Committee	PLANNING COMMITTEE A
Report Title	ADDENDUM
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Date	14th November 2019

ADDENDUM

1 This is an addendum to the planning committee agenda published on 4th November 2019 in respect of Planning Committee A on 14th November 2019.

2 This addendum outlines additional representations received following publication of the committee report for Item 3 (St Mildred's Church and Hall). Additional clarifications are also set out.

ITEM 3 – St Mildred's Church and Hall

3 Following the publication of the committee agenda, Lewisham received correspondence from a representative of the applicant, Stella Gill, on 12th November 2019. This correspondence included:

- Letter to Planning Committee A
- Submission in response to Planning Officer's report
- The Applicant's response statement to Victorian Society
- Commentary on Conservation Officer's comments
- Petition front sheet
- Letter from the Bishop of Southwark
- Letter from the Bishop of Woolwich
- Letter from the Archdeacon of Lewisham and Greenwich
- Letter from the Lewisham Area Dean

4 Officers have reviewed these submissions in detail and they have been placed on the electronic planning file for member's reference. However Officers consider the submissions do not raise new material planning issues that are not already considered in the committee report and the recommendation remains unchanged.

5 The following corrections and clarifications to the committee report are set out below.

Reduced Scheme

6 The Applicant was invited to reduce the scale of the extension in the course of the application. Officers stated the reduction in footprint of the extension to be $0.5m^2$ in the committee report at Paragraph 16. The applicant has advised Officers the reduction is actually $5.0m^2$, not $0.5m^2$. Officer accept this is correct.

7 Paragraph 16 of the committee report should therefore be corrected to read:

> *'The proposal outlined below is the revised scheme; compared to the originally submitted scheme the ground floor footprint of the proposed development was reduced by 5.0m².'*

8 The error was typographical. The error does not change the Officer's recommendation or the overall assessment of the application. Officers consider the reduction (mostly achieved by setting in the extension at the northern elevation) does not address the planning harm identified in the Conservation Officer's or Tree Officer's comments.

9 For Member's context, a reduction of 5.0m² as a percentage of the total proposed floor space of 599m² represents a reduction in the footprint of 0.83%. A reduction 0.5m^2 or 5.0m^2 would not mitigate the planning harm identified.

10 Officers also clarify that the maximum height of the main section of the single storey extension outlined in Paragraph 17 includes the pitched glazed rooflights.

Additional Letters Submitted

11 The letters submitted from the Bishop of Southwark, Bishop of Woolwich, Archdeacon of Lewisham and Greenwich and Lewisham Area Dean set out support for the scheme and object to the officers recommendation, but do not raise any new material planning issues.

Applicant Commentary – Pre-application History

12 The Applicant's submission states that planning pre-application engagement in 2014 was "informal" and a formal pre-application was undertaken in 2017. The applicant's commentary also states that Officers have disregarded the 2017 pre-application response in making the current recommendation.

13 Officer note that whatever the Council's pre-application processes and responses, the pre-applications are not material to the statutory planning decision before Members and Members are unable to take the pre-application responses into consideration in forming a view on the planning merit of the scheme.

14 In so far as it is material, a formal pre-application response was issued to the Applicant on 18th September 2014 following an Officer site visit. The response identified the Church as a Non-Designated Heritage Asset (NDHA) and stated that Officers considered the single storey element (which would wrap around the apse) to have a significant impact on the architectural integrity of the Church.

15 A second pre-application response was issued on 24th August 2017. This response concluded that Officers remained concerned that the wrap around element of the extension would serve to harm the historic footprint of the building. The 2017 response also outlined that the Applicant must ensure a sensitive design approach, so that the architectural integrity of the Church would not be compromised.

Applicant Commentary – Conservation Officer Comments

16 The Applicant asserts that the Conservation Officer has mis-assessed the proposal. Officer do not consider the scheme has been mis-assessed in heritage planning terms and there is nothing in the commentary that alters the Officer position that the scheme should be recommended for refusal.

17 Officers are satisfied that the assessment of the architectural significance of the Church, the stained glass windows, the streetscape value, the obscuring of the apse; and the issues concerning layout, plan form, architectural relationship and

materials have all be robustly considered as per the relevant paragraphs of the committee report.

Applicant Commentary – Committee Report

18 The Applicant asserts the assessment of an unlisted and non-locally listed structure is disproportionate in planning terms. There is no dispute the building is not statutory listed, however Officers maintain the Local Planning Authority (LPA) has a statutory obligation to protect Non-Designated Heritage Assets and the LPA is justified in making the current recommendation, which is considered to be in accordance with the NPPF. This set out in the committee report.

19 Paragraph 6 of the committee report outlines that the Church is pending addition to the Council's Local List and that consultation on a Local List update was due to be undertaken in November at the time of the committee report publication. Officers can confirm that consultation on the update to the Local List commenced on 7th November 2019 and that the Church was included.

https://consultation.lewisham.gov.uk/planning/newadditionslocallist/

20 Subject to the outcome of the consultation and the Mayor and Cabinet's decision, adoption will take place in 2020.

Plan Amendments

21 The Applicant's submission also proposed plan amendments very late in the application process. These are in relation to the proposed landscape plan, cycle parking and trees. Amendments cannot be accepted at this stage given the committee report has been published. Officers also note none of the proposed amendments address the fundamental heritage or tree-related planning concerns or overcome the reasons for refusal.

22 In so far as it is material, Officers have advised the Applicant that if Planning Committee A is minded to accept the Officer recommendation, a reduced scheme incorporating the proposed amendments may be brought forward. Likewise, if Committee is minded to approve the scheme, the amendments may be incorporated by condition, if required.

Tree Officer Response to Applicant's Comments

23 Following publication of the committee report, the Applicant provided a response to the Tree Officer seeking to further address Reason 2. The Tree Officer has considered the Applicant's comments and provided the submission below:

> *The Tree Officer maintains an objection to the proposal as set out in the committee report (Reason 2). The Tree Officer remains concerned that the following aspects of the scheme are not being appropriately considered in the design:*
>
> - *The importance of root protection to ensure the health of the trees*
> - *The green setting to the church building to benefit public realm / visual amenity*
> - *The significance of green vegetation at the front of the site beside the south circular to reduce air pollution*

The Tree Officers makes the following additional points concerning the site frontage and the rear oak tree on the site.

Frontage

- *No kerb edging and concrete haunching to the parking area is best practice within Root Protection Areas (RPAs) and is welcomed.*
- *The proposal to use a Golpa pre-grown grass surface or similar is also welcome, however the suggested use on top of cellweb is for heavily trafficked areas. This will require excessive level reduction within the RPAs of the trees.*
- *No revised plans with construction details have been produced to indicate how the trees and RPAs will actually be protected and accommodated by the parking surfacing now being proposed.*
- *The proposal remains to remove surface tree roots, rather than accommodate them within the green frontage design. This is of significant concern.*
- *The front lime trees and the London Plane in particular, will remain very exposed to vehicle damage as there is no protection from cars knocking into the tree trunks in the parking design*
- *New pedestrian entrance brick piers are still proposed within RPAs*

Rear Oak Tree

- *It would be possible to undertake a hand dug investigation beside the existing building to see if roots have extended beneath the existing building, by a series of trial pits.*
- *If the new building could be on mini piles and ground beams at or above the depth of the existing foundations then the root situation could be managed*
- *However the garden area proposes steps and planting beds which will involve excavating the ground level between the boundary and the new hall contrary to the Tree Protection* Plan *(para 5.4.2, Specific Rootzone Impacts)*