

Committee	STRATEGIC PLANNING COMMITTEE (ADDENDUM)	
Report Title	Blackheath Business Estate, Blackheath Hill, London, SE10 8BA	
Ward	Blackheath	
Contributors	Patrycja Ploch	
Class	PART 1	16 December 2020

## 1 **ADDENDUM**

- 1 This report sets out an addendum to the committee agenda published on 26<sup>th</sup> August 2019 in respect of Strategic Planning Committee that will take place on 16th December 2020. The report outlines amendments to Item 3, as set out below.

## 2 **ITEM 3 – BLACKHEATH BUSINESS ESTATE, BLACKHEATH HILL, LONDON, SE10 8BA**

### **Amendments to the Original Report**

#### *Cycle parking*

- 2 Paragraph 29 on page 20, states that the proposed development would provide 2,220sqm of commercial floorspace. The correct figure is 2,288sqm.

### **Comments on additional representations**

- 3 As part of subsequent representations received post the publication of the main committee report, no new matters have been raised that are not already considered. Although, further detail is emphasised below.

#### *Park Beekeeping / loss of existing tenants*

- 4 Officers would secure relocation strategy for the existing tenants, through a suitably worded obligation within an s106 agreement. This would apply to all existing tenants.
- 5 Concerns have been raised regarding the additional traffic movement that would be a direct result from intensification of the use of this site. To generate the movement to and from the site, the application used the Trip Rate Information Computer System (TRICS) database for residential and commercial use. Officer note that the proposed development would offer no car parking facilities with the exception of the disabled car parking spaces. This is a significant change to the existing situation where there is an ample car parking available on site. With this in mind and the fact that the applicant has made positive changes to make the built environment in and around the application site suitable for walking and cycling would result in most trips made to and from the site by sustainable transport modes. The number of trips by vehicles to and from the site would be negligible. The scheme raises no objection by the Councils Highways Authority and Transport for London, subject to securing highways improvements.

#### *Bundle of Statements*

- 6 The bundle of five (5) statements was received raising concerns with the following:

- Loss of light to flats within Cardinal House and Chalkhill House
- Overbearing impact on residents of Cardinal House and Chalkhill House
- Safety concerns regarding second pedestrian walkway to the rear of Business Block
- Impact of the proposed on the Brain Injury and Neurological Hospital in terms of privacy, rehabilitation and recovery
  - Applicant referring to hospital as Class D not Class C
  - Applicant referring to the internal layout of the hospital incorrectly
  - Construction
- Overall density
- Development as a car free initiative
- The Plan for the Business Block – existing tenants would operate from a multi storey building due to the use of pallets; lack of parking
- Increase in Noise Pollution
- Loss of trees on the west boundary
- Traffic including service vehicles, residential and commercial vehicles (covered above)

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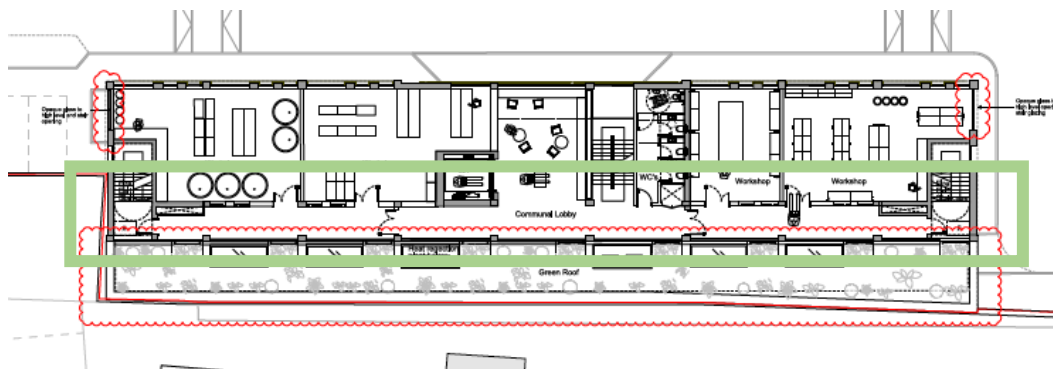
Concerning loss of daylight/sunlight and overbearing impact on residents of Cardinal House and Chalkhill House. Officers note that the original design of this block results in lower light levels. This is because several habitable rooms are located under recessed external walkways that hinder the windows/room ability to see visible sky. The submitted Daylight and Sunlight assessment confirmed that out of the 185 windows, only 65 currently benefit from a VSC of at least 15%, even though the windows in question currently face single storey buildings. This will reduce to 57 windows post development. The VSC results also show that currently the VSC result for the ground and fifth floors are generally between 3% and 5%, although there will be a significant reduction in the VSC level to these windows in the post-development conditions. The result indicate that these are already poorly lit spaces that are expected to use artificial lighting for a larger proportion of the time they are being uses because of the overhangs/walkways and their proximity to the bank. Turning to overbearing impact, the proposed commercial building would be located between 3.8m at the closest point and 7.2m at the widest point at ground floor level. This distance would increase to 7.3m and 11.6m respectively above the ground floor level. The impact of the development would be mitigated by inclusion of climbing plants on the rear elevation of the commercial building to soften its appearance. Officers consider given the existing site conditions and the mitigations measures proposed that the proposal would not result in an impact, which is unacceptable as to refuse planning permission, given the urban and developed context of the site and public benefit that the scheme offers through increased employment space and new housing including affordable housing.

**Image 1 and 2: Originally proposed rear elevation (left) and revised rear elevation (right)**



- 8 Concerning safety concerns regarding second pedestrian walkway to the rear of Business Block. Officers note that there is no pedestrian walkway to the rear of the proposed commercial building. There would therefore be no access toward Heathside and Lethbridge from the commercial building.
- 9 Concerning impacts on privacy, the commercial building has been designed in a way that only have internal corridors on facing rear elevations (see green box). There would be no spaces through the layout that would result in direct overlooking. Furthermore, the material used for the rear elevation would watch ribbed glass, which would provide additional layer of privacy. This can be seen from the Image 1 and 2 above.

**Image 3: Proposed layout of 2<sup>nd</sup> floor of the commercial building**



- 10 Concerning the impact on the Brain Injury and Neurological Hospital in terms of privacy, rehabilitation and recovery. Regardless of the use-class, the hospital has been treated appropriately and given full consideration in the decision making process. The current outlook from the rooms facing the application site is towards shared boundary / rear wall to the existing commercial building on site. The proposed building whist taller than the existing would be lead to improvement on outlook as they would be stepped back from the site and they would have some soft landscaping that would be seen from the hospital site. The applicant's

consultant obtained the floor plans for the patient recovery areas, which form the basis of the assessment. Officers have not received any information about the layout of the hospital to contradict the applicant assumptions on the internal layout of the hospital. In any case, it is considered that the impact would be acceptable and it would not warrant a refusal of planning permission.

- 11 Regarding construction, Officers recognise that during implementation of the development there would be a significant amount of noise, disturbance, impact on air quality from construction related activity including vehicular traffic. A draft consultation management plan (CMP) has been submitted with the application, which sets out how it is intended that the demolition and construction process would be implemented and managed. It is not uncommon for construction projects to be taken place next to sensitive uses. Officers consider that on balance subject to control of the CMP via condition it is not considered appropriate or reasonable to raise an objection to the proposal on the grounds of harm to neighbouring amenity from construction related activity.
- 12 Concerns have been raised with density of the development. Whilst the proposed development would exceed a range for an urban location, the current policies require development to make the most efficient use of land and to optimise density using an assessment of site context and a design –led approach to determine site capacity. Officers are satisfied that the application has sufficiently demonstrate that site is capable of delivering a successfully developed at a higher density.
- 13 Concerns were raised with the development as a car free initiative. Councils Highways Authority, GLA and TfL support the car free development. The applicant has made positive changes during the determination of the application to ensure that the development is not dominated by cars and they seek to prioritise modes of sustainable and active travel over that of vehicle. The submitted transport statement demonstrates that it is estimated that the majority of trips would be taken by sustainable modes of transport given the lack of car parking spaces. In additional the applicant has been asked to enter in a legal agreement which would prevent future tenants and residential from obtaining car parking permits. Furthermore, the application would be required to submit a Travel Plan for both residential and commercial use that would further help promote sustainable and active travel and discourage car-use. This will help further mitigate against increased on-street demand for parking.
- 14 The Plan for the Business Block – existing tenants would operate from a multi storey building due to the use of pallets; lack of parking. The development has been designed in collaboration with a local multi-disciplinary design studio, Studio Raw. The applicant has looked at the need of potential tenants, allowing the architects to design the building that responds to those needs, be flexible, and intensify the employment use on site. Officers also note that the commercial building has been designed in line with the industrial intensification and co-location study: design and delivery testing prepared by We Made That. The study was commissioned by the GLA to explore the potential for intensifying use of London's industrial land, in response to new policies in the draft London Plan. The information contained within this document influenced the design of the service yard. Having reviewed the documents and assessed the proposal, officers are satisfied that the yard space provided would comply with the requirements sets for proposed uses at the site.

- 15 Increase in Noise Pollution from the site. The proposed development would intensify the use of the site and therefore it is inevitable that there will be some increase in noise pollution from the site. The commercial use has been already established at the site, and given that the application is surrounded by residential properties there is no objection to the proposed new use here. The application submitted a noise survey that was reviewed by the Council's Environmental Protection Officer, who raised no objection to the proposed scheme provided that recommendations given in the report are put into place, in terms of glazing and wall construction they are satisfied with the Noise Assessment and its recommendation. An appropriate condition has been added ensuring of this.
- 16 Concerning the loss of existing trees. The proposal would remove 38 trees. All the trees that would be removed are category C (low quality) trees. During the determination of the application. The proposed development includes the planting of 50 new semi-mature and established trees across the site, giving a positive net gain of 12 new trees. In addition to the proposed tree planting, the applicant is also proposing to improve public realm through soft landscaping on the ground and roof level.

*11 Holymouth Close*

- 17 The issues raised in this objection letter submitted to Strategic Planning Committee members relate to
- Loss of amenity to tenants in designed accommodation for families with complex medical needs
  - Overbearing impact on two residential medical units treating NHS patients with brain injuries and neurological conditions.
  - Immediate loss of livelihood of 18 thriving, small, local businesses
- 18 Officers note that all these points were covered in paragraphs 7, 10, 4 and 14 of this addendum report.