ROLFE JUDD
/ PLANNING

/ Alleyn's School - Project Crucible

PLANNING STATEMENT

February 2026

ROLFE JUDD
/ PLANNING

Alleyn's School - Project Crucible

Alleyn’s School, Townley Road, London, SE22 8SU

P09464
February 2026

On behalf of Alleyn’s School

OLD CHURCH COURT, CLAYLANDS ROAD, LONDON SW8 1NZ
T 020 7556 1500 / www.rolfe-judd.co.uk

CONTENTS

01. INTRODUCTION

01.1 SUMMARY

01.1.1 This Planning Statement has been prepared by Rolfe Judd Planning on behalf of the Applicant, Alleyn's School. The statement is prepared in support of a Full Planning application at the site known as Alleyn's School, Townley Road, London, SE22 8SU. The application site, defined by the red-line plan, is around the existing school dining hall which fronts Hillsboro Road.

01.1.2 The existing 1960s school dining hall is beset by problems, beyond its economic life and the school's requirements for modern educational practices. The application proposes the replacement of this building, with a new 3 storey tiered building with flexible spaces and enhanced landscaping and sets the school to decarbonise its estate via the inclusion of an energy centre. This project is known within the school as 'Project Crucible'.

01.1.3 Accordingly, the Description of Development for this planning application is:

'Demolition and replacement of school dining hall with associated landscaping works.'

01.1.4 The key planning benefits of the proposal are:

- Substantial enhancement to the facilities of an educational establishment which is proud to have called this part of Southwark its home since 1887,
- Outstanding architectural design, providing townscape enhancements and people focussed facilities and learning environment,
- A BREEAM 'Excellent' building and a Net-Zero carbon development,
- Enabling wider estate decarbonisation via an energy centre and clean energy generating technology,
- An inclusive access building,
- Landscape and ecological enhancements,
- At least 10% enhancement to biodiversity net-gain,
- Increased urban greening,
- Improved surface drainage,
- Reduced waste from the school's operations,
- Provision of spaces to support local community events (such as lectures).

01.2 PLANNING STATEMENT

The purpose of this statement is to examine the planning issues raised by the current development proposals for the application site. In particular, this statement identifies and describes the key opportunities presented by the proposed development at Alleyn's School.

01.2.1 The statement also provides a comprehensive analysis of the relevant planning policy framework at national, strategic and local levels. As such, our planning statement is structured as follows:

Section 1: Introduction
Section 2: The Application Site and Surrounding Area – sets the context the current proposal and provides a detailed description of the application site and its previous uses;
Section 3: Pre-Application Engagement – describes how the proposed development has evolved;
Section 4 The Development Proposal – describes the proposed development
Section 5: Policy Context – summarises the planning policy relevant to this proposal at national, strategic and local levels;
Section 6: Planning Considerations – reviews the proposal in terms of the relevant policy context and other material considerations; and
Section 7: Conclusion

01.3 SUPPORTING APPLICATION DOCUMENTS

01.3.1 This Planning Statement should be read in conjunction with the following additional documents, which accompany the application:

- Planning Application Form prepared by Rolfe Judd Planning
- Community Infrastructure Levy Form prepared by Rolfe Judd Planning
- Application Drawings prepared by Allford Hall Monaghan Morris (AHMM)
  - Location Plan: 24144-AHMM-ZA-ZZ-DR-A-PL001 P03
  - Existing Site Plan: 24144-AHMM-ZA-ZZ-DR-A-PL002 P03
  - Proposed Site Plan: 24144-AHMM-ZA-ZZ-DR-A-PL003 P03
  - Existing Ground Floor Plan: 24144-AHMM-ZA-GF-DR-A-PL010 P03
  - Existing Roof Plan: 24144-AHMM-ZA-RF-DR-A-PL011 P02
  - Proposed Ground Floor Plan: 24144-AHMM-ZA-GF-DR-A-PL100 P03
  - Proposed First Floor Plan: 24144-AHMM-ZA-01-DR-A-PL101 P03
  - Proposed Second Floor Plan: 24144-AHMM-ZA-02-DR-A-PL102 P03
  - Proposed Roof Plan: 24144-AHMM-ZA-RF-DR-A-PL103 P03

- Existing North & South Elevations: 24144-AHMM-ZA-ZZ-DR-A-PL020 P02
- Existing East & West Elevations: 24144-AHMM-ZA-ZZ-DR-A-PL021 P02
- Proposed North & South Elevations: 24144-AHMM-ZA-ZZ-DR-A-PL200 P03
- Proposed East & West Elevations: 24144-AHMM-ZA-ZZ-DR-A-PL201 P03
- Existing Sections AA & BB: 24144-AHMM-ZA-ZZ-DR-A-PL030 P03
- Proposed Section AA & BB: 24144-AHMM-ZA-ZZ-DR-A-PL300 P03
- Proposed Bay Study South Elevation: 24144-AHMM-ZA-ZZ-DR-A-PL225 P03
- Proposed Bay Study East Elevation: 24144-AHMM-ZA-ZZ-DR-A-PL226 P02
- Proposed Bay Study North Elevation: 24144-AHMM-ZA-ZZ-DR-A-PL227 P02
- Proposed Bay Study West Elevation: 24144-AHMM-ZA-ZZ-DR-A-PL228 P02
- Demolition Ground Floor Plan: 24144-AHMM-ZA-GF-DR-A-PL012 P03

/ Design and Access Statement (ref: 24144-AHMM-ZZ-ZZ-RP-A-PL003) prepared by AHMM
  - Includes Landscaping Statement prepared by Gillespies

/ Landscaping Drawings prepared by Gillespies
  - General Arrangement Ground: 21121-00-001-GIL-0106 Rev 07
  - General Arrangement Roof: P21121-00-001-GIL-0107 Rev 04

/ Statement of Community Involvement prepared by E.C.F.

/ Fire Statement (ref: 00760-ART-XX-XX-RP-FE-0001 Rev 02) prepared by Artec Fire

/ BREEAM Pre-Assessment Report (Rev 01 29/01/26) prepared by BDP

/ Energy Strategy (ref: SQG-PC-AS-Ene-00-3) prepared by Square Gain

/ Sustainability Statement (ref: SQG-PC-AS-Sust-00-3) prepared by Square Gain

/ Sustainable Drainage Strategy (ref: 2250203-EWP-ZA-XX-RP-C-00001 Rev P01) prepared by Elliot Wood

/ Preliminary Ecological Assessment prepared by Greengage

/ Biodiversity Net Gain Assessment prepared by Greengage

/ Equalities Impact Statement prepared by Rolfe Judd Planning

/ Noise Impact Assessment (ref: J7853-MXF-XX-XX-RP-Y-10001_P02) prepared by Max Fordham

/ Odour Assessment prepared by Encon Associates

- Transport Statement (ref: 2250203 Rev 1.0) prepared by Elliot Wood
- Delivery & Servicing Management, incl: swept path analysis (ref: 2250203 Rev 1.0) prepared by Elliot Wood
- Travel Plan (ref: 2250203 Rev 1.0) prepared by Elliot Wood
- Outline Construction Logistics Plan (ref: 2250203 Rev 1.0) prepared by Elliot Wood
- Tree Survey Report [Arboricultural Impact Assessment] (ref: A7482 Rev A) prepared by Encon Associates
- Air Quality Assessment (ref: A7482 Rev A) prepared by Encon Associates

02. THE APPLICATION SITE AND SURROUNDING AREA

02.1 SITE DESCRIPTION & LOCATION

02.1.1 The application site is located within Alleyn's School. Alleyn's School is bound by Townley Road, Hillsboro Road, Playfield Crescent, Lytcott Grove, Colwell Road, and Lordship Lane. The school also has playing fields to the south of Townley Road. The school has been located at the Townley Road site since 1887 having also been in the borough since its founding in 1619. Alleyn's is a co-educational school for children aged 4-18.

02.1.2 The application site itself concerns the existing dining hall and surrounds, fronting Hillsboro Road. Having completed an architectural master planning exercise in 2022, the School is looking to undertake upgrades at the site including the new dining hall building, known as Project Crucible, which is proposed under this application.

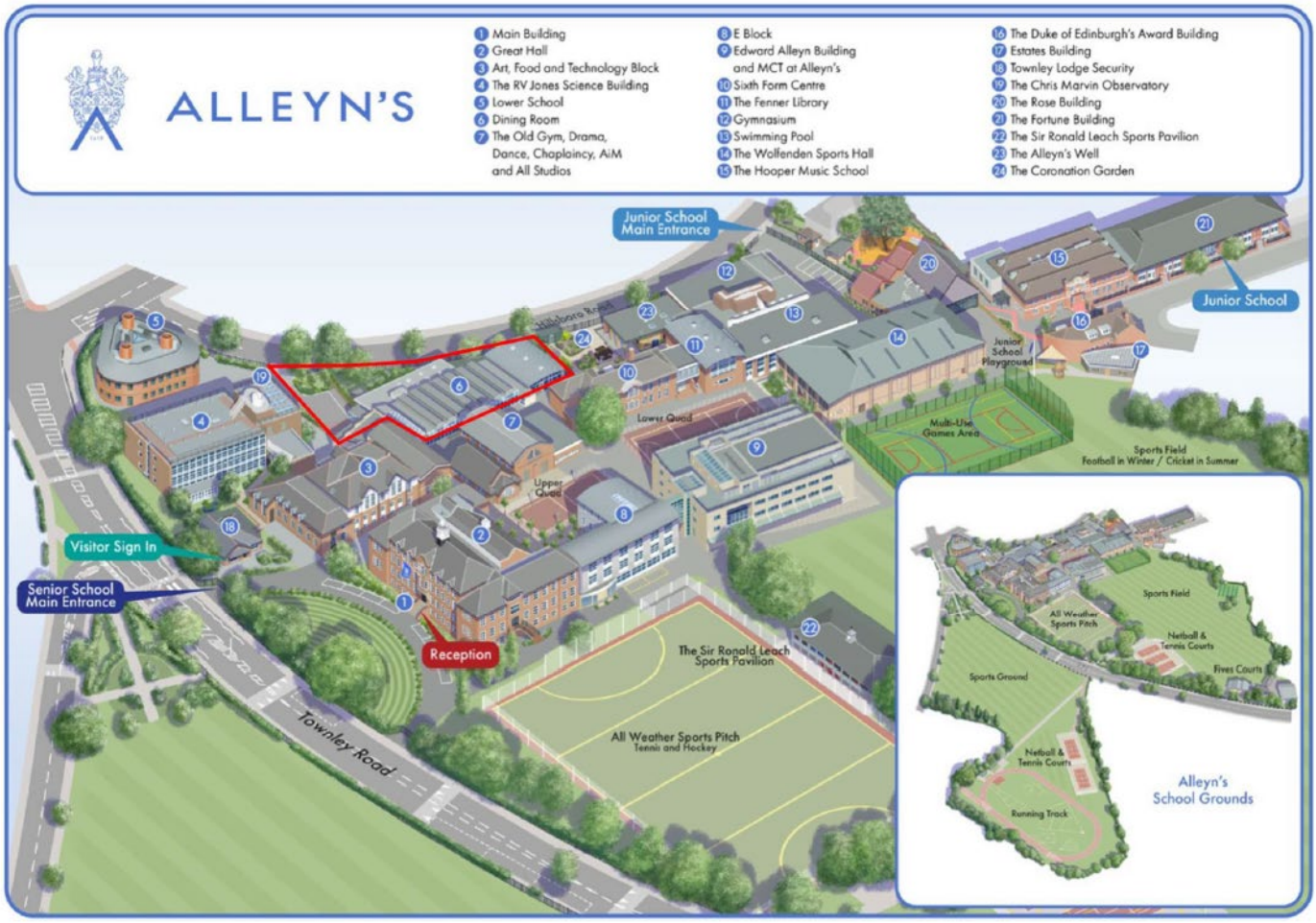
02.1.3 The existing dining hall is a predominantly single storey, post-war building. The hall measures 1,010sqm (GIA) or 1,061sqm (GEA). The hall is on a natural slope, dropping 6.5m west-to-east and whilst there is equal access to the hall, the design approach to its provision is very literal through hard engineering.

02.1.4 The hall is serviced from Hillsboro Road, with the servicing area adjoining the hall to the west. Vehicles reverse into the servicing area, leaving in forward gear. The average number of servicing trips are 5 vehicles per day.

02.1.5 14 trees sit within the red-line boundary, principally on the Hillsboro Road frontage. 10 trees are Category B, and 4 Trees are Category C.

02.1.6 To the east of the existing dining hall is the Well Garden which has a gate to Hillsboro Road.

02.1.7 This part of the site has a PTAL rating of 2-3 with nearby transport services including buses from Townley Road, Heber Road and Dulwich Village. The site is also located approximately 700m from North Dulwich Railway Station. The wider site has provision for 250 cycle bays as well as 60 scooter racks, part of the school's encouragement for sustainable modes of travel to the site.



Application Site within the School Grounds

02.2 ISSUES WITH THE EXISTING BUILDING

02.2.1 The existing hall has several detrimental features, including:

- The age of the hall is in-excess of 65 years, beyond its expected lifespan and severely compromised in how it can be upgraded.
- Lunch servings must take place over multiple sittings and does not meet modern catering requirements, which impacts the school day.
- The floorspace is inflexible, preventing it from being a multi-use facility.
- The hall lacks direct secure access, restricting the ability to open the hall to third parties for educational purposes whilst ensuring the wider campus remains secure.
- The hall has a high number of rooflights and windows on its north & south elevations. Combined with the poor insultation of the building fabric, the building often overheats in the summer and is cold in winter. This

also adds to the school's operational costs. The similarity between the GIA and GEA measurements of the building serves to highlight the lightweight construction with its poor thermal properties.

- The hall is in very close proximity to other school buildings to the south, particularly the Old Gym. This creates pinch points, particularly if queuing is occurring outside.
- The frontage to Hillsboro Road is inactive and detractive from the townscape, with the green space between the hall and the road "trapped" and undervalued.
- The building is an un-inspiring place to be, undermining the quality of education services that the school is determined to achieve and attendees expect.

Dining Hall (Internal to site)

Entrance to Dining Hall from service area

Cramped seating within main hall

Dining Hall from Hillsboro Road (external to site)

02.3 PLANNING POLICY DESIGNATIONS

02.3.1 In respect of specific planning policy designations, the site is located in the:

- East Dulwich Area Vision Boundary
- London Views Management Framework – 4.A2 Primrose Hill summit to Palace of Westminster
- Hot food takeaway primary school and secondary school exclusion zone
- Suburban Zone South

02.3.2 Outside of the application site, defined by the red-line plan, but in proximity is the Dulwich Village Conservation Area to the south, falling only on the original main school building. The main school building is also an unlisted building of merit (locally listed building).

02.3.3 The Metropolitan Open Land (MOL) designation is also to the south, largely on the school's playing fields. The MOL designation has the effect of constraining the school's development within the existing developed parts of the site.

02.4 SURROUNDING AREA

02.4.1 The surrounding area includes part of the school ground including adjacent buildings (Science Building, Old Gym and Buttery).

02.4.2 Hillsboro Road is characterised by residential development which is predominately two storey terraced dwellings with gardens. These properties are at angles to the road, rather than directly fronting it, thereby predominantly present flank walls towards the site.

02.4.3 Images of the surrounding area are provided on the following pages:

Dwellings at corner of Hillsboro Road and East Dulwich Grove

Kempis Way

3-11 Hillsboro Road

02.5 RELEVANT PLANNING HISTORY

02.5.1 The relevant planning history is provided in the following table.

Application Ref.	Proposal	Approved
25/AP/3729	Certificate of lawful development (proposed) for the installation of two storage containers in the Upper Quad with associated decking and fencing and relocation of All Pod container to the east of Block E	Approved 27 January 2026
24/AP/1169	Lawful Development Certificate (Proposed) in respect of minor external alterations to an existing building forming part of the old gym hall within the School site.	Approved 7 June 2024
24/AP/0794	Construction of a timber frame extension and reconfiguration of existing Entrance Lodge; amendments to pedestrian access and landscaping.	Approved 6 June 2024
22/AP/4073	Non material amendment of planning permission ref. no. 22/AP/0184: Construction of a single storey Wellbeing Centre. NMA sought: To update louvre location to suite M and E construction proposals, to amend the brick finish to a Brick Slip Finish, to amend the Sarafil single ply standing seam effect roof to a Fibreglass standing seam effect roof.	Approved 22 December 2022
22/AP/0184	Construction of a single storey Wellbeing Centre.	Approved 19 May 2022
21/AP/1780	Replacement of existing roof with steeper pitched roof and the construction of three dormers two to the front elevation and one to the rear.	Approved 19 July 2021
17/AP/0288	Construction of new electrical substation, with associated changes to the existing hedge and fence to provide access.	Approved 28 March 2017
15/AP/0926	Demolition of existing Lower School building & Construction of new Lower School building and associated landscaping works	Approved 12 May 2015

15/AP/0459	Construction of a proprietary observatory and associated support structure, deck and balustrade, to be located on top of the flat roofed stair tower of the Science Block.	Approved 13 April 2015
13/AP/1886	Erection of a three-storey extension to the north elevation of the existing science building to provide additional teaching accommodation, together with the installation of roof-top photovoltaic panels, the demolition of the caretakers house and associated landscaping.	Approved 29 August 2013
13/AP/0866	Single storey ground floor extension to side/rear.	Approved 22 May 2013
13/AP/0493	First floor extension to existing swimming pool to providing a seating gallery for up to 100 spectators and enhanced changing areas.	Approved 20 February 2013
12/AP/1759	Erection of first floor extension to south-west elevation to provide additional music rooms, and erection of single-storey entrance lobby to south-west elevation.	Approved 14 September 2012
12/AP/1031	Installation of two cycle shelters to cover existing cycle parking.	Approved 30 May 2012
08/AP/2278	Extend at first floor level above existing ground floor structure, creating two new music classrooms	Approved 27 November 2008
07/AP/0130	Erection of replacement railings (height 2m) on Townley Road and Hillborough Road frontages, and gates (maximum height 2.75m) at the North Gate and South Gate site entrances on Townley Road. Provision of vehicle barrier within the North Gate.	Approved 5 April 2007
05/AP/2034	Removal of complete building known as RAF Hut located to the rear of the Duke of Edinburgh Award Office at the school.	Approved 7 November 2005
05/AP/1409	Erection of single storey building to provide office and rest room facilities for school staff.	Approved 1 December 2005
02/AP/1046	Infill covered walk-way to science block by single storey extension for new classroom & new glazed entrance foyer to north-east elevations (facing school yard) & new glazed extension to existing entrance to front elevation (nth-west)	Approved 23 July 2002
00/AP/0743	Erection of 2 storey and link buildings as extension between existing 6th form/library & gym/swimming pool blocks for use as library extension and changing rooms in connection with the school.	Approved 6 July 2000
99/AP/0940	Amendment to permission of 27.10.99, involving reduction of pavilion, steps & balcony to NE elevation, omission of 1 external staircase. Amendments to internal layouts and external alteration to doorway/fenestration.	Approved 10 August 1999
97/AP/0439	Erection of 2 storey extension to existing teaching/staff block to provide new seminar rooms and staff room.	Approved 29 May 1997
96/AP/0280	Demolition of existing staff dining room;erection of extensions to main dining room and main school building (E Block) plus provision of 8 additional parking spaces.	Approved 02 May 1996

02.5.2 Separate ‘enabling works’ planning applications are being prepared which will facilitate an extension to the new gym, erection of a temporary kitchen, temporary dining marquee and new substation. This will manage operations while construction of the new dining hall takes place.

03. PRE-APPLICATION ADVICE

03.1.1 The proposal has been subject to pre-application discussions with the Council (reference: 25/EQ/0253).

03.1.2 Two meetings have taken place, the first was an in-person meeting at Southwark Council on Monday 3 November 2025 with key project team members and Abbie McGovern (Team Leader (Major Applications and New Homes Team) and Richard Craig (Team Leader Design and Conservation) present. Key points raised during this meeting included:

- Queries around access and student numbers and ensuring no negative impact on Hillsboro Road.
- The Council was supportive of the principle of the Crucible Building.
- In terms of design, the need for the building to address the street and explore landscaping further and the upper terrace needs careful treatment.
- No in-principle issues with the position, scale and massing at this stage supporting the progression of the scheme as proposed.
- Emphasis was placed on the importance of consultation which the school confirmed had already commenced.

03.1.3 A second in person meeting took place at Southwark Council on 28 November 2025 to discuss updates made to the proposal since the first meeting. The key points raised during the meeting included:

- Clarification was provided on the groups which will have access to the new building and the potential need for a new secure gate to Hillsboro Road.
- Clarification was requested on level access points and accessed proposed via the Well Garden.
- The Council remained comfortable with the scale and design of the building. It was highlighted that airflow and overheating will be a consideration.
- The idea of a low fence to Hillsboro Road with soft landscaping behind was preferred by the Council.

03.1.4 It was confirmed that this application does not need to go to the DRP.

04. THE DEVELOPMENT PROPOSAL

04.1.1 The Description of Development for the development proposal is:

'Demolition and replacement of school dining hall with associated landscaping works.'

04.1.2 The development proposal is for a replacement dining hall, comprised of a new dining hall, kitchens, teaching space and assembly hall. It will be a three storey multi-functional building. The sq.m. of the new building will be 2,710 sq.m. (GEA), 2,440 sq.m (GIA).

Floorplate

04.1.3 The axis of the new building will be altered on a more east-west basis (rather than north-east – south-west), giving more breathing room and circulation space between the hall and the buildings to the south, as well as strengthening the street-frontage to Hillsboro Road. The building massing reduces for each floor.

04.1.4 The ground floor is mainly comprised of the new dining hall space, kitchens, staff dining (or space for the school community to independently and safely use) and utility and service rooms. All utility and service infrastructure is located and focussed on the western side, along the retained service yard /service yard entrance.

04.1.5 As existing, because of site constraints, service vehicles (deliveries, refuse etc) cannot turn onsite and will reverse into the site and leave in forward gear. The area is (and will remain) fenced off so there is no conflict between users of the service yard and others onsite (such as pupils).

04.1.6 The first floor will comprise 6 classrooms and 6 seminar spaces. These classrooms build additional flexibility for school teaching spaces and in particular for exam periods where capacity is highly constrained at present. The flexibility will enable the school to develop a wider outreach programme towards the local community, for instance lecture theatre space for presentational events outside of teaching hours. The school would like the partitions between the spaces to be adaptable to maximise flexibility, for instance retracting the partition between two classrooms means the space could become a lecture theatre.

04.1.7 The second floor is comprised of a future assembly room / multi-purpose space on the Hillsboro Road side of the building. Combined with the roof terrace on the southern side, these spaces are also aiming to optimise views towards the City of London, and act as a source of inspiration for the school's pupils and other users of the space. Associated plant and PV are also proposed at the roof level.

04.1.8 The building will be served by two-cores, with all parts of the building supporting equal access.

04.1.9 Hillsboro Road has a lack of active frontage at present, given the orientation of both the school's and the opposing residential properties. The new building increases the level of active frontage, complimented by the floorplan, onto the street which aligns with townscape and Secure by Design principles.

Sustainable Design

04.1.10 It may be observed that there is a significant level of plant space / room provided for in the building. This is because the new building is to also act as a new energy centre for the wider Alleyn's site. The school aims to create its own localised energy network wherein overtime the school will progressively connect the other school buildings to it and transition to low-carbon energy. The initial installation will be of 300kWh of ASHP capacity and a target 36kWh of solar energy depending on final product. The plant equipment is otherwise largely related to catering equipment/site operations with passive-design measures prioritised in accordance with the London Plan energy hierarchy.

04.1.11 The new school hall will be built to at least BREEAM 'Excellent' standard. At submission stage, the BREEAM score is calculated at 82.9%, significantly above the 70% required for 'Excellent'.

04.1.12 The development is calculated to achieve a 40% reduction in onsite carbon emissions beyond Building Regulations 2021. By stage, this accounts as 3.3% under Be Lean, 0% under Be Clean and 36.9% under Be Green. The reason for the Be Lean score is detailed under the planning assessment section of this report (as well as the submitted Energy Strategy). The remaining amount will be offset via contribution to achieve a 'net zero' development.

04.1.13 The new hall will be paired with a new initiative by the school over how school dinners are provided, and food waste reduced. The school is keen to trial and promote a technological solution to food waste, by seeking that pupils identify in advance what they would like for lunch via smart technology and accordingly the catering staff understand the volume of food they need to produce. To this end, the development is calculated to reduce refuse waste from 55,440L to 14,946L and the volume required to be recycled from 19800L to 14850L. Site servicing remains broadly the same, with 6 servicing trips a day, against a current average of 5.

04.1.14 A pre-demolition audit has been undertaken of the existing building by Elliot Wood. The development will target that 95% of material waste will either be reused or recycled.

04.1.15 Additional cycle facilities will be included by the provision of 5 Sheffield stands within the landscape. This provides for 8 long-stay and 2 short-stay bays.

Trees, Landscaping and Biodiversity

04.1.16 The proposal requires the removal of 10 trees (6 Category B and 4 Category C) to facilitate the new works, however the landscaping design includes the planting of 15 replacement trees. The proposal includes a detailed landscape proposal for:

- woodland planting to the boundary to Hillsboro Road
- dining terrace and new hard and soft landscaping to the Well Garden – this includes a new access ramp, stairs, various seating types and landscaping
- landscaping to the new entrance nodes of the building

- amenity terrace to the new building
- 609 sqm of biodiverse roof

04.1.17 The proposal will result in 0.4 Urban Greening Factor (UGF) and will met at least 10% Biodiversity Net Gain (BNG).

04.1.18 The increased greening of the site, combined with a Sustainable Drainage System (SuDS) will improve the runoff rate by 96.8%.

Interim construction arrangements

04.1.19 Replacing the existing dining hall means interim facilities need to be provided for the duration of construction. Understanding these logistics have therefore been developed in tandem with the development proposals. Initially it was considered to install a temporary building within the playing fields however it has been concluded that minor demolition and rebuilds to parts of the New Gym, along with the refurbishment and fit out combined with cabins in the service yard as a food production area and an all-season marquee will also be utilised. These works have been included as part of a separate 'enabling works' application to the Council.

South Elevation (Proposed Building Internal to Site)


North Elevation (Proposed Building External to Site)

05. RELEVANT PLANNING POLICIES

05.1 DEVELOPMENT PLAN

05.1.1 The proposal has been developed in accordance with the relevant national policy guidance, strategic and local planning policy and guidance. This section sets out the relevant adopted and emerging planning policy framework, against which the proposal will be considered in Section 6 of this Planning Statement.

05.1.2 In accordance with Section 38(6) of the Planning and Compulsory Purchase Act (2004), 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 adopted Development Plan documents relevant to the site are as follows:

- London Plan (adopted March 2021)
- Southwark Plan 2019-2036 (adopted February 2022)

05.1.3 The National Planning Policy Framework (NPPF), National Planning Policy Guidance (NPPG) and Supplementary Planning Documents are material considerations.

05.2 LONDON PLAN 2021

05.2.1 Outlined below is a list of relevant policies from the London Plan

- Policy D3 (Optimising site capacity through the design-led approach)
- Policy D4 (Delivering good design)
- Policy D5 (Inclusive design)
- Policy D11 (Safety, security and resilience to emergency)
- Policy D12 (Fire Safety)
- Policy D13 (Agent of Change)
- Policy D14 (Noise)
- Policy S3 (Education and childcare facilities)
- Policy HC4 (London View Management Framework)
- Policy G5 (Urban greening)
- Policy G6 (Biodiversity and access to nature)
- Policy G7 (Trees and woodlands)
- Policy SI 1 (Improving air quality)
- Policy SI 2 (Minimising Greenhouse Gas Emissions)
- Policy SI 3 (Energy infrastructure)
- Policy SI 4 (Managing Heat Risk)
- Policy SI 5 (Water Infrastructure)
- Policy SI 7 (Reducing waste and supporting the circular economy)
- Policy SI 8 (Waste Capacity and Net Waste Self-Sufficiency)
- Policy SI 12 (Flood risk management)
- Policy SI 13 (Sustainable Drainage)
- Policy T4 (Assessing and Mitigating Transport Impacts)
- Policy T5 (Cycling)
- Policy T7 (Deliveries, servicing and construction)

05.3 SOUTHWARK PLAN 2019-2036

05.3.1 Outlined below is a list of relevant policies from the Southwark Plan:

- Policy SP2 (Southwark Together)
- Policy SP3 (A great start in life)
- Policy SP4 (Green and inclusive economy)
- AV.08 East Dulwich Vision Area
- Policy P13 (Design of places)
- Policy P14 (Design quality)
- Policy P16 (Designing out crime)
- Policy P18 (Efficient use of land)
- Policy P22 (Borough views)
- Policy P27 (Education Places)
- Policy P50 (Highways Impacts)
- Policy P56 (Protection of amenity)
- Policy P59 (Green infrastructure)
- Policy P60 (Biodiversity)
- Policy P61 (Trees)
- Policy P62 (Reducing waste)
- Policy P65 (Improving air quality)
- Policy P66 (Reducing noise pollution and enhancing soundscapes)
- Policy P69 (Sustainability standards)
- Policy P70 (Energy).

05.4 SUPPLEMENTARY PLANNING GUIDANCE

GLA

- The Control of Dust and Emissions During Construction and Demolition SPG (2014)
- Accessible London SPG (2014)
- Urban Greening Factor LPG (2023)
- Fire Safety LPG (2022)
- Social Infrastructure SPG (2015)
- Energy Planning Guidance

Southwark

- Section 106 and CIL SPD (2025)
- Climate and Environment SPD (2025)

06. PLANNING CONSIDERATIONS

06.1 PLANNING CONSIDERATIONS

06.1.1 The following section assesses the Application scheme against the adopted and emerging planning policy framework and all other relevant material considerations. Section 38 (6) of the Planning and Compulsory Purchase Act (2004) states 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 comprises the London Plan and Southwark Plan and the Application scheme is in accordance with the adopted development plan. The following planning considerations have been addressed:

- Principle of Development
- Design and Heritage
- Neighbouring Amenity
- Transport and Access
- Drainage
- Sustainability and Energy Strategy
- Fire Strategy
- Ecology and Biodiversity
- Trees and Landscaping
- Community Engagement
- S106 Obligations

06.2 PRINCIPLE OF DEVELOPMENT

06.2.1 Policy P27 of the Local Plan supports development of educational facilities where they meet identified needs and where facilities can be shared with local residents and all members of the community. Part 4) of the policy also acknowledges the need for sufficient school infrastructure (teaching spaces, halls, dining etc) to support school places. The development proposal is in alignment with Policy P27, meeting the school's identified needs for dining, teaching and examination spaces as well as being deigned to support the ability for all-inclusive community access, whilst keeping the wider site secure. London Plan Policy S3 aligns with Policy P27.

06.2.2 Policy D18 of the Local Plan promotes the efficient use of land, permitting development that optimises land use. The proposal replaces the existing dining hall and maintains development in the northern part of the school's estate. The presence of the Metropolitan Open Land designation to the south restricts the ability of the school to seek the facilities to meet its needs on this land and therefore densifying and optimising the developed parts of the site, as is proposed, is essential. London Plan Policy D3 aligns with Policy D18. There is no principle issue with the proposal in planning policy terms therefore, aligning also with the pre-application advice received by the applicant.

06.3 DESIGN AND HERITAGE

06.3.1 London Plan Policy D3 (Optimising site capacity through the design-led approach) emphasizes a design-led approach to optimize site capacity, making the best use of land by considering design options that respond to the site's context and capacity for growth. Developments should enhance local context through appropriate form and land use, encourage active travel, and be well-connected to public transport and amenities. They should facilitate efficient servicing, achieve safe and inclusive environments, and offer high-quality, sustainable designs.

06.3.2 London Plan Policy D5 (Inclusive Design) requires developments to achieve the highest standards of accessible and inclusive design. Proposals should consider London's diverse population, creating high-quality people-focused spaces that promote social interaction and inclusion, ensuring convenience and a welcoming environment without disabling barriers, and providing safe and dignified access for all users. Design and Access Statements must include an inclusive design statement, explaining how these principles have been integrated from the outset and through the development process.

06.3.3 Southwark Policy P13 (Design of places) outlines comprehensive guidelines to ensure development projects positively contribute to the urban environment. It requires that developments respect and enhance the existing townscape by considering height, scale, massing, and arrangement. The policy emphasizes the importance of revealing local distinctiveness and architectural character while conserving the historic environment. Developments must improve urban grain, site layout, permeability, and street widths, ensuring buildings and spaces are well-positioned for their function and use.

06.3.4 Southwark Policy P14 (Design quality) requires high standards in design for new developments, emphasizing the need for buildings and spaces to be durable, sustainable, and responsive to their context. Innovative design solutions that consider the site's historic context, topography, and constraints are required. The policy also highlights the importance of using quality materials, promoting active frontages and entrances, and ensuring accessible and inclusive design.

06.3.5 The development proposal is three storeys in height, with the massing reducing on the first and second floors. The ground floorplate is relatively similar to the existing in scale. The school estate is predominantly comprised of 3 storey buildings, including along the Hillsboro Road frontage. On the opposing side of Hillsboro Road, the residential properties present windowless flank elevations. No overlooking or daylight-sunlight issues into the residential properties or their private rear garden spaces are raised both from within the new building, or from the proposed roof terrace. The scale, massing, orientation and outlook of the proposed new hall is therefore considered acceptable in consideration of Local Plan Policy P13 and London Plan Policy D4.

06.3.6 The development proposal is similarly surrounded by 3 storey buildings which subsequently restrict any views from the Dulwich Village Conservation Area and the locally listed main school building. The proposed building is also of substantially improved appearance compared to the existing. The proposal has no material impact on the nearby heritage assets. The development would accord with London Plan Policy HC1 and Local Plan policies P19 and P20.

06.3.7 The sustainability credentials of the proposed building are discussed in subsequent sections.

06.4 AMENITY

06.4.1 Southwark Policy P56 (Protection of amenity) aims to prevent development that would cause unacceptable loss of amenity to current or future occupiers or users. Key considerations include the privacy and outlook of both existing and proposed homes, the actual or perceived sense of overlooking or enclosure, and the impacts of smell, noise, vibration, lighting, and other nuisances.

06.4.2 Southwark Policy P66 (Reducing noise pollution and enhancing soundscapes) requires proposals to avoid significant adverse impacts on health and quality of life due to noise. Adverse impacts should be mitigated through measures such as distancing, screening, and internal layout design rather than solely relying on sound insulation. Developments must also demonstrate how they will reduce, mitigate, and manage noise pollution during the construction process to minimize harm to current site occupants and neighbours.

06.4.3 Southwark Policy P65 (Improving air quality) requires proposals to meet or surpass air quality neutral standards and mitigate the impact of poor air quality on building occupants and public space users. This includes strategic building orientation, effective ventilation systems, and urban greening initiatives proportional to the development scale. The policy aims to address Southwark's significant air quality issues, particularly high concentrations of particulate matter (PM2.5 and PM10) and nitrogen oxides, which negatively affect residents' health and life expectancy.

06.4.4 This application is accompanied by a Noise Impact Assessment prepared by Max Fordham. A long-term noise survey has been undertaken at the existing site to determine the minimum background noise of 36 dB LA90 daytime and 32 dB LA90 night-time on Hillsboro Road. These locations are considered representative of the noise levels at the nearest noise-sensitive receptors. The levels are very low for an urban location, and it therefore, recommended that an absolute level of ≤30dB LAr is set for the plant noise emission limits at the nearest noise-sensitive receptors as outlined in the accompanying Noise Impact Assessment. In order to achieve this target, an acoustic enclosure is proposed for the air source heat pumps and in-duct attenuation / solid screening for the air handling units. With the proposed mitigation, the plant noise emission levels at the nearest noise-sensitive receptors are predicted to be ≤28dB LAr in the day/night, with penalties applied at the receptors nearest the substation. Therefore, the proposed plant meets the proposed limits and ‘No Observed Adverse Effect’ level is predicted.

06.4.5 This application is accompanied by an Air Quality Assessment prepared by Encon Associates. The baseline assessment concludes that pollution levels at the Site are currently meeting the relevant air quality objective limits for NO2, PM10 and PM2.5. The site is therefore considered suitable for educational use and impacts in terms of exposure would be negligible without the need for mitigation. The development will have a negligible impact on local air quality as a result of both operational traffic and on-site emissions. The development has been assessed against Policy S1 of the London Plan and has been shown to be better than Air Quality Neutral in terms of both transport and building emissions. The proposed development would meet current national and local planning policy and based on the results of this assessment air quality.

06.4.6 This application is accompanied by an Odour Assessment prepared by Encon Associates. The proposals include a new main kitchen providing food storage, preparation and cooking facilities and a small café. Based on the risk assessment criteria, the proposed kitchen facility is identified as having a High Risk of producing odour impacts at adjacent receptors. However, the Café kitchen will not be used for any food preparation, storage or cooking, with all food being supplied by the main kitchen. The Café kitchen is therefore concluded as having a Low Risk of producing odour as adjacent receptors. To ensure an adequate level of odour control an extraction system will be installed within the main kitchen and the café. In addition, an effective maintenance program will be implemented including regular cleaning of grill and fryer hoods and ducting and changing of filters in accordance with manufacturers recommendations and timeframes set out in the EMAQ+ guidance. Based on the above extraction system and maintenance program it is considered that odour emissions will be effectively controlled, and no adverse effects will be experienced at nearby sensitive receptors.

06.4.7 The proposed Crucible Building has been designed to minimise the opportunity for overlooking of the residential dwellings across Hillsboro Road. This includes increasing the depth of the roof planters to reduce the useable terrace footprint and help to mitigate overlooking of neighbouring properties.

06.5 TRANSPORT AND ACCESS

06.5.1 London Plan Policy T4 (Assessing and mitigating transport impacts) requires proposals to comprehensively assess the transport impacts, including how the development will affect public transport capacity, the road network, and active travel. It should identify measures to mitigate negative impacts, enhance accessibility, and promote sustainable transport modes. The application must be supported by a Transport Statement and a Travel Plan, detailing how the development will contribute to a safe, efficient, and sustainable transport system.

06.5.2 Southwark Policy P50 (Highways impacts) requires proposals to minimize the demand for private car journeys, demonstrate that the road network has sufficient capacity to support any increase in journeys from the development, and ensure the safe and efficient operation of the local road network, bus network, and the Transport for London Road Network. Additionally, developments must ensure safe and efficient delivery and servicing that minimizes motor vehicle journeys, incorporate delivery and servicing within major development sites rather than on public highways, and demonstrate how the construction phase will be safely managed with minimized vehicular movements to reduce danger to vulnerable road users.

06.5.3 This application is accompanied by Transport Statement, Travel Plan, Delivery and Servicing Plan and Outline Construction Logistics Plan prepared by Elliott Wood.

06.5.4 The Transport Statement considers the effects of the proposals on the local transport network, anticipated net trip generation, car and cycle parking strategy and the servicing arrangements for the site. There is no car parking or cycle parking related to the existing dining hall. The site has a public transport accessibility level (PTAL) of 3 which is considerate ‘moderate’ in terms of public transport access. The site is accessible by bus and train, with four local bus services and two railway stations accessible within a 10-minute walk. Cycle and walking links to the site are good, providing opportunities for staff, pupils and visitors to access the site by sustainable modes. Most trips to the site will be internal to the school.

06.5.5 The principle of vehicle access to the site will remain unchanged. The existing vehicular access to the site from Hillsboro Road will be retained for deliveries and refuse collection only. The proposed development will be car free, as per the existing dining hall. As the dining halls forms part of the wider school complex, which already has 250 cycle parking spaces and 60 scooter racks, no new spaces will be provided for pupils and staff. Cycle parking, however, will be provided for visitors to the building at a rate of 1 space per 10 visitors. The cycle parking will comprise eight long stay and two short stay spaces located adjacent to the gated site access and entrance to the dining hall building for visitors. Bathroom and changing facilities will be provided for staff. The accompanying Travel Plan provides management tools to enable catering staff and visitors to the building to make more informed decisions about their travel choices.

06.5.6 The impact of the development proposals will be negligible as most trips to the dining hall would be internal to the school, with new trip mainly expected outside of the network peak hours.

06.5.7 The accompanying Delivery and Servicing Plan prepared by Elliott Wood. The principle of servicing and deliveries at the site will be unchanged from the existing site use, with vehicles servicing the site from Hillsboro Road. Deliveries and refuse collection will take place via a service area to the west of the building. Delivery and refuse vehicles will be required to reverse into the service area (with the aid of a banksman) and then exit the service area in a forward gear. Swept path analysis are provided in the accompanying Delivery and Servicing Plan.

06.5.8 Waste will be stored in 1,100 litre (refuse and recycling), 240 litre bins (food waste and WEEE) and 60L bin for cooking oil within a dedicated bin store at ground floor to the west of the building. School staff will be responsible for manually (by hand or using a storage trolly) transferring waste and recycling from point of generation bins provided at various locations throughout the proposed building to the dedicated waste store. All waste for the school will be consolidated in the proposed refuse storage area north-west of the proposed Crucible building for storage and collection. General refuse and recycling are currently collected by private contractor three days are week and will be increased to daily on weekdays. Food waste is collected twice a week.

06.5.9 The accompanying Outline Construction Logistics Plan (CLP) details the expected management of traffic during the construction period. The site operational hours are proposed to be Monday to Friday: 8:00 – 18:00, Saturday: 8:00 – 13:00 and no working on Sundays or Bank Holidays. Weekend construction will only be strictly as required. Given the residential nature to the roads east of the site, it is proposed that all construction access takes place on Hillsboro Road via East Dulwich Grove. The CLP outlines the estimated vehicle movements for construction traffic and the type of vehicles that will serve the site. A number of strategies are provided to reduce the potential construction impacts. A final CLP is anticipated to be a condition of the proposed development.

06.6 DRAINAGE

06.6.1 London Plan Policy (SI 13 Sustainable drainage) requires that developments aim to achieve greenfield run-off rates and manage surface water run-off as close to its source as possible. This should be done following the drainage hierarchy that prioritizes the use of green infrastructure (e.g., rainwater harvesting, green roofs, and

rain gardens) over grey infrastructure (e.g., conventional drainage systems). Proposals should also resist impermeable surfaces unless unavoidable and design drainage to promote multiple benefits such as improved water quality, increased biodiversity, and enhanced urban greening.

06.6.2 Southwark Policy P68 (Reducing flood risk) aims to reduce flood risk by ensuring that development does not increase flood risk on or off-site. This is achieved through designing buildings to be safe and resilient to flooding, setting finished floor levels at least 300mm above the predicted maximum water level in flood-prone areas, and reducing surface water run-off in major developments to greenfield run-off rates using Sustainable Urban Drainage Systems (SUDS) and water-sensitive urban design.

06.6.3 The application is accompanied by a Sustainable Drainage Strategy prepared by Elliott Wood. This report and accompanying plans explain the approach taken with regards to the below ground surface and foul water drainage strategy for the proposed development. Despite the slight increase in building footprint, the proposals represent a significant improvement in surface water management by introducing green infrastructure and permeable surfaces where none previously existed. The improvement is 96.8% against the 1-100 year calculation.

06.7 SUSTAINABILITY AND ENERGY STRATEGY

06.7.1 London Plan Policy SI2 (Minimising greenhouse gas emissions) requires proposals to be net zero-carbon, meaning they must reduce greenhouse gas emissions and minimize both annual and peak energy demand. This is achieved through the energy hierarchy:

- Using less energy (be lean),
- Using energy efficiently (be clean),
- Maximizing on-site renewable energy (be green),
- Monitoring energy performance (be seen).

06.7.2 London Plan Policy (SI3: Energy infrastructure) requires development proposals to identify the need for, and suitable sites for, any necessary energy infrastructure requirements including energy centres, energy storage and upgrades to existing infrastructure, as well as identify existing heating and cooling networks, identify proposed locations for future heating and cooling networks and identify opportunities for expanding and inter-connecting existing networks as well as establishing new networks.

06.7.3 Southwark Policy P69 (Sustainability standards) requires that developments achieve a BREEAM rating of 'Excellent' for non-residential and non-self-contained residential projects exceeding 500 sqm. Additionally, the policy emphasizes reducing overheating risks by following a cooling hierarchy, which includes measures such as optimizing building orientation and shading, using energy-efficient designs, employing passive ventilation, and implementing low-carbon active cooling systems.

06.7.4 The accompanying Energy Strategy prepared by Square Gain summarises the developing energy strategy for the Crucible Building. The proposed building exceeds the London Plan and meets Southwark Council requirements for a reduction in regulated emissions compared to baseline (40%). The remaining reduction will be captured via carbon offset, anticipated to form part of the S106 agreement for the scheme. In order to comply with Part L of the Building Regulations and the planning requirements, it is proposed to install photovoltaic (PV) panels to the building. The electricity generated by the PV panels will be used for electrical services, such as lighting, lifts and pumps, within the School, along with supply back into the local grid.

06.7.5 In respect of the Energy Hierarchy, London Plan Policy SI2 seeks that energy efficiency measures (Be Lean) represent 15% of the reduction. The building as physically designed exceeds this requirement at 20%, however the Domestic Hot Water system to be installed has a higher impact than the nominal school building due to the activities undertaken in the space (i.e. kitchen etc), which are not being averaged out over the whole school site - only the Crucible building given the redline boundary. This therefore has a disproportionate effect – giving the development a 3.3% Be Lean score. It is clear that this is a particular operational aspect rather than a design issue with the proposed development (which otherwise clearly exceeds policy requirements). The proposal is therefore considered to adhere to Policy SI 2.

06.7.6 The accompanying Sustainability Statement prepared by Square Gain outlines the sustainability approach of the new crucible building and how this meets relevant requirements. The development aims to achieve BREEAM Excellent, reduce operational carbon emissions by 40% beyond Part L 2021, and incorporate renewable energy technologies such as PV panels. Construction will use responsibly sourced timber and recycled aggregates. A Project Sustainable Procurement Plan will be used, and the Site Waste Management Plan will target 95% diversion of construction waste from landfill.

06.8 FIRE STRATEGY

06.8.1 Policy D12 (Fire Safety) of the London Plan states that the interests of fire safety and to ensure the safety of all building users, all development proposals must achieve the highest standards of fire safety. All major development proposals should be submitted with a Fire Statement, which is an independent fire strategy, produced by a third party, suitably qualified assessor.

06.8.2 The application is accompanied by a Fire Statement prepared by Artec Fire which outlines the fire safety design of the development and to demonstrate that all structures, systems and components related to the development are to be designed to reduce the risk to life and the risk of serious injury in the event of a fire.

06.8.3 The building is to be provided with two escape stairs. The east stair is to be provided with an evacuation lift. Both stairs serve all levels. The east stair is to be provided with a corresponding evacuation lift adjacent to the stair and opens into a protected lobby. Assembly points are to be located a safe distance away from the building and avoid obstruction of Fire Service access to the site.

06.9 ECOLOGY AND BIODIVERSITY

06.9.1 Following the introduction of the Environment Act 2021, there is now a statutory requirement for all developments, unless exempt, to deliver a minimum 10% net gain.

06.9.2 Southwark Policy P60 (Biodiversity) requires that development projects must contribute to net gains in biodiversity. This involves enhancing the value of Sites of Importance for Nature Conservation (SINCs). Development should also incorporate features such as green and brown roofs, green walls, soft landscaping, and nest boxes. Additionally, any shortfall in achieving net biodiversity gains on-site must be compensated off-site through planning obligations or financial contributions.

06.9.3 This application is accompanied by a Biodiversity Net Gain Assessment prepared by Greengage. The development will adhere to the mandatory requirement under the Environment Act of delivering a net-gain of 10% to biodiversity.

06.10 TREES AND LANDSCAPING

06.10.1 London Plan Policy G5 (Urban greening) the use of high-quality landscaping, green roofs, green walls, and sustainable drainage systems. Boroughs are to develop an Urban Greening Factor (UGF) to determine the appropriate level of greening required, with target scores 0.3 for commercial developments.

06.10.2 Southwark Policy P59 (Green infrastructure) requires major developments to provide green infrastructure with arrangements for long-term stewardship and maintenance funding. Green infrastructure should deliver multiple benefits for the health of people and wildlife, integrate with the broader green infrastructure network and landscape to enhance accessibility and habitat connectivity, be adaptable to climate change, support species migration and native species, and extend and upgrade walking and cycling networks to promote community engagement and ownership.

06.10.3 Southwark Policy P61 (Trees) states that development will be permitted if trees are planted as part of landscaping and public realm schemes, commensurate to the scale and type of development, and the character of the neighbourhood. Where trees are removed to facilitate development, they should be replaced by new trees which result in no net loss of amenity, taking into account canopy cover as measured by stem girth; either

> *1. Within the development whereby valuation may be calculated using the Capital Asset Value for Amenity Trees (CAVAT) methodology or other assessment; or*
>
> *2. If this is not possible, outside the development. In this case a financial contribution must be provided to improve borough tree planting located according to 'right tree right place' principles. The financial contribution will include ongoing maintenance costs where trees are planted in the public realm.*

06.10.4 Of the 14 existing trees within the site boundary, ten trees will need to be removed to facilitate the construction of the new building. These include six category B2 trees and four category C2 trees. The four remaining trees can all be retained without harm as part of the finished development. Recommendations are made within the

accompanying Tree Survey Report to safeguard the retained trees and protect them from any damage from construction work. The proposals include the planting of 15 trees, representing a net gain of 5 trees at the site.

06.10.5 The proposal includes a detailed landscape proposal for:

- woodland planting to the boundary to Hillsboro Road
- dining terrace and new hard and soft landscaping to the Well Garden – this includes a new access ramp, stairs, various seating types and landscaping
- landscaping to the new entrance nodes of the building
- amenity terrace to the new building
- biodiverse roof

06.10.6 The proposal will result in 0.4 UGF, in excess of the GLA target of 0.3 for educational development and highlighting the overall improvement to the greening of the site.

06.11 COMMUNITY ENGAGEMENT

06.11.1 This application is accompanied by a Statement of Community Involvement prepared by ECF.
A comprehensive programme of community engagement was developed to provide the community with opportunities to give feedback on the proposals being promoted. This included:

- A dedicated website page on the Alleyn's school website
- A mailshot to local residents
- An online feedback form
- Meetings with political stakeholders
- A meeting with the Neighbourhood Action Group
- A meeting with the Project Steering Group
- Three drop-in events at Alleyn's School
- A parents' webinar.

06.11.2 A total of 38 respondents completed the feedback form and the following feedback was received:

- Further detail requested on building heights

- Concerns about potential view obstruction and location of the building
- Concern regarding new entrance on Hillsboro Road and increased foot and vehicles movements
- Impact on trees
- Construction impacts

06.11.3 Similar concerns to those listed above were also raised by Councillors as part of the political stakeholder meetings. The accompanying Statement of Community Involvement provides a detailed response to the feedback raised in conjunction with the drawings and technical reports accompanying the application. The feedback from the process has been considered by the project team and the community have had the opportunity to directly shape the proposals.

06.12 S.106 OBLIGATIONS

06.12.1 The heads of terms will be discussed with the council during the determination of the application however it is anticipated by the applicant that the following s.106 obligations will be secured:

- Biodiversity Net Gain
- Construction and Environment Management Plan
- Cabon offset payment of £14,857.89 to secure a net-zero carbon development.

07. CONCLUSION

07.1.1 The existing 1960s school dining hall is beset by problems, beyond its economic life and the school's requirements for modern educational practices. The application proposes the replacement of this building, with a new 3 storey tiered building with flexible spaces and enhanced landscaping and sets the school to decarbonise its estate via the inclusion of an energy centre. This project is known within the school as 'Project Crucible'.

07.1.2 The key planning benefits of the proposal are:

- Substantial enhancement to the facilities of an educational establishment which is proud to have called this part of Southwark its home since 1887,
- Outstanding architectural design, providing townscape enhancements and people focussed facilities and learning environment,
- A BREEAM 'Excellent' building and a Net-Zero carbon development,
- Enabling wider estate decarbonisation via an energy centre and clean energy generating technology,
- An inclusive access building,
- Landscape and ecological enhancements,
- At least 10% enhancement to biodiversity net-gain,
- Increased urban greening,
- Improved surface drainage,
- Reduced waste from the school's operations,
- Provision of spaces to support local community events (such as lectures).

07.1.3 The proposal has been developed in accordance with the relevant national policy guidance, strategic and local planning policy and guidance. The development proposal is in accordance with the policies and objectives of the development plan and is sustainable development. There are no material reasons which outweigh the benefits of this comprehensive development proposal. The proposal should therefore be approved in accordance with Paragraph 11 of the NPPF.

OLD CHURCH COURT
CLAYLANDS ROAD
LONDON
SW8 1NZ

+44 (0)20 7556 1500
info@rolfe-judd.co.uk