

Date: 31 March 2022

**Our Ref: LP122**

5th Floor Hub 2  
Southwark Council  
PO Box 64529  
London  
SE1P 5LX

Dear Sir/Madam,

**FULL PLANNING APPLICATION  
49-53 CAMBERWELL CHURCH STREET, LONDON, SE5 8TR  
PLANNING PORTAL REF. PP-11099414**

On behalf of our client, Kingspride Investments Ltd, we hereby request full planning permission in relation to the development of the above site.

The proposed development is:

*"Erection of front and rear dormers and installation of rooflights on the roof of 49-53 Camberwell Church Street and associated reconfiguration of existing hotel (Class C1), and creation of roof terrace with glass balustrade above flat roof at the rear of 51-53 Camberwell Church Street."*

This submission is supported by the following documents:

- Completed Application Form and Certificates B;
- CIL Form;
- Covering Letter with Planning Statement (this document, prepared by Logic Planning);
- Design and Access Statement (prepared by Aura Architecture);
- Heritage Statement (prepared by Squire Heritage Consulting);
- Fire Statement (prepared by Aura Architecture);
- Existing and Proposed drawings (prepared by Aura Architecture):
  - Site and Location Plan (Dwg. No. SP-01);
  - Basement Floor Plans (Dwg. No. PL-01);
  - Ground Floor Plans (Dwg. No. PL-02);
  - First Floor Plans (Dwg. No. PL-03);
  - Second Floor Plans (Dwg. No. PL-04);
  - Third Floor Plans (Dwg. No. PL-05);
  - Fourth Floor Plans (Dwg. No. PL-06);
  - Elevations (Dwg. No. PL-07); and
  - Elevations (Dwg. No. PL-08);

The application fee and the Planning Portal's service charge have been paid on the Planning Portal today.

This application follows the submission of a pre-application advice request (ref. 21/EQ/0214) which sought the Council's advice on a proposal for the erection of roof dormers and rooflights and the conversion of the existing hotel into a co-living space.

Following the receipt of the advice on 28 October 2021, the Applicant has reconsidered the development options and decided to proceed with a full planning application for the extension of the existing hotel, and not to pursue the co-living accommodation option. The 'Planning History' section of this letter specifies the amendments that have been made to the design of the roof extensions and of the terrace to address the issues raised by the Council at pre-application stage.

This covering letter identifies the key constraints and planning considerations of relevance for the assessment of the proposal. Below is a detailed description of the proposed development, a review of the planning history of the site and an assessment of the compliance of the development with Southwark's development plan policies. **Appendix A** of this letter contains a summary of the planning policies of relevance. **Appendix B** is a copy of the pre-application advice letter received from the Council in October 2021.

## **Site and surrounding area**

The site includes the OYO New Dome Hotel at 51-53 Camberwell Church Street and the adjoining property at No.49. The three properties are the last three units of a Victorian terrace including Nos.35-53 which is located on the northern side of Camberwell Church Street, between the junctions with Kimpton Road to the west and Datchelor Place to the east. All the other properties on this terrace have three storeys. The properties on the site have four storeys.

The three terraced units at 49-53 Camberwell Church Street were built at the same time. The corner building, No. 53, was extended later with a two-storey rear addition. This later extension adjoins a three-storey building located immediately to the north of the hotel (4 Datchelor Place). The ground floor of No.53 is occupied by a commercial unit currently in use as a pizza restaurant.

The hotel's entrance and reception area is at Nos. 51 and 53. The ground floor of No.49 is a restaurant, its upper floors are occupied by flats and are physically separated from the adjoining hotel.

The urban pattern of Camberwell Church Street is characterised by regular terraced properties with commercial ground floors and residential or office uses on the upper floors. Most of the terraces have three or four stories.

Further north is a residential area with a mix of four-storey Victorian Terraces, blocks of flats and the three-storey housing estate of Mary Datchelor Close. Camberwell Green, with its mix of tall residential blocks and lower terraces, is just 200 metres to the west of the site. St Giles Church is 200 metres to the east of the site. To the south, beyond the commercial frontage, is the verdant Georgian residential area of Camberwell Grove and Grove Lane.

The site is in the Camberwell Green Conservation Area and the Camberwell District Town Centre. Its ground floor units are within a Protected Shopping Frontage.

#### Planning policy designations

- Camberwell District Town Centre
- Protected Shopping Frontage - Camberwell
- Air Quality Management Area
- Camberwell Green Conservation Area
- Camberwell Green Archaeological Priority Zone

#### Other designations

- Flood Risk Zone 1 (low probability of flooding)
- Critical Drainage Area - Camberwell
- Public Transport Accessibility Level 2 (surrounded by Level 6a)
- Camberwell Grove Conservation Area (bordering the property to the south)



Site Plan



Street view



Aerial photograph

## **Planning history** (excluding minor developments)

### **49 Camberwell Church Street**

- 98/AP/1847 - Change of use of ground floor to restaurant plus retention extraction duct on rear elevation - Permission GRANTED (29/03/2000)

### **51-53 Camberwell Church Street (OYO - The New Dome Hotel)**

- 01/AP/1305 - Extension at second floor level to the rear of the building to provide additional hotel accommodation. - Application WITHDRAWN (25/10/2001)
- 01/AP/1731 - Extension at 2nd floor level to rear of building to provide additional hotel accommodation. - Permission REFUSED, Appeal DISMISSED (31/10/2002)
- 14/AP/4196 - Erection of two-storey side extension at second floor level to existing hotel - Application WITHDRAWN (25/03/2015)

## **Pre-application engagement**

As noted above, this application was preceded by a pre-application advice request for the extension of the roof of No.49-53 Camberwell Church Street and the conversion of the hotel into a co-living accommodation. Appendix B of this document is a copy of the pre-application advice letter issued by Southwark Council on 28 October 2021.

The key differences between the pre-application proposal and the development for which planning permission is now sought are as follows:

- The current proposal no longer seeks to convert the hotel into a co-living space. The hotel will be retained and extended by the addition of 9 new rooms;
- The design of the front dormer windows has been significantly revised to address the comments of the Council. The pre-application scheme proposed simple 'box' type dormers. The current proposal includes dormer windows with a traditional design that take inspiration from the built-in dormers of several properties in the vicinity of the site along Camberwell Church Street;
- The new dormer window on the side roof slope of 53 Camberwell Church Street has been removed; and
- The balustrade of the new roof terrace, now allocated to the hotel, has been set back from the eastern elevation of 53 Camberwell Church Street to conceal the terrace from public views.

## **Proposed development**

The proposed development will extend the existing hotel occupying 51-53 Camberwell Church Street (Class C1) through the erection of front and side dormers and a lateral extension through the incorporation of the mansard space of 49 Camberwell Church Street. The proposal also includes the creation of a new terrace at the rear of No. 51-53 at second floor level, with a glass balustrade set back from Datchelor Place.

As a result of the proposed extensions and internal reconfigurations, the total number of rooms of the hotel will increase from 31 to 39.

The existing ground floor restaurant and the upper floors' flat at No.49 will not be affected by the development. Only the mansard space, extended through a dormer, will be connected laterally to the hotel and will become part of it.

The development also involves the creation of a co-working area for the hotel guests' in the front lobby of the hotel. The existing pizzeria located on the ground floor of 53 Camberwell Church Street will be retained in its current use.

As a result of the proposed roof extensions the total Gross Internal Area of the building will be 1,023 m<sup>2</sup>, a net increase of 117 m<sup>2</sup> from the existing area (905.6 m<sup>2</sup>).

The material operations proposed as part of the development include:

- Erection of five dormer windows and four rooflight on front roof slope of Nos.49-53;
- Erection of two loft conversion dormers on rear roof slope of Nos. 49 and 51;
- Opening of rear door on the second floor to access new roof terrace;
- Installation of glass balustrade to roof terrace;

Further details of the design, layout and accessibility of the development are set out in the Design and Assess Statement and in the drawings prepared by Aura Architecture.

### **Planning policy framework**

In accordance with Section 38 (6) of the Planning and Compulsory Purchase Act 2004, planning applications should be determined in accordance with the development plan, unless other material considerations indicate otherwise.

The Development Plan for the site currently comprises the London Plan 2021 (**LP**) and the Southwark Plan 2019-2036 adopted in February 2022 (**SP**).

The National Planning Policy Framework 2021 (**NPPF**), the Design and Access Statements SPD 2007 (**DAS SPD**), the Heritage SPD 2021 (**Heritage SPD**), and the Camberwell Green Conservation Area Appraisal (**CG CAA**) are also relevant for the assessment of the proposal.

Appendix A contains a summary of the key planning policies for the assessment of the proposal. Below is an assessment setting out its compliance with the local plan's policies and why it should be supported as a sustainable form of development.

## **Planning assessment**

### ***Extension of existing hotel***

The addition of eight rooms to the existing room will improve the viability of the business and provide a better offer for tourists, business travellers and local residents in need of temporary accommodation. The creation of a co-working area on the ground floor will increase the resilience of the business and diversify its offer allowing guests to work remotely or meet clients and business partners within the hotel.

Taken together, the proposed extension of the existing hotel and internal refurbishment will comply with the economic growth and town centre objectives of the Southwark Local Plan and will not have any impact on the amenity of the adjoining properties, and should be supported.

### ***Massing, design, and impact on designated heritage assets***

The Camberwell Green Conservation Area Appraisal identifies the properties on the northern side of Camberwell Church Street between Nos. 3 and 75 as “3 to 4 storey repetitive frontages emphasising the curves of the street and providing strong definition of street form”.

The OYO New Dome Hotel and No. 49 are not locally listed and are not identified as having particular relevance on their own. They are however contributors to the character of the Sub Area 3 – Camberwell Church Street and the consistent urban pattern of this stretch of Church Street.

There will be no new excavations as part of the proposed development, so it is not anticipated that there will be any impact on the Camberwell Green Archaeological Priority Zone.

The proposed dormer windows on the front roof slope will have a traditional design inspired by the small dormers that can be seen in adjoining properties along Camberwell Church Street and will be aligned with the windows below to create a balanced frontage. The front additions will not have negative impacts on protected views within the conservation area and will preserve in full its significance and character. Similarly, the proposed conservation rooflights on the front roof slope will replicate the pattern of fenestration of other properties within the conservation area and will not affect its character.

Following the receipt of the pre-application advice, the project team has significantly revised the approach to the front dormers and opted for a Victorian design that blends seamlessly with the vertical and horizontal hierarchies of the existing building. The simple “box” dormer design presented at pre-application has been replaced by a more refined and sympathetic language with materials matching the parapet below.

The two dormers at the rear will have a contemporary design but not have impacts on the most important element of the group of buildings – the façade – and will be comparable in size and shape to the existing rear dormer at 43 Camberwell Church Street, within the same terrace of the application site. The dormers will not be readily visible from any public vantage point within the conservation area and will not alter the balance of the front elevation. They will have the shape of standard dormers and will be set back from the

ridge and the eaves of the roof. The pre-application advice letter acknowledged that *"the dormers to the rear are less problematic, and are generally acceptable as they are hidden from public view"*.

All the proposed extensions will be built with materials matching the existing ones or appropriate materials that respect the appearance of the building and of the surrounding area.

The proposed glass balustrade installed in the new roof terrace will blend with the more utilitarian character of the rear wing of the hotel building and will not take the attention away from the pattern of frontages of the main road when observed from the conservation areas. In response to the pre-application advice, the glass balustrade has been set back from the side elevation of No.53 to prevent impacts on views within the conservation area.

Taken together, the proposed roof extensions will remain subservient to the host building and will not affect its visual hierarchies or the role of the property in the local townscape. The use of the site will be optimised and the consistency and visual permeability of the urban fabric will be preserved. No harm will be caused to the significance and setting of the Camberwell Green Conservation Area and of the adjoining Camberwell Grove Conservation Area.

The application is supported by a Heritage Statement prepared by Squire Heritage Consulting, containing a detailed analysis of the building, of the character of the conservation area, and an assessment of the expected impact of the proposed external works on the significance of the relevant heritage assets. The conclusions of the Heritage Statement are as follows:

*"The site is within a conservation area. There are ample examples of a diverse range of historic rooftops in the immediate context of no 49-53. This report has found that there would be no direct, material harm to the Camberwell Conservation Area, due to the proposed, and the research identified 5 built heritage assets in the surrounding area whose setting and significance might be affected by the proposed development. After further analysis it was, however, found that the development proposals would make a neutral contribution to the settings and significance of the built heritage assets assessed.*

*It has been shown that development within the Site can be delivered without adverse effects on the setting or significance of built heritage assets in the vicinity and is in accord with both national and local planning policies and guidance.*

*The brief analysis of the local townscape undertaken here shows the building is not completely out of character along Church Street as there are other 4 storey buildings and there is a mix of developed rooflines and plain rooflines.*

*Therefore, in the area which is specific to this immediate context the addition of 5 dormer windows would reflect the character of surrounding properties and the Conservation Area. The dormers can improve the contribution the building makes to the street scene. Well-designed windows are stepped back from the eaves in a way that lessens the impact of new mass. This will alleviate any concerns that it has a negative impact on the Birdcage.*

*Local context suggests that additional scale is acceptable and is suitable in this location. The dormer windows are elegant features that will improve the existing neutral character of the roof on the building. This will enhance the character and appearance of the building, the surrounding area and the Conservation Area."*

In summary, we submit that the proposal will comply with Southwark's policies on design quality, urban design and the protection and enhancement of heritage assets, and the guidance set out in the Camberwell Green Conservation Area Appraisal.

### ***Residential amenity***

The proposed roof dormers will be located well away from the adjoining residential properties and will have a modest massing. For these reasons, they will not have negative amenity impacts by way of overshadowing or overbearing effects or loss of privacy.

The new terrace will be screened from public views by the set-back glass balustrade and from the residential properties at the rear by the volume of the roof of 100 Mary Datchelor Place, which directly adjoins the hotel to the north. A 1 metre deep buffer of planters will also be installed along the northern boundary to further recess the terrace from the adjoining houses. This will ensure that there will not be negative impacts on the residents to the north by way of overlooking, loss of privacy or noise. The hotel's management will ensure that the use of the terrace is monitored and that noisy activities are prevented.

In light of the above, it is considered that the proposed development will align with Policies P55 and P64 of the Southwark Plan.

### ***Energy and sustainability***

The architect has endeavoured to maximise the opportunities for the thermal improvement of the existing buildings and various measures to maximise energy efficiency. Among the options is the installation of heat pumps, electrical appliances and the installation of new fenestration with high thermal and noise insulation standards.

### **Conclusions**

The addition of eight rooms will improve the viability of the hotel and its offer, creating localised economic benefits to the District Town Centre without affecting the residential amenity of the area.

The minor roof additions proposed to facilitate the extension of the hotel will not have any impact on the character and visual pattern of Camberwell Church Street and will preserve views through the Camberwell Green Conservation Area. The character of the host building will be enhanced and the significance of heritage assets will be preserved.

No impacts on residential amenity are foreseen.



For the reasons set out above and in other parts of this letter, we submit that the development would be in accordance with the policies of the local development, regional and national planning policies, and that should be supported by the Council.

If you have any queries, please do not hesitate to contact Lorenzo Pandolfi of this office at [lorenzo.pandolfi@logic-planning.com](mailto:lorenzo.pandolfi@logic-planning.com) or 07825 471559.

Yours faithfully,

**L. P.**

Logic Planning (part of Planning Communications Ltd)  
[info@logic-planning.com](mailto:info@logic-planning.com)

## **APPENDIX A – KEY PLANNING POLICIES**

### ***Land use – Development within Camberwell District town centre***

Policy AV-05 of the Southwark Plan 2022 states, among other things, that development in Camberwell should *“complement and improve the town centre with more large and small shops, entertainment, leisure, workspaces for smaller enterprises, particularly creative industries, and cultural activities and businesses that support the local health economy and well designed public spaces for visitors to linger”*.

Policy P35 of the Southwark Plan 2022 relates to town and local centres. It reads as follows:

*Development must:*

- 1. Ensure main town centre uses including markets, community, civic, leisure and cultural uses are located in town centres and local centres; and*
- 2. Be of a scale and nature that is appropriate to the role and catchment of the centre; and*
- 3. Retain retail floorspace or replace retail floorspace with an alternative use that provides a service to the general public, and would not harm the vitality and viability of the centre; and*
- 4. Not harm the amenity of surrounding occupiers or result in a concentration of uses that harms the vitality, viability and economic growth of the centre; and*
- 5. Provide an active use at ground floor in locations with high footfall; and*
- 6. For large schemes for main town centre uses that are 1,000 sqm (gross GIA) or more provide free public toilets, public drinking fountains and public seating. Public toilets may be provided either on or off site and not reserved for customer use only.*

Policy P37 of the SP states that in Protected Shopping Frontages development must provide active ground floor uses which provide a service to the general public that would not harm the vitality and viability of the shopping frontage.

### ***Land use – Extension of existing hotel***

Policy P41 of the Southwark Plan 2022 regulates proposals for new hotels and other visitor accommodation. At paragraph 1 it states that *“development for hotels and forms of visitor accommodation must ensure the design, scale, function, parking and servicing arrangements respond positively to local character and protect the amenity of the local community and visitors to the hotel”*.

### ***Massing, design and layout***

The NPPF and the London Plan stress the importance of achieving high quality design in all developments, the more so when heritage assets might be affected.

Policy GG2C of the London Plan states that to create successful sustainable mixed-use places that make the best use of land decision-makers should *“proactively explore the potential to intensify the use of land to support additional homes and workspaces, promoting higher density development, particularly in locations*

*that are well-connected to jobs, services, infrastructure and amenities by public transport, walking and cycling”.*

Policy D3 of the London Plan 2021 states that *“all development must make the best use of land by following a designed approach that optimises the capacity of sites, including site allocations. Optimising site capacity means ensuring that development is of the most appropriate form and land use for the site”.*

In relation to form and layout, Policy D3 of the London Plan states that development proposals should *“enhance local context by delivering buildings and spaces that positively respond to local distinctiveness through their layout, orientation, scale, appearance and shape, with due regard to existing and emerging street hierarchy, building types, forms and proportions”.*

Policy D3 also requires developments *“to be of high quality, with architecture that pays attention to detail, and gives thorough consideration to the practicality of use, flexibility, safety and building lifespan through appropriate construction methods and the use of attractive, robust materials which weather and mature well”.*

Policies P13 and P14 of the Southwark Plan 2022 set out detailed guidelines for the delivery of high quality design in new developments and places.

Policy P13 requires development to *“ensure height, scale, massing and arrangement respond positively to the existing townscape, character and context”; “better reveal local distinctiveness and architectural character; and conserve and enhance the significance of the local historic environment”; and “ensure the urban grain and site layout take account of and improve existing patterns of development and movement, permeability and street widths”.*

Policy P14 states that development must provide, among other features, *“high standards of design including building fabric, function and composition”, and “innovative design solutions that are specific to the site’s historic context, topography and constraints”.*

Policy P18 of the SP states that development that maximises the efficient use of land, does not unreasonably compromise development potential or legitimate activities on neighbouring sites and provides adequate servicing facilities, circulation spaces and access to, from and through the site will be permitted.

### ***Impact of development on local townscape and designated heritage assets***

Chapter 16 of the NPPF sets out the tests for conserving and enhancing the historic environment. Paragraph 199 requires that great weight should be given to the conservation of an asset when considering the impact of a proposed development on its significance. Paragraph 200 requires that any harm to, or loss of, the significance of a designated heritage asset should require clear and convincing justification.

Paragraph 202 of the NPPF states that *“where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use”.*

Paragraph D11) of Policy D3 of the London Plan 2021 states that new developments should “respond to the existing character of a place by identifying the special and valued features and characteristics that are unique to the locality and respect, enhance and utilise the heritage assets and architectural features that contribute towards the local character”.

Paragraph C of Policy HC1 of the London Plan 2021 reads as follows:

*“Development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets’ significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings should also be actively managed. Development proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process.”*

Paragraph 5.1.3 of the Camberwell Green Conservation Area Appraisal states that “in the Camberwell Green Conservation Area the main development pressures relate to changes of use of buildings and the renovation and re-use of architecturally valuable, but currently redundant, buildings. There should be no objection in principle to good new building design in the Conservation Area in contemporary styles and the following guidance seeks to promote modern design of quality, and to preserve and reflect the historical character of the area”.

Policy P19 of the SP relates to developments within conservation areas and states that they will be granted only when they preserve or enhance the character or appearance of the conservation area and its setting.

### ***Residential amenity***

Policy D3 of the London Plan 2021 states that new developments should deliver appropriate outlook, privacy and amenity and help prevent or mitigate the impacts of noise and poor air quality.

Policy P56 of the Southwark Plan states that development should not be permitted when it causes an unacceptable loss of amenity to present or future occupiers or users.

### ***Energy and sustainability***

Policy SP6 of the Southwark Plan 2022 states that the objective of reducing carbon and greenhouse gas emissions will be achieved through protecting, improving and enhancing the environment through making new and existing buildings as energy efficient as possible.

Policy P69 of the Southwark Plan sets out the sustainability standards required in new developments, including the need to reduce the risk of overheating by applying a cooling hierarchy.

Policy P70 of the Southwark Plan states that developments must minimise carbon emissions on site in accordance with the “Be Lean, Be Clean, Be Green” energy hierarchy.

**APPENDIX B - PRE-APPLICATION ADVICE RESPONSE REF. 21/EQ/0214**

**DEVELOPMENT MANAGEMENT – PREAPPLICATION RESPONSE – COVER SHEET**

<b>Reference Number:</b>	21/EQ/0214
<b>Site Address:</b>	49-53 Camberwell Church Street, London, Southwark, SE5 8TR,

**Location Plan:**



**KEY DATES**

<b>Application Start Date:</b>	10.09.2021	<b>Application Expiry Date:</b>	22.10.2021
<b>Earliest Decision Date:</b>		<b>Committee Date:</b>	Not applicable

## DEVELOPMENT MANAGEMENT – PREAPPLICATION RESPONSE

### APPLICATION DETAILS

<b>Application Type:</b>	Pre Application Enquiry
<b>Proposal:</b>	Pre application planning advice for the erection of dormer windows and rooflights in the roof slopes of 49-53 Camberwell Church Street and associated conversion of existing hotel (Class C1) into co-living accommodation with a mix of self-contained bedsits, bedrooms, communal facilities and amenity areas, cycle parking and refuse storage (Sui Generis).
<b>Ward(s):</b>	St Giles
<b>From:</b>	Director of Planning and Growth
<b>Case Officer and Team:</b>	Glenn Ruane, Fast Track

### ASSESSMENT OF PROPOSAL

## Executive Summary

The proposal calls for the change of use of an existing hotel (C1 use class), into a co-living space, which functions much in the same way as a large-scale HMO, albeit with a co-working space at ground floor level (sui generis use class across all floors). There are also a series of proposed dormer extensions. The proposed use presents significant issues around the proposed standard of accommodation, and the dormers are unsupported where they would be visually prominent though there may be some space for expansion to the rear of the roof.

## Site Description

The existing site is a four storey building located on the north side of Camberwell Church Street. The site is primarily used as a hotel, though there is a smaller commercial unit at ground floor level (E use class).

The site is located within:

- Camberwell Green Conservation Area
- Protected Shopping Frontage
- Archaeological Priority Zone
- Urban Density Zone
- Camberwell Action Area
- Air Quality Management Area

The site is not listed, nor are there any listed buildings in the immediate vicinity of the site.

The site has a Public Transport Accessibility Level of 6a, indicating good access to local public transport routes.

## Planning Policy

## **National Planning Policy Framework (the Framework)**

The revised National Planning Policy Framework ('NPPF') was published on 20 July 2021 and 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.

Paragraph 218 states that the policies in the Framework are material considerations which should be taken into account in dealing with applications.

The relevant chapters from the Framework are:

- Chapter 2 Achieving sustainable development
- Chapter 6 Building a strong, competitive economy
- 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

## **The London Plan 2021**

On 2 March 2021, the Mayor of London published the London Plan 2021. The spatial development strategy sets a strategic framework for planning in Greater London and forms part of the statutory Development Plan for Greater London. The relevant policies are:

- Policy SD6 Town centres and high streets
- Policy D4 Delivering good design
- Policy D5 Inclusive design
- Policy D6 Housing quality and standards
- Policy D7 Accessible housing
- Policy D8 Public realm
- Policy D10 Basement development
- Policy D11 Safety, security and resilience to emergency
- Policy D12 Fire safety
- Policy D13 Agent of Change
- Policy D14 Noise
- Policy H1 Increasing housing supply
- Policy H2 Small sites
- Policy H11 Build to Rent
- Policy E1 Offices
- Policy E2 Providing suitable business space
- Policy E3 Affordable workspace
- Policy E10 Visitor infrastructure
- Policy E11 Skills and opportunities for all
- Policy HC1 Heritage conservation and growth
- Policy SI 1 Improving air quality
- Policy SI 7 Reducing waste and supporting the circular economy
- Policy SI 12 Flood risk management
- Policy SI 13 Sustainable drainage

- Policy T1 Strategic approach to transport
- Policy T2 Healthy Streets
- Policy T3 Transport capacity, connectivity and safeguarding
- Policy T4 Assessing and mitigating transport impacts
- Policy T5 Cycling
- Policy T6 Car parking
- Policy T6.5 Non-residential disabled persons parking
- Policy T7 Deliveries, servicing and construction

## **Core Strategy 2011**

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:

- 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 10 (Jobs and businesses)
- Strategic Policy 12 (Design and conservation)
- Strategic Policy 13 (High environmental standards)

## **Southwark Plan 2007 (saved policies)**

In 2013, the council resolved to '1save' 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:

- Policy 1.12 - Hotels And Visitor Accommodation
- Policy 1.7 – Development Within Town And Local Centres
- Policy 1.10 - Small Scale Shops And Services Outside The Town And Local Centres And Protected Shopping Frontages
- Policy 3.2 - Protection of amenity
- Policy 3.6 - Air quality
- Policy 3.7 - Waste reduction
- Policy 3.9 - Water
- Policy 3.11 - Efficient use of land
- Policy 3.12 - Quality in design
- Policy 3.13 - Urban design
- Policy 3.15 - Conservation Of The Historic Environment
- Policy 3.16 - Conservation
- Policy 3.18 - Setting Of Listed Buildings, Conservation Areas And World Heritage Sites
- Policy 3.19 - Archaeology
- Policy 4.2 - Quality of residential accommodation
- Policy 4.3 - Mix of dwellings
- 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

## Area based AAP's or SPD's

Of relevance in the consideration of this application are:

- 2015 Technical Update to the Residential Design Standards SPD (2011)
- Sustainable Design and Construction SPD (2008)

## Emerging planning policy

### New Southwark Plan

The New Southwark Plan is now at an advanced stage. The New Southwark Plan (NSP) was submitted to the Secretary of State in January 2020. The Examination in Public (EiP) for the NSP took place between February and April 2021. The Inspectors wrote a post hearings letter on 28 May 2021 and under Section 20(7)(c) of the Planning and Compulsory Purchase Act (2004) the Council asked the Inspectors to recommend Main Modifications to ensure the Plan is sound. The Council is consulting on the Main Modifications as recommended by the Inspectors from 6 August 2021 to 24 September 2021. The Inspectors will write a report once the consultation has concluded and they have had the opportunity to consider representations.

It is anticipated that the plan will be adopted later in 2021 and will replace the saved policies of the 2007 Southwark Plan, the 2011 Core Strategy, the Aylesbury Area Action Plan 2010, the Peckham and Nunhead Area Action Plan 2014 and the Canada Water Area Action Plan 2015.

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.

The Inspectors have heard all the evidence submitted at the Hearings and in previous stages of consultation. The Main Modifications comprise the changes to policies the Inspectors consider are needed to ensure the Plan is sound.

## Assessment

### Land Use

The proposal calls for the changes of use of part of the ground floor as well as the three upper floors from their existing hotel use (C1 use class) to a “co-living” use (sui generis) with an ancillary co-working space on the ground floor; which it is understood would be available for those living in the development but not members of the public.

Saved policy 1.7 (Development within Town and Local Centres) states the LPA will allow a range of uses within a town centre, where the following criteria are met:

- The scale and nature of the proposal is appropriate to the character and function of the centre and the catchment area it seeks to serve; and*
- The proposal will not harm the vitality and viability of the centre; and*
- A mix of uses is provided where appropriate; and*

*iv. Any floorspace currently in A Class use should be retained or replaced, unless the proposed use provides a direct service to the general public and the proposal would not harm the retail vitality and viability of the centre (where the proposal site is located within a protected shopping frontage the proposal should comply with Policy 1.9); and*

*v. The proposal would not materially harm the amenities of surrounding occupiers; and*

*vi. Where developments which are likely to attract a lot of people are proposed, the site should be highly accessible by sustainable modes of transport; and*

*vii. The road network has sufficient capacity to take any additional servicing traffic generated by the proposal without causing adverse effects on the environment, traffic circulation, or air quality; and*

*viii. The development addresses the street, provides an active frontage on pedestrian routes and would not erode the visual continuity of a shopping frontage; and*

*ix. The proposal provides amenities for users of the site such as public toilets, where appropriate.*

The proposed use is unusual, and somewhat unclear in terms of the type of tenure proposed. The use appears to propose a relatively long form of tenure beyond existing visitor accommodation, and hence the requirement for a change of use. However, this type of accommodation is effectively a large HMO, which is unsuitable for a town centre use, and would see the loss of traditional visitor accommodation, which is a common feature of town centres. Based on this, the proposed use is contrary to criteria i) and ii) of saved policy 1.7.

In relation to criterion iii), while the primary co living use is unsuitable, the co-working space at ground floor is a reasonable secondary use and could be incorporated into more traditional visitor accommodation at ground floor level to add some activation to the street frontage.

The quantum of commercial (E class) usage would remain largely unchanged at ground floor level, thus criterion iv) would be met.

Amenity impacts are discussed below.

The site benefits from a high PTAL, thus criterion vi) would be met.

No transport assessment of the proposed use has been submitted, which would be required for a proper assessment of criterion vii)

The proposed co-working space would add a greater level of activation to the street than the current hotel lobby, though there are some concerns around the lack of access of this service to the general public which may lead to an underutilization of the space. Officers would welcome a greater investigation of this service to maximize its activity, which would go towards meeting criterion viii).

The level of amenities provided are discussed under quality of accommodation.

In light of the above assessment, the proposed use is considered to be inappropriate development within a town centre and is unacceptable in principle.

Further to this, Policy E10 (Visitor Infrastructure) of the London Plan 2021 states:

*In outer London and those parts of inner London outside the CAZ, serviced accommodation should be promoted in town centres and within Opportunity Areas (in accordance with the sequential test as set out in Policy SD7 Town centres: development principles and Development Plan Documents) where they are well-connected by public transport, particularly to central London.*

The proposal would see a loss of serviced accommodation within a town centre, while the current condition and viability of the hotel are not known, limited justification for its loss has been proposed at this point and thus cannot be supported in line with the aims of policy E10.

### **Detailed design and heritage implication**

The proposal introduces two significant physical alterations to the site. The first is a series of dormers to the front, side, and rear of the existing roof. The second is a large roof communal roof terrace to the side of the site running along Datchelor Place, including a glazed safety balustrade.

The dormers to the front and side are prominent, and read as “bolted on” to the existing roof, rather than a considered feature as other dormers in the area do, such as across the street. This serves to disrupt a prominent and considered roof, which has a mild positive contribution to the conservation area, and as such these dormers are unacceptable based on the harm caused and the lack of any tangible public benefit to offset this.

Similarly, the roof terrace is a conspicuous feature which will be visible from ground level, and is a highly unusual feature in the conservation area and is also unsupported. There may be scope for some form of terrace, though this would need to be pulled back significantly from the edge in order for it to be properly concealed.

The dormers to the rear are less problematic, and are generally acceptable as they are hidden from public view.

### **Housing Quality**

The proposed development contains 33 bedrooms, with some ancillary facilities including four kitchens and a communal cinema room at basement level. The bedrooms range between 10-16sqm and are intended for single occupancy. There are significant concerns around the quality of the accommodation proposed, particularly as a long-term housing tenure beyond visitor accommodation. The volume of bedrooms coupled with limited facilities, in particular the lack of lounges beyond the basement level cinema room, which lacks any natural light and is relatively small; effectively render the scheme as a series of bedsits with basic facilities. While the bedrooms are generally of an acceptable size for single occupancy, the overall quantum of them would make it difficult to reasonably accommodate the level of communal rooms needed to make the scheme acceptable, at which point it would be closer to a student housing scheme. In short, the proposed accommodation is of a low standard, which would not be supported beyond a scheme of visitor accommodation similar to the existing hotel use.

### **Amenity impacts**

The proposed use does not introduce significant amenity concerns when compared with the existing use. In addition, the proposed dormers are set a reasonable distance from nearby properties than these would also not significantly infringe on neighbouring amenity. There are some concerns around the potential noise generated by the proposed terrace, though this may be offset by it being scaled back as recommended under the design and heritage section.

## **Transport and servicing issues**

### Cycle parking

33 cycle parking spaces are proposed, on a one on to one basis on the number of rooms. While this is a reasonable level of provision for occupiers, additional capacity for staff should be included.

### Servicing

Details of the servicing arrangement of the proposed use are unclear at this time, and likely to be more intensive than that of the hotel. Were the applicant to continue to pursue the proposed use, a full servicing management plan would be required at application stage.

## **Archaeology**

It is unclear at this stage if the basement is proposed to be extended, if this is the case a desk based stage one archaeological assessment would be required, as well as a flood risk assessment and basement impact assessment.

## **Community Infrastructure Levy**

The Mayoral Community Infrastructure levy has not been taken into account within the submission.

This development will be subject to the Mayoral CIL and Southwark CIL. The charge will be calculated according to the amount of new floor space the development will provide. The chargeable rate Southwark and Mayoral CIL can be found on the council's website. It is necessary to complete a 'Planning Application Additional Information Requirement Form' to determine the amount of chargeable floorspace on the site and submit this with any formal planning application on the site. The amount to be paid is calculated when planning permission is granted and it is paid when development starts. Further details about the CIL can be found using the links below.

<http://www.planningportal.gov.uk/planning/applications/howtoapply/whattosubmit/cil>

<http://www.communities.gov.uk/publications/planningandbuilding/communityinfrastructurelevy/may11>

## **Any other matters**

It is unclear how many jobs would be provided by the proposed use, though it is likely to be less than that of the existing hotel which requires a range of staff including desk staff, cleaners, and porters. Where a net loss of jobs is proposed, the proposal is unlikely to be supported.

## **Conclusion**

The proposed use presents significant issues in terms of quality of accommodation and appropriate use within a town centre. Furthermore, the proposed dormers and roof terrace risk harm to the character of the conservation area, and are also unsupported. A further application along these lines is not advised.

## **Seeking further pre-application advice**

Subject to a further fee, you are able to submit revised plans for further comment from the Council. Should you have any further questions then please do not hesitate to contact the case officer.

## **Submitting a Planning Application**

Information as shown below will be required for the formal submission of your application for full planning permission:

- A completed application form
- A site location plan to identify the land to which the application relates drawn to an identified scale (1:1250) showing the direction of North
- A copy of plans and drawings or information necessary to describe the subject of the application including:
  - Block plan of the site
  - Existing and proposed floor plans
  - Existing and proposed site sections, to include finished floor and site levels
  - Existing and proposed roof plans
  - Existing and proposed sections
  - Design and Access Statement (if the proposed works would affect a designated heritage asset or the setting of a designated heritage asset)
- The applicable fee

Signed: Stephen Platts

Director of Planning and Growth

Date: 28 October 2021

## APPENDIX 1: PLANNING APPLICATION SITE HISTORY

No relevant planning history