

THE CAMBERWELL SOCIETY

Registered Charity No. 264751

COMMENTS ON REVISED 18/AP/0532

SEAVINGTON HOUSE AND GARAGES, CHAMPION HILL, LONDON SE5 8DN

Redevelopment of the site involving the demolition of the existing two-storey residential block and single storey garages; and the construction of a 5-storey block on the corner of Champion Hill and Dog Kennel Hill and a 5/6-storey block on the corner of Champion Hill and the adjacent estate road, to provide 14 x 1 bed, 14 x 2 bed, 7 x 3 bed and 1 x 4 bed residential units (36 units) together with associated landscaping.

The revised application has not taken into account the Camberwell Society's previous comments, which are repeated and expanded upon here.

The Camberwell Society has several concerns regarding this application:

1. The first is that the proposed buildings are bigger than every other building, existing and proposed, in the immediate vicinity of the site. The sketch view of the area on page 8 of the Design and Access Statement identifies all the buildings in the vicinity that are over four storeys high, whilst ignoring the buildings opposite the site in Champion Hill, which are the buildings closest to the site, and range from one to three storeys.

The applicants have also sought to exaggerate the impact of the 5 storey building proposed for 1A Dog Kennel Hill by making it seem that the 1A DKH site and the application site are at the same level.

In fact there is a change in level equal to a storey height between the application site and the 1A DKH site. The cross section of block B on page 30 shows this clearly. The slope of the site makes it possible for an extra storey to be added on the downhill site of block B, alongside the site of 1A DKH.

The overall effect of the development is that the two new blocks are overbearing in relation to their immediate neighbours, exacerbated by their immediate proximity to the pavement edges of Dog Kennel Hill and Champion Hill.

Five storey blocks of flats are well represented on the east side of Dog Kennel Hill, but on the west side there is a more varied style of development, including landscaped gardens, a narrow seven storey block of flats, a children's playground, a nursery, a car park and some two storey semi-detached houses.

2. The second, related problem is the effect of the development, particularly block A, on the proposed development at 1A Dog Kennel Hill. This development of 9x5 storey houses was granted permission in March 2011 on the basis that its principal orientation was to the north, to avoid overlooking of the houses to the south.

The introduction of a 5 storey building 12m away from the 1A DKH principal elevation contravenes the Council's own guidelines contained in the Southwark Residential Design Standards 2011, which specify the amount of daylight required in habitable rooms:

Residential developments should maximise sunlight and daylight, both within the new development and to neighbouring properties. Development should seek to minimise overshadowing or blocking of light to adjoining properties, and:

Daylight and sunlight tests on the impact of the new development on neighbouring properties Daylight tests

This test should be used where the proposed development faces the affected window of the neighbouring property 1. Draw a line at 25 degrees upwards from the centre of the affected window. 2. If the proposed development is higher than this 25 degree line, there may be an unacceptable loss of daylight to the affected window."

The daylight received on every floor of the 1A DKH block would fail to meet the required levels if block A were to be built.

In January 2016 Bell Phillips Architects prepared a feasibility study for Southwark Council on their proposed Seavington House development. The study concluded that one of the risks associated with the scheme was

"Impact of daylight and sunlight to be assessed. Particularly in relation to the proposed development at 1A Dog Kennel Hill"

In July 2018 Point 2 Surveyors carried out a survey for Southwark Council:

Daylight and Sunlight Report on the effects on existing buildings of the proposed development.

They identified 1A Dog Kennel Lane (sic) as a building of interest, but claimed that

“We sought to undertake a detailed internal ADF assessment on the neighbour in conjunction with the other methodologies below, however, it transpired that the plans and elevations on Southwark Planning Portal are not consistent with each other and, therefore, we have not been able to complete the assessment.”

The Camberwell Society does not consider this to be an acceptable reason for failing to carry out the tests described above because:

1. Weston Williamson have included numerous plans, sections and elevations of the proposed houses at 1A Dog Kennel Hill as part of this planning application

2. Because Block A is located 12m away from the north elevation of 1A Dog Kennel Hill it is obvious that striking a line at an angle of 25 degrees upwards from almost any point on the elevation of 1A DKH will show that the proposed block is too close and too high for Southwark’s daylighting standards to be achieved.

Point 2 Surveyors also state that the 1A Dog Kennel Hill houses have been sited close to the northern edge of the site which has reduced the quality of adjoining development land to the north. This would, they say, entitle the owner of the adjoining land to meet lower standards of daylight for the adjoining building than would otherwise be required:

“We refer to BRE Guidance .. entitled ‘Adjoining Development Land’: “From a daylighting standpoint it is possible to reduce the quality of adjoining development land by building too close to the boundary”

“Under the circumstances it is appropriate to consider setting alternative target values for skylight access”

The Camberwell Society does not consider this to be an acceptable argument for setting a lower target for daylighting for 1A Dog Kennel Hill because of the decision taken by the planning inspector at the appeal on the John Smart application 05/AP/2192 for development of the 1A Dog Kennel Hill site in 2005. He wrote:

“ The council expressed concern that the proposal could prejudice the

development potential of the adjoining property to the North.I recognise that the position of the proposed building on the appeal site means that it would be close to the boundary with this site. However no evidence has been submitted to indicate that there is any prospect of the adjoining site being available for development....In these circumstances I can attach very little weight to this matter in determining the appeal.”

The Planning Inspector’s decision in May 2006 that the Seavington House site was unlikely to be developed was one of the considerations which resulted in the inspector granting planning permission for the 1A Dog Kennel Hill development at the appeal.

Therefore the location of the houses on the 1A Dog Kennel Hill site has not caused the Seavington House site to be devalued as a development site – it was always unsuitable for development.

Point 2 Surveyors claim that daylight to neighbouring buildings should be treated flexibly where that the proposed development is a conversion of an existing building:

"daylight criteria should be ‘interpreted flexibly because natural lighting is only one of many factors’... it is important to apply the guidance and target levels sensibly and flexibly taking into account the context of the site as a conversion of an existing building."

Southwark Council enforce their daylighting and sunlighting guidelines assiduously in relation to private applications and the same rules should apply to the Council’s own applications.

Also the Seavington House development is not a conversion of an existing building – it is a new building.

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3. Overlooking: The Southwark Residential Design Standards 2011 state that

“House and flat developments should be arranged to safeguard the amenity and privacy of occupiers and neighbours. New development, extensions, alterations and conversions should not subject neighbours to unacceptable noise disturbance, overlooking or loss of security. “

There are numerous vantage points for overlooking 1A Dog Kennel Hill from block A, including from living room windows, balconies and roof terraces, which makes the proposals unacceptable in terms of privacy.

The application states that the 12m gap between the two buildings is council policy (pages 19&20 of the Design and Access Statement), but the Residential Design Standards state that this is an acceptable gap only in relation to the front of a dwelling facing a street, and the required gap at the back of a dwelling is 21m. This should be considered the appropriate standard in this case.

4. The residential accommodation that is provided in this proposal barely meets the minimum space standards required. It is difficult to imagine for example how 6 people could live a full life in the 4 bedroom flat apparently thought suitable for that number (page 41 of the Design and Access Statement).

There is also very little amenity space, and what there is lies between Block A and 1A Dog Kennel Hill, and impinges on the privacy of the prospective residents of 1A Dog Kennel Hill.

Summary:

The proposed flats are an too large and domineering in the context of the scale of the existing buildings in the immediate area.

They are built on the pavement edge whilst the existing buildings are all set back from the pavement, giving the hilltop a feeling of open-ness and space.

They contravene Southwark guidelines for daylight and privacy in a neighbouring building.

They provide cramped accommodation and inadequate amenity space for the prospective residents.

For these reasons the Camberwell Society objects to this application.

Please reply to: planning@camberwellsociety.org.uk