Dulwich Hospital, East Dulwich Grove
in the London Borough of Southwark
Planning application no. 16/AP/2740

Strategic planning application stage II referral

The proposal
Demolition of existing ward buildings and nurses accommodation and development of site to provide a new secondary school within the retained and refurbished ‘Chateau’ building fronting East Dulwich Grove and in a series of new buildings and extensions up to 5 storeys high, comprising teaching and administration spaces, dining and indoor sports hall, multi-use games area, accesses, car parking and servicing areas and landscaping (Use Class D1).

The applicant
The applicant is London Borough of Southwark and the architect is Feilden Clegg Bradley Studios.

Strategic issues summary
- **Land use** – use of the site for new secondary school is supported. (para. 7)
- **Urban design and heritage** – Further information on the heritage submitted, proposals acceptable. (paras.8-13)
- **Climate change** – proposals meet London Plan policy; further information requirements addressed by condition. (paras. 15-19)
- **Transport** – Conditions secured, proposals acceptable. (paras.20-24)

The Council’s decision
Southwark Council has resolved to grant planning permission.

Recommendation
That Southwark Council be advised that the Mayor is content for it to determine the case itself, subject to any action that the Secretary of State may take, and does not therefore wish to direct refusal or direct that he is to be the local planning authority.

Context
On 19 July 2016 the Mayor of London received documents from Southwark Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Two planning applications were submitted and referred to the Mayor for development on the same site (the other application being D&P/4053a, LPA ref: 16/AP/2747, for the erection of a new health centre on the eastern part of the site). Whilst neither application proposal is referable in itself, the two concurrent applications would amount to development with a total floorspace of more than 15,000 sq.m. The application was thus referred to the Mayor under Category 1B.1(c) of the Schedule to the Order 2008:

- Category 1B “Development (other than development which only comprises the provision of houses, flats, or houses and flats) which comprises or includes the erection of a building or buildings outside Central London and with a total floorspace of more than 15,000 square metres”.

On 5 September 2016 the Mayor considered planning report D&P/4053/01, and subsequently advised Southwark Council that whilst the application was generally acceptable in strategic planning terms, the application did not fully comply with the London Plan for the reasons set out in paragraph 69 of the report. Possible remedies were set out in that paragraph.

A copy of the above-mentioned report is attached. The essentials of the case with regard to the proposal, the site and its history, strategic planning issues and relevant policies and guidance are as set out therein, unless otherwise stated in this report. On 11 October 2016 the Council decided that it was minded to grant planning permission, and on 12 October 2016 it advised the Mayor of this decision. Under the provisions of Article 5 of the Town & Country Planning (Mayor of London) Order 2008 the Mayor may allow the draft decision to proceed unchanged, direct Southwark Council under Article 6 to refuse the application or issue a direction to Southwark Council under Article 7 that he is to act as the Local Planning Authority for the purposes of determining the application. The Mayor has until 26 October 2016 to notify the Council of his decision and to issue any direction.

The decision on this case, and the reasons will be made available on the GLA’s website www.london.gov.uk.

**Update**

At the consultation stage, Southwark Council was advised that the application was broadly acceptable in strategic planning terms, but that the application did not yet fully comply with the London Plan as set out below:

- **Principle of land use**: The use of the land for educational use and healthcare use is supported.

- **Design and Heritage**: Further information on the significance of the nurses’ home and the feasibility of retaining the domed end bays of the ward blocks should be submitted. The justification for the demolition of the remaining structures is accepted in view of the benefit of providing a new school, the previous alterations to the historic significance of the complex and the mitigation in the form of the restoration of the retained building. The approach to the design, appearance and layout of the new buildings is supported overall, however additional soft landscaping should be provided.

- **Inclusive access**: A detailed accessibility strategy should be secured by condition.

- **Climate change**: Further information is required to verify the site-wide carbon savings. The figures for the carbon emissions and savings in tonnes per annum for each stage of the energy hierarchy should be provided. A whole life cost (WLC) analysis comparing communal and individual systems should be submitted to justify the absence of a site wide heat network. The option of a linked network with the adjacent site should be further pursued.
Further information on the feasibility of including PV equipment should be provided. The
applicant should revise the flood risk assessment to take account of information from the
Environment Agency mapping.

- **Transport:** The development should provide at least a London Plan-compliant level of
cycle parking in a phased delivery and additional information should be submitted on this.
Consideration should be given to reducing car parking. A pedestrian and cycle environment
audit should be carried out and any improvements identified as necessary should be
secured. The off-site drop off arrangements should be further analysed and reconsidered.
Further assessment is required of bus capacity and bus infrastructure to ensure that the
additional impact of the school can be accommodated. School travel and demand
management plans, construction management plan and delivery and service management
plan should be secured via condition or the Section 106 agreement.

6 Taking each of the outstanding points in turn the following is noted:

**Principle of development**

7 The Council has secured a condition on the draft planning permission, preventing works to
existing operational hospital buildings prior to the completion of the new health centre being
considered under separate planning application ref: 16-AP-2747 (GLA ref: D&P/4053a). This will
ensure the continuation of healthcare services on the site throughout the development.

**Urban design and heritage**

8 At Stage 1 it was noted that whilst the existing buildings are not statutorily or locally listed,
and are not within a conservation area, it is recognised that the chateau, the ward blocks and
access galleries and the nurses’ accommodation have townscape merit and heritage value and can
thus be considered non-designated heritage assets. All buildings apart from the central
administration block (the “chateau”) are proposed to be demolished. Whilst the principle of the
demolition of the buildings was accepted, the GLA noted that no reference to the significance of
the early 20th Century arts and crafts style building (used as nurses’ accommodation) to the west
of the site had been made, and the applicant was requested to submit an appraisal of this building.
The applicant was also requested to explain further how the retention of the domed end bays to
the ward blocks were considered within the design of the scheme, and why their retention was
rejected in the final submitted design.

9 In response, the applicant has submitted an addendum to the heritage assessment which
assesses the significance of the nurses’ accommodation. The assessment concludes that the
buildings exhibit some degree of architectural interest being designed with elements of the Arts
and Crafts movement, although these elements and the consequent interest are limited. It is
considered that the buildings are of low local significance given the quality of their architecture,
their poor state of repair and their limited visibility.

10 The Council confirms in its committee report that the retention of the ward blocks and
access galleries was considered at an early stage of the design process. Consideration was also
given to retaining the domed end bays and the outer walls of the ward buildings and fitting the
MUGAs between them, and removing the domed end bays and placing them in the landscape as
follies. As outlined in the GLA’s Stage 1 report, the existing structures were found to be unsuitable
for conversion to classroom layouts, and their retention would have compromised the amount and
layout of the external space which could be provided. It has been confirmed that to place the
domed end bays in the landscape as follies would have cost implications for the overall school, and
would undermine the integrity and significance of the domes as heritage assets.

11 As discussed in the Stage 1 report, the GLA accepts the case for the demolition of the non-
designated heritage assets given the limited remaining significance of the buildings and the public
benefit of providing a modern fit-for-purpose secondary school. Sufficient clarification has now been provided by the applicant to confirm this view.

12 With regard to the design of the school, whilst the overall design was supported, it was noted that there was a large amount of hard standing associated with the site and additional opportunity for soft landscaping should be explored. In response the applicant has confirmed that whilst the landscaping for the site is driven by the need to provide suitable, hard wearing space for circulation and also formal and informal sports and social areas, the amount of soft landscaping on the site has been maximised. The landscaping scheme includes grassed areas, planted beds, the retention of most existing trees and the planting of new trees. The design and landscaping for this school use is acceptable.

13 The application is therefore considered to be acceptable and in compliance with London Plan policy regarding urban design and heritage.

Inclusive design

14 The Council has secured an appropriate condition requiring a detailed access strategy for the school to be submitted, including details of how the design of the entire school campus including the teaching spaces, sports hall and assembly hall, and drop-off arrangements and routes to local bus stops and shops/services would be accessible to staff and pupils with disabilities. The GLA is thus satisfied with the proposals in respect to inclusive access.

Climate change

15 At the consultation stage, the GLA advised that further information was required to verify the site-wide carbon savings, including further information to justify the absence of a site heat network. Revised flood risk information was also requested.

16 The applicant has provided overheating analysis, demonstrating that the overheating risk has been minimised, and has provided additional information on the site heat network and the reporting of the carbon savings claimed. The development is expected to achieve a 35% reduction in carbon emissions compared to the 2013 Building Regulations baseline.

17 The Council has secured conditions that will require the development to be future proofed for connection to a site heat network, including investigation into the potential for a communal network for the school and health centre sites.

18 The applicant has provided an updated flood risk assessment which considers the flow path of surface water and topographical information, and concludes that on the basis that levels along East Dulwich Grove are maintained after development, there would be no increased surface water flood risk to adjacent receptors. This is accepted. The Council has secured a condition requiring a sustainable drainage strategy to be submitted which meets London Plan policy requirements.

19 With conditions, it is considered that the development will comply with relevant London Plan policies on climate change.

Transport

20 At Stage 1, further information on the phased delivery of cycle parking was requested. The applicant was asked to consider the reduction of car parking. A pedestrian and cycle environment audit was requested, and further information on drop offs and bus capacity.

21 As requested, the Council has secured conditions regarding a travel plan, construction and environmental management plan, delivery and service plan and the appropriate management of car parking. Policy compliant cycle parking, blue badge parking and electric vehicle charge points have also been secured by condition. The required number of cycle parking
spaces would be provided as pupil numbers increase each year, meaning that the overall provision will be policy compliant when the school reaches capacity.

22 Although the school’s car parking provision would not be reduced or phased as requested, it is noted that a servicing, parking and pupil drop off and collection management plan has been secured by condition and it has been demonstrated that minibuses will be able to access the car park for on-site drop offs. Coach access and parking will be appropriately managed through the travel plan. The parking and servicing arrangements are thus accepted.

23 Improvements to the local pedestrian environment would be secured via conditions. Since the Stage 1 report, the applicant has provided further information on bus capacity and the GLA concurs that the school use would not adversely impact on the operation of local bus services.

24 It is therefore considered that the transport issues have been appropriately addressed.

Response to consultation

25 Southwark Council’s committee report confirms that the current application was advertised by way of notification letters sent to neighbouring properties and site notices posted at the site.

26 As a result of statutory consultation, the Council received a total of 25 individual representations, including 12 responses in objection to the proposals, 9 responses in support and 4 neutral representations. In addition, a petition with 42 signatures was received in opposition to the proposals.

27 Matters raised in objection include the following:

Principle of development
- Already over 20 schools in the area;
- School use not compatible with a health centre next door;
- Sports hall too small to accommodate the school;
- Block C would be constructed on an area of greenfield land;
- The development would not be sustainable.

Design and heritage
- Demolition of existing buildings including 'onion' towers;
- Sports hall too high and would dominate neighbouring buildings / should be located along railway line;
- Sports hall elevations uninteresting, would be out of character with the area and of a lesser design quality than the buildings they would replace;
- Loss of trees and harm to trees to be retained.

Impact on residential amenity
- Canteen would result in cooking odours, grease fumes, vermin, noise and pollution to St Barnabas Close;
- Impact on daylight and sunlight to neighbouring properties;
- Noise and dust from demolition works;
- Noise from school use;
- Increased crime in the area;
- Retention of trees on eastern side of proposed sports hall given higher priority than minimising damage to neighbouring properties;
- Design development focuses on availability of land parcels rather than best solution for neighbouring residents.
Highways impact

- Traffic generation and consequent increased air pollution arising from school and health centre proposals;
- Harm to highway safety including cyclists and lack of mitigation proposed from both the school and health centre proposals;
- Increased demand for parking from both the school and health centre proposals;
- Traffic calming, safety measures, a controlled parking zone no left / right turn at Grove Vale / Melbourne Grove or East Dulwich Grove junction are required;
- Poor public transport in the area.

Lack of consultation

- Shops and local businesses should be better informed and consulted on proposed changes;
- Not all residents invited to the three public consultation events / proposal rushed through without proper consultation with key residents.

Matters raised in support include the following:

- Excellent use of the land;
- Good standard of design;
- Retention of the Chateau is positive;
- Retention of trees is positive;
- School places urgently needed in community;
- Site is close to bus and rail networks, and most children would walk. A travel plan would be implemented;
- Site is currently dilapidated;
- Construction impacts can be minimised, and should be weighed against benefit of providing a school;
- Scheme would have significant benefits for local residents

The following groups and statutory bodies were also consulted and responded:

- **Environment Agency**: No objections to the proposals subject to conditions
- **Thames Water**: No objections, conditions and informatives recommended
- **Historic England**: No comments offered
- **Natural England**: Natural England’s Standing Advice should be applied to the application
- **Network Rail**: No objection subject to the inclusion of conditions and informatives regarding construction near to the railway
- **Metropolitan Police**: No objections raised
- **Health and Safety Executive**: No comments

It is also noted that a late representation was made to the Council from the Victorian Society, objecting to the loss of the remaining ward blocks and domed end bays.

In relation to the objections raised, local issues including the impact on local roads, local services and matters of residential amenity, including loss of light and outlook have been considered by the Council in their report and Southwark Council’s officers have considered them acceptable. The strategic issues raised, including the land use, the loss of the non-designated heritage assets, the design of the proposals, parking and inclusive access have been dealt with in this report and in the Stage 1 report.

Legal considerations
32 Under the arrangements set out in Article 5 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor has the power under Article 6 to direct the local planning authority to refuse permission for a planning application referred to him under Article 4 of the Order. He also has the power to issue a direction under Article 7 that he is to act as the local planning authority for the purpose of determining the application and any connected application. The Mayor may also leave the decision to the local authority. In directing refusal the Mayor must have regard to the matters set out in Article 6(2) of the Order, including the principal purposes of the Greater London Authority, the effect on health and sustainable development, national policies and international obligations, regional planning guidance, and the use of the River Thames. The Mayor may direct refusal if he considers that to grant permission would be contrary to good strategic planning in Greater London. If he decides to direct refusal, the Mayor must set out his reasons, and the local planning authority must issue these with the refusal notice. If the Mayor decides to direct that he is to be the local planning authority, he must have regard to the matters set out in Article 7(3) and set out his reasons in the direction.

Financial considerations

33 Should the Mayor direct refusal, he would be the principal party at any subsequent appeal hearing or public inquiry. Government Planning Practice Guidance emphasises that parties usually pay their own expenses arising from an appeal.

34 Following an inquiry caused by a direction to refuse, costs may be awarded against the Mayor if he has either directed refusal unreasonably; handled a referral from a planning authority unreasonably; or behaved unreasonably during the appeal. A major factor in deciding whether the Mayor has acted unreasonably will be the extent to which he has taken account of established planning policy.

35 Should the Mayor take over the application he would be responsible for holding a representation hearing and negotiating any planning obligation. He would also be responsible for determining any reserved matters applications (unless he directs the council to do so) and determining any approval of details (unless the council agrees to do so).

Conclusion

36 It is considered that the scheme, with the suggested conditions, is compliant with the London Plan. Issues regarding the principle of development, heritage impact, urban design, inclusive design, sustainable development and transport have been appropriately addressed.

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Dulwich Hospital, East Dulwich Grove
in the London Borough of Southwark
Planning application no. 16/AP/2740

Strategic planning application stage 1 referral

The proposal
Demolition of existing ward buildings and nurses accommodation and development of site to provide a new secondary school within the retained and refurbished ‘Chateau’ building fronting East Dulwich Grove and in a series of new buildings and extensions up to 5 storeys high, comprising teaching and administration spaces, dining and indoor sports hall, multi-use games area, accesses, car parking and servicing areas and landscaping (Use Class D1).

The applicant
The applicant is the London Borough of Southwark, and the architect is Feilden Clegg Bradley Studios.

Strategic issues summary
- **Land use** – use of the site for new secondary school is supported. (paras.16-20)
- **Urban design and heritage** – Further information on the heritage significance of nurses’ home and feasibility of retaining the domed end bays should be submitted. The case for demolition of the remaining structures is accepted. Design of new buildings supported. (paras.21-31)
- **Climate change** – further information required on energy and flood risk. (paras. 35-53)
- **Transport** – further work on bus capacity, cycling, parking and pedestrian environment required. (paras.54-64)

Recommendation
That Southwark Council be advised that while the application is generally acceptable in strategic planning terms the application does not fully comply with the London Plan, for the reasons set out in paragraph 69 of this report; but that the possible remedies set out in that paragraph could address these deficiencies.
Context

1. On 19 July 2016 the Mayor of London received documents from Southwark Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008 the Mayor has until 29 August 2016 to provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor’s use in deciding what decision to make.

2. Two planning applications have been submitted and referred to the Mayor for development on the same site (the other application being D&P/4053a, LPA ref: 16/AP/2747, for the erection of a new health centre on the eastern part of the site). Whilst neither application proposal is referable in itself, the two concurrent applications would amount to development with a total floorspace of more than 15,000 sq.m. Paragraph 2 of the Schedule of the Order 2008 states that: “If the local planning authority receive an application for planning permission for development, which they consider forms part of more substantial proposed development, on the same land or adjoining land, they must for the purposes of this Schedule treat that application as an application for planning permission for the more substantial development.”

3. This application is thus referable under Category 1B.1 (c), of the Schedule of the Order 2008: “Development (other than development which only comprises the provision of houses, flats, or houses and flats) which comprises or includes the erection of a building or buildings outside Central London and with a total floorspace of more than 15,000 square metres”.

4. Once Southwark Council has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; take it over for his own determination; or allow the Council to determine it itself.

5. The Mayor of London’s statement on this case will be made available on the GLA website www.london.gov.uk.

Site description

6. The wider application site is approximately 2.8 hectares in size and is occupied by buildings associated with Dulwich Community Hospital. The site is bounded to the north by the mainline railway and a Jewson’s building supplies yard, to the south by East Dulwich Grove and to the east and west by housing.

7. The existing buildings on the site are predominantly Victorian red brick hospital buildings comprising of a central entrance block known as the “Chateau” and two connected three storey wings to the west. The eastern part of the site used to house two mirroring wings plus some ancillary hospital buildings, but these were demolished in 2006 and this part of the site is currently vacant land. The site is not within a conservation area and the buildings are not statutorily or locally listed.

8. The Education Funding Agency (EFA) has purchased three parcels of the site from the NHS and these are to be leased to the Charter School East Dulwich on a peppercorn rent for
125 years. The sale agreement with the NHS will see these parcels released to the EFA as follows:

- Parcels 1 and 2, the north-east and south-west parcels, were released on contract completion in October 2015.
- Parcel 3, the central parcel, is expected to be released in April 2019 when the NHS clinical services are relocated to the new Dulwich Health Centre.

(Parcels 1, 2 and 3 together comprise 2.1 hectares and form the application site for the school.)

- Parcel 4, in the south-east corner of the site is being retained by the NHS for the development of the Dulwich Health Centre and is the subject of a separate planning application. It comprises 0.7 hectares.

The site has highway frontage/access onto East Dulwich Grove and Jarvis Road, which form part of the local road network. The nearest part of the Transport for London Road Network (TLRN) is approximately 2.5 km away (Peckham High Street) and the nearest part of the Strategic Road Network (SRN) is approximately 200m away (Lordship Lane). The site is well served by a network of on and off-highway cycle and pedestrian routes, including the proposed Quietway 7.

Six bus routes currently stop on East Dulwich Grove outside the site or on Lordship Lane. An additional route will also stop on East Dulwich Grove from this autumn. East Dulwich (Southern services) station is a 200 – 500m walk depending upon proximity to the Jarvis Road access. Measured on a scale of 1a – 6b the site has a PTAL rating of 3 which is considered moderate with that part on Jarvis Road having a PTAL of 4 (good).
Case history

There is no relevant GLA case history for this site.

Details of the proposal

The application seeks full planning permission for the demolition of the existing buildings (excluding the central “Chateau” building) and construction of an 8 form entry secondary school within three new buildings and the refurbished Chateau building in the western part of the site.

Strategic planning issues and relevant policies and guidance

The relevant issues and corresponding policies are as follows:

- Land use principle: London Plan
- Education facilities: London Plan; Social Infrastructure SPG
- Health facilities: London Plan; Social Infrastructure SPG
- Urban design and Heritage: London Plan; Shaping Neighbourhoods: Character and Context, SPG
- Inclusive access: London Plan; Accessible London: achieving an inclusive environment SPG
- Climate change: London Plan; the Mayor’s Climate Change Mitigation and Energy Strategy; Mayor’s Water Strategy; Sustainable Design and Construction SPG
- Transport: London Plan; the Mayor’s Transport Strategy
- Crossrail: London Plan; Mayoral Community Infrastructure Levy; Crossrail SPG

For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is the Southwark Core Strategy (2011), the Southwark Plan (2007) (saved policies), and the 2016 London Plan (Consolidated with Alterations since 2011).

The following are also relevant material considerations:

- Dulwich SPD (2013)
- Dulwich Hospital Planning Brief (2005)

Principle of development

Education facilities

London Plan Policy 3.18 ‘Education Facilities’ offers strong support for the establishment of new schools, including free schools. The policy states that development proposals which enhance education provision will be supported, including new build, expansion of existing or change of use to educational purposes. Proposals which address the projected shortfall of primary and secondary school places will be particularly encouraged. The policy states that “In particular,
proposals for new schools, including free schools, should be given positive consideration and should only be refused where there are demonstrable negative local impacts which substantially outweigh the desirability of establishing a new school and which cannot be addressed through the use of planning conditions or obligations.” Additionally, the Social Infrastructure SPG states that new sites for schools should be secured to meet additional educational need.

17 The site is proposed to accommodate a new 8-form entry state secondary school (plus sixth form) run by the Charter School, which has an existing free school in North Dulwich. The existing Charter School is within a mile of this site and is heavily oversubscribed. The GLA strongly supports the establishment of a new school that will meet educational need.

18 The school would provide modern, purpose built facilities including a generous proportion of open space and formal/informal playspace. The quality of the school provision would be good, and the school proposal is supported. The school’s facilities, such as the MUGAs, hall, IT rooms and classrooms, should be shared with other schools if there is an identified need, and should be made available out of hours to other users for community or recreational use, in accordance with London Plan Policy 3.18 (paras. E and F). Provision should be made within the s106 agreement to secure out of hours community use of the school’s facilities.

Redevelopment of health care uses

19 The school would be built on the site of the existing Dulwich Community Hospital. London Plan Policy 3.18 (Health and Social Care facilities) states that “Development proposals which provide high quality health and social care facilities will be supported in areas of identified need, particularly in places easily accessible by public transport, cycling and walking. Where local health services are being changed, the Mayor will expect to see replacement services operational before the facilities they replace are closed, unless there is adequate justification for the change.”

20 The separate, concurrent application (ref: 4053a) makes provision for a replacement healthcare facility on the site. Although the existing hospital buildings have an extensive floor area, it is understood that the majority of the floorspace is vacant and unoccupied. The applicant should clarify how much floor space of the existing hospital is actually in use, and how much is vacant. It is understood that the new healthcare centre will provide GP services and a pharmacy, services for people with long term conditions (including chronic kidney disease, diabetes, heart disease, chronic asthma and some mental health services), diagnostics and outpatient services, and primary care children’s services. However, if any existing services are to be relocated off-site or not reprovided, this should be clarified and justified by the applicant. Provided that the new facility will provide equivalent or improved healthcare services compared to the existing site, and that the phasing of the proposals are secured by s106 to ensure the continuous provision of healthcare services throughout the development process, the GLA support the proposal to redevelop the existing hospital site for school and healthcare use.

Urban design and heritage

21 Good design is central to all objectives of the London Plan and is specifically promoted by the policies contained within chapter seven which address both general design principles and specific design issues. London Plan Policy 7.1 sets out a series of overarching design principles for development in London. New development is also required to have regard to its context, and make a positive contribution to local character within its neighbourhood (policy 7.4). With respect to heritage assets, London Plan policy 7.8 states that “Development should identify, value, conserve, restore, re-use and incorporate heritage assets, where appropriate. Development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail.”
Principle of Demolition

22 The proposal involves the demolition of the existing pair of Victorian ward blocks to the west of the central Administration Building, also known as the Chateau (a further pair of identical ward blocks to the east of the Administration Building were demolished in 2006). The linking access galleries to the west of the Chateau entrance block would also be demolished, along with the freestanding former nurses’ home to the west of the site. The entrance block (Chateau) and porter’s lodge would be retained and refurbished for the school’s use. Whilst the buildings are not statutorily or locally listed, and are not within a conservation area, it is recognised that the chateau, the ward blocks and access galleries and the nurses’ accommodation have townscape merit and heritage value and can thus be considered non-designated heritage assets.

23 The National Planning Policy Framework (NPPF) states, in respect of non-designated heritage assets: “The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that affect directly or indirectly non designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.” (para.135)

24 The applicant has submitted a heritage impact assessment which appraises the value of the existing buildings and assesses the degree of harm which would be caused by the proposed demolition of the western ward blocks and associated buildings to the rear of the existing chateau.

25 The assessment notes that, due to the superior architectural quality and relatively good state of repair of the Chateau, this is the building of greatest historic significance on the site. The remaining ward blocks have fallen into a state of partial disuse and disrepair although they do retain features of historic interest (notably the domed sanitation towers at the ends of each block which also give considerable architectural presence). The report acknowledges that the loss of the western ward blocks will result in detrimental impact on the townscape and on the appreciation of the historic significance of the remaining buildings as a hospital. However, it is noted that this historic significance has already been severely eroded by the demolition of the eastern ward blocks which has resulted in the loss of the symmetry to the original pavilion style hospital complex. The harm caused by the demolition could be offset by the restoration of the Chateau, which would be better revealed by the demolition of the dominant ward blocks.

24 The applicant’s design and access statement explains that the retention of the ward blocks and access galleries was considered as part of the redevelopment scheme, but found not to be feasible due to the poor state of repair of the buildings and their physical characteristics, e.g. the width of the blocks relative to the central corridor, which do not lend themselves to providing modern teaching spaces of the required standard. The proposal is thus to demolish the ward blocks, and retain and restore the chateau by removing unsympathetic modern additions, thus allowing the building of greatest historical significance to be better revealed.

25 Officers note that there is no specific reference within the applicant’s heritage assessment to the early 20th Century arts and crafts style building to the west of the site, which also has heritage significance and will also be demolished. It is unclear why this building has not been included in the significance plan as it forms part of the site. An assessment of the significance of these buildings and the feasibility of retaining them should also be provided before the application is referred back to the Mayor at Stage 2.
Of the buildings to be demolished, the most significant loss would be the pair of twin-domed end bays to the western ward blocks, which are highly distinctive architectural features within the townscape. It is acknowledged that the retention of these blocks would not sit well within the current proposed school layout. However, the applicant should explain further how the retention of these end bays were considered within the design of the scheme, and why their retention was rejected in the final submitted design.

With these exceptions, the effect of the proposals on the significance of the non-designated heritage assets has been taken into account in the application, as required by the NPPF. In accordance with the NPPF, the scale of the harm or loss of the non-designated heritage assets should be weighed against the benefits of the proposal. In this case, officers accept that the remainder of the existing buildings would be difficult to reuse and refurbish in order to provide a modern school. It is also accepted that harm to the overall significance of the hospital complex has already been caused by the demolition of the eastern ward blocks. Subject to the further clarification on the domed end bays and the nurses’ home, it is considered that the loss of the historic hospital structures is outweighed by the proposals to provide a new secondary school to meet educational need.

The harm can also be partly mitigated by the proposals to secure significant improvements to the retained buildings, particularly the Chateau. In this respect, the Council should ensure via appropriate condition or in the s106 agreement that the schedule of refurbishment works to the chateau, Porter’s Lodge, railings, gates and piers and the surrounding grounds (outlined in section 3.2 of the applicant’s heritage assessment) are carried out to a high standard.

Built form and layout

The layout of the school complex would position the taller four-five storey teaching blocks towards the rear of the site, adjoining the boundary with the railway and builders’ depot. A three storey block containing the dining hall and sports hall would be located near to the western boundary, and playing pitches would separate this building and the retained chateau. A two storey block would be built to the rear of the chateau, and the new three storey health centre would be positioned to the east of the retained building. The front boundary with East Dulwich Grove would continue to be dominated by the row of mature London Plane trees and the Victorian boundary railings, which would be retained and refurbished.

The new buildings would be flat roofed and predominantly clad in red brick to complement the materials of the chateau and the buildings in the surrounding area. The new buildings would be intentionally simple in form and detailing, and would have a contemporary appearance whilst not competing with the ornate detail of the retained chateau building. The scale and position of the new buildings have been designed to allow the retained building and its roofscape to be fully appreciated in its new context.

The buildings are considered to sit comfortably within their context and the calm detail and simple complementary materials will allow the chateau building to be appreciated in its new setting. The design of the new school is thus supported. Whilst the need for some of the extensive areas of hard surfaces within the school complex is understood, the landscaping strategy should maximise the opportunity for soft landscaping and planting, which would provide a greater opportunity for sustainable drainage (see paras 48-53) and this should be secured via condition. In this respect, reduced car parking as noted in the transport section could also enable a better design response and the opportunity for more soft landscaping whilst
still meeting justified needs for on-site drop off/pick up and parking. This should be further explored by the applicant. The retention of the trees on the site’s frontage and their protection during construction should also be carefully controlled.

**Inclusive access**

32 London Plan Policy 7.2 seeks to ensure that all new development achieves the highest standards of accessible and inclusive design. In accordance with this policy, the applicant has submitted a design and access statement which explains how the principles of inclusive design have been incorporated into the proposed development and how inclusion will be maintained and managed.

33 The applicant’s design and access statement addresses key points regarding inclusive access for the school. It is confirmed that there would be level access throughout the buildings and the external circulation spaces with accessible lifts to all floors. Accessible sanitary facilities will be provided. There would be three accessible parking spaces for use by school staff, which would be located close to the main entrance.

34 A detailed access strategy, including information on how teaching spaces will be designed to accommodate staff and students with visual or hearing impairments, and will be flexible to suit pupils with special educational needs, as well as drop-off arrangements for students with disabilities or SEN should be submitted as part of an appropriate condition. As well as ensuring that a number of the classrooms (including specialised classrooms) can be fitted with a hearing enhancement system and when required, provision should be made for all sports hall, assembly or theatre spaces to have a hearing enhancement system fitted. The Council should secure by condition this detailed inclusive access strategy for both parts of the development, which addresses the points raised above. The access strategy should also explain how the route between the school and the nearby bus stops, and the bus stops themselves, are accessible.

**Climate change mitigation and adaptation**

35 The London Plan climate change policies as set out in Chapter 5 collectively require developments to make the fullest contribution to tackling climate change by minimising carbon dioxide emissions, adopting sustainable design and construction measures, prioritising decentralised energy supply, and incorporating renewable energy technologies with a target of 20% carbon reductions from on-site renewable energy. The policies set out ways in which applicants must address mitigation of and adaptation to the effects of climate change.

36 The applicant has submitted an Energy Assessment which broadly applies the energy hierarchy in policy 5.2 of the London Plan. However, further information and revisions are required before the carbon savings can be verified, as outlined below.

**Energy efficiency standards**

37 A range of passive design features and demand reduction measures are proposed to reduce the carbon emissions of the proposed development. Both air permeability and heat loss parameters will be improved beyond the minimum backstop values required by building regulations. Other features include a carefully considered approach to the buildings’ orientation and high efficiency light fittings.

38 The demand for cooling will be minimised through efficient thermal mass, natural ventilation where possible and mechanical ventilation with heat recovery on all other spaces. Centralised mechanical cooling will be introduced in the form of Air Handling Units (AHUs). The
applicant should provide evidence of how London Plan Policy 5.9 has been assessed demonstrating how the risk of overheating and the cooling demand will be minimised (for each building type). Dynamic overheating modelling in line with CIBSE Guidance TM52 and TM49 is recommended.

39 Based on the information provided, the savings achieved are not clear for the proposed development. The applicant should provide the figures for the carbon emissions and savings in tonnes per annum for each stage of the energy hierarchy. This should be provided for each building and for the total site. See Table 1 and Table 2 in the latest GLA assessment guidance for the required format: https://www.london.gov.uk/what-we-do/planning/planning-applications-and-decisions/pre-planning-application-meeting-service-0

40 The BRUKL sheets including efficiency measures alone should be provided to support the savings claimed.

District heating

41 The applicant should carry out an investigation into whether there are any existing or planned district heating networks within the vicinity of the proposed development. The applicant should particularly pursue the option of a linked network with the proposed Dulwich Hospital on the adjacent site. Evidence of communication should be provided in order to demonstrate that this option has been fully investigated.

42 The applicant has stated that installing a district heating network across the site would be an additional expense and, since the project is under financial pressure, any provision of such an expensive system would reduce the budget available for providing effective teaching environments. The applicant must provide a whole life cost (WLC) analysis comparing the communal and individual systems. If it can be demonstrated and evidenced that the WLC of the site heat network is significantly higher than that of individual systems and would undermine the development going ahead, the site heat network could be deemed uneconomic. However, for the avoidance of doubt and in line with the London Plan and the GLA’s Guidance on Preparing Energy Assessments, a site heat network is strongly supported in order to enable the buildings to be supplied from on-site low and zero carbon energy sources, should these become available in the future.

43 Further information should also be provided on the plant room(s) proposed and information on the floor area and location of the energy centre. Taking into account the proposed phasing of the development, the applicant should further investigate how the number of plant rooms can be minimised.

Combined Heat and Power

44 The applicant has investigated the feasibility of CHP. However, due the intermittent nature of the heat load, CHP is not proposed. This is accepted in this instance.

Renewable energy technologies

45 The applicant has investigated the feasibility of a range of renewable energy technologies and is proposing to install 280sq.m on the roof of Building C. It is stated that the PV array has been sized so that the overall reduction in CO2 is 35%. This approach is proposed due to the project being under budgetary pressure. As such, PVs are not required for Buildings A/B and D, as these buildings already meet the 35% reduction in carbon emissions through fabric performance and system efficiencies. However, the applicant has confirmed that, if the carbon emissions
reductions through passive and efficiency measures are not achieved at a later stage in the project, the available space on the roof can be used for a PV array, ensuring that the 35% reduction can be met. The installation of further solar PV would be supported in order to maximise carbon savings on site and comply with Policy 5.7.

46 The full sample BRUKL sheet of the ‘be green’ scenario should be provided to support the savings claimed and to estimate the carbon reduction.

Overall carbon savings

47 The applicant has stated that each building will be achieving 35% reduction compared to a 2013 Building Regulations compliant development. However, the total side-wide carbon emissions and savings for each stage of the energy hierarchy have not been provided in the energy statement. The total carbon emissions and savings in tonnes per annum for each stage of the hierarchy should be provided before the strategy is verified. See Table 1 and Table 2 in the latest GLA assessment guidance for the required format: https://www.london.gov.uk/what-we-do/planning/planning-applications-and-decisions/pre-planning-application-meeting-service-0.

Flood risk and drainage

48 The Flood Risk Assessment (FRA) has been completed by Ramboll on behalf of the applicants. The FRA confirms that the site is located within flood Zone 1. The FRA refers to the areas of surface water flood risk present on the site and considers that these pose a low risk of flooding and does not propose any mitigation measures.

49 However, the Environment Agency surface water flood risk mapping indicates that the surface water risk follows a flow path and appears to contribute to a larger area of surface water risk beyond the site. Therefore the FRA should consider the nature of the planned land uses and ground levels along this route in order to determine that the existing relatively low risk will not impact any vulnerable buildings and that the new development does not risk exacerbating the current risk.

50 Therefore the FRA should be re-examined in order to determine whether the proposed development is acceptable in terms of London Plan Policy 5.12.

Drainage

51 The site itself has relatively low surface water flood risk. However areas close to the site, including to the immediate north and east are at significant surface water risk, and surface water from this site will contribute to that risk, therefore the application of London Plan policy 5.13 will be an important consideration for these development proposals.

52 The FRA states that the development will be designed to reduce surface water run-off from the site up to the 1 in 100 year storm by at least 50%. The FRA goes on to state that this requirement will be met without the inclusion of the extensive green roofs into the calculations, and that therefore the actual reduction will be in excess of 50%. The methods proposed include permeable paving, infiltration and below ground attenuation tanks.

53 Given the nature and location of the proposals this approach is considered to be the minimum acceptable approach to London Plan Policy 5.13. The detailed drainage design should be agreed with Southwark Council and a condition securing a sustainable drainage strategy meeting the requirements of London Plan Policy 5.13 should be applied to any planning approval.
Transport

54 The site borders the Network Rail (NR) corridor and early consultation with NR is advised to avoid any adverse impacts arising during construction.

Network impact

55 The development proposals are unlikely to have a negative impact on the capacity or operation of the TLRN or the SRN. Southwark Council should ensure that it is satisfied with the impacts on local highway including the proposed accesses for vehicles, pedestrians and cyclists off Jarvis Road and East Dulwich Grove. Some issues need to be addressed to enable compliance with the London Plan, as further detailed below.

Walking and cycling

56 Cycle parking which meets the requirements of London Plan policy should be provided from the outset. Currently the proposals are for 72 spaces to be installed at the school and for further provision to be made as and when the pupil roll and demand dictate. The applicant should clarify how and when additional provision would be made. However, to comply with London Plan minimum standards 240 spaces are required for pupils, 23 for staff and 17 for visitors (total 280 spaces). To avoid discouraging cycling through under provision and the risk of suitable sites being used for other purposes, at least the full 280 spaces should be designed in from the outset. The phasing arrangement for the physical provision of the spaces should be agreed with the Council and secured as part of the permission, enabling this to be easily enforced by the Council.

57 Given the opportunities for cycling in the area and the intended local catchment, consideration should be given to cycle parking above the minimum policy requirement for staff, pupils and visitors to the school. Cycle parking for visitors should be located close to the main entrance and the cycle parking for students and staff should be in covered secure area(s) near to school entrances. Cyclist changing and locker facilities should also be provided for staff. The developers should consult the London Cycle Design Guidance as it sets out standards for cycle parking generally, including access to cycle parking. Compliant cycle parking and associated facilities should be secured by planning condition.

58 An audit of both the pedestrian and cyclist environment in the area and any identified improvements should be secured as part of any permission. Ensuring safe and convenient crossing of East Dulwich Grove should in particular be considered for those walking to the site or using local bus services.

Car parking and drop off

59 23 car parking spaces are proposed (including 3 blue badge spaces) for staff of the school. A reduction in the level of car parking to a car free or car capped development would be encouraged, although policy complaint blue badge parking should be provided in addition to electric vehicle charge points. Consideration should also be given to the need for on street parking controls related to the school use of the site.

60 It is understood that drop off and pick up of students will occur on street. TfL has raised concern about the impact this may have on the safety and convenience of users of other more
sustainable and active modes of travel and compound the existing problems of school-generated car and coach trips in the wider area. Furthermore it may affect bus operations on East Dulwich Grove including the stops adjacent to and opposite the proposed school site. On-site drop off and pick up of disabled students and visitors should be incorporated together with similar provision for minibuses and coaches transporting pupils to off-site activities.

**Buses**

61 Further assessment is required of the potential impact of the school, in particular on the capacity of local buses including consideration of pupil home locations and their likely means of travel. Given the high demand in the area for bus travel at school peaks, in addition to a Travel Plan, the preparation of a School Travel Demand Management Plan is encouraged to spread peak loadings and enable coordination with other nearby schools.

62 An assessment should also be made of the adequacy of the existing bus stops to accommodate a significant number of waiting and alighting passengers especially in the after school peak.

**Delivery and Servicing**

63 All servicing will be on site and should be managed through a Delivery and Service Plan (DSP) secured by condition. A Construction Logistics Plan (CLP) should also be secured by condition to appropriately manage any potential adverse effects on the highway network, including vulnerable road users and bus operations, during the works. This should cover arrangements during construction of the final phase of the school when the earlier two phases and the health centre will have opened.

**Travel Plan**

64 A robust travel plan for the school (including use outside of school hours), should be submitted and agreed by the Council prior to first occupation. The travel plan should be secured, enforced, monitored and reviewed by condition/legal agreement. Given the intended catchment area of the school and to promote sustainable and active travel, students should be encouraged to either walk, cycle or take public transport to school and any necessary improvements to these links should be secured by condition/legal agreement.

**Community Infrastructure Levy**

65 In accordance with policy 8.3 of the London Plan, the Mayoral Community Infrastructure Levy (CIL) came into effect on 1st April 2012. However, development for educational use has a nil charge.

**Local planning authority’s position**

66 It is understood that the application will be reported to Southwark Council’s planning applications committee in October 2016 and that officers are broadly supportive of the proposals.

**Legal considerations**

67 Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan,
and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged, or direct the Council under Article 6 of the Order to refuse the application, or issue a direction under Article 7 of the Order that he is to act as the local planning authority for the purpose of determining the application and any connected application. There is no obligation at this present stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor’s statement and comments.

Financial considerations

68 There are no financial considerations at this stage.

Conclusion

69 London Plan policies on principle of land use, education and health facilities, design, heritage, inclusive access, climate change, and transport are relevant to this application. The application is supported in land use and design terms. Further information is required to demonstrate full compliance with the London Plan in terms of climate change and transport, as follows:

- **Principle of land use**: The use of the land for educational use and healthcare use is supported.

- **Design and Heritage**: Further information on the significance of the nurses’ home and the feasibility of retaining the domed end bays of the ward blocks should be submitted. The justification for the demolition of the remaining structures is accepted in view of the benefit of providing a new school, the previous alterations to the historic significance of the complex and the mitigation in the form of the restoration of the retained building. The approach to the design, appearance and layout of the new buildings is supported overall, however additional soft landscaping should be provided.

- **Inclusive access**: A detailed accessibility strategy should be secured by condition.

- **Climate change**: Further information is required to verify the site-wide carbon savings. The figures for the carbon emissions and savings in tonnes per annum for each stage of the energy hierarchy should be provided. A whole life cost (WLC) analysis comparing communal and individual systems should be submitted to justify the absence of a site wide heat network. The option of a linked network with the adjacent site should be further pursued. Further information on the feasibility of including PV equipment should be provided. The applicant should revise the flood risk assessment to take account of information from the Environment Agency mapping.

- **Transport**: The development should provide at least a London Plan-compliant level of cycle parking in a phased delivery and additional information should be submitted on this. Consideration should be given to reducing car parking. A pedestrian and cycle environment audit should be carried out and any improvements identified as necessary should be secured. The off-site drop off arrangements should be further analysed and reconsidered. Further assessment is required of bus capacity and bus infrastructure to ensure that the additional impact of the school can be accommodated. School travel and demand management plans, construction management plan and delivery and service management plan should be secured via condition or the Section 106 agreement.

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