and can be delivered.
- 1.5 The revised proposals would deliver investment, environmental improvements and regeneration in the area. The proposals would also deliver a number of key planning benefits, including optimising the use of this brownfield site, the provision of much needed new homes, new flexible workspace and new public open space, the restoration and refurbishment of the Victorian warehouse, together with design and visual improvements.
- 1.6 The proposals would comprehensively redevelop the site to create a sustainable community within a quality designed scheme, which would make a genuine

contribution to the regeneration of the local area. All proposals take place within the context of national, regional and local planning policy and recognised best practice. This development is notable in that it accords with Council's Local Plan and the latest national and regional guidance which support mixed use redevelopment of sustainable brownfield sites.

- 1.7 The proposals have been designed in response to a detailed analysis of the site and local context, taking into account the character of the area, adopted policy requirements, the applicant's objective of delivering a high-quality new development, and local representations received at application stage.

#### **Purpose and Structure**

- 1.8 This document reviews the planning context and issues associated with the development and is structured as follows:

- **Section 2** provides a description of the site and surrounding area;
- **Section 3** provides an overview of the application proposals;
- **Section 4** sets out the planning policy context for the project;
- **Section 5** considers the key planning issues associated with the development;  
and
- **Section 6** sets out our summary and conclusions

- 1.9 This statement should be read in conjunction with the other documents which are submitted as part of this application:

## 2.0 SITE AND SURROUNDINGS

### The Application Site

- 2.1 The application site is 39b Consort Road, which is a broadly linear site that covers an area of 0.138 ha and comprises both one and two storey Victorian warehouse buildings together with open yard space. The site is vacant.
- 2.2 The site is bounded by: a narrow wooded area that is designated as a Site of Importance for Nature Conservation (SINC) behind which is an elevated railway line to the north; the public highway on Nazareth Close to the east; the three storey terraced houses at 36-42 Nazareth Close to the south, and; an elevated railway line and the public highway on Consort Road to the west. An aerial photograph of the site and its surroundings is provided at Figure 1.1 below.



- 2.3 The surrounding area is mixed use in character, with the area to the north, east and west being predominantly in residential use, including a mix of terraced housing and flats, whilst the area to the west includes a mix of commercial and public uses, including industrial uses within converted railway arches, a large format builders' merchant, Peckham Bus Garage, and St Mary Magdalene Church of England Primary School, whilst Rye Lane, which is within Peckham Major Town Centre, also includes a range of retail and food and drink uses.

- 2.4 The surrounding townscape is equally varied, including Victorian terraced housing, post-war terraced housing and flats, late 20<sup>th</sup> century warehouse/industrial buildings, together with more contemporary residential development.
- 2.5 The site is not located within a Conservation Area and the site and its surroundings include no Statutory Listed Buildings.

### **Transportation**

- 2.6 The site is reasonably well served by public transport, with the site being located approximately 380 metres to the east of Peckham Rye Station, which is served by London Overground services, as well as with Southern, Southeastern and Thameslink mainline rail services. In addition, bus services operate along Rye Lane to the west of the site and Clayton Road to the north of the site.
- 2.7 Due to the severance created by the elevated railway lines, which impedes pedestrian access and permeability, the Public Transport Accessibility Level (PTAL) varies drastically across the site, with the majority of the site having a low PTAL of 1b, whilst the western end of the site has a excellent PTAL of 6a, with the PTAL using a scale from 0 to 6b where 0 is very poor and 6b is excellent.

### **Relevant Planning History**

- 2.8 As mentioned above, planning permission has been granted for this site previously. This permission (ref 17/AP/4480) was granted in April 2018 for the following,

*“Demolition of some of the existing buildings together with retention and restoration of the former workshop (the eastern most building) to be converted into two new homes. Construction of a new part two, part three and part four storey building to provide seven new homes and commercial space. Construction of a part one, part two storey commercial building to provide a total of 330 sqm of B1 floorspace together with associated landscaping, refuse stores and cycle parking”*

### 3.0 SUMMARY OF PROPOSED DEVELOPMENT

#### The Proposal

- 3.1 A detailed description of the revised application proposals is provided in the Design and Access Statement, dated April 2019, prepared by Holden Harper Architects, which supports the application. The revised application proposes the following:

*Demolition of some of the existing buildings together with retention and restoration of the former workshop (the eastern most building) to be converted into commercial space. Construction of four part two, part three family homes, and a four storey building to provide six new flats. Construction of a part one, part two storey commercial building, to provide an overall total of 349 sqm of A1, A2, B1, D1 and D2 floorspace together with associated landscaping, refuse stores and cycle parking.*

- 3.2 The application site presently comprises one and two storey Victorian warehouse buildings and associated areas of hardstanding that formerly provided 409sqm of Use Class B8 floorspace, although the site is vacant. The proposals include the redevelopment of the site to provide 349 sqm of flexible commercial floorspace, together with 10 residential units.
- 3.3 The proposed residential element of the scheme comprises 6 flats, together with 4 x 3 bed family houses (totalling 10 units and 38 habitable rooms), which accords with the Council's over-arching objective of delivering new homes, and of maximising the delivery of family homes. The proposed development would have a density of 275 hr/ha and 72 u/ha, which sits within the Council's target density range for this site.
- 3.4 The proposed residential units would be of a high quality, with all units meeting or exceeding the minimum internal space and amenity space standards, and with all homes being either dual or triple-aspect. In addition, all homes would receive good levels of natural light and the development has been designed to protect the amenity of both neighbouring residents and future occupants within the development in terms of outlook, privacy, light and noise.
- 3.5 The proposals are being brought forward as part of a design-led approach. The architecture and clean lines of the proposed buildings, together with the use of high-

quality facing materials, result in a visually distinctive development that has regard to the form and materiality of the existing surrounding built form, whilst incorporating elements of the 'New London Housing Vernacular'.

- 3.6 The revised proposals also include the provision of high-quality, landscaped public open space, which includes the creation of a new pedestrian/cycle route through the site that will link Consort Road to the west with Nazareth Close to the east, which will form part of the Peckham Coal Line.

## 4.0 PLANNING POLICY CONTEXT

4.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications are determined in accordance with relevant development plan policies, unless other material considerations indicate otherwise.

4.2 For this purpose, the statutory development plan comprises: The London Plan (2016) and the Southwark Local Plan. In addition, national planning policy, supplementary guidance and emerging policies are relevant material considerations. We set out below the planning policy context within which the application should be considered.

### National Planning Policy

- National Planning Policy Framework (NPPF) (2018); and
- National Planning Practice Guidance (2014)

### Regional Planning Policy

- The London Plan: Spatial Development Strategy for London Consolidated with Alterations since 2011 (2016);
- Housing SPG (2016);
- Accessible London: Achieving an Inclusive Environment SPG (2014);
- The Control of Dust and Emissions During Construction and Demolition SPG (2014);
- Sustainable Design and Construction SPG (2014);
- Shaping Neighbourhoods: Character and Context SPG (2014); and
- The London Planning Statement (2014).

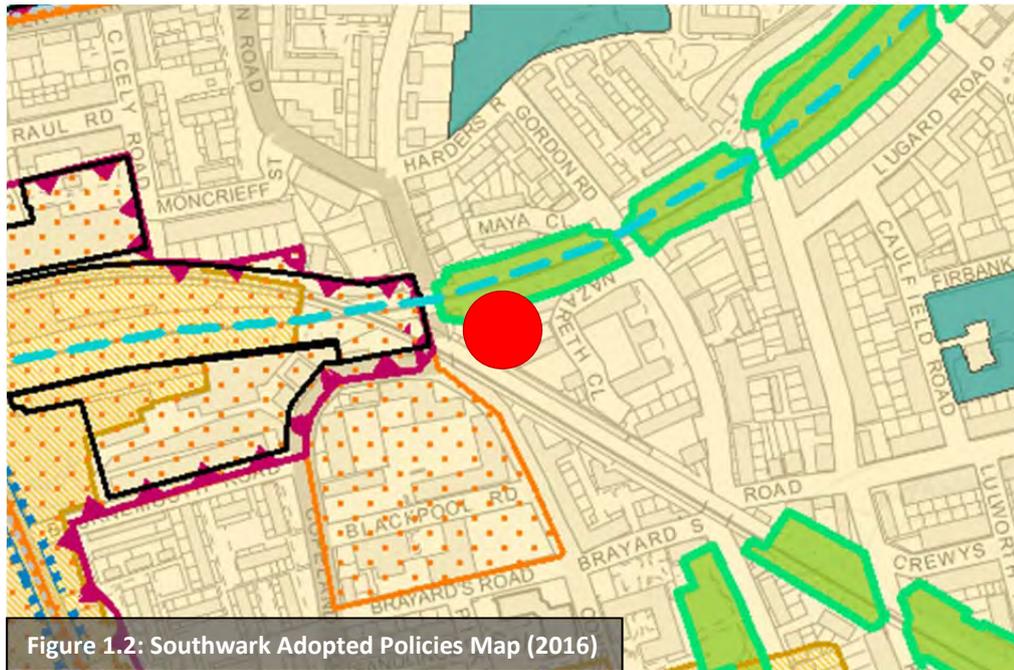
### Local Planning Policy

- Saved Southwark Plan Policies (2007);
- Southwark Core Strategy (2011);
- Southwark Adopted Policies Map (2016);
- Peckham and Nunhead Area Action Plan (2014);
- Design and Access Statements SPD (2007);
- Residential Design Standards SPD (2015);
- Sustainable Design and Construction SPD (2009), and;
- Sustainable Transport SPD (2009).

**Key Planning Designations**

4.3 As illustrated in the below extract from the Southwark Adopted Policies Map the following designations are relevant to the application site (located at the red circle):

- (i) Peckham and Nunhead Area Action Plan;
- (ii) Urban Density Zone, and;
- (iii) Air Quality Management Area.



## 5.0 PLANNING ASSESSMENT

5.1 In light of the redevelopment objectives of the project, and in the context of planning policy, the following paragraphs consider the key issues associated with the application proposals.

### A. GENERAL PRINCIPLE OF DEVELOPMENT

5.2 The general thrust of national, regional and local policies is to secure sustainable patterns of development and the re-use of previously developed urban land. This objective is the common thread running through Government Guidance, the London Plan and the Southwark Local Plan, which all encourage mixed use redevelopment to assist in the creation of sustainable communities.

5.3 Both Government Guidance and the London Plan encourage mixed use development upon non-strategic employment land in order to make optimum use of valuable urban land, and contribute towards urban renaissance and sustainable development.

5.4 A mixed use development is considered appropriate for this site given the scale of development and its location, as outlined by planning policy and the need to create vibrant sustainable communities. Mixed use developments such as the type proposed are becoming increasingly important in urban locations where they can breathe new life into formerly neglected areas, transforming them into vibrant communities.

5.5 The application proposes the creation of a high-quality mixed-use development, containing two main elements, with 349 sqm of flexible commercial floorspace being provided and 10 residential units being provided. This is similar to the permission that has already been granted for the site.

5.6 The principle of redevelopment for this site is strongly supported by planning policy. The need for regeneration within London is a main focus of planning policy at both a regional and national level. Furthermore the existing site is brownfield in an accessible, urban location, and both the London Plan and the Southwark Local Plan

encourage a mix of uses upon vacant brownfield sites to stimulate regeneration and as a valuable source of housing and other much needed uses.

- 5.7 Taking into account the above, it is considered that the principle of residential-led mixed-use redevelopment on this site accords with Local Plan Policies, together with the London Plan and Government Guidance.

## **B. PROPOSED COMMERCIAL USE**

- 5.8 Saved Policy 1.4 of the Southwark Plan states that outside Preferred Industrial Locations and Preferred Office Locations, on sites which have an established B Class Use and which meet any of the following criteria:

- i. The site fronts onto or has direct access to a classified road; or
- ii. The site is within the Central Activities Zone;
- iii. The site is within a Strategic Cultural Area;
- iv. The site is within a Town or Local Centre;
- v. The site is within an Action Area Core, or;
- vi. The site is within the Camberwell Action Area.

- 5.9 Development will be permitted provided that the proposal would not result in a net loss of floorspace in Class B use. An exception to this may be made where:

- a) The applicant can demonstrate that convincing attempts to dispose of the premises either for continued B Class use, or for mixed uses involving B Class, including redevelopment, over a period of 24 months have been unsuccessful, or
- b) The site or buildings would be unsuitable for re-use or redevelopment for B Class use or mixed uses including B Class use, having a regard to physical or environmental constraints; or
- c) The site is located within a town or local town centre in which case accordance with policy 1.7 suitable Class A or other town centre uses will be permitted in place of Class B uses. Where an increase in floorspace is proposed, the additional floorspace may be used for suitable mixed or residential uses.

- 5.10 Where an increase in floorspace is proposed, the additional floor space may be used for suitable mixed or residential use. On employment sites outside the POLs and

PILs and where criteria i-iv above do not apply, a change of use from an employment use to suitable mixed or residential uses will be permitted.

- 5.11 Strategic Policy 10 in the Core Strategy seeks to increase the number of jobs in Southwark and create an environment in which businesses can thrive. Part 2 of this policy seeks to protect existing business floorspace and encourages the provision of 25,000 - 30,000 sqm of additional business floorspace in specific locations, including sites located on classified road.
- 5.12 The application site presently comprises one and two storey Victorian warehouse buildings and associated areas of hardstanding that formerly provided 409sqm of Use Class B8 floorspace, although the site is now vacant. The previous permission proposed the full redevelopment of the site to provide 330 sqm of flexible Use Class B1 employment floorspace, together with 9 residential units.
- 5.13 The proposals have been revised and now include 349 sqm of flexible commercial floorspace. Whilst this would result in a small 60 sqm reduction in overall quantum of commercial floorspace at the site, it should be noted that this represents an increase of 19 sqm from original proposals, whilst still delivering much needed new homes.
- 5.14 The permission only sought approval for B1 use for the commercial space, likely to have been office. Having taken advice from local agents Field & Son (their report is submitted with the application), it is considered that a wider range of uses would be beneficial, both in terms of the space then being more likely to find an end user, but also in terms of adding active frontages and interest to this key site on the Peckham Coal Line. As such, the application includes A1, A2, B1, D1 and D2 use classes for the commercial space. However, it should be noted that in terms of the D2 use, this would only cover gymnasiums and that the other D2 uses (ie place of worship) are not being applied for.
- 5.15 Field & Son are of the view that there is limited demand for office accommodation to rent in the Peckham area, although there could be a higher level for offices to buy given the lack of available stock. They advise that a widening of the previously

approved B1 use for the commercial element is made to include A1/A2 retail, together with specific D1 and D2 uses as outlined above. This would make the finished units more marketable as this would give a wider and larger range of possible occupiers and would therefore reduce the potential for the properties remaining vacant for a significant period. Such alternative uses would also be a good fit in the wider context of the scheme and surrounding areas and could provide useful and welcome community facilities.

- 5.16 Furthermore, as set out above Strategic Policy 10 in the Core Strategy seeks to increase the number of jobs in the borough and create an environment in which business can thrive. The site presently comprises low-grade storage floorspace, which does little to contribute toward the Council's employment objectives.
- 5.17 Using the Homes and Communities Agency Employment Density Guide (2015) it can be seen that the existing B8 floorspace could support 5 jobs (at a density of 77sqm per employee). But the proposed commercial space could accommodate around 30 jobs, depending on the final employment density of occupation. This represents a significant increase in the employment yield of the site.
- 5.18 Taking into account the above, it is considered that the proposals, which include a small reduction in the overall quantum of employment floorspace at the site, whilst significantly increasing the employment yield of the site, accord with the Council's adopted employment policies.

## **C. HOUSING CONSIDERATIONS**

### **(i) Housing Needs and Making Efficient Use of Land**

- 5.19 The NPPF states that applications for housing development should be considered in the context of the presumption in favour of sustainable development (paragraph 49).
- 5.20 Policy 3.3 of The London Plan highlights the need for new homes in London and states that boroughs should seek to achieve and exceed their relevant minimum

annual housing targets, including through intensification, town centre renewal, opportunity and intensification areas and growth corridors, mixed-use, and renewal.

- 5.21 The current London Plan housing target for Southwark is for the delivery of a minimum of 27,362 new homes between 2015-2025, with an annual monitoring target of 2,736 new homes. This is the second highest housing target of all the London boroughs, with only Tower Hamlets having a higher housing target.
- 5.22 Strategic Policy 5 in the Core Strategy seeks the delivery of 24,450 new homes in the borough by the year 2026, although this target has now been superseded by the updated London Plan housing target cited above.
- 5.23 The 2017 draft version of the London Plan sets a new figure for Southwark of 2554 homes per year, slightly lower than the current figure, but still above the target set out in the Core Strategy. It is still one of the higher figures within London.
- 5.24 Whilst not specifically identified for development in the Local Plan there can be little doubt that the application site represents a sustainable location to deliver new homes given the prevailing character of the area, and as demonstrated by its good access to public transport, local shops and services, open spaces and a range of social and community infrastructure.
- 5.25 The number of dwellings proposed (10) falls under the affordable housing threshold. As such, all dwellings would be open market sale / rent in tenure.
- 5.26 In summary, the delivery of additional homes represents a significant benefit and will contribute towards meeting the Council's wider housing targets in a sustainable manner.

**(ii) Density**

- 5.27 London Plan Policy 3.4 seeks to ensure that development optimises housing output for different types of location within the relevant density range shown in table 3.2, whilst having regard to local context and character, the design principles in Chapter 7 of the London Plan and public transport capacity.

5.28 Strategic Policy 5 (Part 3) of the Core Strategy states that residential density will be expected to comply with the following ranges, taking into account matters which include the quantity and impact of any non-residential uses:

- Central Activities Zone: 650 to 1,100hr/ha;
- Urban Zone: 200 to 700hr/ha, and;
- Suburban Zones – North, Middle and South: 200 to 350hr/ha.

5.29 The application site lies within the 'Urban Density Zone' and as such Local Plan policy provides a density target of 200 to 700hr/ha. The site covers an area of 0.138ha and the proposals would provide 10 residential units with 38 habitable rooms, which results in a density of 275 hr/ha and 72 u/ha. This is within the Council's target density range and as such it is considered that the proposals fully accord with Strategic Policy 5 (Part 3) of the Core Strategy.

### **(iii) Dwelling Mix**

5.30 London Plan Policy 3.8 seeks to ensure that new developments offer a range of housing choices in terms of the mix of houses sizes and types, taking account of the housing requirements of different groups and the changing roles of different sectors in meeting these.

5.31 Strategic Policy 7 in the Core Strategy seeks to ensure that development provides more family housing (i.e. 3+ bedrooms) for people of all incomes to help make Southwark a borough that is affordable for families.

5.32 The proposed development would provide a total of 10 residential units, with 2 x 1 bed, 3 x 2 bed and 1 x 3 bed flats and 4 x 3 bed family houses. It is considered that the proposed residential mix accords with London Plan and Southwark Local Plan policy requirements by providing a range of housing types and sizes, with an emphasis on delivering family homes.

### **(iv) Housing Quality**

5.33 Policy 3.5 of The London Plan states that housing development should be of the highest quality internally, externally and in relation to their context and wider environment. This policy also seeks to ensure that new housing development meets

the government's Nationally Described Space Standard (2015) and provides homes that meet the changing needs of Londoners over their lifetime.

- 5.34 The Mayor of London's Housing SPG (2016) provides detailed guidance on the standards for new residential development, including accessibility and private amenity space requirements.
- 5.35 Saved Policy 4.2 of the Southwark Plan states that permission will be granted for residential development, including dwellings within mixed-use schemes, provided that they achieve good quality living conditions and include high standards of accessibility, privacy and outlook, natural light, ventilation, space (including outdoor space), safety and security, and protection from pollution.
- 5.36 All of the proposed residential units have been designed to meet, and wherever possible exceed, the relevant minimum space standards in the London Plan and Housing SPG. All of the new-build homes benefit from well sized private amenity spaces in the form of terraces and balconies. Specifically, each of the 3 bed houses includes a terrace at second floor level. The flats also benefit from private balconies.
- 5.37 All units are either dual or triple aspect, and the position, massing and orientation of the blocks has been designed to ensure that all habitable rooms will receive good levels of natural light, and to ensure that each unit includes benefits from private amenity space that receives good levels of direct sunlight.
- 5.38 Further detail of the residential design quality is provided in the Design and Access Statement.

## **D. DESIGN CONSIDERATIONS**

### **(i) Urban Design**

- 5.39 The NPPF places considerable emphasis on the importance of achieving high-quality design. The Framework states that *"Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities"* (paragraph 124).

- 5.40 Paragraph 131 states that, *“In determining applications, great weight should be given to outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area”*. As a corollary to this paragraph 130 states that *“Permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions”*.
- 5.41 Chapter 7 of The London Plan sets out policies on a range of issues about the places and spaces in which Londoners live, work and visit that are integral to delivering the Mayor’s vision and objectives (paragraph 7.1). The Plan contains a number of design-related policies relevant to the application proposals.
- 5.42 Policy 7.2 (An Inclusive Environment) sets out the Mayor’s policies with respect to an inclusive environment and states that all new development in London should achieve the highest standards of accessible and inclusive design. Policy 7.3 (Designing Out Crime) states that development should reduce opportunities for criminal behaviour and contribute to a sense of security. Policy 7.4 (Local Character) states that development should have regard to the form, function and structure of an area, place or street and the scale, mass and orientation of surrounding buildings.
- 5.43 Policy 7.6 (Architecture) states that architecture should make a positive contribution to a coherent public realm, streetscape and wider cityscape. It should incorporate the highest-quality materials and design appropriate to its context.
- 5.44 Saved Policy 3.12 of the Southwark Plan seeks to ensure that development achieves a high quality of both architectural and urban design, enhancing the quality of the built environment in order to create attractive, high amenity environments people will choose to live in, work in and visit. New buildings and alterations to existing buildings should embody a creative and high quality appropriate design solution, specific to their site’s shape, size, location and development opportunities
- 5.45 Strategic Policy 12 in the Core Strategy seeks to ensure that development achieves the highest possible standards of design to help create attractive and distinctive places which are safe, easy to get around and a pleasure to be in.

- 5.46 The application site presently includes one and two storey Victorian warehouse buildings, which are in a very poor state of repair, together with areas of hardstanding. The site is not located within a Conservation Area and the site and its surroundings include no Locally or Statutory Listed Buildings.
- 5.47 The proposals are for the demolition of the existing buildings, with the retention, restoration and conversion of the Victorian warehouse at the eastern end of the site, and the erection of new blocks ranging from two to four storeys in height to provide 349 sqm of flexible commercial floorspace and 10 residential units. The residential accommodation within the new-build element of the scheme would be provided in the form of 6 flats and 4 x 3 bed houses.
- 5.48 The design rationale for the revised development proposals is set out in detail in the accompanying Design and Access Statement, dated April 2019, prepared by Holden Harper Architects. The proposals are being brought forward as part of a design-led approach. The architecture and clean lines of the proposed buildings, together with the use of high-quality facing materials, result in a visually distinctive development that has regard to the form and materiality of the existing surrounding built form, whilst incorporating elements of the ‘New London Housing Vernacular’, as shown below.



- 5.49 The proposed residential element of the scheme has been designed to protect the amenity of neighbouring residents to the east and south through providing a suitable separation distance between facing habitable rooms windows. In addition, the design and layout of the scheme will ensure that there are no issues of inter-visibility or overlooking between the proposed new homes.
- 5.50 The revised design approach seeks to positively respond to approved scheme and follows a constructive meeting held between the design team and the Peckham Coal Line team and with planning officers from the London Borough of Southwark.
- 5.51 This includes the provision of high-quality, landscaped public open space, including a new pedestrian (car free) public route through the site, linking Consort Road to the west with Nazareth Close to the east. This will form part of the Peckham Coal Line, which is a resident-led initiative to create a new linear link between Queens Road Peckham and Rye Lane.
- 5.52 The revised application is accompanied by a Landscape Strategy, prepared by Spacehub, which provides details of the proposed landscaping strategy, and how this will integrate with the proposed Peckham Coal Line Urban Park. The strategy includes the use of a simple palette of hard materials to provide a robust and adaptable outdoor space; the provision of lighting along the length of the new route and on the building facade; the provision of soft landscaping and tree planting, and; a range of biodiversity enhancements, including green roofs, bird boxes and a range of habitats.
- 5.53 Taking into account the above, it is considered that the proposed development achieves a high quality of both architectural and urban design and would enhance the quality of the built environment and public realm in order to create an attractive, high amenity environment, in accordance with adopted policy requirements.

## **E. AMENITY CONSIDERATIONS**

### **(i) Noise**

- 5.54 The NPPF provides guidance on planning policies and decisions with respect to noise in order to avoid noise giving rise to significant adverse impacts on health and quality of life; mitigating the impacts of noise; recognising the impact of noise on business; and identifying and protecting areas not effected by noise for their recreational and amenity value.
- 5.55 London Plan Policy 7.15 (Reducing and Managing Noise) states that development proposals should seek to manage noise by avoiding significant adverse noise impacts on health and quality of life as a result of development, and mitigating and minimising the existing and potential adverse impacts of noise on, from, within, as a result of, or in the vicinity of new development without placing unreasonable restrictions on development or adding unduly to the costs and administrative burdens on existing businesses.
- 5.56 Saved Policy 3.2 of the Southwark Plan states that planning permission will not be granted for development where it would cause loss of amenity, including disturbance from noise, to present and future occupiers in the surrounding area or on the application site.
- 5.57 The application site is located adjacent to two elevated railway lines which have the potential to cause noise and vibration disturbance to future residential occupiers within the development.
- 5.58 Accordingly, the application is accompanied by an Environmental Noise Assessment, prepared by Cahill, which includes the results of an environmental noise and vibration survey that was carried out at the site between 2<sup>nd</sup> and 3<sup>rd</sup> March 2017 and provides recommendations on the mitigation measures that can be incorporated into the development to ensure that appropriate internal noise levels are maintained within the new homes.
- 5.59 Specifically, the report provides a design approach for the construction of the buildings that would ensure the internal noise targets in BS8233:2014 are met.

These include differing glazing configurations, wall build up specifications and ventilation specifications.

- 5.60 On the basis that the proposals will provide much needed new housing on a sustainable brownfield site, and given the high quality of housing proposed, it is considered that the proposals accord with national policy on noise and that future residential occupiers would be afforded good overall levels of amenity.

**(ii) Daylight and Sunlight**

- 5.61 In terms of the effects of the proposed development on the daylight and sunlight conditions at neighbouring residential properties, the proposed massing of the new blocks has been designed to sit below the 25 degree line taken from the ground floor windows of the terraced houses to the south at 36-42 Nazareth Close. In such instances the BRE document entitled 'Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice' (2011) advises that further daylight assessment is not required.

- 5.62 In terms of sunlight, the site is located immediately to the south of an elevated railway line and there are no neighbouring residential windows that would be affected.

- 5.63 As such, it is considered that the proposals would have a negligible effect on surrounding daylight and sunlight conditions and would therefore protect neighbouring residential amenity in this regard, in accordance with the requirements of Saved Policy 3.2 of the Southwark Plan.

**F. ENVIRONMENTAL CONSIDERATIONS**

**(i) Biodiversity and Trees**

- 5.64 Strategy Policy 11 of the Core Strategy seeks to protect Sites of Importance for Nature Conservation (SINCs) from inappropriate development. This policy also seeks to protect woodland and trees and to improve the overall greenness of places.

- 5.65 Saved Policy 3.28 of the Southwark Plan encourages the inclusion of biodiversity within development proposals and states that developments will not be permitted

which would damage the nature conservation value of SINC's and/or damage habitats, populations of protected species or priority habitats/species.

- 5.66 The application site is located adjacent to a borough SINC that is situated between the site and the elevated railway line to the north. The SINC contains mature trees and accordingly the application is accompanied by an Arboricultural Survey, and Arboricultural Impact Assessment, and an Arboricultural Method Statement, prepared by PJC Consultancy.
- 5.67 Given the age and construction of the existing buildings and proximity to a SINC, the application is also accompanied by a Preliminary Bat Roost Assessment, which includes the results of a site survey, undertaken on 25<sup>th</sup> April 2017. The report confirms that no evidence of bats was found during the survey, although it was noted that the site does include some features that could potentially support roosting bats.
- 5.68 Accordingly, a Bat Emergence and Activity Survey was undertaken and the associated report, prepared by PJC Consultancy, dated 14<sup>th</sup> August 2017, confirms that whilst bats were observed passing over the site, no bats were observed emerging from the building during the four survey visits.

**(ii) Land Contamination**

- 5.69 Strategic Policy 13 (Part 8) of the Core Strategy supports measures for reducing land pollution and avoiding amenity and environmental problems that affect how we enjoy the environment in which we live and work.
- 5.70 A Phase 1 Environmental Risk Assessment has been prepared by Groundsure, which provides a detailed assessment of the site in terms of potential land and groundwater contamination issues, including a preliminary risk assessment, and concludes that there is a moderate environmental risk given the nature of the proposed land uses. The report recommends that exploratory investigations are undertaken with regard to ground conditions, drainage, unexploded ordnance and asbestos.

5.71 Following this, a Phase 2 Ground Investigation Report was undertaken by Jomas. This concluded that no further remediation works are considered necessary, and the site is considered suitable for the proposed use following the adoption of the measures set out in the report.

**(iii) Air Quality**

5.72 Saved Policy 3.6 of the Southwark Plan states that planning permission will not be granted for development that would lead to a reduction in air quality. It is noted that the site is located within an Air Quality Management Area.

5.73 The application is accompanied by an Air Quality Assessment (AQA), prepared by XCO2, which provides recommendations for mitigating dust/air quality impacts during the construction phase of the development. During the operational phase of the development the AQA notes that there is a potential risk of exceedance of the annual mean air quality objective for NO<sub>2</sub> at the proposed residential units and recommends that whole house ventilation is installed to ensure that future residents are not exposed to poor air quality.

5.74 It is considered that suitable mitigation of the construction and operational phase air quality impacts can be secured through the inclusion of appropriately worded conditions.

**(iv) Energy**

5.75 A report by T16 is included within the application to show how the proposed development will meet the policy requirement of achieving 35% reduction in emissions through the Be Lean, Be Clean, Be Green hierarchy. In doing so, preliminary SAP and SbEM calculations have been undertaken using the information available and sensible assumptions on construction and M&E parameters.

5.76 The baseline figures have been calculated and improvements made to the fabric and plant proposed to both the residential and new-build commercial elements of the scheme. Air Source Heat Pumps, improved thermal bridging and fabric U values and whole-house mechanical ventilation with heat-recovery are proposed to ensure the 35% target is met and exceeded.

- 5.77 The results show that a 38% site-wide improvement is met, exceeding the target and providing some room for changes should they be required through the detailed design process. The total annual emissions have also been calculated enabling the report to show the total offset payment required of £24,762.

## **G. TRANSPORT CONSIDERATIONS**

### **(i) Policy Context**

- 5.78 The overarching aim of planning policy at all levels is to promote more sustainable patterns of development, including locating uses in areas which are accessible by public transport, cycling and walking in order to reduce the need to travel by private car.
- 5.79 The London Plan includes a number of policies relating to transport in the context of promoting more sustainable patterns of development and reducing the impact of development proposals on transport infrastructure.
- 5.80 Policy 6.9 (Cycling) states that the Mayor will seek to bring about a significant increase in cycling in London and that development should provide secure, integrated, convenient and accessible parking facilities in line with minimum standards along with on-site changing facilities.
- 5.81 Policy 6.13 (Parking) seeks to ensure that parking is provided in accordance with the maximum standards set out in the Parking Addendum, which for sites with a PTAL of 1 in 'Urban' locations are for up to 1.5 spaces per residential unit.
- 5.82 At a local level Strategic Policy 2 of the Core Strategy encourages walking, cycling and the use of public transport rather than traveling by car.
- 5.83 Saved Policy 5.6 of the Southwark Plan seeks to minimise car parking in accordance with the Council's maximum standards, which for sites located within an Urban Zone with a low PTAL are for up to 1.5 spaces per residential unit, as per the London Plan maximum standards.

**(ii) Car Parking**

5.84 In accordance with adopted policy, which promotes the use of sustainable modes of transport and seeks to minimise car parking, no car parking is proposed on site, which would also help ensure the PCL route is pedestrian friendly. However, given the low PTAL, it is felt desirable for future residents, especially those living within the family homes, to be able to apply for an on-street parking permit.

5.85 The Transport Statement submitted with the application includes a car parking survey which shows there was a minimum of 64 on-street kerbside spaces unoccupied within 200m from the site. It also predicts that the parking demand from the proposal would be six spaces. As such, the car parking demand for these six spaces arising as a result of the proposed development could therefore be accommodated on street in the vicinity of the site without adversely impacting parking availability.

**(iii) Cycle Parking**

5.86 The cycle parking standards set out in Table 6.3 of the London Plan require the following minimum provision by land use:

Use Class	Long-stay Cycle Parking	Short-stay Cycle Parking
B1 office	1 space per 90sqm	1 space per 500sqm
C3 residential	1 space per 1 bed unit; 2 spaces for all other dwellings	1 space per 40 units

5.87 The proposed development includes the provision of cycle spaces for commercial and residential elements in line with the standards above.

**H. PLANNING OBLIGATIONS**

5.88 As part of this proposal, a detailed Section 106 Planning Obligation will be required to ensure off site / on site requirements are secured and delivered. The Government’s policy in respect of planning obligations (as set out in Circular 05/2005) has been well established for some time. From the 6<sup>th</sup> April 2010 the Community Infrastructure Levey (CIL) Regulations gave these policy tests legal force. Regulation 122 provides that “a planning obligation may only constitute a reason for granting planning permission if the obligation is:

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

5.89 This has had the effect requiring greater scrutiny of financial contributions within Section 106 Agreements. It is important to ensure that planning obligations are genuinely “necessary” and “directly related to the development”.

5.90 In addition to the s106, the scheme would also be liable for Community Infrastructure Levy payments. This would include the London Mayoral CIL (as updated), which is chargeable at a rate for £60 per sqm for all uses in this location.

5.91 In terms of the local LLDC CIL, this came into effect on 6<sup>th</sup> April 2015 and sees residential development charged at £218 per sqm (given this is Zone 2), B use classes including B1 charged at a nil rate per sqm, with retail charged at £136 per sqm.

5.92 Given this, the s106 would then be limited to site specific items only, with strategic aspects covered by CIL. As such, the initial Heads of Terms are as follows,

- Provision of new public realm / access through the site.
- Carbon offset payment of £24,762.

5.93 These Heads of Terms are put forward on a ‘without prejudice’ basis and will be subject to further discussion with the local planning authority and other stakeholders. It should be noted that due to the viability issues of the project, the scope for making any additional contributions is limited.

## 6.0 SUMMARY AND CONCLUSIONS

- 6.1 This Planning Statement is submitted in support of revised proposals to regenerate this site. The application seeks to provide commercial floorspace along with residential accommodation, which would provide a genuine contribution to the regeneration of the area.
- 6.2 As it currently stands the existing site represents an inefficient use of land that is indefensible in light of current planning guidance. The proposed development offers the opportunity for a “win win” outcome whereby new, high-quality commercial space can be provided at the same time as much needed new housing in a highly sustainable mixed-use manner.
- 6.3 Mixed-use developments and sustainability are at the forefront of current planning policy. Mixed-use developments are becoming increasingly important in urban locations where they can breathe new life into neglected areas transforming them into vibrant communities.
- 6.4 The London Plan is a strong advocate of this approach, pushing for the redevelopment of this type of site to encourage more efficient use of land. The Plan seeks to ensure that densities of development in appropriate locations be maximised and encourages mixed use developments such as this proposal.
- 6.5 At the heart of the NPPF is a presumption in favour of sustainable development, which should be seen as a golden thread running through decision-taking. There are three dimensions to sustainable development: economic, social and environmental. In terms of economics, the proposal would provide new commercial space and would create jobs during both the construction and operational phases of the development, a good proportion of which would be filled by local people. The social role benefits are clear cut - the provision of new homes, including family homes, to meet the needs of present and future generations. By creating a high quality built environment, the environmental element would be provided for as well. As such, the presumption in favour of development would hold.

- 6.6 The design of the proposal is of a high quality and has been formulated in response to the site's location and would enhance the character and appearance of the area.
- 6.7 In summary the scheme would deliver the following benefits:
- the redevelopment of an under-utilised and unattractive site and the provision of high-quality new buildings that would enhance the local environment;
  - the retention, restoration and refurbishment of the Victorian warehouse;
  - a sustainable mix of uses that makes the best use of a unique brownfield site in accordance with the prevailing planning policy and guidance;
  - the creation of a high-quality, publicly accessible landscaped pedestrian route through the site, which will form part of the Peckham Coal Line.
  - provision of 349 sqm of new flexible commercial space, which would deliver significant long-term benefits; and
  - provision of 10 new homes, including 4 family (3 bed) houses, which would meet a recognised need in the area and also serve to enliven and strengthen the existing community.
- 6.8 In summary, it is intended to develop the existing site with modern, high quality buildings, which would enhance the area and assist with the continuing regeneration. It would provide much needed new commercial space and would also provide much needed new homes.