

Committee	PLANNING COMMITTEE C	
Report Title	Pepys Housing Office, Eddystone Tower	
Ward	Evelyn	
Contributors	Alfie Williams	
Class	PART 1	29 March 2018

<u>Reg. Nos.</u>	DC/17/104445
<u>Application dated</u>	08/11/2017
<u>Applicant</u>	Lewisham Homes
<u>Proposal</u>	The change of use, alteration and conversion of the Class B1 office space at ground and first floor levels of Eddystone Tower, Oxestalls Road SE8 together with the demolition of the existing rear extension, the construction of a two storey rear extension and alterations to the elevations to provide 2 three bedroom maisonettes, 1 two bedroom, 1 three bedroom and 1 four bedroom self-contained flats and a community facility (Use Class D1).
<u>Applicant's Plan Nos.</u>	PL109; PL110; PL111; PL112; PL113; PL114; PL115; PL117; PL118; PL119; PL120; PL121; 16/202/100 rev A received 24 November 2017; Flood Risk Assessment (UNDA, January 2018) received 18 January 2018; PL116 rev B; Design & Access Statement received 25 January 2018;
<u>Background Papers</u>	(1) This is Background Papers List (2) Case File DE/155/A/TP (3) Local Development Framework Documents (4) The London Plan
<u>Designation</u>	Area of Archaeological Priority PTAL 2 Thameside Policy Area Flood Risk Zone 2/3 Deptford Neighbourhood Forum

2.0 Property/Site Description

- 2.1 The site is located on the north side of Oxstalls Road and comprises a 26 storey residential tower block built in the 1960's known as Eddystone Tower. To the east are two similar towers – Daubeney Tower (150m east) and Aragon Tower (300m east) both of similar height. The lower rise Argosy House and Lanyard House are located approximately 90m to the north with Bambridge House 140m to the north east.
- 2.2 This application relates to the vacant ground and first floors of the tower. The bottom floors of the tower are B1 office uses and were previously the Pepys Estate Housing Office. Eddystone tower has an existing two storey extension to the western elevation of the building. The eastern elevation has an existing balcony at first floor level. Access to the tower is provided via entrances on the eastern and western elevations.

- 2.3 Eddystone Tower is located within the Thameside Policy Area and Flood Risk Zone 3. The site is not located within a conservation area and has a PTAL of 2.

3.0 Planning History

- 3.1 The applicant received detailed pre-application advice before the submission of the application in November 2017. In the pre-application meetings, officers raised concerns regarding the proposed external materials and expressed a preference for brick. Officers also requested alterations to the size of the proposed units and the associated amenity space, in order to meet London Plan Requirements.
- 3.2 The proposal was amended in accordance with the Council's recommendations and officers confirmed that the proposal was satisfactory in September 2017.

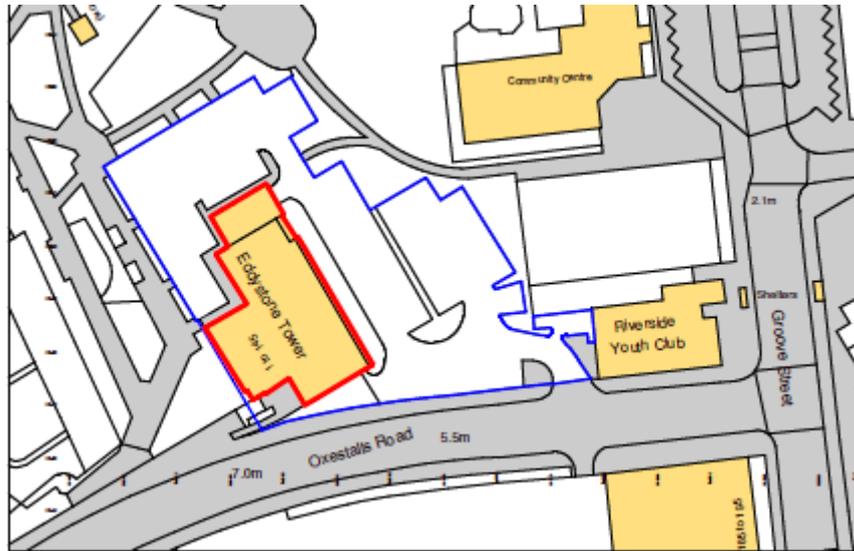
4.0 Background

- 4.1 Lewisham Homes is acting as the development agent of Lewisham Council as part of the Council's strategy to deliver as much new affordable housing as possible. In 2012, the Council agreed its New Homes; Better Places programme to deliver 2,000 new affordable homes for Lewisham residents in housing need, including 500 new Council homes at social rent.
- 4.2 This programme responds to the on-going housing in crisis in London that is felt most acutely by those with the lowest incomes and the least recourse to access market products. In Lewisham, this is expressed most clearly in the fact that 1,900 Lewisham households are homeless and housed in temporary housing of varying kinds. This number has doubled since 2010/11 and has been driven principally by the withdrawal of Government capital funding for new affordable homes, leading to a drop in supply and fewer homes for the Council to use to meet its duties to homeless households.
- 4.3 It was in that context the Lewisham Council initiated its own housebuilding programme to deliver the first new Council homes in the borough for a generation. It is backed by £100m of Council investment, with the new homes being delivered on the Council's behalf principally by Lewisham Homes on a number of small "infill" sites around the borough.
- 4.4 This application is one of the schemes that contribute to this programme, and if approved will contribute 5 new affordable Socially Rented homes as part of the 500 Council home target.

5.0 Current Planning Applications

The Proposals

- 5.1 The proposed development would see the conversion and change of use of the ground and first floors of Eddystone Tower from B1 office to provide five residential units and a D1 Community facility.



5.2 To facilitate the conversion the existing two storey extension to the western elevation would be demolished and a replacement built on the existing footprint. The extension would measure 17.1m wide with a height of 6.7m and a depth of 8.5m and would house two maisonettes. The maisonettes would be split over two floors and would provide 3 bedroom living accommodation for 5 persons. The extension would be constructed from brick with a flat roof and would accommodate aluminium composite windows and doors. Private amenity space would be provided at ground floor and first floor level on the western elevation. The maisonettes would be accessed via the communal corridor on the ground floor of Eddystone Tower. The unextended area of the western elevation would be refurbished in keeping with the appearance of the extension.

5.3 The first floor of Eddystone tower would be divided between the three proposed flats. Flat 03 would be accessed via the communal entrance on the eastern elevation with access to Flats 04 and 05 via a communal entrance on western elevation. Each flat would benefit from private amenity space provided by alterations to the existing balcony on the eastern elevation. The existing fenestration would be replaced with aluminium composite windows and doors.

5.4 **Table 1: Development Summary**

Dwelling	Layout	GIA m ²	Amenity Area m ²	Floor
Maisonette 01	3 bed/5 person	113	26.8	Ground/First
Maisonette 02	3 bed/5 person	119	31.5	Ground/First
Flat 03	4 bed/6 person	129	9.3	First
Flat 04	2 bed/3 person	92	15	First
Flat 05	3 bed/4 person	99	16	First

5.5 The ground floor level of Eddystone Tower would be divided between existing services and the proposed community facility. The community facility would provide two community rooms accommodating up to 60 people and kitchen and toilet facilities. The facility would be managed by Lewisham Homes and is intended to be used by residents of the estate.

- 5.6 No additional vehicle parking would be provided for the new residential units. However, ten cycle spaces would be allocated to the new residential units housed within a cycle store on the eastern elevation at ground floor level. Two Metrostor bin units are proposed adjacent to the eastern elevation providing four Eurobins for existing and new residents.

Supporting Documents

Design & Access Statement prepared by Bailey Garner

- 5.7 This statement provides a comprehensive description of the subject site. It outlines the contextual analysis, community consultation, design, schedule of accommodation, parking strategy, refuse strategy, flood risk, ecology and transport impact.

Flood Risk Assessment prepared by UNDA (January 2018)

- 5.8 The report analyses the flood risk to the development in accordance with the National Planning Policy Framework (NPPF 2012). The report documents details of the proposal and local flood defences and concludes that the proposed development is suitable in flood risk terms.

6.0 Consultation

- 6.1 This section outlines the consultation carried out by the applicant prior to submission and the Council following the submission of the application and summarises the responses received. The Council's consultation exceeded the minimum statutory requirements and those required by the Council's adopted Statement of Community Involvement.
- 6.2 Lewisham Homes held several meetings with residents prior to the submission of the application. The two most recent meetings were held in July and September 2017 as documented within the Design & Access Statement.
- 6.3 Following the submission of the application, site notices were displayed and letters were sent to residents and business in the surrounding area and the relevant ward Councillors. The Environment Agency and Deptford Action were also consulted in addition to the Council's Highways Departments.
- 6.4 The Tenants Action Group (TAG) objected to the proposal for the following reasons:
- The proposed flats would add to the population density in the area, which had been augmented by 8,000 new properties being built on 7 large sites in Deptford, North Lewisham. It was also noted that Eddystone Tower currently provided 145 residential flats.
 - The Housing Office has been moved to the Albany Building off Deptford High Street and is not easily accessible via public transport from Pepys Estate. The long walk also puts off some residents.
 - The cost of telephoning the Housing Office is prohibitive.
 - The Housing Officer should therefore be relocated back to Eddystone Tower.

7.0 Policy Context

Introduction

7.1 Section 70(2) of the Town and Country Planning Act 1990 (as amended) sets out that in considering and determining applications for planning permission the local planning authority must have regard to:-

- (a) the provisions of the development plan, so far as material to the application,
- (b) any local finance considerations, so far as material to the application, and
- (c) any other material considerations.

A local finance consideration means:

- (a) a grant or other financial assistance that has been, or will or could be, provided to a relevant authority by a Minister of the Crown, or
- (b) sums that a relevant authority has received, or will or could receive, in payment of Community Infrastructure Levy (CIL)

7.2 Section 38(6) of the Planning and Compulsory Purchase Act (2004) makes it clear that 'if regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise'. The development plan for Lewisham comprises the Core Strategy, the Development Management Local Plan, the Site Allocations Local Plan and the Lewisham Town Centre Local Plan, and the London Plan. The NPPF does not change the legal status of the development plan.

National Planning Policy Framework

7.3 The NPPF was published on 27 March 2012 and is a material consideration in the determination of planning applications. It contains at paragraph 14, a 'presumption in favour of sustainable development'. Annex 1 of the NPPF provides guidance on implementation of the NPPF. In summary, this states in paragraph 211, that policies in the development plan should not be considered out of date just because they were adopted prior to the publication of the NPPF. At paragraphs 214 and 215 guidance is given on the weight to be given to policies in the development plan. As the NPPF is now more than 12 months old paragraph 215 comes into effect. This states in part that '...due weight should be given to relevant policies in existing plans according to their degree of consistency with this framework (the closer the policies in the plan to the policies in the Framework, the greater the weight that may be given)'.

7.4 Officers have reviewed the Core Strategy for consistency with the NPPF and consider there is no issue of significant conflict. As such, full weight can be given to these policies in the decision making process in accordance with paragraphs 211, and 215 of the NPPF.

Other National Guidance

7.5 On 6 March 2014, DCLG launched the National Planning Practice Guidance (NPPG) resource. This replaced a number of planning practice guidance documents.

London Plan (March 2016)

7.6 The London Plan was updated on 14 March 2016 to incorporate the Housing Standards and Parking Standards Minor Alterations to the London Plan (2015). The new, draft London Plan was published by the Mayor of London for public consultation on 29 November 2017 (until 2 March 2018). However, given the very early stage in this process, this document has very limited weight as a material consideration when determining planning applications, does not warrant a departure from the existing policies of the development plan in this instance and is therefore not referred to further in this

report. The policies in the current adopted London Plan (2016) relevant to this application therefore are:

Policy 2.9 Inner London
Policy 3.3 Increasing housing supply
Policy 3.4 Optimising housing potential
Policy 3.5 Quality and design of housing developments
Policy 3.8 Housing choice
Policy 5.3 Sustainable design and construction
Policy 5.4 Retrofitting
Policy 6.9 Cycling
Policy 7.4 Local character
Policy 7.6 Architecture

London Plan Supplementary Planning Guidance (SPG)

7.7 The London Plan SPG's relevant to this application are:

Housing (2012)
Sustainable Design and Construction (2006)

London Plan Best Practice Guidance

7.8 The London Plan Best Practice Guidance's relevant to this application are:

London Housing Design Guide (Interim Edition, 2010)

Core Strategy

7.9 The Core Strategy was adopted by the Council at its meeting on 29 June 2011. The Core Strategy, together with the Site Allocations, the Lewisham Town Centre Local Plan, the Development Management Local Plan and the London Plan is the borough's statutory development plan. The following lists the relevant strategic objectives, spatial policies and cross cutting policies from the Lewisham Core Strategy as they relate to this application:

Core Strategy Policy 1 Housing provision, mix and affordability
Core Strategy Policy 8 Sustainable design and construction and energy efficiency
Core Strategy Policy 10 Managing and reducing the risk of flooding
Core Strategy Policy 13 Addressing Lewisham's waste management requirements
Core Strategy Policy 14 Sustainable movement and transport
Core Strategy Policy 15 High quality design for Lewisham

Development Management Local Plan

7.10 The Development Management Local Plan was adopted by the Council at its meeting on 26 November 2014. The Development Management Local Plan, together with the Site Allocations, the Lewisham Town Centre Local Plan, the Core Strategy and the London Plan is the borough's statutory development plan. The following lists the relevant strategic objectives, spatial policies and cross cutting policies from the Development Management Local Plan as they relate to this application:

7.11 The following policies are considered to be relevant to this application:

DM Policy 1 Presumption in favour of sustainable development
DM Policy 4 Conversions of office space and other B Use Class space into flats
DM Policy 22 Sustainable design and construction

DM Policy 30	Urban design and local character
DM Policy 31	Alterations/extensions to existing buildings
DM Policy 32	Housing design, layout and space standards
DM Policy 41	Innovative community facility provision

Residential Standards Supplementary Planning Document (August 2006)

7.12 This document sets out guidance and standards relating to design, sustainable development, renewable energy, flood risk, sustainable drainage, dwelling mix, density, layout, neighbour amenity, the amenities of the future occupants of developments, safety and security, refuse, affordable housing, self containment, noise and room positioning, room and dwelling sizes, storage, recycling facilities and bin storage, noise insulation, parking, cycle parking and storage, gardens and amenity space, landscaping, play space, Lifetime Homes and accessibility, and materials.

8.0 Planning Considerations

8.1 The main issues to be considered in respect of this application are:

- a) Principle of Development
- b) Design
- c) Housing
- d) Residential Amenity
- e) Highways and Transport Impacts
- f) Flood Risk
- g) Refuse and Recycling

Principle of Development

8.2 The ground and first floors of Eddystone Tower presently contains disused B1 offices and services for existing units within Rawlinson House. The area of the building to which the application relates is the vacant housing office.

8.3 National and local planning policies place considerable emphasis on the importance of achieving high quality design that complements existing development, and establishes townscape and character. The Residential Standards Supplementary Planning Document sets out guidance for all residential properties.

8.4 The Core Strategy recognises the Borough's need for housing and outlines the objectives to achieve 18,165 new dwellings between 2009/2010 and 2025. Further, the Council has a target to provide 500 homes for social rent to which this development would contribute five.

8.5 Officers acknowledge the concern raised by local residents to the relocation of the Housing Office. However, the housing office has been provided in a different location and therefore the application site is considered to be vacant. DM Policy 4 states that the Council supports the conversion of office space to flats in circumstances in which the conversion does not conflict with policies that protect employment floor space. Officers note that the site is not within a Town or District Centre and therefore the conversion would not conflict with any employment policies.

8.6 Officers therefore support the conversion of the vacant office into residential units where the proposal meets the relevant housing standards, and the proposal achieves a high quality living environment with access, parking and safety standards, and refuse storage and collection arrangements.

- 8.7 DM Policy 41 states that the Council will encourage, where appropriate, the use of innovative solutions to the provision of community meeting space. Officers consider that the proposed community facility is compliant with the specifications of the policy and will provide positive impacts for the local community and increase social cohesion.
- 8.8 The design elements of the scheme are discussed in detail in following sections of this report. The proposal will also be assessed in relation to housing standards and standard of accommodation in following sections of this report.

Design

- 8.9 The external changes proposed to the east and west elevations of the property are considered to have an acceptable impact on the character and appearance of the area. Specifically, the changes to the eastern façade will result in windows that are a similar pattern to, and more in keeping with, the residential windows on the upper floors of the building.
- 8.10 The proposed two storey extension would be subservient in the context of the principal 26-storey tower. The brick cladding and aluminium fenestration are considered high quality contemporary designs and materials. The proposed boundary treatments would be sufficient to offer an appropriate level of defensible space and security at the property.
- 8.11 Overall, the development would represent a minor change to the external appearance of Eddystone Tower that would be in keeping with the scale of the existing extension and complement the fenestration on the upper floors of the building. The alterations would provide natural surveillance, and make a high quality positive contribution to the area, activating a currently vacant unit which is considered to detract from the outward appearance of the building and view from the recently completed section of the Canal Park which extends past the site. As such, the proposal would accord with the objectives of DM Policy 30 in respect of high quality urban design and local character, and Core Strategy Policy 15, which promotes high quality design for Lewisham.

Housing

a) Tenure of Residential Accommodation

- 8.12 The proposed residential units would be available for social rent and would contribute to the Council's target to provide 500 new homes for social rent. Officers therefore considered the proposed tenure to be acceptable.

b) Standard of Residential Accommodation

- 8.13 DM Policy 32 states that the standards in the London Plan will be used to assess whether new housing development provides an appropriate level of residential quality and amenity. This will involve an assessment of whether the proposals provide accommodation that meets criteria relating to minimum space standards, floor to ceiling heights and storage space.
- 8.14 The minimum GIA required for 3 bedroom 5 person units with two storey is 93m² and is comfortably exceeded by the maisonettes 01 and 02. The London Plan requires that Flat 03 should have a GIA of 99m², Flat 04 a GIA of 61m² and Flat 05 are GIA of 74m². All three of the proposed first floor flats exceed the minimum GIA requirement.
- 8.15 Floor to ceiling heights are in excess of 2.3m (as measured from the plans provided with the application). Four of proposed units will be provided with dual aspect by way of windows facing two direction to enable an acceptable amount of daylight and sunlight into habitable rooms. Flat 04 is single aspect however, as the flat faces, east it is not

considered reason to refuse the application and would continue to provide high quality accommodation.

- 8.16 The London Plan recognises the importance of private amenity space as a means of retreat. For that reason, all new development should have private open space. The London Plan Housing SPG states that for 1-2 person dwellings, a minimum 5m² is required and an additional 1m² per person thereafter. The SPG also states that the minimum depth and width should be 1.5m. The private amenity space provided would comply with the specifications of the London Plan.
- 8.17 Given the above, officers are satisfied that overall, the design and layout of the new flat created would be suitable and the proposal would provide an appropriate standard of residential accommodation in accordance with the NPPF, the London Plan, the London Plan Housing SPG, the technical housing standards – nationally described standards, and the Council's DMLP. Therefore, the development is considered to provide adequate amenities for future residents.

Residential Amenity

- 8.18 Core Strategy Policy 15 states that development should be designed in a way that is sensitive to the local context. It must therefore be demonstrated that proposals are neighbourly and that significant harm will not arise with respect to overbearing impact, loss of outlook, overshadowing, loss of light or general noise and disturbance.
- 8.19 The proposed conversion would not have an adverse impact on the amenity of the occupiers of the subject building or nearby buildings, as many of the changes are internal.
- 8.20 The proposed extension is to be built on the footprint of the existing extension. The neighbouring residential properties are located above the level of the first floor and therefore there would not be any issues relating to daylight and sunlight or overshadowing in relation to neighbouring properties. Eddystone Tower is approximately 30m from the nearest residential buildings at Crandley Court. Officers consider that the additional windows are sufficiently removed from neighbouring residential properties such that no overlooking or privacy issues are anticipated to arise.
- 8.21 Overall, the impact on the amenity of neighbouring properties is considered acceptable.

Highways and Traffic Issues

- 8.22 Table 6.3 of the London Plan requires that two Cycle Spaces should be provided per residential unit. Further to the London Plan requirements, Transport for London's (TFL's) 'London Cycling Design Standards' sets out that cycle parking should be fit-for-purpose, secure, dry and well-located.
- 8.23 A cycle store containing 10 cycle spaces has been proposed in accordance with the requirements of the London Plan. The area is considered secure and dry, as well as fit-for-purpose (given it will provide cycle parking for residents of the unit). The cycle store was amended to contain Sheffield Stands and have ramp access in accordance with comments from the Council's Highways Officer.
- 8.24 As discussed above, the principle of providing residential accommodation on the application site is accepted; therefore it is acknowledged that there may be some additional traffic associated with the conversion of Housing Office to residential use on the site. However, the amount of additional traffic generated is not likely to be significant and therefore the effect is not considered to be of significant harm. As a result, effects in terms of traffic safety on the highway network will be minor.

- 8.25 Deliveries and servicing will be accommodated within the existing arrangements for Eddystone Tower and is therefore considered acceptable. The site is located in close proximity to a school and therefore it is recommended that a condition is imposed requiring that a Construction Management Plan is submitted to be approved by the Council.

Flood Risk

- 8.26 A Flood Risk Assessment (FRA) was submitted with the application due to the sites location within Flood Zone 3. The FRA was reviewed by the Environment Agency and the recommendations of the report were accepted. It was noted in the report that no sleeping accommodation is proposed for the ground level in accordance with guidance.

Refuse & Recycling

- 8.27 The proposed waste management plan is considered an improvement on the existing arrangement. The proposal provides enclosures for the existing bins as well as providing sufficient extra capacity for the additional units. The Metrostor enclosures would also improve the visual appearance of the site.

9.0 Local Finance Considerations

- 9.1 Under Section 70(2) of the Town and Country Planning Act 1990 (as amended), a local finance consideration means:

- (a) a grant or other financial assistance that has been, or will or could be, provided to a relevant authority by a Minister of the Crown; or
- (b) sums that a relevant authority has received, or will or could receive, in payment of Community Infrastructure Levy (CIL).

- 9.2 The weight to be attached to a local finance consideration remains a matter for the decision maker.

- 9.3 The Mayor of London's CIL is therefore a material consideration. CIL is payable on this application and the applicant has completed the relevant form.

10.0 Community Infrastructure Levy

- 10.1 The above development is CIL liable.

11.0 Equalities Considerations

- 11.1 Section 149 of the Equality Act 2010 ("the Act") imposes a duty that the Council must, in the exercise of its functions, have due regard to:-

- (a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Act;
- (b) advance equality of opportunity between persons who share a relevant protected characteristic and those who do not;
- (c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

- 11.2 The protected characteristics under the Act are: age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

- 11.3 The duty is a “have regard duty” and the weight to attach to it is a matter for the decision maker bearing in mind the issues of relevance and proportionality. In this matter there is minimal/no impact on equality.
- 11.4 Equality issues have been duly considered as part of the assessment of this application. It is not considered that the application would have any direct or indirect impact on the protected characteristics.
- 11.5 This planning application engages certain human rights under the Human Rights Act 2008 (the HRA). The HRA prohibits unlawful interference by public bodies with conventions rights. The term ‘engage’ simply means that human rights may be affected or relevant.
- 11.6 The rights potentially engaged by this application, including the right to a fair trial and the right to respect for private and family life are not considered to be unlawfully interfered with by this proposal.

12.0 Conclusion

- 12.1 This application has been considered in the light of policies set out in the development plan and other material considerations.
- 12.2 Officers consider that principle of the change of use is acceptable and that the scheme meets the relevant design and housing standards whilst having an acceptable impact on residential amenity and the local highway network. The scheme is therefore considered acceptable.

13.0 RECOMMENDATION

GRANT PERMISSION subject to the following conditions:-

Conditions

1. The development to which this permission relates must be begun not later than the expiration of three years beginning with the date on which the permission is granted.

Reason: As required by Section 91 of the Town and Country Planning Act 1990.

2. The development shall be carried out strictly in accordance with the application plans, drawings and documents hereby approved and as detailed below:

PL109; PL110; PL111; PL112; PL113; PL114; PL115; PL117; PL118; PL119; PL120; PL121; 16/202/100 rev A received 24 November 2017; Flood Risk Assessment (UNDA, January 2018) received 18 January 2018; PL116 rev B received 25 January 2018;

Reason: To ensure that the development is carried out in accordance with the approved documents, plans and drawings submitted with the application and is acceptable to the local planning authority.

3. All of the five (5) residential units hereby granted permission shall be provided and maintained in perpetuity as 100% affordable, social housing (for social rent) to meet the needs of householders whose incomes are not sufficient to permit them to access and afford to rent on the open market. The affordable housing shall be provided in accordance with the Planning Statement and shall meet the definition of

affordable housing in Annex 2 of the National Planning Policy Framework or any future guidance that replaces it.

Reason: In order to meet the housing needs of the Borough and comply with Core Strategy Policy 1 of the Lewisham Core Strategy (2011).

Informatives

- A. **Positive and Proactive Statement:** The Council engages with all applicants in a positive and proactive way through specific pre-application enquiries and the detailed advice available on the Council's website. On this particular application, positive discussions took place which resulted in further information being submitted.