



**D&M PLANNING** Ltd  
Chartered Town Planners

1A High Street, Godalming Surrey GU7 1AZ | 01483425705 | info@dm-planning.co.uk  
www.dm-planning.co.uk

## **PLANNING STATEMENT**

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**For**

**CHANGE OF USE FROM CLASS E TO RESIDENTIAL (USE CLASS C3)  
TO FORM 2 x 1 BEDROOM RESIDENTIAL UNITS AND INTERNAL  
ALTERATIONS**

**At**

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**UNIT 4, ST SAVIOURS WHARF, 23 – 25 MILL STREET, LONDON,  
SOUTHWARK, SE1 2BE**

**D&M REF:12/22/MS  
APRIL 2022**

**DIRECTORS** - ANDREW BANDOSZ BA (Hons) MSc Dip UPI MRTPI | JESSE CHAPMAN BA (Hons) Dip.TP MRTPI  
**ASSOCIATE** - MATT SMITH BA (Hons) MA MRTPI **PLANNER** - PAUL HARDWICK BSc (Hons) MRTPI

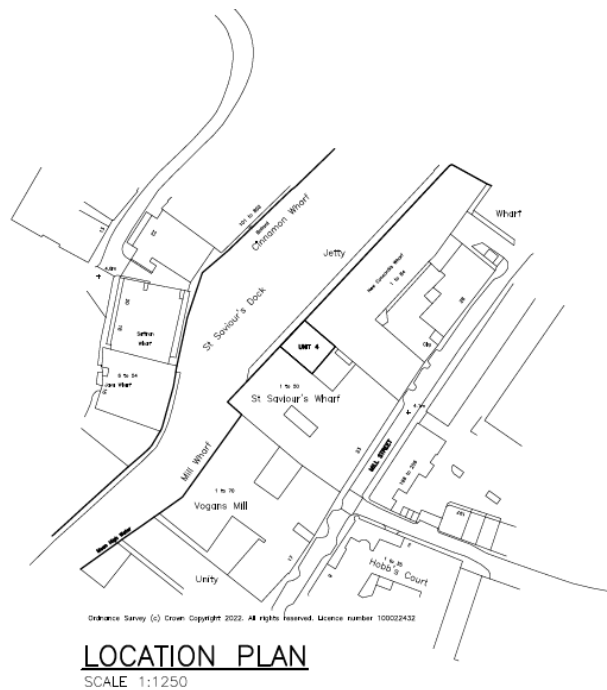
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## 1.0 INTRODUCTION

1.1 This Planning Statement is submitted on behalf of our client, Bicknell Estates Limited, in support of this full application and application for listed building consent which proposes the change of use of the existing commercial premises to provide a C3 residential dwelling at Unit 4, St Saviours Wharf, 23 – 25 Mill Street, London, SE1 2BE.

1.2 The application site, as shown on the site plan below, fronts on to Mill Street. The building is a Grade II Listed former warehouse six storeys in height. The building is currently divided into a number of separate units including commercial premises and residential flats.



*Location Plan*

1.3 The building was first listed as Mill Street, in 1983. The Historic England record describes the building as:

*Warehouse, now residential and business units. c1860. Stock brick with plain parapet with coping. 6 storeys, symmetrical 9-bay front with 3 hatch ranks (now balconies) with yellow bull-nosed reveals. Entranceways either side of central hatch rank on ground floor have segmental, gauged-brick arches and yellow bull-nosed reveals.*

*Pairs of windows each side of hatch ranks with segmental, gauged-brick arches. 5th floor has 2 cast-iron pivot hoists with arched braces and circular bracing to spandrels. Drain pipes slightly recessed. INTERIOR: rebuilt to include internal courtyards; some original timber beams and cast-iron columns. Good sequence with adjoining New Concordia Wharf buildings (qv) and group value with range of wharf buildings in Mill Street (qqv).*

- 1.4 Unit 4 is located on the ground floor of the building and is currently in commercial office use (Use Class E). The site has been marketed unsuccessfully for several months.
- 1.5 A similar application within the building has recently been approved and several units within the building are already residential in use.
- 1.6 In addition to the change of use the application seeks listed building consent for the necessary internal alterations to convert the open plan office to a residential property. This includes the installation of partition walls and the installation of the necessary fixtures and fittings.
- 1.7 This statement covers the site description, the proposal, the principle of development and contextual assessment. It will also demonstrate how the proposal accords with the relevant policies of the Development Plan consisting of soon to be adopted Southwark Plan 2022 and the London Plan.
- 1.8 The site is located within a Central Activity Zone wherein the new local plan sets out the loss of employment space can be justified.
- 1.9 It is contended that this proposal full accords with all of the relevant local plan policies, guidance within the NPPF and various supporting documents. Accordingly, it is contended that permission should be granted.

## **SCOPE OF SUBMISSION**

- 1.10 The documents submitted in support of the planning application have been informed by the Council's validation list.

1.11 This statement should be read in conjunction with the following documents which are submitted for formal approval:

- Application form (including ownership certificates)
- Site Location Plan
- Plans and Elevations

1.12 The following documents in addition to this Planning Statement are submitted in support of the planning application for information:

- Covering Letter
- Design and Access Statement
- Flood Risk Assessment
- Marketing report
- Heritage Statement

#### **STRUCTURE OF PLANNING STATEMENT**

1.13 The purpose of this statement is to set out the proposed development in further detail and assess the proposals against the relevant national and local planning policies and other material considerations.

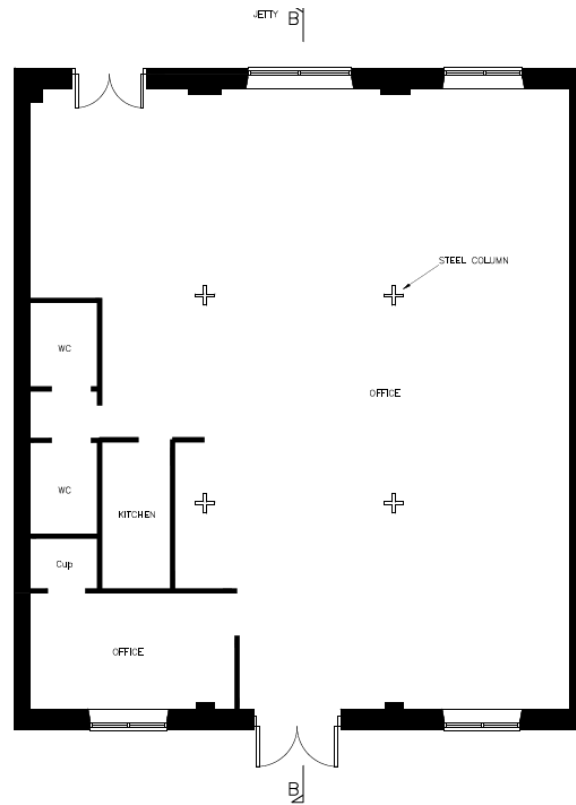
1.14 The statement will include the following sections: site description, planning history, description of the proposal, relevant planning policy, planning considerations, heritage statement and conclusion.

## 2.0 EIA STATEMENT

- 2.1 In accordance with the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (2017 No. 571) Part 2 4(3), the development scheme has been ‘self-screened’ to ascertain whether the proposed development comprises a project subject to EIA Regulations 2017.
- 2.2 The proposed development does not comprise development within Schedule 1 of the EIA Regulations 2017. The development could not be considered to comprise of development contained within Schedule 2 Column 1 10B development contained namely Infrastructure Projects and “Urban Development Projects, including the construction of shopping centres and car parks, sports stadiums, leisure centres and multiplex cinemas”. However, the development does not meet the applicable thresholds and criteria within Column 2 of Schedule 2 as amended within The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (2017 No. 571):
- (i) The development includes more than 1 hectare of urban development which is not dwelling house development; or
  - (ii) The development includes more than 150 dwellings; or
  - (iii) The overall area of the development exceeds 5 hectares.
- 2.3 The proposal would result in the change of use of a commercial building to a single residential property. The proposal would therefore fall well within the above thresholds. The proposal is considered not to result in a significant effect upon the environment and does not meet criteria contained within Schedule 3 of the EIA Regulations 2017 or result in a variation/amendment to a previous EIA development nor taken in conjunction with other development is it likely to have a significant environmental effect.
- 2.4 On this basis, the proposal would not represent EIA development in accordance with the Regulations 2017.

### 3.0 DESCRIPTION OF SITE AND LOCALITY

3.1 The site, as shown on the location plan below, is located along Mill Street, adjacent to the River Neckinger which leads into the Thames.



EXISTING FLOOR PLAN  
SCALE 1:50

*Existing*

- 3.2 The land consists of a six storey former warehouse which is a Grade II Listed Building divided into a number of commercial and residential units.
- 3.3 The elevation to Mill Street includes letting in-bays set in a largely symmetrical elevation incorporating a number of bays. The entrance to the building is located within the central bay.
- 3.4 A number of the letting in bays at upper floors have been adapted to provide balconies for residential properties.

- 3.5 The surrounding area incorporates a number of similar former warehouse buildings with letting in bays fronting on to the water way to the east. There are also a number of more recently constructed properties. The surrounding properties incorporate a mixture of residential and commercial uses.
- 3.6 The unit subject of this application consists of a ground floor property with partitioned meeting room and kitchenette. One side of the unit faces the internal courtyard of the building whilst the other faces St Saviours Dock leading onto the Thames.



## 4.0 PLANNING HISTORY

- 4.1 There is extensive planning history for the building as a whole, most of which relates to minor changes with permission required owing to the listed status of the building.
- 4.2 There is no specific history relating to Unit 4.
- 4.3 Planning permission was granted in the 1980s for the conversion of the former warehouse to a mixture of commercial and residential development.
- 4.4 Planning permission and listed building consent was granted in the late 00's and last year for the change of use of Units 8, 9, 10 and 11 from commercial to residential development.
- 4.5 In consideration of the most recent conversion (unit 11) the Council found the scheme to be acceptable on balance and considered the loss of the employment space to be entirely justified. It is contended that the same conclusion should be reached on this application.

## 5.0 THE PROPOSAL, INCLUDING DESIGN AND ACCESS PRINCIPLES

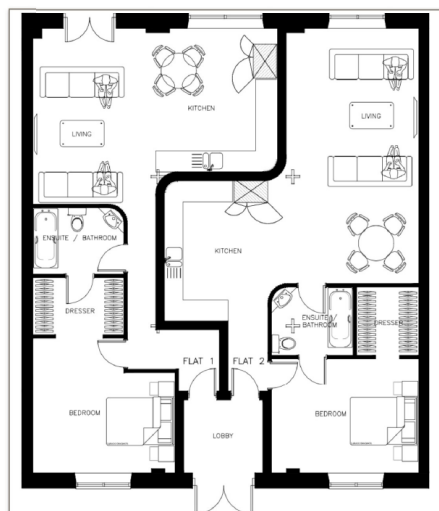
- 5.1 The application proposes the change of use of the existing ground floor commercial unit (Unit 4) to provide a residential dwelling and associated internal operations.
- 5.2 The proposal is outlined in detail by way of the proposed and existing plans, however, a description of such is set out below.

### Use

- 5.3 The application proposes the change of use of the space from commercial (Use Class E) to a single residential use (Use Class C3).

### Layout

- 5.4 The overall layout of the site would remain unchanged; no external alterations or extensions are proposed.
- 5.5 Internally it is proposed to insert walls and alterations to provide accommodation as shown on the plan below. This would result in the provision of 2 x 1 bedroom units.



Amount

- 5.6 The application proposes the change of use of the existing commercial property with a floor area of circa 140 sqm to two dwellings.
- 5.7 The proposed dwellings would occupy a floor area of circa 66 and 64 sqm and provide 2 dwellings both with one bedroom each.

Scale

- 5.8 No external alterations are proposed as part of the application

Appearance

- 5.9 No external alterations are proposed as part of the application and accordingly the external appearance would not be altered. Internally the form would be residential commensurate with the proposed change of use

Access

- 5.10 Access would remain unchanged being through a communal entrance and foyer.

## 6.0 PLANNING POLICY AND GUIDANCE BACKGROUND

- 6.1 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, planning applications are required to be determined in accordance with the Development Plan unless material considerations indicate otherwise.
- 6.2 The approved Development Plan for this site therefore comprises the policies of The Southwark Plan 2022 and the London Plan 2021.
- 6.3 At the time of writing it should be noted that The Southwark Plan 2022 has not been formally adopted with this expected to be on the 23<sup>rd</sup> February 2022. It has, however, been recommended for adoption by the Cabinet and is afforded significant weight at this time.

### Planning Policy Constraints

- 6.4 The application site is subject to the following planning constraints:
- Flood Zone 2 benefiting from Flood Defences
  - Conservation Area
  - Urban Density Zone
  - Article 4 restriction
  - Air Quality Management Area
  - Grade II Listed Building
  - Archaeological Priority Zone
  - Central Activities Area

### Central Government Planning Policy Guidance

- 6.5 The National Planning Policy Framework (NPPF) was first introduced in March 2012 and replaced planning policy statements (PPSs) and planning policy guidance notes (PPGs). The NPPF sets out national planning policy to be taken into account by

Councils when preparing new local plans and when taking decisions on planning applications.

6.6 The NPPF has recently been updated with a revised version being published in 2021. There continues to be a strong presumption in favour of sustainable development and at paragraph 3 it advises the Framework should be read as a whole.

6.7 Paragraph 7 states the purpose of the planning system is to contribute to the achievement of sustainable development. Paragraph 8 states achieving sustainable development means that the planning system has three overarching objectives (economic, social and environmental), which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives). However, paragraph 9 states these are not criteria against which every decision can or should be judged. Decisions should also take local circumstances into account, to reflect the character, needs and opportunities of each area.

6.8 Paragraph 12 states the following:

*‘The presumption in favour of sustainable development does not change the statutory status of the development plan as the starting point for decision-making. Where a planning application conflicts with an up-to-date development plan...permission should not usually be granted. Local planning authorities may take decisions that depart from an up-to-date development plan, but only if material considerations in a particular case indicate that the plan should not be followed.’*

6.9 The most relevant sections of the NPPF in relation to this proposal are 5 (Delivering a sufficient supply of homes); 11 (Making effective use of land); 12 (Achieving well-designed places); 14 (Meeting the challenge of climate change, flooding and coastal change); and 16 (Conserving and enhancing the historic environment).

6.10 Section 5 sets out how the Government expects local planning authorities to help achieve the aim of substantially boosting the available housing stock. It sets out that

Local Planning Authorities should identify and subsequently seek to deliver housing stock to meet an identified 5 year housing land supply. The change of use would help this identified need be addressed.

- 6.11 Section 11 deals with making the most effective use of land particularly for meeting the need for homes. It sets out that in paragraph 120 regard should be given to the underutilized buildings and land. The proposal would introduce a use to an otherwise vacant commercial premises whilst supporting housing delivery.
- 6.12 Section 12 deals with the requirement for good design, which it notes is a key aspect of sustainable development. The proposal would not result in any external alterations; however, the internal ones have been designed in such a way to ensure that there would be no harm by way of such.
- 6.13 Section 14 sets out that development needs to take appropriate measures to address with the changing climate both in mitigating and adapting to such. It further sets out that inappropriate development in areas of flood risk should be avoided.
- 6.14 Section 16 deals with the historic environment with the main principles being preservation and enhancement. The NPPF sets out that an assessment of the importance of heritage assets should accompany a planning application and that applications should be determined in accordance with the tests set out within it.

#### **Local Development Plan**

- 6.15 The approved Development Plan for this site comprises the policies of the Southwark Plan 2022 and the London Plan 2021 where they are consistent with the provisions of the National Planning Policy Framework 2019.
- 6.16 The following policies of the Southwark Plan are considered to apply to this application:
- ST1: Southwark's Development Targets
  - ST2: Southwark's Places
  - SP1: Homes for all

- SP6: Climate Emergency
- P2: New Family Homes
- P13: Design of Places
- P14: Design Quality
- P15: Residential Design
- P16: Designing out Crime
- P18: Efficient Use of Land
- P19: Listed Buildings and Structures
- P20: Conservation Areas
- P23: Archeology
- P30: Office and Business development
- P65: Improving Air Quality
- P67: Reducing Water use
- P68: Reducing Flood Risk
- P69: Sustainability standards
- P70: Energy
- IP1: Infrastructure
- IP2: Transport Infrastructure

6.17 The following policies of the London Plan are considered to apply to this application:

- GG2: Making the best use of land
- GG3: Creating a healthy city
- GG4: Delivering the homes Londoners need
- SD4: The Central Activities Zone
- SD5: Offices, other strategic functions and residential development in the CAZ
- D1: London's form, character and capacity for growth
- D4: Delivering good design
- D6: Housing quality and standards
- H1: Increasing housing supply
- H10: Housing size mix
- E1: Offices
- HC1: Heritage conservation and growth

6.18 Further relevant guidance also considered as part of the proposed development:

- National Planning Policy Framework (February 2019) (NPPF)
- The National Planning Practice Guidance 2014 (NPPG)

## 7.0 PLANNING CONSIDERATIONS

7.1 The application consists of the change of use of the existing ground floor office to provide two residential dwellings. Listed Building Consent is sought for the relevant internal works to facilitate the development.

7.2 Having had regard to the planning constraints of the land it is considered that the key determining factors will be:

- Principle of development
- Loss of Commercial Space
- Impact on Heritage Asset
- Design and Visual Impact of the development
- Standard of Accommodation
- Impact on Neighbouring Amenity
- Cycle and Refuse Storage
- Flood Risk
- Other matters

### Principle of development

7.3 The application site is located within the Central Activities Zone (CAZ). Policy H1 of the London Plan sets out the targets for delivering housing across the Greater London area including the targets for individual boroughs. It sets out that over the plan period Westminster's target is for 9,850 new dwellings.

7.4 Policy SP1 sets out the overall requirement for new housing delivery in borough across the plan period. This is at least 40,035 homes equivalent to 2,355 new homes per annum. This includes the delivery of new homes within the Central Activities Zone.

7.5 The majority of the building has been converted into residential properties emphasising its suitability as a location for new housing.



- 7.6 The existing property is currently vacant, but the lawful planning use is as an office (Use Class E). The proposal therefore would result in the loss of employment space which policy P30 seeks to resist unless there are exceptional circumstances to justify such.
- 7.7 The building is also a Grade II Listed Building. Accordingly, the Council must be satisfied, in line with the relevant legislative and policy framework, that the proposal would not result in unacceptable harm to the heritage asset.
- 7.8 The site also forms part of the St Saviours Dock Conservation Area; accordingly, the Council must also be satisfied that the proposal does not result in harm to this wider heritage asset.

#### Loss of Employment Space

- 7.9 Policy P30 of the Southwark Plan states:

- 1. In the Central Activities Zone, town centres, opportunity areas and individual development plots within site allocations where employment re-provision is required, development must:
  - 1. Retain or increase the amount of employment floorspace on site (Gross Internal Area (GIA) of E(g), B2, B8 class use or sui generis employment generating uses); and*
  - 2. Promote the successful integration of homes and employment space in physical layout and servicing in areas that will accommodate mixed use development. This will include a range of employment spaces including freight, logistics, light industry, co-working, maker spaces and offices; and*
  - 3. Provide a marketing strategy for the use and occupation of the employment space to be delivered to demonstrate how it will meet current market demand.**
- 2. In exceptional circumstances the loss of employment floorspace may be accepted in the Central Activities Zone, town centres, opportunity areas and where specified in site allocations where the retention or uplift in employment floorspace on the site is not feasible. This must be demonstrated by a marketing exercise for two years immediately prior to any planning application. This should be for both its existing condition and as an opportunity for an improved employment use through redevelopment which shows there is no demand.*

3. *Development that results in a loss of employment floorspace anywhere in the borough must provide a financial contribution towards training and jobs for local people.*

4. *Employment uses required by this policy (Use Class E(g)) will be secured and where necessary, retained through the implementation of conditions and/or planning obligations in accordance with the tests set out in national policy.*

7.10 In considering the change of use of Unit 11 (21/AP/1497) the officer's report when assessing the loss of the employment use under the now superseded policy 1.4 states:

*It is important to note that the application site is situated at the very edge of the Central Activities Zone (CAZ) and the loss of office floorspace would not be excessive at 107sqm. The planning history of the application site and surrounding area shows several instances where existing offices within mix use buildings in the CAZ have been changed to residential units for example Unit 3 within the neighbouring Vogan Mill Wharf (application reference 11/AP/3533); the third floor office unit within Unity Wharf (application reference 15/AP/2827) or most recently a second floor office unit (application reference 21/AP/1639) unit within New Concordia Wharf. As such the change of use of small office units within mixed use buildings appears to be common in this area.*

*The loss of 107sqm office in this location is unlikely to negatively impact the vitality and vibrancy of the CAZ, and the residential use would be a more sustainable use compared to a vacant office space. The area is mixed-use in character including a fair proportion of residential, both surrounding the site and within other parts of the same building. As such on balance the change of use is considered acceptable. As such there is no objection to the provision of a selfcontained flat as proposed.*

7.11 The application for unit 11 included justification for the loss of the employment space based on the limitations of being able to accommodate the need of modern officing (ICT, air conditioning, fire safety etc) owing to its listed nature. It further highlighted the trend as a result of the ongoing pandemic for home working making single office units unviable.

7.12 These elements quite clearly have impacted on the suitability of Unit 4, subject of this application, to be utilised for continued commercial purposes. The expectation of modern employment space is not feasible within Unit 4 both in relation to its existing arrangement and the constraints on growth owing to its Listed nature.

- 7.13 This is further evidenced in the information provided by commercial agents instructed by the applicant to market the properties. This was from both KALMARs for six months followed by Fields & Sons.
- 7.14 The letter from KALMARs indicates that they were instructed in October 2020, however, despite the strong pre-covid market a tenant was not found. The property was also listed for sale at the same time. There was very limited interest in the unit despite reduction in price and refresh launches. Furthermore, the report indicates that other units within the building have also remained vacant.
- 7.15 As identified in the report from Fields & Sons they were first instructed in January 2021 and advertised the property for both sale and let. This was priced at £725 per sq foot for sale and £35 per sq foot for rent. The property was marketed on both Zoopla and Primelocation, the agents own website and specifically targeted websites. Over the marketing period there was enquiries by circa 30 parties but only four viewings, none of which were successful.
- 7.16 The report further adds that the trends in the area indicate that it is no longer a location deemed attractive to potential office occupiers with a total of 14 offices available in the immediate area.
- 7.17 Having had regard to such it is contended that the exceptional circumstances referenced in part 2 of Policy 30 are engaged. Owing to the change of uses in the area and the listed nature of the building it is not possible to uplift or adapt the floor area. Furthermore, it has been demonstrated from 24 months of marketing that there is no market demand for the unit as a commercial premises.
- 7.18 We therefore contend that the loss of the employment space is, in this circumstance, entirely justified and in accordance with Policy 30 of the development Plan.

#### Impact on the Heritage Assets

- 7.19 The building itself is Grade II Listed and first listed in 1981 as part of Mill Street more widely. The Historic England description states:

*Warehouse, now residential and business units. c1860. Stock brick with plain parapet with coping. 6 storeys, symmetrical 9-bay front with 3 hatch ranks (now balconies) with yellow bull-nosed reveals. Entranceways either side of central hatch rank on ground floor have segmental, gauged-brick arches and yellow bull-nosed reveals. Pairs of windows each side of hatch ranks with segmental, gauged-brick arches. 5th floor has 2 cast-iron pivot hoists with arched braces and circular bracing to spandrels. Drain pipes slightly recessed. INTERIOR: rebuilt to include internal courtyards; some original timber beams and cast-iron columns. Good sequence with adjoining New Concordia Wharf buildings (qv) and group value with range of wharf buildings in Mill Street (qqv).*

- 7.20 The site is also within the St Saviours Dock Conservation Area and within the vicinity of a number of other listed buildings.

- 7.21 Policy P19 states that development relating to listed buildings structures and their settings will only be permitted if it preserves or enhance their special significance. Policy P20 states the same for Conservation Area.

- 7.22 Policy HC1 of the London Plan requires development proposals which affect heritage assets and their settings to conserve their significance and avoid harm to them.

- 7.23 Section 66 of the relevant act requires that in considering whether to approve planning permission which affects a listed building, the LPA shall have special regard to the desirability of preserving the building or its setting or any features of special interest.

- 7.24 This is expanded on in the NPPF which makes it clear that significant weight should be given to the impact of a proposal on listed buildings. Paragraph 199 states that great weight should be given to the asset's conservation.

- 7.25 In the consideration of the listed building consent for unit 11 the accompanying officer's report identified that the harm to the historic building from the necessary internal subdivisions would be nil. Furthermore, the consideration identified public benefits in the provision of a new residential dwelling.

- 7.26 There is no reason why a separate conclusion should not be reached in the determination of this scheme. The accompanying Heritage Statement will deal with this assessment in much greater detail; however, it is concluded that the development would preserve the historic fabric and character of the building, surrounding buildings and Conservation Area. This is emphasised by the absence of any external alterations.

#### Design and Impact on Visual Amenity

- 7.27 The NPPF attaches great importance to the design of the built environment as a key part of sustainable development. Paragraph 126 of the NPPF states: *the creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development.*
- 7.28 It continues to state at paragraph 130 that planning decisions should ensure that developments:
- a) *Will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*
  - b) *Are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;*
  - c) *Are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities)*
  - d) *Establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;*
  - e) *Optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and*
  - f) *Create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users, and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.*

- 7.29 Policy P13 of the Local Plan states:

1. *Ensure height, scale, massing and arrangement respond positively to the existing townscape, character and context; and*

2. *Better reveal local distinctiveness and architectural character; and conserve and enhance the significance of the local historic environment; and*
3. *Ensure the urban grain and site layout take account of and improve existing patterns of development and movement, permeability and street widths; and*
4. *Ensure buildings, public spaces, open spaces and routes are positioned according to their function, importance and use; and*
5. *Ensure a high quality public realm that encourages walking and cycling and is safe, legible, and attractive, and eases the movement of pedestrians, cyclists, pushchairs, wheelchairs and mobility scooters and vehicular traffic. Street clutter should be avoided; and*
6. *Provide landscaping which is appropriate to the context, including the provision and retention of street trees, and*
7. *Provide the use of green infrastructure through the principles of water sensitive urban design, including quiet green spaces, tree pit rain gardens in addition to green grid spaces for people and surface water runoff; and*
8. *Provide accessible and inclusive design for all ages and people with disabilities; and*
9. *Provide opportunities for formal and informal play; and*
10. *Provide adequate outdoor seating for residents and visitors.*

7.30 Further, Policy P14 of the Development Plan states:

1. *High standards of design including building fabric, function and composition; and*
2. *Innovative design solutions that are specific to the site's historic context, topography and constraints; and*
3. *Adequate daylight, sunlight, outlook, and a comfortable microclimate including good acoustic design for new and existing residents; and*
4. *A positive response to the context using durable, quality materials; and*
5. *Buildings and spaces which are constructed and designed sustainably to adapt to the impacts of climate change; and*
6. *Buildings and spaces that utilise active design principles that are fitting to the location, context, scale and type of development; and*
7. *Active frontages and entrances that promote activity and successfully engage with the public realm in appropriate locations; and*
8. *Adequate servicing within the footprint of the building and site for each land use; and*
9. *Accessible and inclusive design for all; and*
10. *A positive pedestrian experience; and*
11. *Basements that do not have adverse archaeological, amenity or environmental impacts.*

7.31 There are no external changes proposed to facilitate the change of use. Accordingly, the outward appearance of the building would remain unchanged and its impact on the character of the area would be neutral.

7.32 This conclusion was reached in the Council's determination of Unit 11 wherein the officers report stated:

*There are no external alterations proposed, as such there are no design concerns*

7.33 Accordingly, it is asserted that in regard to its impact on the character of the area the proposal would accord with policies 13 and 14 of the Local Plan.

#### Standard of Accommodation

7.34 Policy D6 of the London Plan states:

- A. Housing development should be of high quality design and provide adequately-sized rooms (see Table 3.1) with comfortable and functional layouts which are fit for purpose and meet the needs of Londoners without differentiating between tenures.*
- B. Qualitative aspects of a development are key to ensuring successful sustainable housing. Table 3.2 sets out key qualitative aspects which should be addressed in the design of housing developments.*
- C. Housing development should maximise the provision of dual aspect dwellings and normally avoid the provision of single aspect dwellings. A single aspect dwelling should only be provided where it is considered a more appropriate design solution to meet the requirements of Part B in Policy D3 Optimising site capacity through the design-led approach than a dual aspect dwelling, and it can be demonstrated that it will have adequate passive ventilation, daylight and privacy, and avoid overheating.*
- D. The design of development should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context, whilst avoiding overheating, minimising overshadowing and maximising the usability of outside amenity space.*
- E. Housing should be designed with adequate and easily accessible storage space that supports the separate collection of dry recyclables (for at least card, paper, mixed plastics, metals, glass) and food waste as well as residual waste.*

*F. Housing developments are required to meet the minimum standards below which apply to all tenures and all residential accommodation that is self-contained.*

*Private Internal Space*

- 1. Dwellings must provide at least the gross internal floor area and built-in storage area set out in Table 3.1.*
- 2. A dwelling with two or more bedspaces must have at least one double (or twin) bedroom that is at least 2.75m wide. Every other additional double (or twin) bedroom must be at least 2.55m wide.*
- 3. A one bedspace single bedroom must have a floor area of at least 7.5 sq.m. and be at least 2.15m wide.*
- 4. A two bedspace double (or twin) bedroom must have a floor area of at least 11.5 sq.m..*
- 5. Any area with a headroom of less than 1.5m is not counted within the Gross Internal Area unless used solely for storage (If the area under the stairs is to be used for storage, assume a general floor area of 1 sq.m. within the Gross Internal Area).*
- 6. Any other area that is used solely for storage and has a headroom of 0.9- 1.5m (such as under eaves) can only be counted up to 50 per cent of its floor area, and any area lower than 0.9m is not counted at all.*
- 7. A built-in wardrobe counts towards the Gross Internal Area and bedroom floor area requirements, but should not reduce the effective width of the room below the minimum widths set out above. Any built-in area in excess of 0.72 sq.m. in a double bedroom and 0.36 sq.m. in a single bedroom counts towards the built-in storage requirement.*
- 8. The minimum floor to ceiling height must be 2.5m for at least 75 per cent of the Gross Internal Area of each dwelling*

7.35 There is evidently some overlap with Policy 14 cited above and also Policy 15 which focuses on ensuring high quality development.

7.36 The table below shows the internal floor area of the two units.

<b>Unit</b>	<b>GIA (sqm) (circa)</b>
<b>1</b>	65
<b>2</b>	66

7.37 The proposed dwellings would therefore exceed the space standards set out in the referenced table 3.1. Furthermore, the room sizes would also exceed those set out in the policy, providing a high standard of internal amenity.



- 7.38 Furthermore, the habitable rooms of both properties served by windows to provide natural light. These windows would in combination provide a dual aspect to the property allowing for ventilation and air floor.
- 7.39 The units would also be provided with storage in the form of a designated dressing space, which exceeds the minimum requirements for storage set out within the designation as per point 7 of the policy.
- 7.40 It is therefore contended that the development would accord and exceed the space standards in accordance with Policy D6 of the London Plan.

#### Impact on neighbouring amenity

- 7.41 Policy 56 of the Local Plan states:

*1. Development should not be permitted when it causes an unacceptable loss of amenity to present or future occupiers or users. Amenity considerations that will be taken into account include:*

- 1. The privacy and outlook of occupiers of both existing and proposed homes*
- 2. Actual or sense of overlooking or enclosure*
- 3. Impacts of smell, noise, vibration, lighting or other nuisances*
- 4. Daylight, sunlight, and impacts from wind and on microclimate*
- 5. Residential layout, context and design*

- 7.42 The Council's Residential Design Standards updated in March 2015 provides further guidance on the assessment of development on the amenity of neighbouring properties.
- 7.43 The proposed development would be contained within the existing built form of the property and, accordingly, there would be no harm to the amenity of neighbouring properties by way of additional built form; this would ensure there would be no harm by way of impact on light.
- 7.44 The proposed conversion would utilise the existing windows and accordingly, would not result in any greater overlooking than the existing arrangement.

7.45 The only impact of the development therefore would be by way of the change of use. The building as a whole has predominately been altered to residential with the noise insulation between the properties being established and suitably installed.

7.46 In the consideration of the change of use application at Unit 11 the officer's report states:

*The existing uses within the application building is mixed use office and residential, as such the proposed residential use is not considered to have any adverse impact on the amenity of adjoining occupiers within the application property as they would all fall within the same Use Class C3.*

7.47 This assessment would not be altered by way of the current proposal. It is therefore contended that the change of use would be entirely appropriate in terms of its impact on neighbouring amenity.

#### Cycle and Refuse Store

7.48 The wider building provides opportunity for cycle storage and communal refuse store. The proposal will provide an additional two secure cycle parking spaces and associated provision for refuse store.

7.49 This is shown on the plans and their relationship to unit 4. It is further contended that the development would provide less demand on these facilities than the existing lawful use.

#### Flood Risk

7.50 Policy 68 sets out that development should be designed to be resilient to flooding and to reduce the risk of such.

7.51 The application is accompanied by a Flood Risk Assessment produced by Flume Consulting Engineering. This concludes that the development can be carried out in accordance with the relevant legislation and guidance.

7.52 It is proposed therefore that the development would accord with Policy 56 of the Local Plan and the relevant guidance.

## 8.0 CONCLUSIONS

- 8.1 The application proposes the change of use of Unit 4, St Saviours Wharf from its lawful commercial office (Class E) to provide two residential dwellinghouses; both of them providing one-bedroom properties.
- 8.2 St Saviours Wharf is a Grade II listed building and set within the St Saviours Dock Conservation Area. The application does not propose any external alterations to the building and only internal alterations.
- 8.3 As is set out in the Heritage Statement the proposal would respect the character and historic fabric of the building.
- 8.4 The conversion of units within the building has been accepted with a number of other similar proposals having been approved by the local planning authority. The principle of the conversion is therefore long established. Furthermore, it has been demonstrated by the marketing of the property, the wider context, and the listed status of the building that the continued commercial use is unviable.
- 8.5 The proposed dwellings would deliver a high standard of accommodation exceeding the minimum space standards, providing a dual aspect living and a generous storage.
- 8.6 The proposal would provide a contribution towards meeting the housing demand of the borough within a highly sustainable location suitable for such a provision.
- 8.7 We contend that there is significant merit in the granting of this application and trust that the local planning authority will agree.
- 8.8 We trust that you have been provided with sufficient information, however, if you require anything further, please do not hesitate to contact me.

**D & M Planning Ltd**

*Chartered Town Planners*