

Planning Committee

Tuesday 3 March 2020

6.30 pm

Ground Floor Meeting Room G02 - 160 Tooley Street, London SE1 2QH

Membership

Councillor Martin Seaton (Chair)
Councillor Kath Whittam (Vice-Chair)
Councillor Barrie Hargrove
Councillor Adele Morris
Councillor Margy Newens
Councillor Damian O'Brien
Councillor Catherine Rose
Councillor Cleo Soanes

Reserves

Councillor Eleanor Kerslake
Councillor Sarah King
Councillor Richard Livingstone
Councillor James McAsh
Councillor Hamish McCallum
Councillor Darren Merrill
Councillor Jason Ochere
Councillor Jane Salmon

INFORMATION FOR MEMBERS OF THE PUBLIC

Access to information

You have the right to request to inspect copies of minutes and reports on this agenda as well as the background documents used in the preparation of these reports.

Babysitting/Carers allowances

If you are a resident of the borough and have paid someone to look after your children, an elderly dependant or a dependant with disabilities so that you could attend this meeting, you may claim an allowance from the council. Please collect a claim form at the meeting.

Access

The council is committed to making its meetings accessible. Further details on building access, translation, provision of signers etc for this meeting are on the council's web site: www.southwark.gov.uk or please contact the person below.

Contact: Tim Murtagh on 020 7525 7187 or email: tim.murtagh@southwark.gov.uk

Members of the committee are summoned to attend this meeting

Eleanor Kelly

Chief Executive

Date: 24 February 2020



Planning Committee

Tuesday 3 March 2020

6.30 pm

Ground Floor Meeting Room G02 - 160 Tooley Street, London SE1 2QH

Order of Business

Item No.	Title	Page No.
	PART A - OPEN BUSINESS	
	PROCEDURE NOTE	
1.	APOLOGIES	
	To receive any apologies for absence.	
2.	CONFIRMATION OF VOTING MEMBERS	
	A representative of each political group will confirm the voting members of the committee.	
3.	NOTIFICATION OF ANY ITEMS OF BUSINESS WHICH THE CHAIR DEEMS URGENT	
	In special circumstances, an item of business may be added to an agenda within five clear days of the meeting.	
4.	DISCLOSURE OF INTERESTS AND DISPENSATIONS	
	Members to declare any personal interests and dispensation in respect of any item of business to be considered at this meeting.	
5.	MINUTES	1 - 4
	To approve as a correct record the minutes of the meeting held on 5 February 2020.	
6.	DEVELOPMENT MANAGEMENT	5 - 8

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6.2.	77-89 ALSCOT ROAD, LONDON SE1	93 - 188

ANY OTHER OPEN BUSINESS AS NOTIFIED AT THE START OF THE MEETING AND ACCEPTED BY THE CHAIR AS URGENT.

EXCLUSION OF PRESS AND PUBLIC

The following motion should be moved, seconded and approved if the committee wishes to exclude the press and public to deal with reports revealing exempt information:

“That the public be excluded from the meeting for the following items of business on the grounds that they involve the likely disclosure of exempt information as defined in paragraphs 1-7, Access to Information Procedure rules of the Constitution.”

Date: 24 February 2020

Planning Committee

Guidance on conduct of business for planning applications, enforcement cases and other planning proposals

1. The reports are taken in the order of business on the agenda.
2. The officers present the report and recommendations and answer points raised by members of the committee.
3. The role of members of the planning committee is to make planning decisions openly, impartially, with sound judgement and for justifiable reasons in accordance with the statutory planning framework.
4. The following may address the committee (if they are present and wish to speak) for **not more than 3 minutes each**.

- (a) One representative (spokesperson) for any objectors. If there is more than one objector wishing to speak, the time is then divided within the 3-minute time slot.
- (b) The applicant or applicant's agent.
- (c) One representative for any supporters (who live within 100 metres of the development site).
- (d) Ward councillor (spokesperson) from where the proposal is located.
- (e) The members of the committee will then debate the application and consider the recommendation.

Note: Members of the committee may question those who speak only on matters relevant to the roles and functions of the planning committee that are outlined in the constitution and in accordance with the statutory planning framework.

5. If there are a number of people who are objecting to, or are in support of, an application or an enforcement of action, you are requested to identify a representative to address the committee. If more than one person wishes to speak, the 3-minute time allowance must be divided amongst those who wish to speak. Where you are unable to decide who is to speak in advance of the meeting, you are advised to meet with other objectors in the foyer of the council offices prior to the start of the meeting to identify a representative. If this is not possible, the chair will ask which objector(s) would like to speak at the point the actual item is being considered.
6. Speakers should lead the committee to subjects on which they would welcome further questioning.
7. Those people nominated to speak on behalf of objectors, supporters or applicants, as well as ward members, should sit on the front row of the public seating area. This is for ease of communication between the committee and the speaker, in case any issues need to be clarified later in the proceedings; it is **not** an opportunity to take part in the debate of the committee.

8. Each speaker should restrict their comments to the planning aspects of the proposal and should avoid repeating what is already in the report. The meeting is not a hearing where all participants present evidence to be examined by other participants.
9. This is a council committee meeting which is open to the public and there should be no interruptions from the audience.
10. No smoking is allowed at committee.
11. Members of the public are welcome to film, audio record, photograph, or tweet the public proceedings of the meeting; please be considerate towards other people in the room and take care not to disturb the proceedings.

The arrangements at the meeting may be varied at the discretion of the chair.

Contacts: General Enquiries
Planning Section, Chief Executive's Department
Tel: 020 7525 5403

Planning Committee Clerk, Constitutional Team
Finance and Governance
Tel: 020 7525 57187



Planning Committee

MINUTES of the Planning Committee held on Wednesday 5 February 2020 at 6.30 pm
at Ground Floor Meeting Room G02A - 160 Tooley Street, London SE1 2QH

PRESENT: Councillor Martin Seaton (Chair)
Councillor Kath Whittam (Vice-Chair)
Councillor Barrie Hargrove
Councillor Adele Morris
Councillor Margy Newens
Councillor Damian O'Brien
Councillor Catherine Rose
Councillor Cleo Soanes

OTHER MEMBERS PRESENT: Councillor Richard Livingstone
Councillor Bill Williams

OFFICER SUPPORT: Simon Bevan (Director of Planning)
Jon Gorst (Legal Officer)
Colin Wilson (Head of Regeneration Old Kent Road)
Pip Howson (Transport Policy)
Alex Oyebade (Transport Policy)
Michael Tsoukaris (Design and Conservation)
Lasma Putrina (Development Management)
Troy Davies (Development Management)
Gerald Gohler (Constitutional Officer)

1. APOLOGIES

There were no apologies.

2. CONFIRMATION OF VOTING MEMBERS

Those members listed as present were confirmed as the voting members for the meeting.

3. NOTIFICATION OF ANY ITEMS OF BUSINESS WHICH THE CHAIR DEEMS URGENT

The chair gave notice of the following additional papers which were circulated before the meeting:

- Addendum report relating to item 6.1
- Members pack relating to item 6.1. and 6.2.

4. DISCLOSURE OF INTERESTS AND DISPENSATIONS

The following members of the committee declared an interest:

6.1. St Olaves Nursing Home, Ann Moss Way, London SE16 2TL

Councillor Kath Whittam, non-pecuniary, as the application site is in her ward. She would, however, approach the application in a neutral fashion.

5. MINUTES

RESOLVED:

That the minutes of the meeting held on 8 January 2020 be approved as a correct record of the meeting and signed by the chair.

6. DEVELOPMENT MANAGEMENT

RESOLVED:

1. That the determination of planning applications, or formal observations and comments, the instigation of enforcement action and the receipt of the reports included in the agenda be considered.
2. That the decisions made on the planning applications be subject to the conditions and/or made for the reasons set out in the reports unless otherwise stated.
3. That where reasons for decisions or conditions are not included or not as included in the reports relating to an individual item, they be clearly specified.

6.1 ST OLAVES NURSING HOME, ANN MOSS WAY, LONDON SE16 2TL

Planning application number: 19/AP/1612

PROPOSAL:

Demolition of the existing buildings on site (a derelict single storey nursing home and porta-cabins) and construction of two buildings (Building A - Part 4/Part 5/Part 6 storey building fronting Lower Road, Building B - Part 3/Part four-storey building fronting Ann Moss Way) providing 62 residential units together with two wheelchair parking spaces and associated landscaping.

The committee heard the officer's introduction to the report. Members of the committee

asked questions of the officers.

An objector addressed the committee and responded to questions put by members of the committee.

The applicant's representative addressed the committee, and answered questions from the committee.

A supporter living within 100 meters of the development addressed the committee, and answered questions put by the committee.

Councillor Bill Williams addressed the committee in his capacity as a ward councillor, and answered questions from the committee.

The committee put further questions to the officers and discussed the application, during which the committee asked for additional trees to be added to the landscaping plan that is to be submitted to the planning authority.

A motion to grant the application was moved, seconded, put to the vote and declared carried.

RESOLVED:

1. That planning permission be granted, subject to the conditions set out in the report and the applicant entering into an appropriate legal agreement.
2. That in the event that the requirements of (1) are not met by 15 May 2020, the director of planning be authorised to refuse planning permission, if appropriate, for the reasons set out in paragraph 134 of the report.

The meeting then adjourned for a comfort break from 8.05pm to 8.15pm.

6.2 840 OLD KENT ROAD, LONDON SE15 1NQ

Planning application number: 19/AP/1322

PROPOSAL:

Demolition of existing building and redevelopment of the site to provide a new building of up to 13 and 21 storeys in height (maximum height 73.60m above ground level). Redevelopment to comprise 168 residential units (Class C3), a 1,778 sqm (GIA) retail unit (Class A1) and a 52 sqm (GIA) flexible retail unit (Class A1/A3), with associated landscaping, car parking, servicing, refuse and plant areas, and all ancillary or associated works.

The committee heard the officer's introduction to the report. Members of the committee asked questions of the officers.

An objector addressed the committee and responded to questions put by members of the committee.

The applicant's representatives addressed the committee, and answered questions from

the committee.

There were no supporters who lived within 100 meters of the development site present at the meeting that wished to speak.

Councillor Richard Livingstone addressed the committee in his capacity as a ward councillor, and answered questions put by the committee.

The committee put further questions to the officers and discussed the application.

A motion to grant the application was moved, seconded, put to the vote and declared carried.

RESOLVED:

1. That planning permission be granted, subject to conditions set out in the report and referral to the Mayor of London, and the applicant entering into an appropriate legal agreement by no later than 5 August 2020.
2. That the environmental information be taken into account as required by Regulation 30 of the Town and Country Planning (Environmental Impact Assessments) Regulations 2017.
3. That following issue of the decision it be confirmed that the director of planning shall place a statement on the Statutory Register pursuant to Regulation 30 of the Town and Country Planning (Environmental Impact Assessments) Regulations and that for the purposes of Regulation 30(1) (d) the main reasons and considerations on which the Local Planning Authority's decision is based shall be set out as in the report.
4. That in the event that the requirements of (1) are not met by 5 August 2020, the director of planning be authorised to refuse planning permission, if appropriate, for the reasons set out at paragraph 490 of the report.

Meeting ended at 11.18 pm.

CHAIR:

DATED:

Item No. 6.	Classification: Open	Date: 3 March 2020	Meeting Name: Planning Committee
Report title:		Development Management	
Ward(s) or groups affected:		All	
From:		Proper Constitutional Officer	

RECOMMENDATIONS

1. That the determination of planning applications, or formal observations and comments, the instigation of enforcement action and the receipt of the reports included in the attached items be considered.
2. That the decisions made on the planning applications be subject to the conditions and/or made for the reasons set out in the attached reports unless otherwise stated.
3. That where reasons for decisions or conditions are not included or not as included in the reports relating to an individual item, they be clearly specified.

BACKGROUND INFORMATION

4. The council's powers to consider planning business are detailed in Part 3F which describes the role and functions of the planning committee and planning sub-committees. These were agreed by the annual meeting of the council on 23 May 2012. The matters reserved to the planning committee and planning sub-committees exercising planning functions are described in part 3F of the Southwark Council constitution.

KEY ISSUES FOR CONSIDERATION

5. In respect of the attached planning committee items members are asked, where appropriate:
 - a. To determine those applications in respect of site(s) within the borough, subject where applicable, to the consent of the Secretary of State for Housing, Communities and Local Government and any directions made by the Mayor of London.
 - b. To give observations on applications in respect of which the council is not the planning authority in planning matters but which relate to site(s) within the borough, or where the site(s) is outside the borough but may affect the amenity of residents within the borough.
 - c. To receive for information any reports on the previous determination of applications, current activities on site, or other information relating to specific planning applications requested by members.

6. Each of the following items are preceded by a map showing the location of the land/property to which the report relates. Following the report, there is a draft decision notice detailing the officer's recommendation indicating approval or refusal. Where a refusal is recommended the draft decision notice will detail the reasons for such refusal.
7. Applicants have the right to appeal to Planning Inspector against a refusal of planning permission and against any condition imposed as part of permission. Costs are incurred in presenting the council's case at appeal which maybe substantial if the matter is dealt with at a public inquiry.
8. The sanctioning of enforcement action can also involve costs such as process serving, court costs and of legal representation.
9. Where either party is felt to have acted unreasonably in an appeal the inspector can make an award of costs against the offending party.
10. All legal/counsel fees and costs as well as awards of costs against the council are borne by the budget of the relevant department.

Community impact statement

11. Community impact considerations are contained within each item.

SUPPLEMENTARY ADVICE FROM OTHER OFFICERS

Director of Law and Democracy

12. A resolution to grant planning permission shall mean that the director of planning is authorised to grant planning permission. The resolution does not itself constitute the permission and only the formal document authorised by the committee and issued under the signature of the director of planning shall constitute a planning permission. Any additional conditions required by the committee will be recorded in the minutes and the final planning permission issued will reflect the requirements of the planning committee.
13. A resolution to grant planning permission subject to legal agreement shall mean that the director of planning is authorised to issue a planning permission subject to the applicant and any other necessary party entering into a written agreement in a form of words prepared by the director of law and democracy, and which is satisfactory to the director of planning. Developers meet the council's legal costs of such agreements. Such an agreement shall be entered into under section 106 of the Town and Country Planning Act 1990 or under another appropriate enactment as shall be determined by the director of law and democracy. The planning permission will not be issued unless such an agreement is completed.
14. Section 70 of the Town and Country Planning Act 1990 as amended requires the council to have regard to the provisions of the development plan, so far as material to the application, and to any other material considerations when dealing with applications for planning permission. Where there is any conflict with any policy contained in the

development plan, the conflict must be resolved in favour of the policy which is contained in the last document to be adopted, approved or published, as the case may be (s38(5) Planning and Compulsory Purchase Act 2004).

15. Section 38(6) of the Planning and Compulsory Purchase Act 2004 provides that where, in making any determination under the planning Acts, regard is to be had to the development plan, the determination shall be made in accordance with the plan unless material considerations indicate otherwise. The development plan is currently Southwark's Core Strategy adopted by the council in April 2011, saved policies contained in the Southwark Plan 2007, the where there is any conflict with any policy contained in the development plan, the conflict must be resolved in favour of the policy which is contained in the last document to be adopted, approved or published, as the case may be (s38(5) Planning and Compulsory Purchase Act 2004).
16. On 15 January 2012 section 143 of the Localism Act 2011 came into force which provides that local finance considerations (such as government grants and other financial assistance such as New Homes Bonus) and monies received through CIL (including the Mayoral CIL) are a material consideration to be taken into account in the determination of planning applications in England. However, the weight to be attached to such matters remains a matter for the decision-maker.
17. "Regulation 122 of the Community Infrastructure Levy regulations (CIL) 2010, provides that "a planning obligation may only constitute a reason for granting planning permission if the obligation is:
 - a. necessary to make the development acceptable in planning terms;
 - b. directly related to the development; and
 - c. fairly and reasonably related to the scale and kind to the development.

A planning obligation may only constitute a reason for granting planning permission if it complies with the above statutory tests."

18. The obligation must also be such as a reasonable planning authority, duly appreciating its statutory duties can properly impose i.e. it must not be so unreasonable that no reasonable authority could have imposed it. Before resolving to grant planning permission subject to a legal agreement members should therefore satisfy themselves that the subject matter of the proposed agreement will meet these tests.
19. The National Planning Policy Framework (NPPF) came into force on 27 March 2012. The NPPF replaces previous government guidance including all planning practice guidance (PPGs) and planning policy statements (PPSs). For the purpose of decision-taking policies in the Core Strategy (and the London Plan) should not be considered out of date simply because they were adopted prior to publication of the NPPF. For 12 months from the day of publication, decision-takers may continue to give full weight to relevant policies adopted in accordance with the Planning and Compulsory Purchase Act (PCPA) 2004 even if there is a limited degree of conflict with the NPPF.
20. In other cases and following and following the 12 month period, due weight should be given to relevant policies in existing plans according to their degree of consistency with the NPPF. This is the approach to be taken when considering saved plan policies under the Southwark Plan 2007. The approach to be taken is that the closer the

policies in the Southwark Plan to the policies in the NPPF, the greater the weight that may be given.

BACKGROUND DOCUMENTS

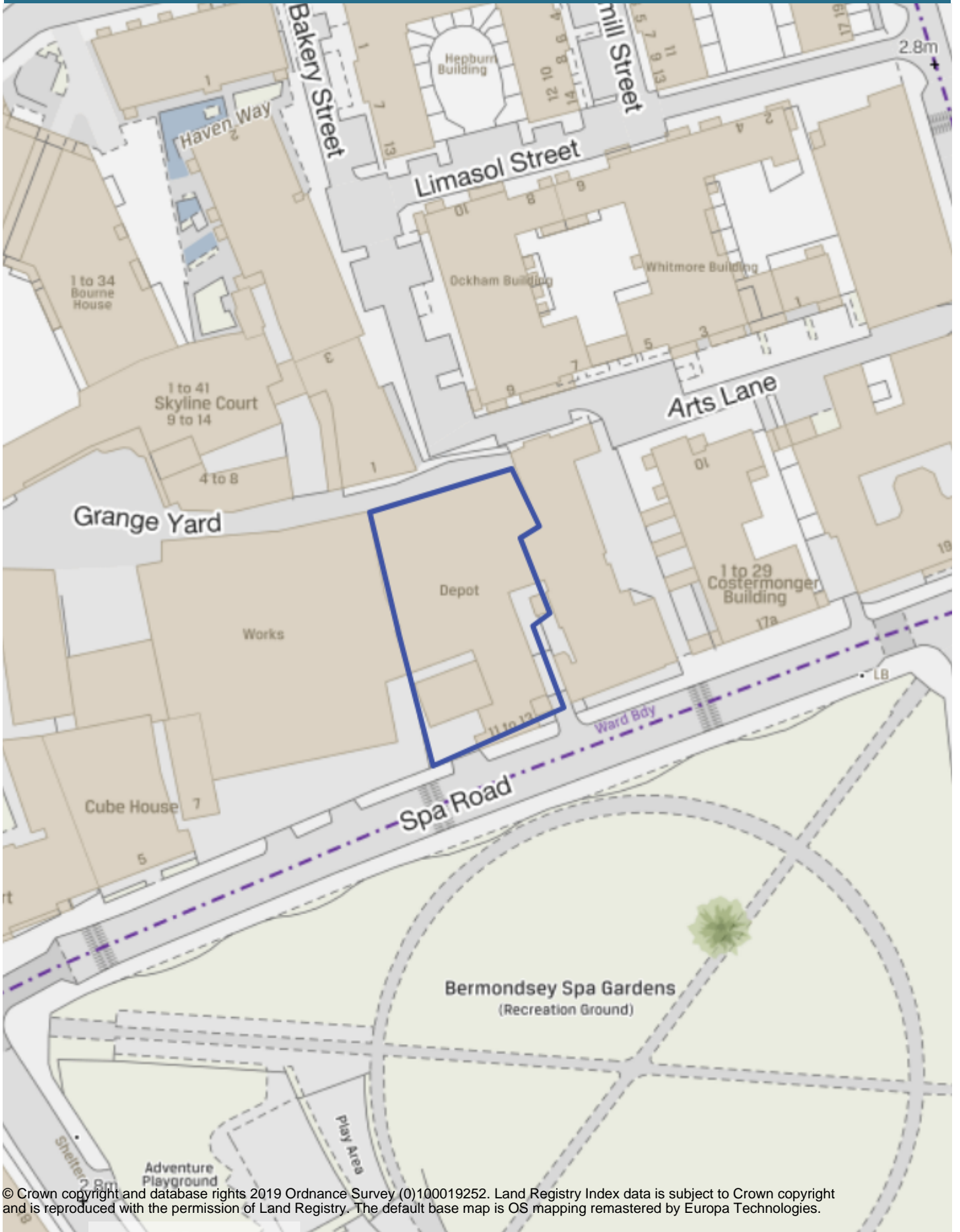
Background Papers	Held At	Contact
Council assembly agenda 23 May 2012	Constitutional Team 160 Tooley Street London SE1 2QH	Virginia Wynn-Jones 020 7525 7055
Each planning committee item has a separate planning case file	Development Management 160 Tooley Street London SE1 2QH	Planning Department 020 7525 5403

APPENDICES

No.	Title
None	

AUDIT TRAIL

Lead Officer	Chidilim Agada, Head of Constitutional Services	
Report Author	Tim Murtagh, Constitutional Officer Jonathan Gorst, Head of Regeneration and Development	
Version	Final	
Dated	21 February 2020	
Key Decision?	No	
CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER		
Officer Title	Comments sought	Comments included
Director of Law and Democracy	Yes	Yes
Director of Planning	No	No
Cabinet Member	No	No
Date final report sent to Constitutional Team		21 February 2020



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Scale = 1000

18-Feb-2020

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Item No. 6.1	Classification: Open	Date: 3 March 2020	Meeting Name: Planning Committee
Report title:	Development Management planning application: Application 17/AP/3281 for: Full Planning Application Address: 11-13 SPA ROAD LONDON SE16 3RB Proposal: Demolition of existing buildings and construction of a part 4,5, and 6 storey building to form 185 students rooms (sui generis), communal student facilities, plant room, cycle storage, gym, recycling & refuse facilities and associated works		
Ward(s) or groups affected:	London Bridge & West Bermondsey		
From:	Director of Planning		
Application Start Date 18/09/2017		Application Expiry Date 18/12/2017	
Earliest Decision Date 23/12/2019			

RECOMMENDATION

1.
 - a) That planning permission be granted, subject to conditions and the applicant entering into an appropriate legal agreement.
 - b) That in the event that the requirements of a) are not met by 3 June 2020, the director of planning be authorised to refuse planning permission (if appropriate) for the reasons set out in paragraph 255.

EXECUTIVE SUMMARY

2. This application is for decision by the committee as it is a major application for which five or more objections have been received.
3. The proposal is for the redevelopment of this light industrial site with a student housing building of four to six storeys. It would provide 185 student bedrooms as well as the associated communal rooms, reception, laundry, cycle and refuse storage. Landscaped courtyard spaces, roof terraces and boundary treatments would be provided.
4. The proposed student housing development would be a direct let scheme, that is, it is not linked to any specific university or college. While the site is outside a town centre, it is in a comparatively central part of the borough, and the location requirement is removed in the emerging student housing policy P5 of the New Southwark Plan. A payment in lieu of £6.5m is proposed for affordable housing as it is not practical to include conventional housing on site and a feasible amount of student housing on this relatively small site. This payment in lieu is above the maximum reasonable payment

for a viable development as agreed by the council's expert assessor, and is equivalent to 35% affordable housing.

5. The massing of the building is considered appropriate fronting onto Bermondsey Spa Gardens, in its architectural treatment and in terms of its impact on the setting of the adjacent and nearby Grade II listed buildings. It would provide good quality student housing and would not cause unacceptable harm to the amenity of neighbouring properties. Planning obligations would secure the necessary highway works, transport improvements, travel plan and management arrangements. Proposed conditions would ensure the proposal accords with policies on sustainability, archaeology, biodiversity and flood risk.

BACKGROUND INFORMATION

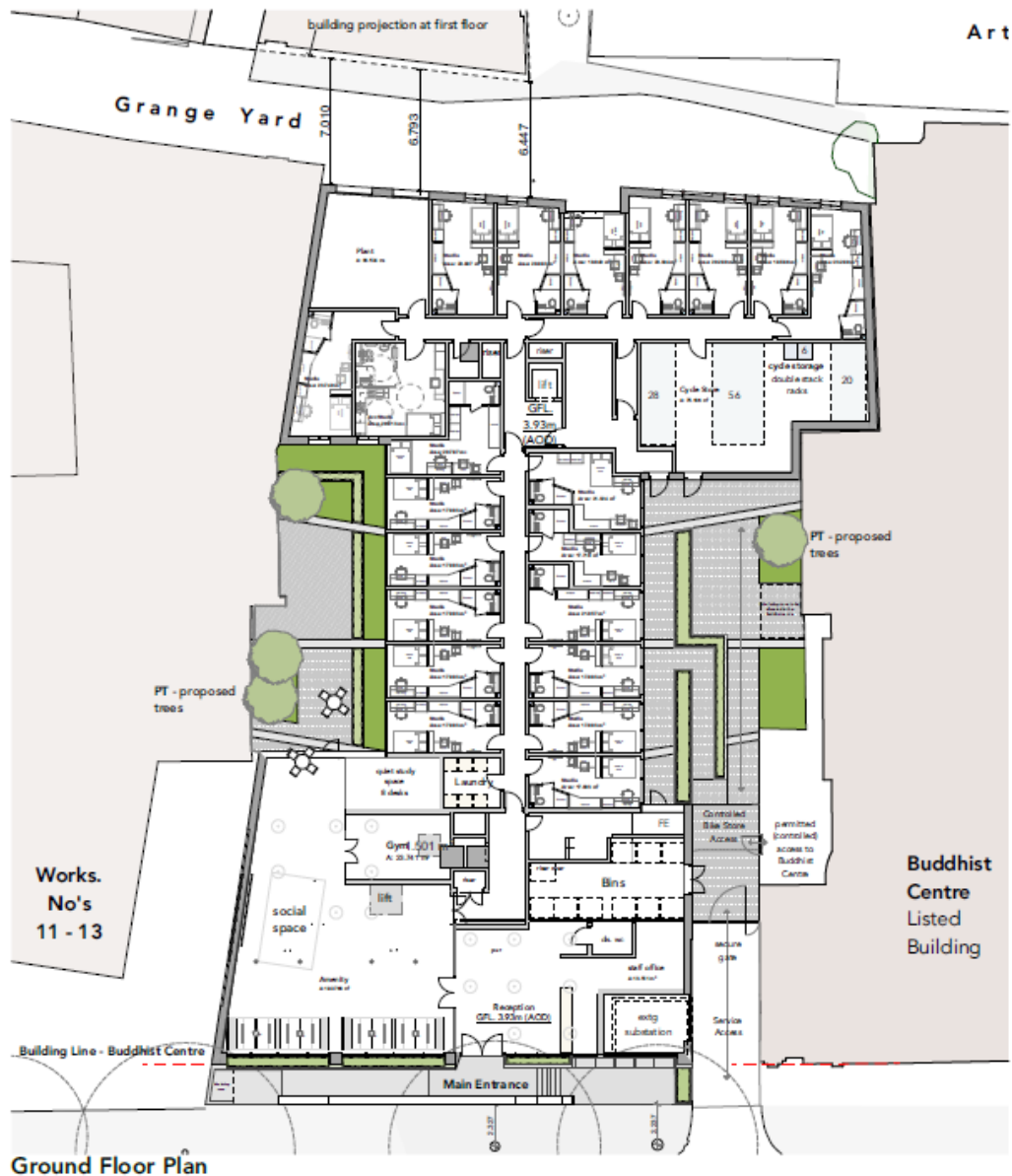
Site location and description

6. The application site comprises approximately 0.156ha and is located in the Bermondsey Spa area of the borough. It fronts a southerly aspect onto Spa Road and overlooks the large green open space of Bermondsey Spa Gardens, and fronts onto Grange Yard to the north. The site comprises low rise former industrial buildings and vehicular access from Spa Road. It also has a substation in the south eastern corner of the site which would be retained in the redevelopment.
7. The site is bounded by further low rise industrial buildings to the west and a grand Grade II listed Victorian-built former public library to the east. This neighbouring building is currently occupied by the Kagyu Samye Dzong London Tibetan Buddhist Centre.
8. To the north beyond the bounding Grange Yard/Arts Lane are residential-led developments of between four and seven storeys. These sites have been developed in the past 5 – 10 years as part of the Bermondsey Spa regeneration masterplan area, of which the application site is also a part.
9. The site is located within:
 - the air quality management area (AQMA)
 - the urban residential density zone
 - the 'Borough, Bermondsey and Rivers' Archaeological Priority Zone
 - flood zone 3
 - PTAL of 2.
10. As well as bounding the Grade II listed former public library building (now the Buddhist Centre), the site is within the setting of the Grade II listed former municipal offices of the Bermondsey Metropolitan Borough Council, located approximately 60m to the east also overlooking Spa Gardens, within the same stretch of streetscape as the application site and former library building. The site is not located in a conservation area; the closest is the Bermondsey Street Conservation Area which is 110m to the west.
11. The site is not designated as a site allocation for development within the development plan, nor the emerging New Southwark Plan. The site is identified in the Bermondsey Spa regeneration masterplan (as part of 'Site C') which was adopted by the council in 2010. However the masterplan is not a planning document and does not hold planning weight.

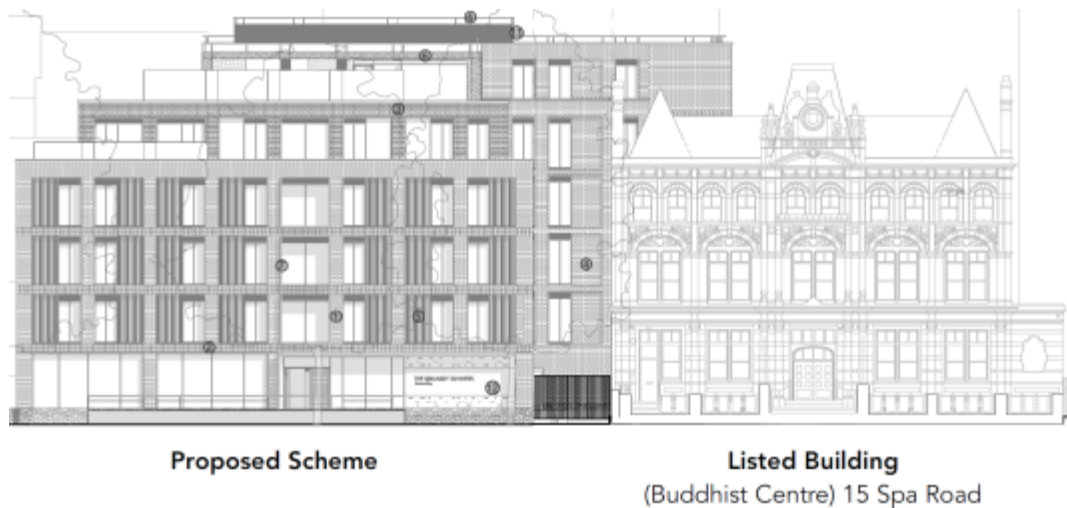
12. The surrounding area comprises predominantly residential use in the form of inter- or post-war blocks of flats of generally between four - seven storeys or low rise twentieth century houses of two - three storeys. Non-residential uses are interspersed throughout the immediate area, including shops and services at ground floor in a number of nearby locations. Other sites in the immediate area have been redeveloped into relatively substantial residential-led blocks of five – seven storeys as part of the regeneration programme in the past five – fifteen years.

Details of proposal

13. The proposed development comprises demolition of the existing buildings on the site and construction of a new part four-, part five- and part six-storey building fronting Spa Road to provide new student accommodation. It would comprise 185 student studio units (185 bed spaces) with associated amenity, communal social and study spaces and other ancillary facilities, secure cycle parking, refuse store and on-site servicing access. The student housing would be direct let, rather than having a nomination agreement with a particular higher education institution.
14. The Spa Road frontage of the building would be four storeys high plus a set back fifth storey (with a roof height of 16.5m). It would extend across almost the full width of the plot, except to allow for a servicing access on the eastern side. The ground floor level would be slightly raised with boundary treatment and the reception and communal facilities behind, overlooking Spa Road through glazing within a wider brick-led façade. A communal roof terrace would be provided wrapping around the western-most corner at fourth floor level. Another communal roof terrace would be provided above the fifth floor.
15. Towards the centre of the site, the building would step up to six storeys (to the maximum roof height of 21m) and the width of the building would reduce to step in from the boundaries. PV panels would be provided in the middle portion of the building at roof level. At the northern end, the building would face onto Grange Yard, where it would widen to the width of the site. The building would step back at fourth and fifth floor levels on this side.



16. The building would primarily be clad in brick; using a light grey colour on the Spa Road facing main element and a darker grey for the set back fourth floor above. Detailing and fenestration would be through a mix of concrete panels and anodised aluminium window frames, with these elements paired with more extensive glazing on the side elevations. The rear elevations would see a mix of the two palettes in distinct building volumes.



17. The accommodation would comprise studio units of a variety of sizes averaging at 20sqm. Five wheelchair accessible units of approximately 26sqm are proposed on ground – fourth floor levels. The proposed studio accommodation would otherwise comprise:
- Ground floor: 20 standard units ranging between 18 – 24sqm
 - First - third floor: 38 standard units ranging from 17 – 30sqm
 - Fourth floor: 29 units ranging 17 – 30sqm
 - Fifth floor: 18 units ranging from 16 – 26sqm.
18. The courtyard area in the western portion of the site would provide ground floor level communal amenity space. The courtyard space to the east of the site would provide access to the secure cycle parking provision located within the ground floor of the building to the rear of the site.
19. The service access on the eastern side would link to the retained substation, the bin store and through to the cycle store. No on-site car parking is proposed.

Amendments

20. The proposal has seen a number of relatively substantial amendments following the receipt of feedback through the consultation process both with the council and the local community. Feedback and resultant amendments were primarily aimed at reducing the impact of the development on the setting of the adjacent listed building to the east and residential occupiers to the north in terms of townscape, heritage and amenity impacts.
21. The changes include:
- Reduction in the scale of the building from seven to six storeys, and reduction in total number of student studio units proposed from 206 to 185.
 - Alterations to the building volume and massing, including
 - reducing the set back on the Spa Road frontage at fourth floor level (i.e. bringing forward the 5th floor building line) and
 - reducing the building volume and increasing the set backs at the rear and eastern elevations at third, fourth and fifth floor levels.
 - Introduction of roof terrace amenity spaces at fourth and fifth floor levels.
 - Minor alterations in proposed brick specification.

- Minor alterations to layout and access arrangements.
- The applicant has also revised the affordable housing offer, committing to provide a 35% equivalent payment in lieu (of £6.5m) affordable housing contribution.

Planning history

22. See Appendix 3 for the relevant planning history of the application site.

Planning history of near by sites

23. 77-89 Alscot Road – current application, 160m to the south-east of the site:

18/AP/2295 – Redevelopment of site to provide 143 student bedrooms in a building ranging from 3- to 7-storeys (plus basement) and ancillary bin store, cycle store, laundry and office/reception, car parking, substation, associated landscaping, and alterations to the vehicle access. Removal of a street tree on Alscot Road and works to the highway.

15 Spa Road adjacent to the east of the site:

09/AP/0306, Listed Building Consent for:

Internal and external alterations in connection with the change of use of the library building from offices (Use Class B1) to Buddhist centre (Use Class D1) with ancillary residential accommodation. Granted 11/06/2009.

08/AP/2985, Full planning permission for:

Change of use from offices (Use Class B1) to a Buddhist Centre (Use Class D1) with ancillary residential accommodation, external alterations and a disabled car space, 5 visitors bicycle parking and 21 bicycle parking spaces for residents.

KEY ISSUES FOR CONSIDERATION

Summary of main issues

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

- Principle of development in terms of land use;
- Environmental impact assessment;
- Design and impact on heritage assets;
- Density;
- Quality of accommodation;
- Affordable housing;
- Impact of proposed development on the amenity of adjoining occupiers;
- Archaeology;
- Sustainable development implications;
- Trees, landscaping and ecology;
- Transport and highways issues;
- Planning obligations and community infrastructure levy (CIL);
- Community involvement and engagement;
- Community impact and equalities assessment;
- Human rights and;
- Positive and proactive statement

25. These matters are discussed in detail in the 'Assessment' section of this report.

Legal Context

26. Section 38(6) of the Planning and Compulsory Purchase Act (2004) requires planning applications to be determined in accordance with the development plan, unless material considerations indicate otherwise. In this instance the development plan comprises the London Plan 2016, the Core Strategy 2011, and the Saved Southwark Plan 2007.
27. There are also specific statutory duties in respect of the Public Sector Equalities Duty which are highlighted in the relevant sections below and in the overall assessment at the end of the report.

Adopted planning policy

National Planning Policy Framework (NPPF)

28. The revised National Planning Policy Framework ('NPPF') was published in February 2019 which sets out the national planning policy and how this needs to be applied. The NPPF focuses on sustainable development with three key objectives: economic, social and environmental.
29. Paragraph 212 states that the policies in the Framework are material considerations which should be taken into account in dealing with applications. The following sections are relevant:

Chapter 2 Achieving sustainable development
 Chapter 5 Delivering a sufficient supply of homes
 Chapter 6 Building a strong, competitive economy
 Chapter 8 Promoting healthy and safe communities
 Chapter 9 Promoting sustainable transport
 Chapter 11 Making effective use of land
 Chapter 12 Achieving well-designed places
 Chapter 14 Meeting the challenge of climate change, flooding and coastal change
 Chapter 15 Conserving and enhancing the natural environment
 Chapter 16 Conserving and enhancing the historic environment.

The London Plan 2016

30. The London Plan is the regional planning framework and was adopted in 2016. The relevant policies of the London Plan 2016 are:
- Policy 3.3 Increasing housing supply
 Policy 3.4 Optimising housing potential
 Policy 3.5 Quality and design of housing developments
 Policy 3.8 Housing choice
 Policy 3.9 Mixed and balanced communities
 Policy 3.10 Definition of affordable housing
 Policy 3.11 Affordable housing targets
 Policy 3.12 Negotiating affordable housing on individual private residential and mixed use schemes
 Policy 3.13 Affordable housing thresholds
 Policy 3.18 Education facilities
 Policy 4.4 Managing industrial land and premises

Policy 4.10 New and emerging economic sectors
 Policy 4.12 Improving opportunities for all
 Policy 5.2 Minimising carbon dioxide emissions
 Policy 5.3 Sustainable design and construction
 Policy 5.7 Renewable energy
 Policy 5.9 Overheating and cooling
 Policy 5.10 Urban greening
 Policy 5.11 Green roofs and development site environs
 Policy 5.12 Flood risk management
 Policy 5.13 Sustainable drainage
 Policy 5.14 Water quality and waste water infrastructure
 Policy 5.15 Water use and supplies
 Policy 5.21 Contaminated land
 Policy 6.3 Assessing effects of development on transport capacity
 Policy 6.5 Funding Crossrail and other strategically important transport infrastructure
 Policy 6.9 Cycling
 Policy 6.10 Walking
 Policy 6.13 Parking
 Policy 7.1 Lifetime neighbourhoods
 Policy 7.2 An inclusive environment
 Policy 7.3 Designing out crime
 Policy 7.4 Local character
 Policy 7.5 Public realm
 Policy 7.6 Architecture
 Policy 7.8 Heritage assets and archaeology
 Policy 7.14 Improving air quality
 Policy 7.15 Reducing and managing noise, improving and enhancing the acoustic environment and promoting appropriate soundscapes
 Policy 7.19 Biodiversity and access to nature
 Policy 8.2 Planning obligations
 Policy 8.3 Community Infrastructure Levy.

Core Strategy 2011

31. The Core Strategy was adopted in 2011 providing the spatial planning strategy for the borough. The strategic policies in the Core Strategy are relevant alongside the saved Southwark Plan (2007) policies. The relevant policies of the Core Strategy 2011 are:

Strategic Policy 1 – Sustainable development
 Strategic Policy 2 – Sustainable transport
 Strategic Policy 5 – Providing new homes
 Strategic Policy 6 – Homes for people on different incomes
 Strategic Policy 8 – Student homes
 Strategic Policy 11 – Open spaces and wildlife
 Strategic Policy 12 – Design and conservation
 Strategic Policy 13 – High environmental standards
 Strategic Policy 14 – Implementation and delivery.

Southwark Plan 2007 (July) - saved policies

32. In 2013, the council resolved to 'save' all of the policies in the Southwark Plan 2007 unless they had been updated by the Core Strategy with the exception of Policy 1.8 (location of retail outside town centres). Paragraph 213 of the NPPF states that existing policies should not be considered out of date simply because they were adopted or made prior to publication of the Framework. Due weight should be given to

them, according to their degree of consistency with the Framework. The relevant policies of the Southwark Plan 2007 are:

Policy 1.1 Access to Employment Opportunities
 Policy 1.4 Employment sites outside the Preferred Office Locations and Preferred Industrial Locations
 Policy 2.5 Planning Obligations
 Policy 3.1 Environmental Effects
 Policy 3.2 Protection of Amenity
 Policy 3.3 Sustainability Assessment
 Policy 3.4 Energy Efficiency
 Policy 3.6 Air Quality
 Policy 3.7 Waste Reduction
 Policy 3.9 Water
 Policy 3.11 Efficient Use of Land
 Policy 3.12 Quality in Design
 Policy 3.13 Urban Design
 Policy 3.14 Designing Out Crime
 Policy 3.18 Setting of listed buildings, conservation areas and World Heritage Sites
 Policy 3.19 Archaeology
 Policy 3.28 Biodiversity
 Policy 4.2 Quality of residential accommodation
 Policy 4.4 Affordable Housing
 Policy 4.7 Non self-contained housing for identified user groups
 Policy 5.1 Locating Developments
 Policy 5.2 Transport Impacts
 Policy 5.3 Walking and Cycling
 Policy 5.6 Car Parking
 Policy 5.7 Parking Standards for Disabled People and the Mobility Impaired
 Policy 5.8 Other Parking.

Southwark Supplementary Planning Documents

33. The following Supplementary Planning Documents issued by the council are material considerations:

2015 Technical Update to the Council's Residential Design Standards SPD 2011
 Design and Access Statements SPD (2007)
 Development Viability SPD (2016)
 Draft Affordable Housing SPD (2011)
 Section 106 Planning Obligations and CIL SPD (2015)
 Sustainable Design and Construction SPD (2009)
 Sustainability Assessment SPD (2009).

GLA Supplementary Planning Guidance

34. The following Supplementary Planning Guidance issued by the GLA are material considerations:

Mayor of London Housing Supplementary Planning Guidance (2017)
 Homes for Londoners: Affordable Housing and Viability SPG (2017)

Emerging planning policy

35. The draft development plan documents of the draft New London Plan and draft New

Southwark Plan are material considerations that can be given weight.

Draft London Plan

36. The draft New London Plan was published by the GLA on 30 November 2017 and the first and only stage of consultation closed on 2 March 2018. Minor suggested changes to the plan were published on 13 August 2018 and an Examination in Public (EIP) began on 15 January 2019 and closed in May 2019.
37. The Inspector's report and Panel Recommendations were issued to the Mayor of London in October 2019. The Mayor then issued his intentions to publish the London Plan along with a statement of reasons for not including all of the Inspector's recommendations to the Secretary of State. The Secretary of State was due to respond to the Mayor before 17 February 2020. Until the London Plan reaches formal adoption it can only be attributed limited weight.
38. The draft New London Plan is the strategic plan which sets out an integrated economic, environmental, transport and social framework for the development of London for the period from 2019 to 2041. However the annual housing targets are set for the first 10 years only of the Plan. A range of consultation responses were received to the draft policies from London councils, individuals, businesses, campaign groups, community groups, government bodies etc.
39. Due to the stage it has reached, just before its adoption, the New London Plan can be given weight in decision making, and it is noted that the GLA when commenting upon referable applications does accord substantial weight to many of the emerging policies. The following policies are relevant to this proposal:

GG4: Delivering the homes Londoners need

D1: London's form, character and capacity for growth

D2: Infrastructure requirements for sustainable densities

D3: Optimising site capacity through the design-led approach

D4: Delivering good design

D5: Inclusive design

D6: Housing quality and standards

D7: Accessible housing

H1: Increasing housing supply

H4: Delivering affordable housing

H15: Purposed built student accommodation

E4: Land for industry, logistics and services to support London's economic function

HC1: Heritage conservation and growth

G5: Urban greening

G6: Biodiversity and access to nature

G7: Trees and woodlands

SI1: Improving air quality

SI2: Minimising greenhouse gas emissions

SI12: Flood risk management

SI13: Sustainable drainage

T4: Assessing and mitigating transport impacts

T5: Cycling.

New Southwark Plan

40. For the last five years the council has been preparing the New Southwark Plan (NSP) which will replace the saved policies of the 2007 Southwark Plan and the 2011 Core

Strategy. The council concluded consultation on the Proposed Submission version (Regulation 19) on 27 February 2018. The New Southwark Plan Proposed Submission Version: Amended Policies January 2019 consultation closed in May 2019.

41. The New Southwark Plan Submission Version – Proposed Modifications for Examination was submitted to the Secretary of State in January 2020 for Local Plan Examination. It is anticipated that the plan will be adopted in late 2020 following an Examination in Public. As the NSP is not yet adopted policy, it can only be attributed limited weight. Nevertheless paragraph 48 of the NPPF states that decision makers may give weight to relevant policies in emerging plans according to the stage of preparation of the emerging plan, the extent to which there are unresolved objections to the policy and the degree of consistency with the Framework.
42. Paragraph 48 of the NPPF states that decision makers may give weight to relevant policies in emerging development plans according to the stage of preparation, the extent to which there are unresolved objections to the policy and the degree of consistency with the NPPF. As the NSP is not yet adopted policy, it cannot be attributed full weight as a whole, but individual policies can be given weight (as set out below).
43. The evidence base to support the NSP is substantially complete. The NPPF states that the more advanced the preparation of the plan, the more weight can be given. The NSP has been subject to six rounds of consultation and comprehensive consultation reports have been prepared at each stage in response to representations. The council received 332 representations to the Proposed Submission Version (2018) and as a result some policies were amended and further consultation took place in 2019. The council received 131 representations to the Amended Policies consultation. A full consultation report incorporating comments from both stages of the Regulation 19 consultation was prepared alongside Submission. The council is meeting various community planning interest groups, as well as preparing Statements of Common Ground with individuals and organisations who will be taking an active part in the EiP.
44. In response to the various rounds of consultation on the NSP, a variety of comments and objections were received from individuals, groups and businesses. Where no objections were received a draft policy can be given more weight than for policies where objections were received and have not been resolved, particularly where there is little change from current adopted policies. For example, the following NSP policies can be given moderate weight as no objections were received or they are very similar to policies in the development plan:
 - P12 Design of places
 - P13 Design quality
 - P14 Residential design – objections were received to the earlier version of this policy titled ‘Optimising the delivery of new homes.’ The changes made in the 2019 version relate to the removal of the density matrix in line with the draft New London Plan. The draft policy uses standards which are the same as adopted policy and the Residential Design Standards SPD.
 - P15 Designing out crime
 - P17 Efficient use of land
 - P22 Archaeology
 - P32 Business relocation
 - P48 Public transport

- P49 Highway impacts
 - P50 Walking
 - P52 Cycling
 - P53 Car parking (no substantial objections were received, comments related to minimising residential car parking)
 - P55 'Protection of amenity
 - P58 Green infrastructure
 - P59 Biodiversity
 - P60 Trees
 - P61 Reducing waste
 - P63 Contaminated land and hazardous substances
 - P64 Improving air quality
 - P67 Reducing flood risk
 - P68 Sustainability standards.
45. Where draft policies are different from the adopted policy (or are completely new policies) and objections were received, the specifics of those objections and the differences from the adopted policy need to be considered for each planning application proposal. For example,
- P27 Access to employment and training – objection was received relating to the financial burden.
 - P29 Office and business development – objections related to the two year marketing justification and differentiation of B Class uses.
 - P65 Reducing noise pollution and enhancing soundscapes – the agent of change principle in the NPPF must also be considered.
46. Where objections were received to a draft policy and these have not been resolved through revisions, that policy can have only limited weight. In these instances, the degree of change from adopted policy on these topics should also be considered. Examples of these policies include:
- P1 Social rented and intermediate housing – this amends the tenure split in the saved Southwark Plan policy 4.4. The amended policy in 2019 introduced a fast track method for schemes at 40% affordable housing, although this is linked to the draft New London Plan.
 - P5 Student homes – objections were received to the December 2017 version P24 regarding the viability of providing affordable housing or a payment in lieu.
 - P54 Parking standards for disabled people and mobility impaired people.
 - P69 Energy – objections that the December 2017 version P62 being too onerous for the carbon reductions.
47. The NSP responds positively to the NPPF, by incorporating area visions, development management policies and 82 site allocations which plan for the long term delivery of housing. The NSP responds to rapid change which is occurring in Southwark and London as a whole, and responds positively to the changing context of the emerging New London Plan.
48. In line with paragraph 48 of the NPPF, as both the New London Plan and the New Southwark Plan are at an advanced stage of preparation (the New London Plan further progressed) both can be afforded some material weight and this is detailed in the report where relevant to particular policy issues.

Consultation

49. Details of consultation undertaken in respect of this application are set out in paragraph 257 onwards below and Appendices 1 and 2.
50. Statutory consultation was undertaken on the proposed development including neighbour letters, sites notices and a press notice in Southwark News. The applicant undertook community engagement consulting on the proposals prior to the submission of the planning application, and during the course of the application, resulting in several amendments to the scheme. Further information can be found in paragraph 20 - 21 above and 256 below.

Summary of consultation responses

51. Three rounds of consultation were undertaken by the council following the first receipt of the initial application in 2017, and two rounds of reconsultation undertaken in 2019 on the amendments made. Just under 400 representations were received from members of the public across these three rounds of consultation.
52. The overwhelming majority of these, approximately 390, objected to the proposal. Of the 190 objections received during the second round of consultation, many would have been submitted by members of the public who submitted the 176 objections as part of the first 2017 consultation. 24 objections were received in response to the final, third round of consultation which related to the final proposal as described in this report.
53. In addition to these, the Bermondsey Spa Preservation Group (BSPG) and the adjacent Buddhist Centre each submitted detailed objections in response to the first iterations of the scheme. However following the applicant's revisions and the council's reconsultation on the most recent version of the scheme, both groups notified the council of their withdrawal of the previous objections providing particular conditions on design, implementation and management of the development were met.
54. In addition to the handful of supporting comments submitted, early on in the application process evidence of support from a 19 of local businesses was provided. 13 of these subsequently withdrew their support however, and requested to have their interest declared neutral, so these have not counted into the above figures.
55. Similarly not counted in the above totals was the submission by the applicant of 149 signed leaflets from students in attending university in Southwark supporting the principle of provision of additional purpose built student accommodation and in particular the proposed development.
56. The issues raised by the submitted objections are summarised as:
- *Excessive scale, height, massing and density*
This is discussed in further detail in the 'Density' and 'Design and heritage impacts' sections below
 - *Development would harm the setting of the listed building*
This is discussed in further detail in the 'Design and heritage impacts' section below
 - *Harm to amenity including to privacy and overlooking, outlook and sense of enclosure, noise and daylight, sunlight and overshadowing to neighbouring*

occupiers

This is discussed in further detail in the 'Impacts on the amenity of adjoining occupiers' section below

- *Harm to trees*
This is discussed in further detail in the 'Trees, landscaping and ecology' section below
- *Student population would negatively impact the existing residential character of the area with concerns raised regarding a transient population and anti social behaviour and particularly when the site could be used to deliver conventional affordable housing*
This is discussed in further detail in the 'Principle of the proposed development' and 'Impact on the amenity of the adjoining occupiers' sections below
- *Impact on community services and facilities, including the doctor's surgery and transport infrastructure, including nearest bus routes being at capacity*
This is discussed in further detail in 'Transport and highways issues' and 'Section 106 Planning Obligations and Community Infrastructure Levy (CIL)' sections below
- *Increase in air and noise pollution associated with both completed occupied development and demolition and construction impacts.*
This is discussed in further detail in the 'Impact on amenity of adjoining occupiers' and 'Sustainable development implications' sections below

57. Objections which were not taken into account included impact on values of surrounding properties and 'right to light' issues. These are not planning considerations.
58. The comments received supporting the application saw the provision of additional students to the local population as a positive potential change and would support the local economy. The principle of the provision of purpose built student accommodation was also supported acknowledging that there was a need for housing of all kinds in Southwark.

ASSESSMENT**Principle of the proposed development in terms of land use***Loss of employment space on the site*

59. The employment use Class B1c that comprises the existing lawful use of the site is not protected by adopted development plan policy. The site is outside any Strategic Industrial Location or Preferred Industrial Location designation, and it does not meet the criteria of saved policy 1.4 of the Southwark Plan (as it does not have direct access to a classified road, is not within the Central Activities Zone nor a Strategic Cultural Zone). The light-industrial use of the site is not protected by adopted planning policies, and there is no in principle objection to the redevelopment of this brownfield site.
60. It is noted that emerging London Plan policy E7 'Industrial intensification, co-location and substitution' seeks to protect industrial sites. Part c of the draft policy states that

non-designated industrial sites should only be redeveloped for mixed use or residential development where there is: 1) no reasonable prospect of the site being used for industrial and related purposes, storage, waste management, utilities etc; or 2) it has been allocated in the development plan for residential or mixed use development; or 3) industrial floorspace is provided as part of the mixed-use intensification. This strategic London-wide policy is in draft, but has been through its Examination in Public and has weight.

61. This 0.156 hectare Spa Road site might be suitable for redevelopment for light industrial use, however the proximity of the neighbouring residential properties to the north and community use to the east would require careful design and mitigation to protect neighbour amenity. It is also noted that this site is within the wider context of change in the immediate area as part of the Bermondsey Spa regeneration programme, of which the site is one of the final parts, and which has informed the approach to the development proposals to date. The site is not allocated in the current or emerging development plan (so part 2 of the draft policy is not applicable), and no industrial floorspace is proposed in the planning application (so part 3 of the draft policy is not addressed). Officers are of the view that the adopted policies within the Council's planning documents for the borough, particularly saved policy 1.4 of the Southwark Plan, carry more weight than this draft policy within the emerging regional-level London Plan. Therefore, the redevelopment of this site for a student residential use, instead of a light industrial use or mixed use that re-provides industrial space, should not be refused for this reason.
62. Turning to the emerging New Southwark Plan, draft policy P29 'Office and business development' at part 3 states that development resulting in a loss of employment floorspace must provide a financial contribution towards training and jobs for local people. Part 3 is a recent addition in the January 2020 submission version. Objections were received to the earlier version of this draft policy, however the thrust of the policy is similar to adopted policy 1.4 of the Southwark Plan and the reference in the Planning Obligations SPD (for payments on schemes which reduce employment space in protected employment locations). As set out above, this Spa Road site does not meet the locational requirement of policy 1.4 and so is not in a protected employment location where the loss of employment floorspace triggers a payment. On this basis, officers consider the adopted policy to have more weight than the emerging policy, and a payment is not required.
63. Draft New Southwark Plan policy P32 'Business Relocation' requires a relocation strategy where small or independent businesses would be displaced by a development. The strategy must demonstrate how potential options have been explored to support existing businesses on sites subject to a planning application for redevelopment that are at risk of displacement as a result of potential redevelopment.
64. The site has been vacant since 2018 when the previous business operating within the warehouses on the site was sold on the owner's retirement. The firm which bought the business once operating on the site has since independently re-located to Charlton in South East London. The requirements of this policy have not therefore been applied.

Provision of student accommodation

65. The site has no allocation in the adopted development plan or draft New Southwark Plan, and is outside any AAP or Opportunity area. Planning policies within the London Plan, Core Strategy and saved Southwark Plan, and within the draft New Southwark Plan and draft New London Plan where they can be given weight, apply to the consideration of this application.

66. Objections were received to the proposed student housing use of the site on the grounds that the location is inappropriate for students and out of character in this residential area, and the cumulative impact of this proposal and the current student housing proposal on Alscot Road. Concerns were raised that local services and infrastructure would not be able to cope with the additional population. Comments were received that luxury student developments do not address the need for housing, and cause rising rental charges in London.
67. Student housing is considered as non self-contained accommodation and a “sui generis” use in the Use Classes Order. Student housing is however considered as housing for monitoring purposes through the Council’s and GLA’s monitoring reports. The Core Strategy sets a target of providing at least 24,450 net new homes between 2011 and 2026. The Council’s London Plan (2016) target is a minimum ten year target of 27,362 homes between 2015 and 2025, i.e. a rate of 2,736 per year. It is noted that the draft New London Plan sets lower targets for the borough (of 23,550 over 10 years) compared with the adopted London Plan of 27,362 over ten years.
68. The proposed student housing would contribute towards the borough’s housing, at a rate of 2.5 student bedrooms being counted as a single home (as set out in the December 2019 draft London Plan, paragraph 4.1.9). With 185 student rooms proposed, the development would count as 74 homes towards meeting the council’s housing targets.
69. The Council can demonstrate a five year supply of housing land, plus the necessary 20% buffer required by the housing delivery test. Through its assessment of the deliverable housing sites in the borough, the five year housing land supply with an additional 20% buffer has been identified (and exceeded). This Spa Road site is not an identified proposal site in any current AAP nor the emerging NSP, therefore its redevelopment for housing has not been anticipated by the borough-wide assessment of deliverable housing sites.
70. While this application site would be appropriate for Class C3 residential development to contribute to the council’s general housing supply as part of the windfall allowance for small sites, it has not been assumed for such development in calculating the five year housing land supply and buffer. The proposed student housing scheme would not compromise the council’s ability to meet its strategic housing targets set in the Core Strategy and London Plan, particularly as student housing contributes towards the borough’s housing and given the relatively small size of the site.
71. There is support for student housing in the adopted Southwark policies, London Plan and Mayor of London’s Housing SPG, and within the emerging New Southwark Plan and draft London Plan. These policies are summarised below.
72. London Plan policy 3.18 ‘Education facilities’ requires boroughs to support and maintain London’s international reputation as a centre of excellence in higher education, and policy 4.10 ‘New and emerging economic sectors’ at part b requires borough to “*give strong support for London’s higher and further education institutions and their developments, recognising their needs for accommodation*”. London Plan policy 3.8 ‘Housing choice’ requires local planning authorities to identify the ranges of needs likely to arise within their areas and ensure that (h) “*strategic and local requirements for student housing meeting a demonstrable need are addressed by working closely with stakeholders in higher and further education and without compromising capacity for conventional homes*”. The supporting text in paragraphs 3.52-3.53C set out further detail, including reference that there could be a requirement

for some 20,000-31,000 student places over the ten years to 2025, but that “addressing these demands should not compromise capacity to meet the need for conventional dwellings”. The supporting text also notes that Southwark is one of four central boroughs where 57% of provision for new student accommodation has been concentrated, reflecting the clustering of the HEIs in and around central London.

73. The Mayor of London’s Housing SPG in section 3.9 states that specialist student accommodation makes an essential contribution to the attractiveness of London as an academic centre of excellence.
74. Core Strategy strategic policy 8 ‘Student homes’ is consistent with the London Plan and acknowledges there is a need for student housing in Southwark, by stating that development will meet the needs of universities and colleges for new student housing whilst balancing the building of student homes with other types of housing, such as affordable and family housing. This would be achieved by 1) allowing student homes within the town centres and places with good access to public transport services, providing that these do not harm the local character, and 2) requiring 35% of student developments as affordable housing, with a cross reference to strategic policy 6 ‘Homes for people on different incomes’.
75. Saved policy 4.7 of the Southwark Plan relates to non-self contained accommodation (including student accommodation), and states that it will normally be permitted where 1) the need for and suitability of the accommodation can be demonstrated; 2) its provision does not result in a significant loss of amenity to neighbouring occupiers; 3) there is adequate infrastructure in the area to support any increase in residents and; 4) a satisfactory standard of accommodation, amenities and facilities are provided.
76. These requirements of saved policy 4.7 link into the Residential Design Standards SPD, which sets out at section 4.3 sets out the further information required of a student housing scheme:
- “Student housing can be in the form of halls of residence, cluster flats or self-contained units. To ensure that the appropriate levels of student accommodation are supplied in the borough without prejudicing the development of general needs housing, planning applications for student accommodation will have to be accompanied with evidence that there is an identified need for this type of housing, including:*
- *A letter from a recognised educational establishment*
 - *Confirmation that the accommodation will be affordable to the identified user group*
 - *Details of security arrangements*
 - *Details of the long-term management and maintenance arrangements of the student accommodation.”*
77. In terms of emerging policy, both the draft London Plan and draft New Southwark Plan have specific student housing policies.
78. Draft London Plan policy H15 ‘Purpose-built student accommodation’ states in part A that boroughs should seek to ensure the local and strategic need for purpose-built student accommodation is addressed provided that; 1) the development contributes to a mixed and inclusive neighbourhood; 2) it is secured for students; 3) the majority of bedrooms and all affordable student accommodation is secured through a nomination agreement for occupation by students of one or more higher education providers; 4)

the maximum level of accommodation is secured as affordable student accommodation and; 5) the accommodation provides adequate functional living space and layout. Part B of emerging policy H15 states that boroughs, student accommodation providers and higher education providers are encouraged to deliver student accommodation in locations well-connected to local services by walking, cycling and public transport, as part of mixed-use regeneration and redevelopment schemes.

79. The supporting text for draft policy H15 states that purpose built student accommodation contributes to meeting London's overall housing need, and is not in addition to need. It requires 3,500 student bed spaces to be provided annually across London; this is a higher annual figure than the range of the adopted London Plan, suggesting that the need for student housing has increased since 2016. This strategic London-wide need has not been broken down into borough-level targets in the draft London Plan. To demonstrate there is a need for new student housing development; accommodation must be operated directly by an HEI or have an agreement in place with one or more HEIs to provide housing for its students (i.e. a nomination agreement).

80. The draft New Southwark Plan policy P5 states:

“Development of purpose-built student housing must:

- 1. Provide 10% of student rooms as easily adaptable for occupation by wheelchair users; and*
- 2. When providing direct lets at market rent, provide 35% of the Gross Internal Area of the floorspace as conventional affordable housing, as per policy P4, as a first priority. In addition to this, 27% of student rooms must be let at a rent that is affordable to students as defined by the Mayor of London; or*
- 3. When providing student rooms for nominated further and higher education institutions at affordable student rents as defined by the Mayor of London, provide 35% conventional affordable housing subject to viability, as per policy P4.”*

81. The first reason listed in support of this policy is that there is a need for more student accommodation across the whole of London which needs to be balanced with making sure Southwark has enough sites for other types of homes, including affordable and family homes. The affordable housing element of the current application is considered in a separate section below.

82. The evidence base behind the NSP includes a background paper on student housing (dated December 2019). It refers to the Council's Strategic Housing Market Assessment (SHMA) Update 2019 which found over 21,000 students aged 20 or over reside in the borough during term time, and 23,500 places at HEIs in Southwark. At least 50% of these students live in private rented accommodation, and 15% live with their parents. There are some 7,800 bed spaces in purpose built student accommodation in the borough for London South Bank University, King's College, University of the Arts, and in independent halls of residence. The evidence base background paper also refers to the SHMA confirming an acute need for affordable homes in the borough of 2,077 net affordable homes annually, which is a significant increase from the 2014 SHMA of 799 affordable homes annually.

83. When assessing the principle of a student housing scheme, these policies require consideration of the need for student housing, the location of the proposal, and management of the student accommodation. Later sections of this report will consider the affordable housing, quality of accommodation and transport aspects of this

proposal that are referred to in these policies as well.

Need for student housing

84. There are several HEIs in the borough, including London South Bank University, Kings College London, UAL and LSE with teaching facilities and student accommodation. There are a number of developments providing direct let student housing in the borough. The proposed accommodation in this scheme would be 'direct let' to students, rather than associated with one particular HEI. Nonetheless it would contribute towards the borough's and London's stock of purpose built student accommodation. In this respect, the application addresses London Plan policy 3.8 and draft London Plan policy H15.
85. The council's student housing background paper in the NSP evidence base notes there are eight live planning applications that include student housing. Of these eight applications: two are this Spa Road scheme and the Alscot Road scheme; two have resolutions to grant (Capital House and Canada Water Masterplan); 1 at 272 St James Road is awaiting its appeal decision; and three are current 2019 applications at 89-111 Borough High Street, Paris Gardens and Eagle Wharf. The seven schemes total 2,162 student rooms, with no figure put to the Canada Water outline scheme given the inherent flexibility within the masterplan.
86. From the Spa Road site, 23 HEIs are within a 40 minute journey by public transport or cycle. The report concludes the Spa Road site would be able to serve students at the following locations:
- HEIs in the central and eastern areas of London such as Goldsmiths, Kings, LSE and Queen Marys.
 - Campuses within the borough at Elephant and Castle, Camberwell and London Bridge.
 - Future HEI campuses in Elephant and Castle and any established through the redevelopment of Canada Water and Old Kent Road.
87. Many of the public objections received refer to the proposal changing the character of the quiet residential neighbourhood. The site is not within the vicinity of other purpose built student housing schemes in the borough. The nearest sites hosting student housing are located approximately 800m to the west around Great Dover and Tabard Streets in the Borough area, or 800m north at Butler's Wharf. The next nearest scheme is located over 1,600m east on Lower Road in Rotherhithe.
88. There is however another application for 143 student bedrooms currently under consideration (ref. 18/AP/2295) for a site located 160m to the south across Spa Gardens. However, given the lack of other purpose built student housing schemes within the wider area, were both schemes to be granted planning consent and implemented, it is not considered that together they would impact the neighbourhood in terms of the mix of uses and inclusivity. On this basis the proposed land use is considered to be broadly in conformity with the new London Plan policy. While the objections are noted, introducing a modest amount of student housing into a mainly residential area is not considered to cause harm.
89. The proposal is considered to address a need for student housing within London and could be used to serve students of HEIs within the borough. Providing student housing in this location may also assist in freeing up private rental housing which is currently occupied by students for conventional housing needs.

Location

90. The site is not within a town centre, and has a relatively low PTAL of 2; however as set out in more detail below it is in a relatively accessible location to relative to a number of HEIs.

University	Distance from the site
LSBU	1.5 miles
Kings College	2.6 miles
Goldsmith's	2.7 miles
LSE	2.8 miles
Queen Mary's	3.2 miles
University of Greenwich	3.4 miles
UCL/Birkbeck/SOAS	3.8 miles
Imperial	5.3 miles

91. The site is approximately 10 minutes walk from Bermondsey Underground station with the Jubilee line providing access to Waterloo (to walk to the LSE campus or change for Charing Cross), and there are 7 bus routes within a 10 minute walk of the site (routes 1, 78, C10, 381, 188, 47 and N199).
92. Draft policy P5 of the New Southwark Plan removes the reference in Core Strategy policy 8 part 1 to siting student housing in town centres and places with good access to public transport. Without such a locational restriction, the draft policy allows in principle for student housing to be located anywhere in the borough. The December 2019 student housing document of the evidence base for the NSP notes that the draft policy does not have a location and accessibility point, commenting that "*the borough is considered to be very accessible and therefore the restriction on location and accessibility is not necessary*" and that "*we would encourage students to use active travel as well as public transport which therefore limits the need for a location requirement within the policy.*"
93. This proposal is in line with the emerging NSP policy direction for the acceptability of student housing on this site outside a town centre and without an especially high PTAL rating. While the weight that can be given to policy P5 is limited due to the objections received to it, these objections were in terms of the affordable housing and viability aspects rather than no longer directing student housing to town centres and places with good access to public transport. The proposal would comply with emerging policy P5 in terms of part 1 (set out further in the Quality of Accommodation section), and part 2 in terms of the affordable housing contribution which is considered in a later section of this report.
94. There are public transport, cycle links and walking routes around the site and the associated journey times to HEIs, and the local facilities in the area that students could make use of, as well as attractions and places of interest in Bermondsey such as the parks, markets and pubs. While not in a town centre the site is relatively close to central London, with public transport links towards HEIs.
95. Public transport and cycling options in the area include:
- The Bermondsey Underground station being a 10 minute walk. The Jubilee line would link the site with King's College, LSE and Courtauld Institute at Waterloo,

Ravensbourne at North Greenwich, University of East London at Stratford. Other higher education establishments can be reached by changing from the Jubilee Line to:

- the Overground at Canada Water to reach Goldsmiths at New Cross Gate.
- London South Bank University at Elephant and Castle, and the various universities in Bloomsbury (e.g. UCL, SOAS, Birkbeck) via the Northern line.
- University of Westminster via the Bakerloo line.

- There are 7 bus routes within a 10 minute walk from the site:

Bus route	Closest bus stop to the site	Destinations of that route
1 (and N1)	Grange Road	New Oxford Street – Canada Water
47	Jamaica Road	Shoreditch – Bellingham/Catford Bus Garage
78	Grange Road	Shoreditch – Nunhead
188	Jamaica Road	Russell Square – North Greenwich
381 (and N381)	Jamaica Road	Waterloo – Peckham
C10	Abbey Street/Jamaica Road	Victoria – Canada Water
N199	Abbey Street/Jamaica Road	Trafalgar Square – Bromley

- Cycle links – the Cycle Superhighway along Jamaica Road to the north of the site (currently under construction), and the Quietway cycle route along Willow Walk is to the south of the site, linking Greenwich to Bloomsbury. London South Bank University would be approximately 12 minutes by cycle, and other HEIs in central London and Southa 20-30 minute cycle ride away.

96. The site is considered to be sufficiently accessible by various means to a range of HEIs and local shops and amenities. In view of the changes to the council's student housing policy by the draft New Southwark Plan policy P5, the location of student housing in this location is considered acceptable in principle.

Management

97. A student management strategy has been provided, to address two requirements of the Residential Design Standards SPD. Homes for Students would be the accommodation managers for the site, and currently manage over 12,000 residential and student accommodation units in the country – including in Camberwell. The site would be managed by a dedicated property manager who would lead the management team, to include customer service assistants, maintenance and cleaning staff, on site Monday – Friday during office hours. Student wardens would be employed to attend the site out of office hours. Feeds from CCTV cameras in and around the building would be fed to the staffed reception 24/7. There would be an electronic access control to prevent unauthorised access to the building. Kitchen areas of the studio units would be inspected monthly using a traffic light system and students charged for any deep cleans. Homes for Students would maintain the landscaping, be responsible for day to day repairs and health and safety equipment, and longer-term redecoration and building fabric works. Homes for Students would engage with the local community through regular meetings, at minimum annually, to discuss and address any issues. External amenity areas would be subject to a curfew at night (considered further below in the 'impact to neighbour amenity' section). Further comment on the student management plan is set out in the transport section

below, but for this consideration section, sufficient information has been provided to address the requirements of the SPD.

98. In conclusion, the use of this site for student housing is considered acceptable in principle. The provision of 185 student bed spaces would contribute towards achieving the student housing target in the London Plan, and contribute towards the borough's housing supply (equivalent to 74 homes). While it is not within a town centre to comply with part 1 of Core Strategy policy 8, it is within a relatively central location in the borough to be close to HEIs, public transport, shops and services. With the direction of travel in the emerging New Southwark Plan student housing policy that removes this location restriction, and in view of the relatively modest scale of this scheme, it is considered acceptable in principle. The use for student accommodation only (in term time and summer holiday) and the management plan would be secured by planning obligations.

Environmental impact assessment

99. The scale of development proposed by this application does not reach the minimum thresholds established in the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 that would otherwise trigger the need for an environmental impact assessment. The proposal's location and nature do not give rise to significant environmental impacts in this urban setting sufficient to warrant a requirement for an EIA. An EIA for this proposed development is not required.

Design and impact on heritage assets

100. The NPPF stresses the importance of good design and states in paragraph 124 that: *"Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people."* Policy SP12 of the Core strategy states that *"Development will achieve the highest possible standards of design for buildings and public spaces to help create attractive and distinctive places which are safe, easy to get around and a pleasure to be in."* Saved policy 3.12 of the Southwark Plan asserts that developments should achieve a high quality of both architectural and urban design, enhancing the quality of the built environment in order to create attractive, high amenity environments people will choose to live in, work in and visit. When considering the quality of a design, the fabric, geometry and function of the proposal are included as they are bound together in the overall concept for the design. Saved policy 3.13 asserts that the principles of good urban design must be taken into account, including the height, scale and massing of buildings, consideration of the local context, its character and townscape as well as the local views and resultant streetscape. Saved policy 3.18 seeks to preserve or enhance the settings of heritage assets.
101. Objections were received from members of the public regarding the scale, height, massing, density, architectural quality and impact on the listed building.

Scale, height, massing and layout

102. The proposal's subdivision into the three building volumes including 1) the Spa Road frontage element, 2) the thinner spinal element in the centre of the site and 3) the rear element fronting Grange Yard is a logical response to the physical constraints imposed by neighbouring buildings and the site's boundaries. It would help reduce the bulk and mass of the scheme within its context, from the perspective of the public realm surrounding the site, and occupiers of neighbouring buildings.

103. The Spa Road frontage would be in line with that of the Buddhist Centre and other buildings comprising the streetscape to the east, having been set back relative to the existing boundary wall on the site. The set back fourth floor on the Spa Road frontage would feature a darker brick with a view to relating to the slate roof tiles of the adjoining Buddhist Centre. This level, and the top fifth floor level further into the site, would have limited visibility from Spa Road and would be visible from within and across Spa Gardens during winter between the mature trees.
104. As viewed from the northern context of the site, the scheme would be differentiated vertically into two distinct building volumes. This would be achieved through both variation in massing and the use of set backs and differentiation in materials, detailing and fenestration.
105. The taller, six-storey element would relate to seven-storey Grange Yard development across Arts Lane to the north east, while the smaller five and six storey element would relate to the Haven Way block which comprises the same massing (at four storeys with progressively set back fourth and fifth floor level floors above) to the immediate north west.
106. The overall approach to the scale, height and massing have resulted in a proposed building that forms an appropriate response to its context and would not appear dominant or out of character with the surrounding area. This is particularly in relation to the Buddhist Centre to the immediate east and the mixture of new build and older buildings of a similar scale located to the north of the site.

Architectural composition, materials and detailing

107. The ground floor of the Spa Road frontage would be slightly raised and recessed below the floors above. It would have full height glazing across a large portion of its frontage, providing outlook from and views of activity into the main social space provided for the student occupiers behind, with minor instances of the brick which is the primary material on the floors above.
108. The frontage would have soft landscaping elements and low level stone boundary treatments to the access ramp and small set of stairs up to the raised entrance. The eastern portion of this ground floor level elevation would host a large bronzed-coloured anodised aluminium panel with the name of the development (indicated as 'the Tannery').
109. The main massing of the Spa Road frontage would be subdivided into 8 bays with full height windows in a pale grey or buff coloured brick façade. These windows would be surrounded by a similarly sized coloured cement panel on alternating sides of the windows providing a degree of interest to the brick-led façade in terms of both elevation rhythm and materials. Window frames would be provided as bronze-coloured anodised aluminium. Horizontal demarcation would additionally be provided by soldier coursing of bricks at each floor level within this façade.
110. The exception to the window design would be for the windows within the bay above the ground floor entrance, providing a point of demarcation and orientation for people approaching or moving past the building. The proposed rhythm of panels means that this front façade would not have a symmetrical composition, unlike the strong element of the adjacent listed building's Spa Road frontage.
111. The overall approach to the design of the proposed Spa Road frontage is considered to be of a high standard. The building would provide a well proportioned and

articulated contribution to the wider streetscape and, as a building with a more contemporary, reserved, architectural treatment would be a respectful neighbour of an appropriately urban character to the more elaborate adjacent listed building frontage. That it is not symmetrical in the context of the adjacent building is not therefore objected to.

112. The side elevations of this front building would be subject to similar brick-led treatment and include recessed areas and patterned detailing to provide some variation from the perspective of neighbouring occupiers.
113. The central part of the building would comprise a lighter range of materials including a greater amount of glazing elements, some of which would be obscured for privacy purposes, combined with cladding panels.
114. The rear building would be brick-led, incorporating the same elements of detailing and material variation as the front building. The rear elevation itself, facing onto Grange Yard/Arts Lane would use differentiated detailing materials and rhythm of fenestration (including the box bay windows). The architectural treatment of this elevation would sit comfortably in the surrounding streetscape where the contemporary character of surrounding developments dominates.
115. It is important that the design quality is maintained through to the finished building, and conditions regarding materials and detailed drawings are included in the recommendation.

Impact on heritage assets

116. Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires decision makers to 'have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses' when determining planning applications which affect a listed building or its setting.
117. Paragraphs 190, 192 and 193 – 196 of the NPPF set out the obligations of decision makers in considering heritage assets, such as listed buildings, in the context of determining planning applications for development proposals. Considerations include identifying and assessing significance of any heritage asset and the impact a proposal may have on this or its setting.
118. Paragraph 193 requires the decision maker to place great weight on the conservation of a heritage asset. Heritage significance is defined in the NPPF as 'the value of a heritage asset to this and future generations because of its heritage interest [that] may be archaeological, architectural, artistic or historic.'
119. Paragraph 195 sets out considerations in the event an impact that a development proposal would have on the significance of a heritage asset would amount to 'substantial harm or total loss of significance.' Paragraph 196 sets out that where a proposed development's impact would incur less than substantial harm to the significance of a heritage asset, the harm should be weighed against the public benefits of the proposal.
120. The impact of the proposal on the setting of two nearby listed building needs to be carefully considered.

1) *Former public library building*

121. The Grade II listed former public library building, now housing the Buddhist Centre, is a building of distinguished late Victorian civic character, architectural composition and detailing particularly from the Spa Road frontage. It largely retains its original layout and spaces internally, including the reception hall and staircase to the first floor above, the ground floor former lending library (retained as a library within the Buddhist Centre) on the western side of the building's plan, and the prominent former central reading room (now prayer room) at first floor level.
122. The Spa Road frontage of the building comprises a relatively substantial raised ground floor, similarly generously proportioned first floor and smaller supplementary second floor, forming a solid base-body-top composition. The frontage is vertically subdivided into five bays with the second floor level further subdivided with two smaller windows per bay. This is topped by a strong cornice and small parapet.
123. The top is crowned by a modest, decorated tower within the centre of the roof profile, itself flanked by two tiled roof turrets at the either edge of the building. The material within the façade is primarily red terracotta brick on upper floors with lighter buff masonry used on the ground floor and in highlights and detailing above. Externally, this Spa Road frontage is an aspect of the application site's context that comprises a key positive contributor to its surrounding character.
124. In the context of the proposed development it is this Spa Road frontage which is considered to be the aspect of the building which has the greatest heritage significance. Due regard must be had to the preservation of the building, its setting and the impact of the proposed development on it.
125. Consideration has also been given to the significance of the original design's emphasis in maximising natural light to internal spaces, including the former reading room (now prayer room), as evidenced by the original design brief and winning competition response, in the context of a historic public library building.

2) Former municipal offices

126. The application site is also within the wider setting of the Grade II listed former Bermondsey municipal offices building, comprising two generously sized storeys (plus basement) when viewed from the street. This is a 1930s building now converted to residential use built in a Greek revival style with bright Portland stone.
127. It is located approximately 60m to the east of the application site, within the same stretch of streetscape and following the building line established by the former library, and an adjacent contemporary development situated in between these two listed buildings.

Setting of the heritage assets

128. From the Spa Road frontage, the current setting of the former library building includes the existing industrial warehouse plots to the immediate west, including the application site. These are utilitarian buildings of little townscape value, bounded by high walls along their frontages which do not contribute anything positive to the streetscape or setting of the listed buildings.
129. To the east of the former library building is a recent four- and five-storey residential-led scheme (featuring ground floor retail). Located between the two listed buildings, with the former municipal offices to the immediate east, it has clearly sought to take a

respectful approach to overall design and composition to quietly mediate between the two prominent heritage assets.

130. The former library frontage is primarily viewed from Spa Road itself rather than Spa Gardens due to the screening that the trees provide to views of this adjacent townscape for the majority of the year.

Assessment of the impacts on heritage assets

131. The impact of the proposed development on the setting of the adjacent former public library would be positive, as an improvement on the existing setting. The frontage of the proposal would provide a neighbouring façade of an urban character at an appropriate scale, height, mass, rhythm of fenestration, palette of materials and overall composition which would not compete with or distract from the adjacent listed building. The proposal is considered to be an improvement in the context of the existing blank wall and light industrial buildings currently on the site, which do not contribute positively to the setting of the building.
132. The proposed building respects its immediate neighbour. The height of the proposed building's four storeys, as read from Spa Road would not exceed the established line set by cornice of the top second floor level and would sit below the small parapet wall, giving the brick volume of the former library adequate prominence.
133. The proposed building's set back fifth floor on the frontage would be set lower than, and remain subservient to, the crowning points of the turret roof forms of the former library building. This would ensure that, where visible, the Buddhist Centre's distinct roofscape would retain prominence in terms of presence on the local skyline when viewed from Spa Gardens.
134. Similarly, the proposal's frontage would respect and conform to the adjacent former library building in terms of the primary building line. This is a building line which is established by this and the other existing buildings running along to Spa Road, meaning it would sit comfortably in the wider setting of the former municipal offices also.
135. A part of the architectural and historic significance of the building is acknowledged to stem from both the original design brief of the public library building and the responding winning architectural competition entry in emphasising and seeking to design in the maximum access to natural light. The reduction in access to light incurred by the proposed development therefore could be said to harm the significance of the heritage asset to some degree.
136. It is not however an aspect of the design that is considered unusual or unique for a publically accessible civic building of this period. Therefore, as well as the consideration that the original library function of the site having long ceased, any harm to the significance of this aspect of the heritage asset is considered not to be less than substantial. It must also be considered with the overall improvement in the setting of the listed building. The public benefits of providing new student accommodation to meet an identified need in a sustainable location, and affordable housing are considered to outweigh any harm noted in this regard.
137. The proposal would sit well within the frontage context surrounding Bermondsey Spa Gardens and within the setting of the Grade II listed buildings. Subject to the conditions, the proposal would comply with policies 7.4, 7.5 and 7.6 of the London Plan, Core Strategy policy 12, and saved policies 3.12, 3.13 and 3.18 of the

Southwark Plan.

Density

138. London Plan (2016) policies 3.3 and 3.4 seek to increase housing supply and optimise housing potential through intensification and mixed use redevelopment. Table 3.2 of the London Plan suggests a density of 200-450 habitable rooms per hectare for a site in the urban area with a PTAL of 2-3. Core Strategy policy 5 “Providing new homes” sets the expected density range for new residential development across the borough. This site is within the urban density zone, where a density of 200-700 habitable rooms per hectare is anticipated. Southwark Plan policy 3.11 requires developments to ensure they maximise efficient use of land.
139. The Residential Design Standards SPD sets out the method for calculating density on primarily conventional residential developments and mixed use schemes. Counting each student bedroom as a habitable room and counting each student bedroom as a habitable room, in the absence of communal shared spaces, gives a total of 185 habitable rooms in the proposal.
140. With a site area of 1,560sqm, and a total of 185 habitable rooms, the proposed density is 1,186 habitable rooms per hectare. This exceeds the maximum of the expected range for the urban density zone.
141. Core Strategy policy 5 states that “*within the opportunity areas and action area cores the maximum densities set out above may be exceeded when developments are of an exemplary standard of design*”. The site is neither within an opportunity area nor an action area core; however the Council often applies the requirement to achieve an exemplary standard of design in other areas where the expected density range is exceeded. The Residential Design Standards SPD sets out a list of criteria for demonstrating an exemplary standard in a conventional housing scheme: some are not as relevant to a student housing scheme, such as the provision of bulk storage.
142. Density gives a numerical measure of the amount (intensity) of development and provides an indication of whether the scale of development is likely to be appropriate in different parts of the borough. A density above the expected range would not of itself necessarily lead to a conclusion that the scheme should be judged unacceptable. If it can be demonstrated that the scheme would achieve a high standard of design, including quality of accommodation, and there are no adverse impacts arising to neighbour amenity for example, then the higher density of the scheme would not be a reason to warrant refusing planning permission. The emerging New Southwark Plan and New London Plan both reduce the emphasis on numeric density ranges (and remove the density table 3.2 of the adopted London Plan) and instead put more emphasis on the quality of design.
143. As explored elsewhere in this report, the quality of the proposed student rooms, the design of the building, and its resulting impacts are considered acceptable and do not suggest an overdevelopment of the site. Subject to the conditions and obligations identified the proposal would not cause harm in these regards or indicate the proposed density is unacceptable. Therefore the proposal is considered to comply with the above mentioned policies for density, and would make efficient use of land as required by saved Southwark Plan policy 3.11.

Quality of accommodation

Rooms

144. The proposed student accommodation would comprise studio units of a variety of sizes. The smallest would be approximately 16sqm while the largest would be 30sqm. The average size across all the units would be approximately 20sqm. Each unit would accommodate a bed, toilet and shower room, kitchenette area, two-person dining table, desk and wardrobe.
145. The smaller 17sqm sized units would be toward the front of the site and afforded outlook over Spa Gardens. The two smallest units at 16sqm would be located on the top fifth floor and also afforded a southerly aspect. The 18sqm units would primarily be located around the central block with larger units located in the wider building volumes to the front or rear of the site. The lower levels of the building have stacked floorplans up to the fourth floor where the recesses change the layouts.

Accessibility

146. Five 26sqm units (as 3% of the proposal) are proposed as fully wheelchair accessible units. A further 14 (7%) of the larger units would also be constructed to an adaptable standard. This would achieve the minimum of 10% required by policy. Level access would be provided to the building, and two lift cores would provide access across the building and terraces.

Outlook

147. Units would all generally be single aspect. Most units would have outlook either south, west or east however 35 of the 185 units would be north facing. All units would host a large floor-to-ceiling element of glazing as their window providing outlook with adequate access to daylight and in most instances sunlight.

Daylight and sunlight

148. The BRE does not set target daylight levels for student accommodation, but it is considered appropriate to use the standards advised by the BRE for self-contained residential units.
149. 56 windows and rooms were tested according to generic BRE methodology for self contained residential units. The 56 windows and rooms were all those at ground and first floor level, with the others omitted from the study on the basis that those on the ground and first floors would be most constrained and, should these meet BRE thresholds, those on the floors above would meet or exceed the thresholds too.
150. An average daylight factor (ADF) of 1.5%, which the BRE recommends is achieved for living rooms in self contained residential units (with kitchens at 2% and bedrooms at 1%) was chosen as the benchmark against which to test the student room's access to daylight. Of the 56 tested 42 (75%) passed, and 14 (25%) had an ADF of below 1.5%. Across the scheme of 185 student rooms, this would be acceptable particularly given the average ADF across the rooms below 1.5% would be 1.3%, close to the target level.
151. Twenty rooms facing within 90 degrees of due south were tested against the BRE recommended sunlight levels (Annual Probable Sunlight Hours) for living rooms. Of these, 19 would meet or exceed the BRE recommended level of sunlight access for the year, while 13 would meet the recommended level across the winter period. Given the built up nature of the site, it is considered that the rooms would have a good level of access to daylight and sunlight and which would be acceptable for student

accommodation.

Privacy

152. Glazing on the ground floor overlooking the adjoining courtyard spaces and Grange Yard/Arts Lane would be treated with privacy film to protect the occupiers from overlooking. The courtyard facing units would be set behind a low level hedge planting to provide some defensible space.

Amenity space

153. There are no specific requirements set out in development plan policy or supporting guidance for amenity space provision for student accommodation. The studio units would not be afforded their own private amenity space, which is not unusual for development of this type.
154. The scheme incorporates a number of communal external amenity spaces for the student occupiers. A landscaped courtyard area approximately 70sqm would provide a ground floor amenity space in addition to the approximately 87sqm and 23sqm communal roof terraces at fifth and fourth floor levels, respectively. This equates to a total of approximately 181sqm of amenity space for the student occupiers which, in conjunction with the internal communal facilities is considered adequate.
155. A fourth floor communal social room (approximately 31sqm) would overlook the park, a ground floor social room (approximately 147sqm) overlooking Spa Road, a small gym (approximately 24sqm) and a quiet study room (14sqm) would also be included.
156. In total the communal internal facilities provided for use by the students (excluding the shared laundry room) would amount to approximately 216sqm which, in conjunction with the proposed level of communal external amenity space is considered to be adequate. Spa Gardens in front of the site would be readily accessible by the occupiers. To mitigate the impact of increased use, a payment of £73,500 has been proposed by the applicant. This would allow for the additional maintenance cost to the Council from increased use of the park and to allow for improvement works (such as planting, seating, additional bins, paths and potential entrance changes), in the Spa Gardens.
157. In conclusion, the proposal would provide high quality living accommodation for students, with a range of room sizes, with good consideration of accessibility, shared facilities, good daylight and outlook, and sufficient amenity space. It would provide good functional living spaces and layout for future student occupiers as required by the draft London Plan policy.

Affordable housing

158. London Plan policy 3.8 states that the provision of affordable family housing should be a strategic priority for borough policies, and policy 3.9 promotes mixed and balanced communities (by tenure and household income). Further details on the definition of affordable housing, targets, and requiring the maximum reasonable amount of affordable housing on major schemes are included in policies 3.10, 3.11, 3.12, and 3.13 of the London Plan. Core Strategy policy 8 'Student homes' requires 35% of student developments as affordable housing, in line with policy 6 'Homes for people on different incomes' which requires as much affordable housing on developments of 10 or more units as is financially viable, and at least 35%. Saved policy 4.4 "Affordable housing" of the Southwark Plan seeks at least 35% of all new housing as

affordable, and a tenure split of 70% social rented to 30% intermediate in the urban zone. The Council's adopted Affordable Housing SPD and the draft Affordable Housing SPD clarify the Southwark Plan and Core Strategy policy framework, and set out the approach in relation to securing the maximum level of affordable housing in proposed schemes, with a sequential test for delivering affordable housing.

159. Emerging New Southwark Plan policy P5 "Student homes" in part 2 states "*when providing direct lets at market rents, provide 35% of the Gross Internal Area of the floorspace as conventional affordable housing, as per policy P4, as a first priority. In addition to this, 27% of student rooms must be let at a rent that is affordable to students as defined by the Mayor of London*". The reason for the policy is clear that this is to balance the need for student accommodation with the provision of other types of housing such as affordable and family homes.
160. Planning policies and emerging development plan documents also refer to affordable student housing, such as NSP policy P5 mentioned above. The London Plan (2016) at paragraph 3.53B requires an element of affordable student accommodation where a provider of student accommodation does not have a nominations agreement. The Mayor of London's Housing SPG provides further information on student housing, including affordable student accommodation. The draft London Plan policy H15 has a requirement for purpose built student accommodation schemes to provide the maximum level of affordable student accommodation (of at least 35% or subject to the viability tested route). It should be noted that the London Plan does not require purpose built student housing schemes to provide a contribution to affordable general needs housing.
161. The lack of affordable housing was referred to in the objections received to this application.
162. Taking the affordable student accommodation first, none is proposed in this application. While the draft London Plan specific requirement for affordable student housing is noted (policy H15 part 4), the borough's priority is for conventional affordable housing. Officers consider that although there would be some benefit to providing affordable student housing, this benefit would be significantly outweighed by the borough's pressing need for general needs affordable housing, and that this should take priority over the provision of affordable student accommodation. Southwark is one of the top four London Boroughs in terms of the provision of student housing, and already contributes significantly to London's student housing needs. In reviewing the viability of the scheme therefore the payment in lieu has been considered in terms of a contribution towards general needs affordable housing, rather than for use in reducing the rent levels of students occupying the site. Including affordable student housing within the development would adversely affect the overall viability, and therefore the contribution the development could make to general needs affordable housing.
163. When taking account of the habitable rooms in the scheme (185 studio room student bedrooms) and counting any rooms that are over 27.5sqm as two rooms, there are a total of 187 habitable rooms in the proposal. To comply with the Core Strategy policy a 35% on-site provision would be 65 habitable rooms of affordable housing (split as 46 social rent and 19 intermediate tenure). This method of calculation has been carried out in accordance with that described in the December 2019 student housing evidence base document. The Affordable Housing SPD and draft Affordable Housing SPD set out the sequential test of firstly on-site provision, then if this is not possible off-site provision, and finally if off-site provision is not possible, requiring an in lieu payment in exceptional circumstances.

164. No on-site affordable housing is proposed in this application. Providing affordable housing on site was not considered to be the optimum solution as the site is relatively small. On-site provision would require a separate access and core (plus cycle and refuse storage) to the affordable, self contained housing from Spa Road as the only available option for the location; this would further reduce the viability of the scheme by reducing the floorspace for the student aspect of the scheme. As residential habitable rooms would generally be larger than the student rooms in the scheme, a 35% provision by habitable room would result in the affordable housing taking a proportionally larger floor area than the student housing. This consideration, in conjunction with maximum viable level of possible on-site provision (considered to be 20% on the original scheme) being substantially below the 35% minimum requirement, was considered to justify an off-site approach to affordable housing provision.
165. The applicant, Urban Student Living, has other student housing sites in London and across the country that are occupied. As a student housing provider, it does not have alternative sites in the borough where off-site affordable housing could be provided.
166. The Council's draft Affordable Housing SPD states at 6.3.9 that "*New housing developments in Southwark may, in exceptional circumstances, provide affordable housing by making a pooled contribution instead of providing the affordable housing on-site or through the developer securing their own off-site affordable housing site. The sequential test must be followed to justify that at least as much affordable housing as would have been provided if the minimum 35% affordable housing requirement were achieved on-site. A minimum of £100,000 of pooled contribution per habitable room of affordable housing will be required. To ensure that the maximum reasonable proportion of affordable housing is negotiated on each development we will determine the exact amount required (above £100,000 per affordable habitable room) using a robust viability assessment.*"
167. As set out in paragraph 6.3.9 of the draft SPD, the viability appraisal must justify that at least as much affordable housing is being provided as would have been provided if the minimum 35% affordable housing requirement were achieved on-site. The requirement for a financial appraisal for any application that has an affordable housing requirement is further established under the Council's Development Viability SPD.
168. For this scheme, a 35% provision would be 65 habitable rooms, resulting in a minimum expected contribution of £6.5m as an in lieu payment to the council to use for providing affordable housing.
169. In line with the Affordable Housing SPD, a financial appraisal was submitted to allow an assessment of the maximum level of affordable housing that could be supported by the development. The appraisal was reviewed by Avison Young on behalf of the Council. Following the review of the appraisal, Officers have concluded the most beneficial approach for this proposal would be to accept a payment in lieu for the affordable housing. The Core Strategy requires as much affordable housing as is financially viable and the London Plan requires the maximum reasonable amount. The in lieu payment proposed by the applicant, as justified through the financial appraisal, would need to meet both of these criteria.
170. The applicant is proposing a payment in lieu of £6.5m which is equivalent to 35% affordable housing using the £100,000 per habitable room rate set out in the draft Affordable Housing SPD. The payment in lieu exceeds the maximum reasonable amount of affordable housing that the development can provide. Therefore Officers

are satisfied that the proposed approach to affordable housing is acceptable and would maximise the provision of affordable housing.

171. By providing the maximum viable payment in lieu, the proposal accords with Core Strategy policy 8 part 2 and policy 6 part 1 which require 35% affordable housing and as much affordable housing as is financially viable. The payment in lieu and viability reviews would be secured by a planning obligation. A viability review would be secured through the s106 agreement should the scheme not be implemented within two years of the permission. A further late stage viability review would be required to ensure the maximum payment in lieu is provided; as the student housing is not typical for sale housing and the value relies on the rent levels achieved it is proposed that this late stage review be carried out after the first full academic year of occupation of the development.

Conclusion on affordable housing

172. The London Plan, Core Strategy and saved Southwark Plan contain policies which seek the maximum reasonable and financially viable amount of affordable housing in proposed developments. These policies at national, London and borough levels allow for a commuted sum in exceptional circumstances, and the NPPF acknowledges that there may be circumstances where an in lieu payment can be justified. Where it is clear that a payment in lieu approach would deliver more (and more appropriate) affordable housing, a commuted sum is acceptable.
173. The council would use a payment in lieu in its New Council Homes Delivery Programme to deliver truly affordable housing. The payment in lieu of £6.5 million offered by the applicant is substantial and could deliver a number of new affordable homes, and a higher number than could be provided on site. The acceptability of the offered payment in lieu is based on the specific merits of this proposal, taking account of all the material considerations highlighted above. It is also consistent with the approach taken on other consented purpose built student housing schemes. It is considered that the council's own New Council Homes Delivery Programme is the most effective way to provide affordable housing, to the extent that any departure from the on-site preference of the NPPF, London and Southwark Plan is justified (for the above reasons based on the specific merits of this student housing proposal).

Impact on the amenity of the adjoining occupiers

174. Core Strategy policy 13 "High environmental standards" seeks to avoid amenity and environmental problems. Saved policy 3.1 "Environmental effects" of the Southwark Plan seeks to prevent development from causing material adverse effects on the environment and quality of life. Saved policy 3.2 "Impact on amenity" of the Southwark Plan states that planning permission for development will not be granted where it would cause a loss of amenity to present and future occupiers in the surrounding area, or on the application site.
175. References to the proposal causing harm to neighbouring properties, particularly to the Buddhist Centre, were included in the objections received.

Daylight and sunlight

176. A daylight and sunlight report was submitted that considered the daylight and sunlight impacts to the residential habitable rooms in the following surrounding properties:
- Haven Way 'block C'
 - Grange Walk, Ockham Building (also known as 'Block A')

- Buddhist Centre

177. The submitted report follows the Building Research Establishment's (BRE's) 2011 guidance. The calculations are based on computer models of the massing of existing and proposed buildings. The BRE guidance states that it is intended as advisory guidance for building designers and planners, but is not mandatory and should not be seen as an instrument of planning policy. Although it gives quantitative guidelines these should be interpreted flexibly as daylight and sunlight levels are only one aspect of site layout design. The Residential Design Standards SPD refers to the BRE methodology for daylight and sunlight tests as the appropriate means of assessing impacts on neighbouring properties.
178. The submitted report assesses values according to the vertical sky component (VSC) and the no sky line (NSL) tests (the latter where room layouts are known), and the annual probable sunlight hours (APSH) to the windows and rooms of these neighbouring properties. A reduction in daylight is likely to be noticeable if the resulting VSC or NSL levels are lower than 0.8 of the existing levels (i.e. more than a 20% loss). Similar, although more nuanced criteria are used for sunlight impacts for windows which face within 90 degrees due south.
179. The following tables provide a summary of the windows to residential habitable rooms tested and whether they passed the BRE criteria:

Vertical sky component (VSC)

	Windows assessed	Pass	Fail
Haven Way	64	44	20
Grange Walk	40	32	12
Buddhist Centre (residential only)	10	8	2
Total	114	84 (74%)	30 (26%)

Daylight distribution (no sky line – NSL test)

	Rooms tested	Pass	Fail
Haven Way	40	38	2
Grange Walk	23	23	0
Buddhist Centre (residential only)	8	7	1
Totals	71	68 (96%)	3 (4%)

Sunlight (annual probable sunlight hours – APSH test)

	Windows tested	Passes both tests	Fail Total annual	Fail Winter hours
Haven Way	37	34	3	2
Grange Walk	34	29	4	2
Buddhist Centre (residential only)	0	n/a	n/a	n/a
Total	71	63 (89%)	7	4

Daylight and sunlight impacts to the adjacent Buddhist Centre

180. In a number of instances for the Buddhist Centre's windows, the levels are below the advised values set out in BRE guidance. The applicant has sought to minimise the impact of the proposed development on the shrine room's access to light by way of reducing the total number of storeys of the building and removing portions of the proposed building massing closest to these affected windows.
181. The windows in the Buddhist centre comprise a mix of those affording light to domestic spaces and those to non-domestic spaces (such as the central shrine room or circulation spaces). The BRE guidance regarding planning for daylight and sunlight is primarily for impact on neighbouring residential occupiers. Windows to habitable rooms providing living accommodation for the complex are primarily located on the southern and eastern boundaries, although there are several bedrooms lit only by roof lights on the western side of the building near the site boundary
182. In the instance of this adjacent, largely non-residential property it was considered appropriate to undertake a full technical daylight and sunlight assessment on all the windows/rooms potentially impacted by the development for a number of reasons. These include the proximity of the proposed development to this neighbouring building, and to the two considerations of a) the building's original design emphasis (the surviving fabric of which has merited listing) in maximising access to natural light as a public library, particularly to the former reading room, and b) that this former reading room is now the shrine room, and by extension a central aspect of the Buddhist Centre that is operational on this site.
183. The form of the shrine room is square in plan with large windows approximately 3m tall on the western and eastern elevations. These large windows are also present on the northern elevation although they are abutted externally by an adjoining building (part of the complex to the north) and internally by the shrine wall, limiting the light-admitting function. The shrine room also has a secondary run of six clerestory windows on each of its four elevations.
184. The large windows in the western elevation of the shrine room that face towards the proposal would lose over half their access to daylight, according to the Vertical Sky

Component (VSC) tests undertaken. Similarly the clerestory windows above would be subject to a proportional loss of access to daylight of around 30 – 40% for their VSC values.

185. While this is a relatively substantial reduction in VSC terms, it should be noted that due to the total number, size and distribution of orientation of windows, the proposed development would not impact on the room's daylight distribution (No Sky Line), with 100% of the room's area receiving daylight under the NSL metric. The room overall would remain well-lit, as indicated by the excellent performance in the daylight distribution test.
186. The same set of the larger, primary windows on the western elevation would also be affected with a reduction in access to sunlight, measured in Annual Probable Sunlight Hours (APSH). They would be subject to a relatively substantial reduction on the annual figure from approximately 50% APSH to between 20 – 25%, broadly in line with the BRE recommendation of 25%. There would be a similarly relatively substantial reduction in the access to sunlight across winter months from between 11 – 19% across the windows to between 2 – 6%, where three of the five windows would be subject to sunlight levels below the BRE advised 5% winter value.
187. The impact on the reduction of sunlight on these west-facing windows would be noticeable for the occupiers of the shrine room, although the set of 6 smaller clerestory windows on the southern and western elevations would still benefit from access to sunlight levels in significant exceedance to the BRE thresholds, which would lessen the impact. It is noted that the BRE guidance is primarily for residential daylight and sunlight, and needs to be applied with some flexibility in urban areas and for non-residential uses. This room in the Buddhist Centre is considered to retain relatively good sunlight levels.
188. The proposed development would see a reduction in access to daylight and sunlight to a limited extent for the residential rooms located within the western portion of the rear building volume of the complex which hosts bedrooms. Planning permission for the change of the use of the building to the Buddhist Centre saw these rooms approved as 'retreat rooms' rather than habitable rooms (bedrooms). As they lack a vertical window and outlook, the spaces would not conform to quality of residential accommodation standards set by the Council. Under the subsequently approved listed building (LBC) consent application however, these rooms are labelled as bedrooms. This LBC application was not subject to assessment against planning policy, including quality of accommodation standards to which applications for planning permission are subject. It is not clear the extent that the rooms provide permanent residences to occupiers of the centre but it is understood that there is the possibility they house permanent residents based on consultation feedback.
189. Nonetheless, due to their position on a flat roof of this building, the impact of the proposed development on the rooflights' access to daylight and sunlight would be marginal due to the open aspect to the sky facing directly up. The impact on these residential rooms therefore would be acceptable.
190. There would be a reduction in daylight for a west facing dining room that is connected to significantly more substantial living spaces and bedrooms located in the front portion of the building overlooking the Spa Gardens. Given this is a minor aspect of the residential part of this building, and that the impact on daylight in NSL terms is not especially low (retaining a value of 67%) the impact on this space is considered to be acceptable.

191. In the majority of the instances of reduction noted above the tested windows and rooms would be close to or above the advised BRE levels. Taking into account the urban character of the site, the impact of the proposed development on the Buddhist Centre's window's access to daylight and sunlight is considered to be acceptable.

Daylight and sunlight impacts on the residential blocks to the north

192. 104 windows and 63 residential habitable rooms within the neighbouring Haven Way and Grange Walk blocks to the north of the site were tested according to VSC and NSL methods. Of these, 76 windows (for VSC) and 61 habitable rooms (for NSL) would pass BRE guidelines.
193. 28 windows would be subject to a reduction in daylight levels below BRE thresholds according to the VSC test. 8 of these windows would be subject to reductions of between 20 – 30%. Of these:
- 5 windows have existing high VSC values (avg. 26% VSC) and would retain a good VSC with the proposal (av. 20% VSC) and
 - 3 windows currently have low VSC values where a relatively small change in VSC is a high percentage change.
194. 20 are subject to proportionally higher reduction in VSC. Of these 20, 11 would be to a room that hosts at least one other window that complies with BRE standards in terms of VSC. For the remaining 9 windows:
- 4 would be subject to good VSC levels for a built up urban area, with an average across them at 22% (range between 21 – 24%)
 - 5 would be subject to relatively low retained VSC, with the average across them at approximately 13% (range between 9 – 16%).
195. Where the highest level of reductions occur, these are partially borne of the design of the neighbouring property - where overhangs above the affected windows already limited daylight levels - and the affected windows are all to rooms hosting a number of other windows which meet the BRE criteria.
196. Using the daylight distribution test which assesses the distribution of light across the whole of the affected room, two rooms in the Haven Way block (a bedroom and a kitchen/living/dining room) would be subject to a noticeable reduction. The proposed development would result in a 27% reduction (to the bedroom) and a 37% reduction (to the K/L/D) to the area that currently has direct access to daylight at working plane level.
197. As the existing daylight distribution of the rooms is near 100%, the resultant area of each room that has direct access to daylight following the construction of the proposed development would be relatively good for a built up urban area, at 69% and 60%, respectively.
198. Rooms in the Grange Walk block would not be subject to a noticeable daylight distribution impact as a result of the proposed development.
199. The proposed development would cause reductions to sunlight, in most instances in

accordance with BRE thresholds. Of the 71 windows tested for sunlight impacts, 7 would fall short of the advisory thresholds in terms of Annual Probable Sunlight Hours.

200. Two of these would be located the Haven Way block and subject to total retained APSH of 22%, close to the 25% advised value. These windows would meet the winter recommended winter values. Both windows serve a kitchen/living/dining room that has 6 other windows that meet BRE standards.
201. Three windows within the Grange Walk block would not meet the BRE sunlight values. One window would fail both the summer and winter levels, although is subject to very low levels of access to sunlight as existing. The other two windows would meet recommended BRE levels in winter but be subject to a reduction of approximately 50% for the total annual values. In all instances however the windows are serve kitchen/living/dining rooms which have two further windows that meet BRE criteria for sunlight.
202. Overall, it can be seen that the windows which see a noticeable reduction in sunlight serve rooms which have other windows that remain unaffected, so the room would retain good levels of sunlight access.

Overshadowing

203. Three roof terrace amenity spaces located on the fourth and fifth floor levels of the Haven Way block were tested for overshadowing impacts given the proposed development would be located to the south. Because of their elevated position however, the proposed development would not have any impact on the overshadowing to these spaces.
204. Given the proposed development is located north of Spa Gardens, it would not overshadow the park.

Privacy, overlooking and sense of enclosure

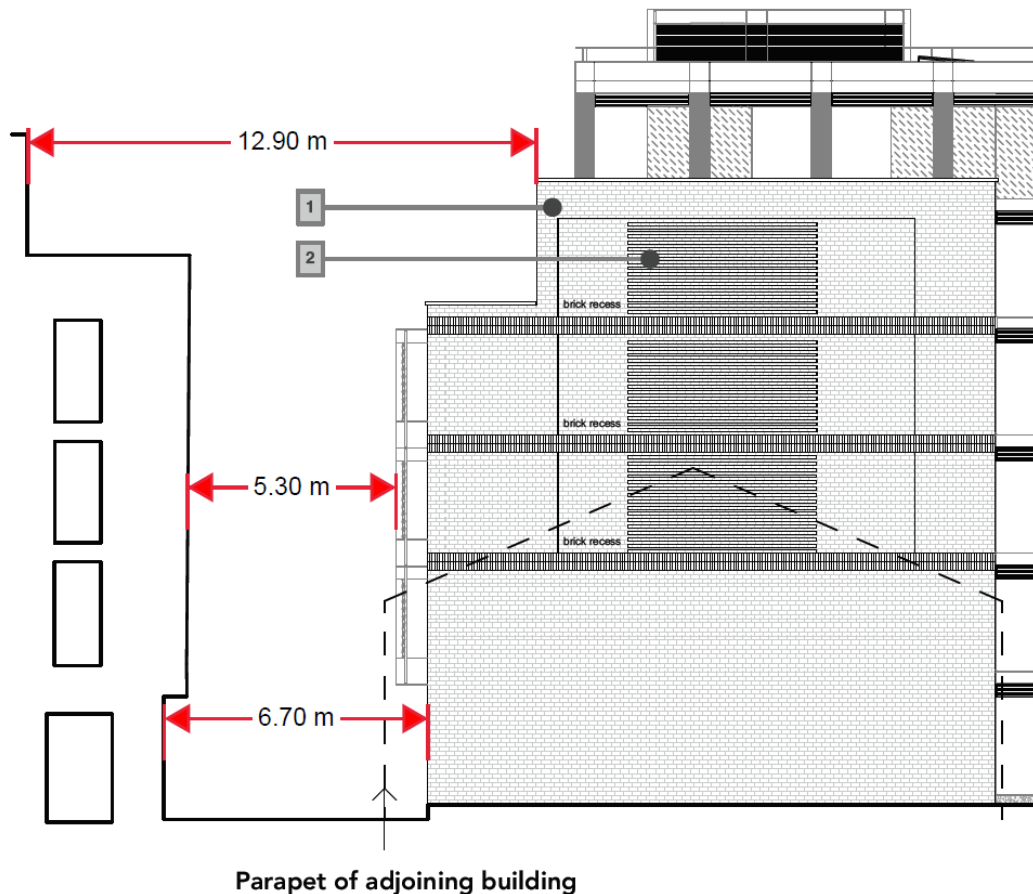
205. Any redevelopment of this site would have a larger massing and would introduce new overlooking to neighbouring properties from upper floor windows. The Residential Design Standards SPD seeks separation distances of a minimum of 12m at the front of the building (and any elevation that fronts onto a highway) and a minimum of 21m at the rear of the building; where these minimum distances cannot be met, the applicants must provide justification through the Design and Access Statement.
206. The Buddhist Centre has one window to a residential habitable room on its facing western elevation at second floor level that would be subject to overlooking from the proposed development. The window serves a small dining room. The room is associated with other substantially larger bedrooms and living room spaces that overlook Spa Gardens within this floor of the Buddhist Centre. As the other living spaces would retain access to with full privacy, this minor instance of overlooking to a dining room is considered not to cause such harm to the privacy of these residential rooms that would warrant refusal.
207. There would be no overlooking issues from the proposal's windows to the west as the adjacent site being an industrial depot shed.
208. The existing residential neighbours within the facing Haven Way block to the north would have a close relationship to the rear elevation of the proposed development. These blocks extend up to the pavement. The ground floor of the Haven Way block

is slightly set back into its site plan, with the first to third floors above overhanging this and is topped with a set back fourth (and fifth) floor level.

209. The ground floor of the proposed development is by comparison flat with first to third floors having angled box window elements protruding from the elevation. The proposed arrangement would see a facing distance between the proposed development and the Haven Way block to the north of:

- between 6.5 – 7m between ground floor elements of the two elevations
- 5.3m between facing first to third floors and
- 13m+ between facing fourth floor levels.

210. Therefore at the lower levels the relationship between these two buildings would be substantially below the minimum 12m across-street distance set out in the Residential Design Standards SPD. It can be noted that for floors 1 – 3 noted above, the windows of the Haven Way block are either dual aspect, set back approximately 1.7m further than the main elevation due to inset balcony amenity spaces (themselves dual aspect) or a bedroom.



211. The primary facing glazing elements of the proposed box windows would be obscured to protect the privacy of the occupiers of the Haven Way block in close proximity to the north. Side elements of the windows would be clear glazed to provide outlook for student occupiers away from the neighbours. The fourth and fifth floor levels in the proposed development would be set back from the floors below by approximately 2.7m and 3.5m from the primary building line, respectively to exceed the minimum separation distance across a highway. These design features mean that the

neighbouring occupiers would not be impacted by intrusive overlooking.

212. Taking the built up nature of the area into account and the development pattern borne of past land uses, these distances are not unusual where there are similar facing distances across Grange Yard and Arts Lane. The relationship to neighbours and the impact on privacy, overlooking and their sense of enclosure is therefore considered to have been adequately addressed and is acceptable.

Noise and disturbance

213. The days when students move in or out are likely to cause the most disturbance with vehicles arriving and unpacking. If not effectively managed, this would likely disturb neighbouring properties; this is considered further in the transport section below.
214. The larger communal roof terrace amenity space would be approximately 86sqm and located at the top the building fronting Spa Gardens. This space itself would be set back within the roof area and bounded by an approximately 1.8m high glazed balustrade.
215. The eastern boundary of the larger fifth floor level roof space would be approximately 10.5m away from the facing elevation of the Buddhist Centre to the east, and so close to the residential rooms, albeit a dining room only, with the other living and bedroom spaces located on the southern elevation of the building.
216. The terrace would have a more direct relationship with the large single glazed windows to the facing prayer room 15m away to the north west. The size of the terrace space means it has the potential to accommodate a significant number of student occupiers simultaneously and by extension the potential to generate a relatively substantial level of noise. It is on this basis that is considered appropriate to limit the hours of occupation for this roof terrace to 7am to 9pm in order to minimise the impact on the amenity of the adjoining occupiers.
217. This larger terrace would be approximately 40m distance away from the residential occupiers to the north in the Haven Way block, with fifth floor level student accommodation within the proposal providing an element of separation and screening. The proposed roof terrace amenity space is not considered to have the potential to harm the amenity of these nearby occupiers in terms of noise and disturbance, to any significant extent.
218. The smaller wrap-around communal roof terrace amenity space on the south western corner would measure approximately 22sqm. It is not considered that this would have the potential to impact on the amenity of nearby occupiers by virtue of its size and position relative to neighbouring residential occupiers (set 50m away).
219. The courtyard on the western side of the site would be enclosed by the massing of the proposed building, and being set away from the Buddhist Centre boundary and behind the Grange Yard frontage would not raise neighbour amenity issues.
220. Conditions are proposed requiring a demolition and construction environmental management plan to be submitted for approval, and regarding plant noise, in the interest of neighbour amenity.
221. Subject to proposed conditions to require obscure glazing and limit the hours of use of the terraces, the proposal is considered not to cause significant harm to the amenity of surrounding residential properties through loss of privacy, daylight or sunlight, nor

overbearing impact. The proposal would comply with strategic policy 13 of the Core Strategy, and saved policies 3.1 and 3.2 of the Southwark Plan.

Archaeology

222. The site is located within the 'Borough, Bermondsey and Rivers Archaeological Priority Zone (APZ). A desk based assessment and archaeological evaluation were submitted as part of the application. The field work did not reveal archaeology on the small sample of the site. The report concluded however that it is possible archeologically remains may survive on the site.
223. The surviving nineteenth century building from the historic tannery complex once on the site has the potential to have local industrial and social history interest. Conditions regarding both recording this building to be demolished on the site, and works below ground regarding wider archaeological investigations are recommended to be included on any grant of planning permission. Subject to these conditions, the proposal would accord with London Plan policy 7.8, strategic policy 12 of the Core Strategy, and saved policy 3.19 of the Southwark Plan.

Sustainable development implications

Energy and BREEAM

224. The proposed development would achieve an on-site carbon emissions saving of 40% on 2013 Building Regulations Part L which would exceed the 35% minimum reduction required by the adopted policy requirement of the London Plan. This saving would be achieved through a number of measures following the GLA's energy hierarchy, including fabric efficiencies and use of an air source heat pump and PV panels on the roof. Compliance with the approved energy assessment would be secured by condition.
225. As a scheme providing non-self contained residential accommodation, it is appropriate to apply the requirement for BREEAM level 'excellent'. A pre-assessment has indicated that this policy requirement would be achieved and pre-fit out and post-completion verification assessments are recommended to be required by a suggested condition. This would ensure compliance with Core Strategy policy 13 for sustainable construction, and draft NSP policy P68.

Air quality

226. An air quality assessment submitted with the application identified that, under a worst case scenario (i.e. no improvement to NOx concentration levels) the development would be subject to poor air quality in certain parts of the site and therefore mechanical ventilation would be required to protect occupant health. Details of this ventilation, including air intake points and associated plant requirements and information, are recommended to be secured by condition. The development was also assessed as having transport and building emissions below the 'air quality neutral' benchmarks. The development would therefore comply with London Plan policy 7.14 'Improving air quality.'
227. Details of demolition and construction in the form of a Demolition and Construction Management Plan are recommended to be secured by condition in order to ensure each process has acceptable impacts and where required adequate mitigation to maintain an acceptable air quality in terms of dust and emissions.

Ground conditions and contamination

228. Given the history of industrial uses on the site, the potential for contamination being present on the site is high. An initial assessment identified an elevated level of lead and sulphates that would require remediation. A condition requiring submission of findings of further intrusive ground investigations and a remediation strategy is therefore recommended.

Flood risk

229. The site is located in flood zone 3 and benefits from the Thames flood defences. A site specific flood risk assessment and drainage strategy were submitted to support the application and reviewed by the council's Flood and Drainage Team. Revisions were made to ensure the ground floor was raised marginally on the request of the Flood and Drainage Team and the Environment Agency. Compliance with the revised flood risk assessment and finished floor level would be required by a condition.
230. The submitted drainage strategy sets out how greenfield run off rates would be achieved by utilising a number of measures including green roof areas, permeable paving, water butts and underground storage. Further technical details regarding this are recommended to be required by condition, including a greater allowance for climate change under the submitted strategy.
231. Subject to the conditions highlighted above to secure the different aspects of sustainable development, the proposal would comply with policies 5.2, 5.3, 5.7, 5.9, 5.12, 5.13, 5.14, 5.15, 5.21 and 7.14 of the London Plan, policy 13 of the Core Strategy, saved policies 3.1, 3.2, 3.3, 3.4, 3.6 and 3.9 of the Southwark Plan.

Trees, landscaping and ecology

232. The courtyard spaces either side of the central part of the proposed building would be landscaped, including green buffers and low level hedges in front of the ground floor studio units with outlook facing onto the courtyards to provide an element of defensible space. A selection of trees and ground cover planting would be provided in the courtyards with the species to be confirmed by condition in consultation with the council's Urban Forester.
233. Three substantial mature street trees are located in the footway in the immediate vicinity of the site's Spa Road boundary. Conditions to ensure they are adequately protected during demolition and construction are recommended. The crowns of the trees would require pruning to accommodate the four storey Spa Road frontage of the proposal, the details of which will be secured by condition in consultation with the council's urban forester. A financial contribution will be secured as part of the S106 agreement to cover the cost of the pruning and any other maintenance works required as a result of the development.
234. Sedum roofs were initially proposed by the applicant however conditions regarding provision of full green roofs are recommended to maximise biodiversity benefits. Submission of details of bird bricks in the façade would be secured by condition.
235. Subject to the conditions relating to tree protection measures, tree planting, landscaping, green roofs, bird and bat boxes, the proposal would comply with policies 5.10, 5.11 and 7.19 of the London Plan, policies 11 and 13 of the Core Strategy, and saved policies 2.5 and 3.28 of the Southwark Plan.

Transport and highways issues

236. London Plan policies on transport seek to ensure major developments are located in accessible locations, and support improvements to sustainable transport modes. Core Strategy policy 2 encourages sustainable transport to reduce congestion, traffic and pollution. Policies 5.1 “Locating developments”, 5.2 “Transport impacts”, 5.3 “Walking and cycling”, 5.6 “Car parking” and 5.7 “Parking standards for disabled people and the mobility impaired” seek to direct major developments towards transport nodes, provide adequate access, servicing, facilities for pedestrians and cyclists, and to minimise car parking provision while providing adequate parking for disabled people.
237. The site is to the north of Bermondsey Spa Gardens and the Spa Road footways connect with Bermondsey tube station (a 10 minute walk), the bus routes on the nearby Grange Road and to the walking routes running through the neighbouring Bermondsey Spa Gardens. The footways also links northwards with the riverside walk/riverboat service along River Thames. This site is close to various cycle routes in this locality including the contiguous LCN22 on Grange Road/Crimscott Street and Quietways on Willow Walk. The site is within Grange CPZ which operates weekdays from 0800hrs to 1830hrs. Grange CPZ provides parking control in this vicinity on weekdays. There are a few car club spaces close to this development on Henley Drive, Spa Road, Balaclava Road, Grange Walk and Enid Street.

Car parking

238. The development would be car free with no on-site car parking spaces provided. Given the location and proposed use of the site this would be acceptable. With the exception of disabled occupiers, students living in the development would be restricted from having a car and parking in the vicinity of the site as part of the terms of their tenancy agreement. A planning obligation would prevent future occupiers from being eligible for CPZ parking permits, except for blue badge holders.
239. The existing cross over to service the industrial buildings on the site would be made redundant and therefore the footway would need to be made good as part of the highway works. The carriage way space in front would be given over to on street parking spaces as part of S278 works associated with the servicing and refuse arrangements (detailed further below) and result in a net gain of one on-street space. This would be provided as a disabled-only space.
240. There would be adequate parking capacity in the immediately surrounding on-street parking network during move-in and move-out days, indicated in the indicative student management plan as being managed over a two week period. Further detail of this would be required by a planning obligation.

Cycle parking

241. The development would provide 124 cycle parking spaces for use by the student occupiers, housed within the ground floor of the building ensuring they would be secure and weatherproof.
242. The number of spaces would exceed the London Plan 2016 minimum standards which require 1 space for every two bed spaces (equating to a minimum of 93 spaces). The total proposed 124 spaces would substantially exceed the minimum requirement set out in adopted policy and be relatively close to the new London Plan requirement (that would require 139 cycle spaces).

The level of dedicated cycle parking for the student occupiers is therefore considered to be acceptable.

243. The development would also accommodate a fold up bicycle scheme for use by the student occupiers to encourage sustainable travel. The bikes would be stored in dedicated lockers within the cycle store area in ground floor plan, with details being secured by both a condition regarding cycle parking provision and the travel plan, to include monitoring, in the S106 agreement.
244. The applicant would also contribute a sum towards the cost of a Santander cycle hire docking station (£56,402) in order to further encourage the uptake of sustainable travel to and from the site particularly towards central London where most HEIs are located. This will be secured by the S106 agreement.

Public transport

245. Although this site is in an area with a low PTAL rating, with the nearest bus route on Grange Road providing 24 two-way buses per hour, it is within practical walking distances of Bermondsey tube station. A contribution towards improving the bus service would be secured (£76,143 indexed) which is considered a proportionate amount for the number of students in the development. A travel plan would be required by any permission to detail how sustainable transport modes would be encouraged. Further financial contributions (totalling £40,000 indexed) would be secured to provide the one bus stop on Grange Road near the site with the countdown passenger information system, and new longer shelter to improve the infrastructure.

Servicing and highways issues

246. The development would be subject to on-street servicing from Spa Road, including refuse collection and deliveries. An internal refuse store would be located within eastern portion of the ground floor plan of the building. Refuse containers would be bought out and left prior to collection times in the servicing alley located within the eastern portion the site.
247. A dropped kerb would be provided in the footway in front of this part of the site to ensure the bins can be carried to and from the refuse collection vehicle, and to aid cyclists accessing the cycle store. The dimensions of the dropped kerb would be specified to ensure vehicular movements that would reduce pedestrian safety (such as three point turns) cannot be accommodated in this space. A condition to ensure the refuse storage is provided, and subject to this the proposal would comply with saved policy 3.7 of the Southwark Plan.
248. Subject to the items to be secured by planning obligations in terms of the highway works, travel plan, contributions to bus frequency, bus infrastructure and cycle docking station, student management plan for the moving in/out periods and preventing the issue of CPZ permits, and conditioning the provision of the cycle parking, the proposal does not raise significant transport or highway safety issues. It would comply with transport policies in the London Plan, Core Strategy policy 2, saved policies 5.1, 5.2, 5.3, 5.6 and 5.7 of the Southwark Plan.

Planning obligations and Community Infrastructure Levy CIL)

249. Section 143 of the Localism Act states that any financial contribution received as community infrastructure levy (CIL) is a material "local financial consideration" in

planning decisions. The requirement for payment of the Mayoral or Southwark CIL is therefore a material consideration; however the weight attached is determined by the decision maker.

250. The Mayoral CIL2 is required to contribute towards strategic transport investments in London as a whole, primarily Crossrail, while Southwark's CIL will provide for infrastructure that supports growth in Southwark. The rate for Southwark CIL for this development is £109 per sqm (indexed) while for Mayoral CIL it is £60 per sqm. In this instance Mayoral CIL2 payment of £249,096 and Southwark CIL payment of £537,272 would be payable in the event planning permission is granted. Payment of the Mayoral CIL would accord with policy 8.3 of the London Plan.
251. A recurring issue raised in consultation responses was the lack of capacity of local services; in particular doctor's practices and the associated long wait times for appointments and the impact of an additional residential student population would have on these. The council's adopted CIL Regulation 123 list identifies health facilities as one type of infrastructure that CIL could fund to mitigate the impact of the development in this regard.
252. The following table sets out the required site specific mitigation to be secured by a section 106 agreement, and the applicant's position with regard to each point:

Planning obligation	Mitigation	Applicant's position
Student housing use only	Restrict to only student housing occupation (and summer lets only to students)	Agreed
Student housing management	Management plan for day to day operation of the student housing and to detail the moving in/out arrangements to minimise disruption to the public highway.	Agreed
Affordable housing contribution	Payment in lieu of £6.5m (indexed) to be paid in phases on implementation (25%), practical completion (50%) and occupation (25%).	Agreed
Affordable housing contribution viability review	Require a viability review if the scheme is not implemented within two years of the permission date Late stage review at first full year of occupation.	Agreed
Delivery and servicing plan	And the associated servicing deposit (£9,250 indexed) and monitoring fee (£1,600	Agreed

	indexed).	
Parking permit restriction	Prevent future occupiers from being eligible for permits in the CPZ (except blue badge holders).	Agreed
Construction phase jobs and training	<ul style="list-style-type: none"> • 11 jobs lasting a minimum of 26 weeks for unemployed Southwark residents • Where this is not possible to meet this requirement, a charge of £4,300 per job not provided will be applied • 11 Southwark residents trained in pre- or post-employment short courses • Where this is not possible to provide a payment a charge of £150 per resident will be applied • Three new apprenticeship start or in work NVQ • Where this is not possible to provide a payment a charge of £1,500 per apprenticeship will be applied 	Agreed
Employment and enterprise	Allow for local procurement and supply chain measures during construction and after construction.	Agreed
Highway works	<p>Section 278/38 agreement for highway works including:</p> <ul style="list-style-type: none"> • Remove existing redundant westerly cross over fronting site and reinstate footway • Shift existing on-street car parking spaces west to occupy space within carriage way previously retained for access to redundant cross over • Provide net gain in parking space as dedicated disabled space • Single yellow lines on carriage way • Reconfigure and make good existing easterly cross over and footway per approved plans including narrowing to restrict car access • Repave and make good existing footway in front of the site 	Agreed
Street tree	Contribution of £6,400 (indexed) for the	Agreed

additional maintenance fee	additional maintenance of the street trees close to the façade of the proposal.	
Spa Gardens contribution	£73,500 (indexed) towards improvement works in the Gardens and the enhanced maintenance costs from the students using the park	Agreed
Transport and travel measures plan	Securing the provision of sustainable travel measures - e.g. <ul style="list-style-type: none"> • Brompton cycle hire scheme • £40,000 (indexed) contribution for bus shelter replacement and countdown installation • £76,143 (indexed) contribution to bus service improvements • £56,402 (indexed) contribution to cycle hire docking station. 	Agreed
Archaeological monitoring	£6,778 (indexed) as required for this scale of development, set out in the Planning Obligations and CIL SPD.	Agreed
Administration and monitoring fee	Payment to cover the costs of monitoring these necessary planning obligations, calculated as 2% of £259,233 = £5,185 (Plus the £1,600 monitoring fee for delivery and servicing as mentioned above).	Agreed

253. These obligations are necessary in order to make the development acceptable in planning terms, and to ensure the proposal accords with policies 2.5 of the Southwark Plan, Core Strategy policy 14 and London Plan policy 8.2, and the Section 106 Planning Obligations and CIL SPD.
254. In the absence of a legal agreement to secure the items and mitigation listed in the table above, the proposal would be contrary to saved policies 2.5 and 4.4 of the saved Southwark Plan 2007, Core Strategy policy 13, London Plan policies 3.12 and 8.2, and section 5 of the NPPF.
255. In the event that a satisfactory legal agreement has not been entered into by 3 June 2020, the director of planning be authorised to refuse planning permission (if appropriate) for the following reason:

“The proposal fails to provide an appropriate mechanism for securing the in lieu payment for affordable housing, the highways works and financial contributions towards transport mitigation. The proposal therefore fails to demonstrate conformity with strategic planning policies and fails to adequately mitigate the particular impacts associated with the development in accordance with saved policies 2.5 'Planning

obligations' and 4.4 'Affordable Housing' of the Southwark Plan (2007), Strategic Policies 8 'Student Housing' and '14 'Delivery and implementation' of the Core Strategy (2011), and London Plan (2016) policies 3.12 'Negotiating affordable housing' and ' 8.2 'Planning obligations', as well as guidance in the Council's Section 106 Planning Obligations and Community Infrastructure Levy SPD (2015)."

Community involvement and engagement

256. The applicant submitted a Statement of Community Involvement with the initial application submission in 2017. This was updated several times across the application process, most recently in November 2019. The report, including the updates, sets out the additional consultation and community engagement that the applicant had undertaken outside of the statutory consultation undertaken by the Council as the local planning authority. It reported on the feedback received and how this was taken on board and the scheme amended in response.
257. The Council advertised the application by neighbour letters, site and press notices in line with the requirements for a major development next to a listed building. Two rounds of reconsultation were undertaken on the amended scheme. Further detail on the feedback was received through consultation responses as part of the statutory consultation process undertaken by the Council is summarised below.

Consultation responses, and how the application addresses the concerns raised

Consultation responses from members of the public

258. Summarised below are the material planning considerations raised in the objections and support comments made by members of the public.
259. Principle of development and proposed land uses:
- Objection to introduction of student accommodation residential use onto the site
 - Support regarding introduction of student accommodation residential use onto the site
260. Affordable housing and viability:
- Objected to on the grounds that student accommodation would take from land that should go towards providing affordable housing
261. Design quality and site layout:
- Too large a scale, height, mass and density for the site
262. Neighbour amenity impacts:
- Disturbance from student occupiers
 - Reduction in access to daylight and sunlight and privacy for neighbouring occupiers
263. Transport, parking, highways, deliveries and servicing matters:
- Impact on local bus capacity
264. Environmental impact during the construction phase (noise, dust and dirt etc.):
- Concerns regarding unacceptable noise and dust emissions during construction

265. Ecology and biodiversity:
- Concern regarding impact on local mature street trees requiring pruning
266. Security and prevention of anti-social behaviour:
- Objections based on concern of risk of antisocial behaviour from student occupiers
267. Other matters:
- Impact on property values
 - Right to light issues
268. These matters are addressed comprehensively in the relevant preceding parts of this report.

Consultation responses from internal and divisional consultees

269. Summarised below are the material planning considerations raised by internal and divisional consultees, along with the officer's response.
270. Environmental Protection Team:
- Acceptable subject to conditions

Officer response to issue(s) raised: Incorporated in the recommendation.

271. Local Economy Team:
- Acceptable subject to S106 employment obligations/contributions

Officer response to issue(s) raised: Included in the heads of terms table above.

272. Flood Risk Management Team:
- Acceptable subject to conditions

Officer response to issue(s) raised: Noted

273. Ecologist:
- Acceptable subject to conditions

Officer response to issue(s) raised: Noted

Consultation responses from external consultees

274. Summarised below are the material planning considerations raised by external consultees, along with the officer's response.

275. Environment Agency:
- Acceptable subject to conditions regarding groundwater protection.

Officer response to issue(s) raised: Included in the recommendation.

276. Historic England:
- Advised that consultation was not necessary and provided no comment.

Officer response to issue(s) raised: Noted

277. Metropolitan Police:
- Acceptable subject to condition regarding Secured by Design

Officer response to issue(s) raised: Included in the recommendation.

278. These matters are addressed comprehensively in the relevant preceding parts of this report.

Community impact and equalities assessment

279. The council must not act in a way which is incompatible with rights contained within the European Convention of Human Rights

280. The council has given due regard to the above needs and rights where relevant or engaged throughout the course of determining this application.

281. The Public Sector Equality Duty (PSED) contained in Section 149 (1) of the Equality Act 2010 imposes a duty on public authorities to have, in the exercise of their functions, due regard to three "needs" which are central to the aims of the Act:

1. The need to eliminate discrimination, harassment, victimisation and any other conduct prohibited by the Act

2. The need to advance equality of opportunity between persons sharing a relevant protected characteristic and persons who do not share it. This involves having due regard to the need to:
 - Remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic
 - Take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it
 - Encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low

282. The need to foster good relations between persons who share a relevant protected characteristic and those who do not share it. This involves having due regard, in particular, to the need to tackle prejudice and promote understanding

283. The protected characteristics are: race, age, gender reassignment, pregnancy and maternity, disability, sexual orientation, religion or belief, sex, marriage and civil partnership.

Human rights implications

284. This planning application engages certain human rights under the Human Rights Act 2008 (the HRA). The HRA prohibits unlawful interference by public bodies with conventions rights. The term 'engage' simply means that human rights may be affected or relevant.

285. This application has the legitimate aim of providing student housing through the redevelopment of a brownfield site. The rights potentially engaged by this application, including the right to a fair trial and the right to respect for private and family life are not considered to be unlawfully interfered with by this proposal.

Positive and proactive statement

286. The council has published its development plan and Core Strategy on its website together with advice about how applications are considered and the information that needs to be submitted to ensure timely consideration of an application. Applicants are advised that planning law requires applications to be determined in accordance with the development plan unless material considerations indicate otherwise.
287. The council provides a pre-application advice service that is available to all applicants in order to assist applicants in formulating proposals that are in accordance with the development plan and core strategy and submissions that are in accordance with the application requirements.

Positive and proactive engagement: summary table

Was the pre-application service used for this application	Yes
If the pre-application service was used for this application, was the advice given followed?	Yes
Was the application validated promptly?	Yes
If necessary/appropriate, did the case officer seek amendments to the scheme to improve its prospects of achieving approval?	Yes
To help secure a timely decision, did the case officer submit their recommendation in advance of the statutory determination date?	No

Conclusion

288. There is no policy objection to the loss of the light industrial use of this site as it is outside the strategic and preferred industrial locations, and does not meet the criteria of saved policy 1.4 of the Southwark Plan.
289. There is support in the London Plan, Core Strategy and Southwark Plan for student housing and it counts towards the borough's housing delivery. Core Strategy policy 8 part 1 directs student housing to town centres and places with good access to public transport services. The site is not within a town centre and while it has a low PTAL rating of 2 it is next to sites with higher PTAL ratings and is in a relatively accessible part of the borough for students to travel to HEIs. It is noted that emerging NSP policy P5 'Student homes' removes the location restriction on student housing. Whilst the weight ascribed to the NSP is limited, given the Council's stated intention, through the submission of the NSP, to remove the locational requirements for student housing, it would be difficult to justify refusal of planning permission based on the site being outside one of the areas identified under the Core Strategy.
290. No affordable housing is proposed within the redevelopment due to the size of the site and the impact it would have on the size of a student housing scheme. A payment in lieu is proposed of £6.5m, which equates to 35% affordable housing by habitable room. In this regard the proposal complies with part 2 of Core Strategy policy 8.

291. The design of the building is appropriate for this site fronting onto Bermondsey Spa Gardens, sitting comfortably in scale, height, massing and architectural treatment in the context of the adjacent and nearby Grade II listed buildings and newer developments to the north.
292. The proposal would provide a high standard of accommodation for student residents, by the size of rooms, daylight provision, outlook, communal facilities and amenity spaces. It would not cause significant harm to the amenity of neighbouring properties, nor to the sunlight levels of the Gardens, and a condition is proposed relating to the use of outdoor spaces in the interest of neighbour amenity.
293. Conditions are proposed to secure the sustainability aspects (e.g. carbon reduction, BREEAM excellent, flood risk), potential archaeological impacts, biodiversity and flood risk mitigation. Highway works, management plan and transport contributions would be secured by the legal agreement to ensure the development makes appropriate improvements to the local area to mitigate its impacts.
294. Subject to the proposed conditions and completion of an appropriate legal agreement to secure the necessary planning obligations, the proposal is considered to accord with the development plan and emerging policies, and a grant of planning permission is recommended.

BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
Southwark Local Development Framework and Development Plan Documents	Place and Wellbeing Department 160 Tooley Street London SE1 2QH	Planning enquiries telephone: 020 7525 3841 Planning enquiries email: planning.enquiries@southwark.gov.uk Case officer telephone: 0207 525 0254 Council website: www.southwark.gov.uk

APPENDICES

No.	Title
Appendix 1	Consultation undertaken
Appendix 2	Consultation responses received
Appendix 3	Relevant planning history
Appendix 4	Recommendation

AUDIT TRAIL

Lead Officer	Simon Bevan, Director of Planning	
Report Author	Tom Weaver, Planning Officer	
Version	Final	
Dated	19 February 2020	
Key Decision	No	
CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER		
Officer Title	Comments Sought	Comments included
Strategic Director of Finance and Governance	No	No
Strategic Director of Environment and Leisure	No	No
Strategic Director of Housing and Modernisation	No	No
Director of Regeneration	No	No
Date final report sent to Constitutional Team		20 February 2020

APPENDIX 1

Consultation undertaken

Site notice date: 28/9/2017

Press notice date: 28/9/2017

Case officer site visit date: 28/9/2017

Neighbour consultation letters sent: 28/9/2017

Internal services consulted

Flood Risk Management & Urban Drainage

Highways Development and Management

Waste Management

Ecology

Archaeology

Design and Conservation Team

Urban Forester

Transport Policy

Statutory and non-statutory organisations

Environment Agency

Thames Water

EDF Energy

London Fire & Emergency Planning Authority

Metropolitan Police Service

Neighbour and local groups consulted:

Effingham House Arundel Street London	32 Cario House 12 The Grange London
18 Bourne House 49 Grange Walk London	31 Cario House 12 The Grange London
20 Bourne House 49 Grange Walk London	27 Cario House 12 The Grange London
22 Bourne House 49 Grange Walk London	23 Cario House 12 The Grange London
21 Bourne House 49 Grange Walk London	22 Cario House 12 The Grange London
17 Bourne House 49 Grange Walk London	24 Cario House 12 The Grange London
13 Bourne House 49 Grange Walk London	26 Cario House 12 The Grange London
12 Bourne House 49 Grange Walk London	25 Cario House 12 The Grange London
14 Bourne House 49 Grange Walk London	40 Cario House 12 The Grange London
16 Bourne House 49 Grange Walk London	39 Cario House 12 The Grange London
15 Bourne House 49 Grange Walk London	41 Cario House 12 The Grange London
30 Bourne House 49 Grange Walk London	43 Cario House 12 The Grange London
29 Bourne House 49 Grange Walk London	42 Cario House 12 The Grange London
31 Bourne House 49 Grange Walk London	38 Cario House 12 The Grange London
33 Bourne House 49 Grange Walk London	34 Cario House 12 The Grange London
32 Bourne House 49 Grange Walk London	33 Cario House 12 The Grange London
28 Bourne House 49 Grange Walk London	35 Cario House 12 The Grange London
24 Bourne House 49 Grange Walk London	37 Cario House 12 The Grange London
5 Bourne House 49 Grange Walk London	36 Cario House 12 The Grange London
4 Bourne House 49 Grange Walk London	9 Bakery Street London SE16 3GF
34 Bourne House 49 Grange Walk London	13 Bakery Street London SE16 3GF
29 Cario House 12 The Grange London	Flat 1 Parchment Building 52 Grange Walk
28 Cario House 12 The Grange London	7 Bakery Street London SE16 3GF
30 Cario House 12 The Grange London	21 Bakery Street London SE16 3GF

19 Bakery Street London SE16 3GF
 1 Bakery Street London SE16 3GF
 5 Bakery Street London SE16 3GF
 3 Bakery Street London SE16 3GF
 Flat 9 Parchment Building 52 Grange Walk
 Flat 8 Parchment Building 52 Grange Walk
 Flat 10 Parchment Building 52 Grange Walk
 Flat 12 Parchment Building 52 Grange Walk
 Flat 11 Parchment Building 52 Grange Walk
 Flat 7 Parchment Building 52 Grange Walk
 Flat 3 Parchment Building 52 Grange Walk
 Flat 2 Parchment Building 52 Grange Walk
 Flat 4 Parchment Building 52 Grange Walk
 Flat 6 Parchment Building 52 Grange Walk
 Flat 5 Parchment Building 52 Grange Walk
 Flat 38 Ockham Building 10 Limasol Street
 Flat 37 Ockham Building 10 Limasol Street
 Flat 39 Ockham Building 10 Limasol Street
 Flat 41 Ockham Building 10 Limasol Street
 Flat 40 Ockham Building 10 Limasol Street
 Flat 10 Cube House 5 Spa Road
 Flat 1 Cube House 5 Spa Road
 Flat 11 Cube House 5 Spa Road
 Flat 2 Cube House 5 Spa Road
 Flat 12 Cube House 5 Spa Road
 Flat 8 Amisha Court 161 Grange Road
 Flat 38 Amisha Court 161 Grange Road
 Flat 37 Amisha Court 161 Grange Road
 Flat 39 Amisha Court 161 Grange Road
 Flat 41 Amisha Court 161 Grange Road
 Flat 40 Amisha Court 161 Grange Road
 Flat 36 Amisha Court 161 Grange Road
 Flat 32 Amisha Court 161 Grange Road
 Flat 31 Amisha Court 161 Grange Road
 Flat 33 Amisha Court 161 Grange Road
 Flat 35 Amisha Court 161 Grange Road
 Flat 34 Amisha Court 161 Grange Road
 Flat 49 Amisha Court 161 Grange Road
 Flat 48 Amisha Court 161 Grange Road
 Flat 50 Amisha Court 161 Grange Road
 Flat 52 Amisha Court 161 Grange Road
 Flat 51 Amisha Court 161 Grange Road
 Flat 47 Amisha Court 161 Grange Road
 Flat 43 Amisha Court 161 Grange Road
 Flat 42 Amisha Court 161 Grange Road
 Flat 44 Amisha Court 161 Grange Road
 Flat 46 Amisha Court 161 Grange Road
 Flat 45 Amisha Court 161 Grange Road
 Flat 16 Amisha Court 161 Grange Road
 Flat 15 Amisha Court 161 Grange Road
 Flat 21 Amisha Court 161 Grange Road
 Flat 20 Amisha Court 161 Grange Road
 Flat 22 Amisha Court 161 Grange Road
 Flat 24 Amisha Court 161 Grange Road
 Flat 23 Amisha Court 161 Grange Road
 Flat 45 Whitmore Building 4 Limasol Street
 Flat 44 Whitmore Building 4 Limasol Street
 Flat 46 Whitmore Building 4 Limasol Street
 Flat 48 Whitmore Building 4 Limasol Street
 Flat 47 Whitmore Building 4 Limasol Street
 Flat 43 Whitmore Building 4 Limasol Street
 Flat 39 Whitmore Building 4 Limasol Street
 Flat 38 Whitmore Building 4 Limasol Street
 Flat 40 Whitmore Building 4 Limasol Street
 Flat 42 Whitmore Building 4 Limasol Street
 Flat 41 Whitmore Building 4 Limasol Street
 Flat 56 Whitmore Building 4 Limasol Street
 Flat 55 Whitmore Building 4 Limasol Street
 Flat 57 Whitmore Building 4 Limasol Street
 Flat 59 Whitmore Building 4 Limasol Street
 Flat 58 Whitmore Building 4 Limasol Street
 Flat 54 Whitmore Building 4 Limasol Street
 Flat 50 Whitmore Building 4 Limasol Street
 Flat 49 Whitmore Building 4 Limasol Street
 Flat 51 Whitmore Building 4 Limasol Street
 Flat 53 Whitmore Building 4 Limasol Street
 Flat 52 Whitmore Building 4 Limasol Street
 Flat 15 Whitmore Building 3 Arts Lane
 Flat 14 Whitmore Building 3 Arts Lane
 Flat 16 Whitmore Building 3 Arts Lane
 Flat 18 Whitmore Building 3 Arts Lane
 Flat 17 Whitmore Building 3 Arts Lane
 Flat 60 Whitmore Building 4 Limasol Street
 Flat 16 Ockham Building 9 Arts Lane
 Flat 15 Ockham Building 9 Arts Lane
 Flat 17 Ockham Building 9 Arts Lane
 Flat 19 Ockham Building 9 Arts Lane
 Flat 18 Ockham Building 9 Arts Lane
 Flat 14 Ockham Building 9 Arts Lane
 Flat 10 Ockham Building 9 Arts Lane
 Flat 9 Ockham Building 9 Arts Lane
 Flat 11 Ockham Building 9 Arts Lane
 Flat 13 Ockham Building 9 Arts Lane
 Flat 12 Ockham Building 9 Arts Lane
 Flat 27 Ockham Building 10 Limasol Street
 Flat 26 Ockham Building 9 Arts Lane
 Flat 28 Ockham Building 10 Limasol Street
 Flat 30 Ockham Building 10 Limasol Street
 Flat 29 Ockham Building 10 Limasol Street
 Flat 25 Ockham Building 9 Arts Lane
 Flat 21 Ockham Building 9 Arts Lane
 Flat 20 Ockham Building 9 Arts Lane
 Flat 36 Whitmore Building 3 Arts Lane
 Flat 35 Whitmore Building 3 Arts Lane
 Flat 37 Whitmore Building 3 Arts Lane
 Flat 2 Ockham Building 9 Arts Lane
 Flat 1 Ockham Building 9 Arts Lane
 Flat 2 Whitmore Building 3 Arts Lane
 First Floor Flat Rear Tibetan Buddhist
 Centre 15 Spa Road

Second Floor Flat Tibetan Buddhist Centre
 15 Spa Road
 Part Right Hand Side 7 Spa Road London
 Flat Tibetan Buddhist Centre 15 Spa Road
 New Hangar Neckinger Depot Neckinger
 Unit 7 3 Haven Way London
 Lower Ground Floor Amisha Court 161
 Grange Road
 1 Grange Yard London SE1 3AE
 Ground Floor 4 Grange Yard London
 2 Arts Lane London SE16 3GB
 4 Arts Lane London SE16 3GB
 8 Arts Lane London SE16 3SL
 6 Arts Lane London SE16 3GB
 17B Spa Road London SE16 3SA
 17A Spa Road London SE16 3SA
 Unit 2 7 Spa Road London
 Flat 104 3 Haven Way London
 Flat 103 3 Haven Way London
 Flat 205 3 Haven Way London
 Flat 207 3 Haven Way London
 Flat 29 Costermonger Building 10 Arts Lane
 Flat 25 Costermonger Building 10 Arts Lane
 Flat 24 Costermonger Building 10 Arts Lane
 Flat 26 Costermonger Building 10 Arts Lane
 Flat 28 Costermonger Building 10 Arts Lane
 Flat 27 Costermonger Building 10 Arts Lane
 5 Arts Lane London SE16 3GB
 7 Arts Lane London SE16 3GB
 Flat 1 Whitmore Building 3 Arts Lane
 1 Arts Lane London SE16 3GB
 7 Limasol Street London SE16 3GE
 6 Limasol Street London SE16 3GE
 8 Limasol Street London SE16 3GE
 9 Limasol Street London SE16 3GE
 Flat 9 Costermonger Building 10 Arts Lane
 Flat 8 Costermonger Building 10 Arts Lane
 Flat 10 Costermonger Building 10 Arts Lane
 Flat 12 Costermonger Building 10 Arts Lane
 Flat 11 Costermonger Building 10 Arts Lane
 Flat 7 Costermonger Building 10 Arts Lane
 Flat 3 Costermonger Building 10 Arts Lane
 Flat 2 Costermonger Building 10 Arts Lane
 Flat 4 Costermonger Building 10 Arts Lane
 Flat 6 Costermonger Building 10 Arts Lane
 23 Bourne House 49 Grange Walk London
 25 Bourne House 49 Grange Walk London
 27 Bourne House 49 Grange Walk London
 26 Bourne House 49 Grange Walk London
 Flat 2 1 Haven Way London
 Studio Flat Ground Floor Skyline Court 9
 Grange Yard
 Flat 3 1 Haven Way London
 Flat 4 1 Haven Way London
 Flat 3 3 Haven Way London
 Flat 8 2 Haven Way London
 Flat 6 2 Haven Way London
 Flat 1 1 Haven Way London
 Flat 2 3 Haven Way London
 Flat 1 3 Haven Way London
 8 Bourne House 49 Grange Walk London
 7 Bourne House 49 Grange Walk London
 9 Bourne House 49 Grange Walk London
 11 Bourne House 49 Grange Walk London
 10 Bourne House 49 Grange Walk London
 6 Bourne House 49 Grange Walk London
 2 Bourne House 49 Grange Walk London
 1 Bourne House 49 Grange Walk London
 3 Bourne House 49 Grange Walk London
 7 Cario House 12 The Grange London
 6 Cario House 12 The Grange London
 8 Cario House 12 The Grange London
 10 Cario House 12 The Grange London
 9 Cario House 12 The Grange London
 5 Cario House 12 The Grange London
 1 Cario House 12 The Grange London
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 18 Cario House 12 The Grange London
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 21 Cario House 12 The Grange London
 20 Cario House 12 The Grange London
 16 Cario House 12 The Grange London
 12 Cario House 12 The Grange London
 11 Cario House 12 The Grange London
 13 Cario House 12 The Grange London
 15 Cario House 12 The Grange London
 14 Cario House 12 The Grange London
 Flat 5 2 Haven Way London
 11 Bakery Street London SE16 3GF
 Flat 36 Ockham Building 10 Limasol Street
 Flat 32 Ockham Building 10 Limasol Street
 Flat 31 Ockham Building 10 Limasol Street
 Flat 33 Ockham Building 10 Limasol Street
 Flat 35 Ockham Building 10 Limasol Street
 Flat 34 Ockham Building 10 Limasol Street
 Flat 49 Ockham Building 10 Limasol Street
 Flat 48 Ockham Building 10 Limasol Street
 Flat 50 Ockham Building 10 Limasol Street
 17 Bakery Street London SE16 3GF
 15 Bakery Street London SE16 3GF
 Flat 47 Ockham Building 10 Limasol Street
 Flat 43 Ockham Building 10 Limasol Street
 Flat 42 Ockham Building 10 Limasol Street
 Flat 44 Ockham Building 10 Limasol Street
 Flat 46 Ockham Building 10 Limasol Street
 Flat 45 Ockham Building 10 Limasol Street

1 Old Town Hall Apartments 19 Spa Road SE16 3SA
 31 Old Town Hall Apartments 19 Spa Road SE16 3SA
 30 Old Town Hall Apartments 19 Spa Road SE16 3SA
 5 Skyline Court 9 Grange Yard London
 28 Skyline Court 9 Grange Yard London
 23 Skyline Court 9 Grange Yard London
 22 Skyline Court 9 Grange Yard London
 25 Skyline Court 9 Grange Yard London
 27 Skyline Court 9 Grange Yard London
 26 Skyline Court 9 Grange Yard London
 37 Skyline Court 9 Grange Yard London
 36 Skyline Court 9 Grange Yard London
 38 Skyline Court 9 Grange Yard London
 40 Skyline Court 9 Grange Yard London
 39 Skyline Court 9 Grange Yard London
 35 Skyline Court 9 Grange Yard London
 30 Skyline Court 9 Grange Yard London
 29 Skyline Court 9 Grange Yard London
 31 Skyline Court 9 Grange Yard London
 33 Skyline Court 9 Grange Yard London
 32 Skyline Court 9 Grange Yard London
 Unit 4 To 6 And 10 Larnaca Works Grange Walk
 Flat 6 1 Alscot Road London
 8 Skyline Court 9 Grange Yard London
 7 Skyline Court 9 Grange Yard London
 Flat 5 1 Alscot Road London
 Flat 1 1 Alscot Road London
 Flat 516 2 Haven Way London
 Flat 2 1 Alscot Road London
 Flat 4 1 Alscot Road London
 Flat 3 1 Alscot Road London
 18 Skyline Court 9 Grange Yard London
 17 Skyline Court 9 Grange Yard London
 19 Skyline Court 9 Grange Yard London
 21 Skyline Court 9 Grange Yard London
 Flat 19 10 The Grange London
 Flat 21 10 The Grange London
 Flat 20 10 The Grange London
 Part Ground Floor The Grange Grange Yard
 Units 1 And 2 Larnaca Works Grange Walk
 Old Town Hall Apartments 19 Spa Road London
 Tibetan Buddhist Centre 15 Spa Road London
 Woodmill Building Neckinger Depot Neckinger
 11-13 Spa Road London SE16 3RB
 6 Grange Yard London SE1 3AE
 5 Grange Yard London SE1 3AE
 7 Grange Yard London SE1 3AE
 Flat 2 10 The Grange London
 8 Grange Yard London SE1 3AE
 4 Grange Yard London SE1 3AE
 11 Grange Yard London SE1 3AQ
 10 Grange Yard London SE1 3AQ
 12 Grange Yard London SE1 3AQ
 14 Grange Yard London SE1 3AQ
 13 Grange Yard London SE1 3AQ
 Flat 11 10 The Grange London
 Flat 10 10 The Grange London
 Flat 12 10 The Grange London
 Flat 16 10 The Grange London
 Flat 15 10 The Grange London
 Flat 9 10 The Grange London
 Flat 5 10 The Grange London
 Flat 3 10 The Grange London
 Flat 6 10 The Grange London
 Flat 8 10 The Grange London
 Flat 7 10 The Grange London
 133 Cario House 12 The Grange London
 73 Cario House 12 The Grange London
 72 Cario House 12 The Grange London
 78 Cario House 12 The Grange London
 77 Cario House 12 The Grange London
 79 Cario House 12 The Grange London
 81 Cario House 12 The Grange London
 80 Cario House 12 The Grange London
 51 Cario House 12 The Grange London
 50 Cario House 12 The Grange London
 52 Cario House 12 The Grange London
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 49 Cario House 12 The Grange London
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 46 Cario House 12 The Grange London
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 62 Cario House 12 The Grange London
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 63 Cario House 12 The Grange London
 65 Cario House 12 The Grange London
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 60 Cario House 12 The Grange London
 56 Cario House 12 The Grange London
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 94 Cario House 12 The Grange London
 90 Cario House 12 The Grange London
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 91 Cario House 12 The Grange London
 93 Cario House 12 The Grange London
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 106 Cario House 12 The Grange London
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 110 Cario House 12 The Grange London
 109 Cario House 12 The Grange London
 105 Cario House 12 The Grange London
 101 Cario House 12 The Grange London
 100 Cario House 12 The Grange London
 102 Cario House 12 The Grange London
 104 Cario House 12 The Grange London
 103 Cario House 12 The Grange London
 Flat 214 1 Haven Way London
 Flat 213 1 Haven Way London
 Flat 215 1 Haven Way London
 Flat 317 1 Haven Way London
 Flat 316 1 Haven Way London
 Flat 212 1 Haven Way London
 Flat 208 1 Haven Way London
 Flat 107 1 Haven Way London
 Flat 60 Amisha Court 161 Grange Road
 161A Grange Road London SE1 3FH
 Right Side 7 Spa Road London
 Left Side 7 Spa Road London
 Flat 59 Amisha Court 161 Grange Road
 Flat 55 Amisha Court 161 Grange Road
 Flat 54 Amisha Court 161 Grange Road
 Flat 56 Amisha Court 161 Grange Road
 Flat 58 Amisha Court 161 Grange Road
 Flat 57 Amisha Court 161 Grange Road
 Flat 103 1 Haven Way London
 Flat 102 1 Haven Way London
 Flat 104 1 Haven Way London
 Flat 106 1 Haven Way London
 Flat 105 1 Haven Way London
 Flat 101 1 Haven Way London
 Flat 429 1 Haven Way London
 Flat 319 2 Haven Way London
 Flat 318 2 Haven Way London
 Flat 420 2 Haven Way London
 Flat 423 2 Haven Way London
 Flat 421 2 Haven Way London
 Flat 317 2 Haven Way London
 Flat 213 2 Haven Way London
 Flat 212 2 Haven Way London
 Flat 314 2 Haven Way London
 Flat 316 2 Haven Way London
 Flat 315 2 Haven Way London
 Flat 631 2 Haven Way London
 Flat 530 2 Haven Way London
 Flat 632 2 Haven Way London
 Flat 634 2 Haven Way London
 Flat 633 2 Haven Way London
 Flat 529 2 Haven Way London
 Flat 425 2 Haven Way London
 Flat 533 1 Haven Way London
 Flat 208 2 Haven Way London
 Flat 107 2 Haven Way London
 Flat 209 2 Haven Way London
 Flat 211 2 Haven Way London
 Flat 210 2 Haven Way London
 Flat 106 2 Haven Way London
 Flat 102 2 Haven Way London
 Flat 101 2 Haven Way London
 Flat 103 2 Haven Way London
 Flat 105 2 Haven Way London
 Flat 104 2 Haven Way London
 Flat 53 Amisha Court 161 Grange Road
 Flat 15 Cube House 5 Spa Road
 Unit 8B Larnaca Works Grange Walk
 Flat 16 Cube House 5 Spa Road
 Flat 18 Cube House 5 Spa Road
 Flat 17 Cube House 5 Spa Road
 Unit 8A Larnaca Works Grange Walk
 Unit 7B Larnaca Works Grange Walk
 Flat 9 Cube House 5 Spa Road
 3 Grange Yard London SE1 3AE
 Unit 9 Larnaca Works Grange Walk
 Unit 7A Larnaca Works Grange Walk
 Flat 4 Amisha Court 161 Grange Road
 Flat 3 Amisha Court 161 Grange Road
 Flat 5 Amisha Court 161 Grange Road
 Flat 7 Amisha Court 161 Grange Road
 Flat 6 Amisha Court 161 Grange Road
 Flat 2 Amisha Court 161 Grange Road
 Flat 21 Cube House 5 Spa Road
 Flat 19 Cube House 5 Spa Road
 17 Spa Road London SE16 3QP
 Flat 1 Amisha Court 161 Grange Road
 Flat 17 Amisha Court 161 Grange Road
 Flat 19 Amisha Court 161 Grange Road
 Flat 18 Amisha Court 161 Grange Road
 Flat 14 Amisha Court 161 Grange Road
 Flat 10 Amisha Court 161 Grange Road
 Flat 9 Amisha Court 161 Grange Road
 Flat 11 Amisha Court 161 Grange Road
 Flat 13 Amisha Court 161 Grange Road

Flat 12 Amisha Court 161 Grange Road
 Flat 27 Amisha Court 161 Grange Road
 Flat 26 Amisha Court 161 Grange Road
 Flat 28 Amisha Court 161 Grange Road
 Flat 30 Amisha Court 161 Grange Road
 Flat 29 Amisha Court 161 Grange Road
 Flat 25 Amisha Court 161 Grange Road
 Flat 10 Whitmore Building 3 Arts Lane
 Flat 9 Whitmore Building 3 Arts Lane
 Flat 11 Whitmore Building 3 Arts Lane
 Flat 13 Whitmore Building 3 Arts Lane
 Flat 12 Whitmore Building 3 Arts Lane
 Flat 8 Whitmore Building 3 Arts Lane
 Flat 4 Whitmore Building 3 Arts Lane
 Flat 3 Whitmore Building 3 Arts Lane
 Flat 5 Whitmore Building 3 Arts Lane
 Flat 7 Whitmore Building 3 Arts Lane
 Flat 6 Whitmore Building 3 Arts Lane
 Flat 21 Whitmore Building 3 Arts Lane
 Flat 20 Whitmore Building 3 Arts Lane
 Flat 22 Whitmore Building 3 Arts Lane
 Flat 24 Whitmore Building 3 Arts Lane
 Flat 23 Whitmore Building 3 Arts Lane
 Flat 19 Whitmore Building 3 Arts Lane
 Flat 22 Ockham Building 9 Arts Lane
 Flat 24 Ockham Building 9 Arts Lane
 Flat 23 Ockham Building 9 Arts Lane
 Flat 31 Whitmore Building 3 Arts Lane
 Flat 30 Whitmore Building 3 Arts Lane
 Flat 32 Whitmore Building 3 Arts Lane
 Flat 34 Whitmore Building 3 Arts Lane
 Flat 33 Whitmore Building 3 Arts Lane
 Flat 29 Whitmore Building 3 Arts Lane
 Flat 25 Whitmore Building 3 Arts Lane
 Flat 61 Whitmore Building 4 Limasol Street
 Flat 26 Whitmore Building 3 Arts Lane
 Flat 28 Whitmore Building 3 Arts Lane
 Flat 27 Whitmore Building 3 Arts Lane
 Flat 5 Ockham Building 9 Arts Lane
 Flat 4 Ockham Building 9 Arts Lane
 Flat 6 Ockham Building 9 Arts Lane
 Flat 8 Ockham Building 9 Arts Lane
 Flat 7 Ockham Building 9 Arts Lane
 Flat 3 Ockham Building 9 Arts Lane
 Flat 206 3 Haven Way London
 Flat 102 3 Haven Way London
 Unit 4 2 Haven Way London
 Flat 635 2 Haven Way London
 Unit 5 2 Haven Way London
 Flat 101 3 Haven Way London
 Unit 6 2 Haven Way London
 Flat 415 3 Haven Way London
 Flat 414 3 Haven Way London
 Flat 516 3 Haven Way London
 Flat 518 3 Haven Way London
 Flat 517 3 Haven Way London
 Flat 413 3 Haven Way London
 Flat 309 3 Haven Way London
 Flat 208 3 Haven Way London
 Flat 310 3 Haven Way London
 Flat 312 3 Haven Way London
 Flat 311 3 Haven Way London
 Flat 1 Costermonger Building 10 Arts Lane
 2 Limasol Street London SE16 3GE
 1 Limasol Street London SE16 3GE
 3 Limasol Street London SE16 3GE
 5 Limasol Street London SE16 3GE
 Flat 5 Costermonger Building 10 Arts Lane
 Flat 20 Costermonger Building 10 Arts Lane
 Flat 19 Costermonger Building 10 Arts Lane
 Flat 21 Costermonger Building 10 Arts Lane
 Flat 23 Costermonger Building 10 Arts Lane
 Flat 22 Costermonger Building 10 Arts Lane
 Flat 18 Costermonger Building 10 Arts Lane
 Flat 14 Costermonger Building 10 Arts Lane
 Flat 13 Costermonger Building 10 Arts Lane
 Flat 15 Costermonger Building 10 Arts Lane
 Flat 17 Costermonger Building 10 Arts Lane
 Flat 16 Costermonger Building 10 Arts Lane
 32 Neckinger Estate Spa Road SE16 3QH
 66 Cadbury Way London SE16 3XB
 20 Skyline Court 9 Grange Yard London
 16 Skyline Court 9 Grange Yard London
 10 Skyline Court 9 Grange Yard London
 9 Skyline Court 9 Grange Yard London
 11 Skyline Court 9 Grange Yard London
 15 Skyline Court 9 Grange Yard London
 12 Skyline Court 9 Grange Yard London
 41 Skyline Court 9 Grange Yard London
 Flat 25 10 The Grange London
 Flat 23 10 The Grange London
 Flat 26 10 The Grange London
 Flat 28 10 The Grange London
 Flat 27 10 The Grange London
 Flat 22 10 The Grange London
 Flat 18 10 The Grange London
 Flat 17 10 The Grange London
 74 Cario House 12 The Grange London
 76 Cario House 12 The Grange London
 75 Cario House 12 The Grange London
 71 Cario House 12 The Grange London
 67 Cario House 12 The Grange London
 66 Cario House 12 The Grange London
 68 Cario House 12 The Grange London
 70 Cario House 12 The Grange London
 69 Cario House 12 The Grange London
 84 Cario House 12 The Grange London
 83 Cario House 12 The Grange London
 85 Cario House 12 The Grange London
 87 Cario House 12 The Grange London

86 Cario House 12 The Grange London	Flat 5 Cube House 5 Spa Road
82 Cario House 12 The Grange London	Flat 8 Cube House 5 Spa Road
116 Cario House 12 The Grange London	Flat 6 Cube House 5 Spa Road
112 Cario House 12 The Grange London	Flat 20 Cube House 5 Spa Road
111 Cario House 12 The Grange London	32 Old Town Hall Apartments 19 Spa Road
113 Cario House 12 The Grange London	SE16 3SA
115 Cario House 12 The Grange London	34 Old Town Hall Apartments 19 Spa Road
114 Cario House 12 The Grange London	SE16 3SA
129 Cario House 12 The Grange London	33 Old Town Hall Apartments 19 Spa Road
128 Cario House 12 The Grange London	SE16 3SA
130 Cario House 12 The Grange London	29 Old Town Hall Apartments 19 Spa Road
132 Cario House 12 The Grange London	SE16 3SA
131 Cario House 12 The Grange London	25 Old Town Hall Apartments 19 Spa Road
127 Cario House 12 The Grange London	SE16 3SA
123 Cario House 12 The Grange London	24 Old Town Hall Apartments 19 Spa Road
122 Cario House 12 The Grange London	SE16 3SA
Flat 209 1 Haven Way London	26 Old Town Hall Apartments 19 Spa Road
Flat 211 1 Haven Way London	SE16 3SA
Flat 210 1 Haven Way London	28 Old Town Hall Apartments 19 Spa Road
Flat 425 1 Haven Way London	SE16 3SA
Flat 424 1 Haven Way London	27 Old Town Hall Apartments 19 Spa Road
Flat 426 1 Haven Way London	SE16 3SA
Flat 428 1 Haven Way London	Flat 1 2 Haven Way London
Flat 427 1 Haven Way London	41 Old Town Hall Apartments 19 Spa Road
Flat 323 1 Haven Way London	SE16 3SA
Flat 319 1 Haven Way London	Flat 2 2 Haven Way London
Flat 318 1 Haven Way London	Flat 4 2 Haven Way London
Flat 320 1 Haven Way London	Flat 3 2 Haven Way London
Flat 322 1 Haven Way London	40 Old Town Hall Apartments 19 Spa Road
Flat 321 1 Haven Way London	SE16 3SA
Flat 61 Amisha Court 161 Grange Road	36 Old Town Hall Apartments 19 Spa Road
Flat 424 2 Haven Way London	SE16 3SA
Flat 426 2 Haven Way London	35 Old Town Hall Apartments 19 Spa Road
Flat 528 2 Haven Way London	SE16 3SA
Flat 527 2 Haven Way London	37 Old Town Hall Apartments 19 Spa Road
Flat 537 1 Haven Way London	SE16 3SA
Flat 536 1 Haven Way London	39 Old Town Hall Apartments 19 Spa Road
Unit 1 1 Haven Way London	SE16 3SA
Unit 3 1 Haven Way London	38 Old Town Hall Apartments 19 Spa Road
Unit 2 1 Haven Way London	SE16 3SA
Flat 535 1 Haven Way London	9 Old Town Hall Apartments 19 Spa Road
Flat 431 1 Haven Way London	SE16 3SA
Flat 430 1 Haven Way London	8 Old Town Hall Apartments 19 Spa Road
Flat 532 1 Haven Way London	SE16 3SA
Flat 534 1 Haven Way London	10 Old Town Hall Apartments 19 Spa Road
Unit 17D Cube House 5 Spa Road	SE16 3SA
Unit 14A Cube House 5 Spa Road	12 Old Town Hall Apartments 19 Spa Road
Flat 7 Cube House 5 Spa Road	SE16 3SA
Flat 13 Cube House 5 Spa Road	11 Old Town Hall Apartments 19 Spa Road
Unit 15B Cube House 5 Spa Road	SE16 3SA
14 Skyline Court 9 Grange Yard London	7 Old Town Hall Apartments 19 Spa Road
4 Skyline Court 9 Grange Yard London	SE16 3SA
24 Skyline Court 9 Grange Yard London	3 Old Town Hall Apartments 19 Spa Road
Flat 4 Cube House 5 Spa Road	SE16 3SA
Flat 3 Cube House 5 Spa Road	

2 Old Town Hall Apartments 19 Spa Road
SE16 3SA
4 Old Town Hall Apartments 19 Spa Road
SE16 3SA
6 Old Town Hall Apartments 19 Spa Road
SE16 3SA
5 Old Town Hall Apartments 19 Spa Road
SE16 3SA
20 Old Town Hall Apartments 19 Spa Road
SE16 3SA
19 Old Town Hall Apartments 19 Spa Road
SE16 3SA
21 Old Town Hall Apartments 19 Spa Road
SE16 3SA
23 Old Town Hall Apartments 19 Spa Road
SE16 3SA
22 Old Town Hall Apartments 19 Spa Road
SE16 3SA
18 Old Town Hall Apartments 19 Spa Road
SE16 3SA
14 Old Town Hall Apartments 19 Spa Road
SE16 3SA
13 Old Town Hall Apartments 19 Spa Road
SE16 3SA
15 Old Town Hall Apartments 19 Spa Road
SE16 3SA
17 Old Town Hall Apartments 19 Spa Road
SE16 3SA
16 Old Town Hall Apartments 19 Spa Road
SE16 3SA
2 Skyline Court 9 Grange Yard London
1 Skyline Court 9 Grange Yard London
3 Skyline Court 9 Grange Yard London
6 Skyline Court 9 Grange Yard London

Re-consultation:

Two rounds of reconsultation were undertaken, most recently in December

APPENDIX 2

Consultation responses received

Internal services

Flood Risk Management & Urban Drainage
 Highways Development and Management
 Ecology
 Archaeology
 Design and Conservation Team
 Urban Forester
 Transport Policy

Statutory and non-statutory organisations

Environment Agency
 Metropolitan Police Service

Neighbour and local groups consulted:

53 Hanbury Road London W3 8UJ	30 Ockham Building 10 Limasol Street London
9 Bakery Street London SE16 3GF	Tibetan Buddhist Centre 15 Spa Road London
3 Bakery Street London SE16 3GF	32 Ockham Building 10 Limasol Street London
Flat 38 Ockham Building 10 Limasol Street	27 Whitmore Building London SE16 3GB
Flat 16 Ockham Building 9 Arts Lane	12 Weightman House 124A Spa Road London
Flat 21 Ockham Building 9 Arts Lane	12 Aulay House London SE16 3FE
Flat 20 Ockham Building 9 Arts Lane	15 Wellington Road Norwich NR2 3HT
First Floor Flat Rear Tibetan Buddhist Centre 15 Spa Road	14 Ockham Building 9 Arts Lane London
Flat 26 Costermonger Building 10 Arts Lane	Flat 12 Old Town Hall Apartments 19 Spa Road London
Flat 27 Costermonger Building 10 Arts Lane	9 Steeple Court Coventry Rd London
5 Arts Lane London SE16 3GB	15 Spa Road Bermondsey London
1 Arts Lane London SE16 3GB	25 Costermonger Building, 10 Arts Lane London
15 Spa Road Spa Road Bermondsey	19 Cube House 5 Spa Road London
Flat 3 Block H Peabody Buildings London	23 Ockham Building 9 Arts Lane London
Kagyu Samye Dzong Tibetan Buddhist Centre 15 Spa Road London	33 Fendall Street Bermondsey SE1 3FX
Flat 2 Ockham Building 9 Arts Lane London	Flat 25 Gutenberg Court 177 Grange Road London
25 Whitmore Building London SE16 3GB	Flat 5 Hepburn Building 51 Grange Walk London
39 Whitmore Building 4 Limasol Street London	4 Ockham Building 9 Arts Lane London
Flat 10 Skyline Court, 9 Grange Yard London SE13AN	9 Cube House 5 Spa Road London
10 Limasol Street London SE16 3GE	12 Whitmore Building 3 Arts Lane London
66 Cadbury Way Bermondsey, London	Flat 18 Ockham Building 9 Arts Lane London
Tibetan Buddhist Centre 15 Spa Road London	9 Woodfield Lane Ashtead KT21 2BQ
14, Woodmill Street London SE16 3GG	Flat 2C 28 Pellatt Grove London
17 Whitmore Building 3 Arts Lane London	Buddhist Centre 15 Spa Rd Bermondsey London
133 Corio House 12 The Grange Bermondsey	
Kagyu Samye Dzong Buddhist Centre 15 Spa Road London	

4 Cube House 5 Spa Road London
 18 Ockham Building London SE16 3GB
 Flat 27 Ockham Building 10 Limasol Street
 London
 2 Haven Way London SE1 3FL
 Flat 27 Ockham Building 10 Limasol Street
 London
 32 Whitmore Building 3 Arts Lane London
 39 Eyot House Marine Street London
 35 Skyline Court 9 Grange Yard London
 52 Marcia Road London SE1 5XF
 Flat 7 Ockham BLDG 9 Arts LN London
 9 Renton Close Brixton Hill London
 Skyline Court, 9 Grange Yard, Flat 29
 London SE1 3AN
 25 Ockham Building 9 Arts Lane London
 Flat 12, Skyline Court 9 Grange Yard
 London
 Flat 3 185 Grange Road London
 Flat 533 1 Haven Way London
 174 Simms Road London SE1 5QJ
 Flat 31 Pinner SE1 3AN
 The Rectory Stables 9 Church Walk Brent
 Broughton
 32 Chatsworth Lodge Bourne Place
 Chiswick
 13 Ockham Building 9 Arts Lane London
 Rooftrees Rissington Road Bourton On The
 Water
 13 Ockham Building 9 Arts Lane London
 Flat 3 Costermonger Building 10 Arts Lane
 London
 Flat 9 Ockham Building 9 Arts Lane London
 Flat 47 Ockham Building 10 Limasol St.
 London
 Flat 1 673-675 Harrow Road London
 56 Southwark Park Road London SE16
 3RS
 Rysings, Church Hill, Stone Tenterden
 Flat 49 Ockham Building 10 Limasol Street
 Flat 45 Ockham Building 10 Limasol Street
 23 Skyline Court 9 Grange Yard London
 39 Skyline Court 9 Grange Yard London
 Tibetan Buddhist Centre 15 Spa Road
 London
 5 Grange Yard London SE1 3AE
 4 Grange Yard London SE1 3AE
 10 Grange Yard London SE1 3AQ
 12 Grange Yard London SE1 3AQ
 13 Grange Yard London SE1 3AQ
 73 Cario House 12 The Grange London
 124 Cario House 12 The Grange London
 Flat 215 1 Haven Way London
 Flat 104 1 Haven Way London
 Flat 101 1 Haven Way London
 Flat 212 2 Haven Way London
 Flat 633 2 Haven Way London
 Flat 16 Cube House 5 Spa Road
 Flat 6 Whitmore Building 3 Arts Lane
 Flat 23 Whitmore Building 3 Arts Lane
 Flat 19 Whitmore Building 3 Arts Lane
 Flat 7 Ockham Building 9 Arts Lane
 Flat 206 3 Haven Way London
 Flat 5 Costermonger Building 10 Arts Lane
 46 Priory Gardens London
 31 Ockham Building 10 Limasol Street
 London
 Flat 46 12 Bermondsey Square London
 Flat 2 Ockham Building 9 Arts Lane London
 15 Spa Road Bermondsey London
 15 Spa Road London SE16 3SA
 7 Albert Road Twickenham
 Kagyu Samye Dzong Tibetan Buddhist
 Centre 15 Spa Road Bermondsey
 Flat 39, Skyline Court 9 Grange Yard
 London
 15 Spa Road, Tibetan Buddhist Centre
 London SE163SA
 Flat 19 Sandover House 124 Spa Rd
 London
 10 Hebpurn Building London
 48 Daybrook Road Merton Park London
 Samye Dzong 15 Spa Road Samye Dzong
 15 Spa Road London
 36C Lancaster Road London W111QR
 15 Spa Road Bermondsey SE163SA
 Flat 4 91 Alscot Road London
 Ockham Building 10 Limasol Street London
 19 Ockham Building London SE16 3GB
 KSD Tibetan Buddhist Centre 15 Spa Road
 London
 33 Eyot House Marine Street London
 15 Spa Road Bermondsey
 24 McKenzie Road Chatham ME5 8DL
 Tibetan Buddhist Center 15 Spa Road
 London
 Corio House London SE1 3GU
 33 Ockham Building London SE163GE
 46 Crampton Road Penge London
 6 Ockham Building 9 Arts Lane London
 4 Woodmill Street London SE16 3GG
 17 Aulay House 122 Spa Road London
 10 Greenhill Court London SE184BS
 109 Manor Place London SE17 3JP
 121 Corio House 12 The Grange London
 32 Whitmore Building 3 Arts Lane London
 Flat 21 Costermonger Building 10 Arts Lane
 London
 21 Whitmore Building London SE16 3GB
 4 Grange Yard London SE1 3AE

27 Costermonger Building London SE16 3GA
 17/10 Arts Lane London SE16 3GA
 1 Gutenberg Court 177 Grange Road London
 9 Woodmill London SE163GG
 Flat 4 Parchment Building 52 Grange Walk London
 Flat 12 Hepburn Building 51 Grange Walk London
 3 Bakery Street London SE16 3GF
 Flat 5, Skyline Court, 9 Grange Yard London SE1 3AN
 46 Ockham Building 10 Limasol Street Bermondsey London
 121A Railton Road London SE240LR
 Kagyu Samye Dzong London 15 Spa Road London
 Flat 38 Ockham Building 10 Limasol Street London
 158 Fort Rd London SE1 5QA
 24 Alma Grove London SE1 5PY
 6 Grange Yard Bermondsey London
 Flat 5 Parchment Building 52 Grange Walk London
 Flat 5 Parchment Building 52 Grange Walk London
 15 Longfellow Way London SE1 5TB
 The Circle Queen Elizabeth St. London
 Flat 104 1 Haven Way London
 Flat 53 Artesian House 98 Alscot Road Bermondsey
 Flat 4 Whitmore Building 3 Arts Lane London
 14 Weyman Road Blackheath London

Kagyu Samye Dzong Tibetan Buddhist Centre, 15 Spa Road London
 Flat 2 3 Haven Way London
 66 Cadbury Way London SE16 3XB
 5 Longley Street London SE1 5QQ
 4 Chiswell Street London EC1Y 4UP
 28 Beckwith Road London SE24 9LG
 28 Beckwith Road London SE24 9LG
 By Email
 Flat 27 Costermonger Building 10 Arts Lane London
 10 Skyline Court 9 Grange Yard London
 12 Skyline Court 9 Grange Yard London
 Flat 427 1 Haven Way London
 32 Old Town Hall Apartments 19 Spa Road SE16 3SA
 28 Old Town Hall Apartments 19 Spa Road SE16 3SA

40 Old Town Hall Apartments 19 Spa Road SE16 3SA
 39 Old Town Hall Apartments 19 Spa Road SE16 3SA
 5 Old Town Hall Apartments 19 Spa Road SE16 3SA
 15 Old Town Hall Apartments 19 Spa Road SE16 3SA
 24 Mckenzie Road Chatham ME5 8DL
 15 Skyline Court 9 Grange Yard London
 25 Ockham Building 9 Arts Lane Bermondsey
 Flat 14 Pilgrims Cloisters 116 Sedgmoor Place London
 138 Erlanger Road London SE14 5TJ
 57 Green Lane Harrogate HG2 9LP
 Flat 1 Parchment Building 52 Grange Walk London
 91 Leathermarket court London SE1 3HS
 3 Josef Albers House London SE12 0PJ
 Flat 29, Billiard Lodge 413 Coldharbour Lane London
 13 Worland Road London E15 4EY
 87 Arngask Rd London Se6 1xz
 71 Whitlock Drive, Wimbledon LONDON
 Gedling court 8, Jamaica rd London SE1 2RN
 55 Golding House London NW9 5YS
 FLAT 53, ST GILES HOUSE ST GILES ROAD LONDON
 Flat 38 Ockham Building 10 Limasol street London
 31 Mill Street London SE1 2AX
 Flat 38 Ockham Building 10 Limasol Street LONDON
 19 Giles House 158 Westbourne Grove London
 32 Artesian House 98 Alscot Road London
 31 Ockham Building 10 Limasol Street London
 3 Wilton Close Deal/Kent CT14 9AJ
 5 Grange Yard Southwark London
 30 mill street London Se12ax
 32 Old Town Hall Apartments 19 Spa Road London
 63 Alscot Road London SE1 3FQ
 32 Vauban Estate London SE16 3QU
 10 Whitmore Building 3 Arts Lane London
 Flat 6 Buckley court 63 Alscot road London
 Flat 1 673-675 hARROW rD IONDON
 Flat 101 2 Haven way London
 73a Bewdley Road Stourport-on-severn dy138xx
 27 Costermonger Building London Se163Ga

32 Ockham Building 19 Limasol St London
 3 Skyline Court Southwark London
 FLAT 12,SKYLINE COURT 9,GRANGE
 YARD LONDON
 Buckley Court London SE1 3FQ
 Flat 12 Skyline Court 9 Grange Yard
 London
 17 leathermarket court london se1 3hs
 49 Corio House 12 The Grange London
 90E Highbury Hill London N5 1AP
 37 Burstead Close Brighton BN1 7HT
 Barn Cottage, Keysoe Row West Keysoe
 Bedford
 Kagyu Samye Ling Eskdalemuir Langholm
 Amadlozi La rue du Becquet Vincent Trinity
 Flat 7, Whitfield Court Rouse Gardens
 London
 64 BONNINGTON sQUARE LONDON
 76 C Tooting High Street London SW17
 0RN
 Kagyu Samye Dzong Tibetan Buddhist
 Centre 15 Spa Road London
 Flat 18 Ockham Building 9 Arts Lane
 London
 8 McCartney House London SW9 6JR
 6 Ash House East Ferry Road London
 40 Oldway Drive Solihull B91 3HP
 9 kenlor road london sw17 0dg
 101 Elgin crescent London W112JF
 6 Kirkstall Road Streatham Hill SW2 4HF
 8 Old Town Hall Apartments 19 Spa Road
 London
 KSD Tibetan Buddhist Centre 15 Spa Road
 LONDON
 Kagyu Samye Dzong Tibetan Buddhist
 Centre London
 29 Kidbrooke Grove London SE3 0LE
 42 Ockham Building 10 Limasol Street
 London
 6 Marsworth Wharf Marsworth Tring
 57 Weald Square Upper Clapton Road
 London
 19 Spa Road Flat 24 London
 1 Old Town Hall Apartments 19 Spa Road
 London
 Flat 13, Ockham Building 9 Arts Lane
 London
 42 Stephendale Rd London SW6 2PF
 19 spa road London Se163sa
 17 Aulay House 122 Spa Road London
 32 Junction Road Norwich Norwich
 Flat 2, Gemini House 180-182 Bermondsey
 Street London
 Flat 8 Buckley Court 63 Alscot Rd SE1 3FQ
 Flat 319 2 Haven Way London
 13 Grange Yard London SE13AQ
 128 Corio House 12 The Grange London
 Corio house London Se13gu
 3 Bakery Street London SE16 3GF
 14 Woodmill Street London SE16 3GG
 Flat 9 5, Cube House London
 Flat 2, Pollard House 122A Spa Road
 London
 Flat 427 1 Haven Way London
 76 hurstwood road london NW11 0AU
 41 Skyline Court 9 Grange Yard
 Bermondsey
 86-87 Grange Road London SE1 3BW
 c/o Warner Bros. Studio 98 Theobald's
 Road London
 Flat 4 The Curve 1 Dacre Park London
 7 Althorpe close Market Deeping PE6 8BL
 7 Albert Road Twickenham TW1 4HU
 28 Beckwith Road London SE24 9LH
 69 Drewstead Rd London SW16 1AA
 76 hurstwood road london nw11 0au
 16 Old Town Hall Apartments 19 Spa Road
 London
 13 Old Townhall Apartments 19 Spa Rd
 London
 65 Corio House 12 The Grange London
 Clair logis 2 Holmfield avenue St Brelade
 Probyn Miers, Hamilton House 1 Temple
 Avenue London
 Grange yard London Se1 3an
 15 Spa Road London SE16 3SA
 10 Heathway Woodford Green IG8 7RG
 58 Osier House 14 Quebec Way London
 Flat 14 Ockham Building 9 Arts Lane
 London
 Flat 20 Whitmore Building 3 Arts Lane
 LONDON
 Flat 632 2 Haven Way London
 Flat 3 Hepburn Building 51 Grange Walk
 London
 2 Old Town Hall Apartments 19 Spa Road
 London
 25 Partridge Road Hampton TW12 3SB
 25 COSTERMONGER BUILDING 10 ARTS
 LANE LONDON
 446 Watford Way London NW7 2QH
 25 Ockham Building 9 Arts Lane London
 15 Spa Road Bermondsey Londond
 Bakery Street London SE16 3GF
 36 C Lancaster Road London w111qr
 13 Bedford road Twickenham Tw2 5ew
 1 Elm Terrace Harrow HA3 6HW
 33-35 Bassett Road Bognor Regis PO21
 2JH
 Samye Ling Langholm Dg13 0ql

Chobham Road Stratford London
 58 Osier House 14 Quebec Way London
 Flat 4 145 Kennington Park Road London
 197 Hammersmith Grove London W6 0NP
 40 Old town hall apartments 19 spa road
 london
 32 Old Town Hall Apartments 19 Spa Road
 London
 2 Naylor Road London SE15 1BE
 15 Spa Road London SE16 3SA
 14 Woodmill Street London SE16 3GG
 Flat 42 Parker building Freda street London
 3 Skyline Court Grange Yard London
 95 Durrington Road London E5 0HS
 Flat 16 Ockham Building, 9 Arts Lane
 London SE163GB
 C/O 63 Maudsley House, Green Dragon
 Lane London TW8 0DN
 flat 12, 100 building alaska 61 grange road
 london
 17 OLD TOWN HALL APTS 19 SPA ROAD
 LONDON
 19 Spa Rd London SE16 3SA
 22 Cornwall Close Tetbury GL8 8JD
 66, Cooper Road Newport Isle of Wight
 PO30 2PX
 High View Cottage, Parish Lane Little Birch
 Hereford
 45 Cinnabar Wharf Central 24 Wapping
 High Street London
 37 Old Town Hall Apartments LONDON
 2A Alderville Road London SW6 3RJ
 15 Spa Road London SE163SA
 7/5 Howard Street Canonmills Edinburgh
 Windmill St London Se16
 35 West stockwell street Colchester
 CO11HR
 1 Talbot Road Twickenham
 Flat 10 Skyline Court 9 Grange Yard
 London
 38 Tynemouth Road Mitcham CR4 2BN
 Flat 10 Skyline Court 9 Grange Yard
 London
 10 Ingleway London N12 0QJ
 15 Spa Road London SE16 3SA
 53 Osprey House, Sillwood Place Brighton
 BN1 2NE
 45 Eyot House London SE16 4BN
 flat 206 3 Haven way London
 Flat 3 Block H Peabody Buildings
 Cambridge Crescent London
 33 Green Lane London SE9 2AF
 Flat 11 Jacobs Island House Dunlop Place
 London

Flat 2, Little London Court 8 Mill Street
 London
 9 Bakery Street London SE16 3GF
 65 Corio House 12 The Grange London
 Flat 18 Ockham Building 9 Arts Lane
 London
 38, 60 River Gardens Walk London
 SE100TY
 Graigina Farm Llanybydder
 Carmarthenshire
 14 Ockham Building, 9 Arts Lane London
 SE16 3GB
 32 Neckinger Estate Bermondsey London
 121 Railton Road London SE24 0LR
 Flat 10, Buckley Court 63 Alscot Road
 London
 133 Corio House 12 The Grange London
 24 Old Town Hall Apartments 19 Spa Road
 London
 26 Skyline Court 9 Grange Yard London
 15 Spa Rd Bermondsey London
 Flat 26, Costermonger Building 10 Arts
 Lane London
 21 West Park Avenue St. Helier
 Maison Blanche Sandybrook St Lawrence
 273 Hills Road Cambridge CB2 8RP
 Kagyu Samye Dzong London 15 Spa Road
 London
 flat 9 Ockham Building 9 Arts Lane London
 13 Ockham Building 9 Arts Lane London
 104 1 Haven Way London
 28 Old Town Hall Apartments 19 Spa Road
 London
 68a Corio House 12 The Grange London
 3 Old Town Hall Apartments 19 Spa Road
 London
 6, Corio House, 12 The Grange London
 SE1 3GU
 Flat 21 Ockham building 9 Arts Lane
 London
 Flat 28, Corio House 12 The Grange
 London
 Flat 2 Ockham Building London SE16 3GB
 124 Corio House 12 The Grange London
 112 Corio House 12 The Grange London
 41 Skyline Court 9 Grange Yard
 Bermondsey
 73 Corio House, 12 The Grange London
 SE1 3GW
 Flat 27 Costermonger Building 10 Arts Lane
 London
 17,AULAY HOUSE 122,SPA ROAD
 LONDON
 Flat 12, 100 Alaska buildings 61 grange
 road London

12 the Grange London SE1 3GW
Flat 2 Ockham Building 9 Arts Lane London
Flat 5 Old Town Hall Bermondsey Spa
Gardens Bermondsey SE163SA
121 Corio House 12 The Grange London
37 Old Town Hall Apartments 19 Spa Road
London

RELEVANT PLANNING HISTORY**APPENDIX 3**

Reference and Proposal	Status
16/EQ/0380 Redevelopment of the site to provide student housing scheme, comprising circa 243 units (both clusters and studios) together with associated support and ancillary floor space.	Pre-Application Enquiry Closed 16/05/2017

RECOMMENDATION

This document shows the case officer's recommended decision for the application referred to below. This document is not a decision notice for this application.

Applicant	Student Urban Living Bermondsey Ltd & Bermondsey Spa Ltd	Reg. & Number	17/AP/3281
Application Type	Major application	Case Number	4-A
Recommendation			

Draft of Decision Notice

Planning Permission was **GRANTED** for the following development:

Demolition of existing buildings and construction of a part 4, 5 and 6 storey building to form 185 student rooms (sui generis), communal student facilities, plant room, cycle storage, gym, recycling & refuse facilities and associated works

11-13 Spa Road London SE16 3RB

In accordance with application received on 21 August 2017

and Applicant's Drawing Nos.:

Existing Plans

2736-MA-00-GF-DR-A-00101 REV P01 SITE LOCATION PLAN

MSL20571-E-01 REV A EXISTING FRONT ELEVATIONS

MSL20571-E-02 REV A EXISTING SIDE AND REAR ELEVATIONS

MSL20571-FP1 REV A EXISTING FIRST AND FLOOR PLAN

MSL20571-FPG REV B EXISTING GROUND FLOOR PLAN

Proposed Plans

2736-MA-00-GF-DR-A-00103 SITE _ GROUND FLOOR PLAN S4-P07

2736-MA-00-ZZ-DR-A-00104 _ FLOOR PLANS S4-P18

2736-MA-00-ZZ-DR-A-00122 GA_ ELEVATION TO SPA ROAD S4-P07

2736-MA-00-ZZ-DR-A-00120 GA BUILDING ELEVATIONS S4-P08

2736-MA-00-GF-DR-A-001004 SITE _ ROOF PLAN S4-P02

2736-MA-00-ZZ-DR-A-00130 FLOOR PLANS ACCESSIBLE STUDIOS S4-P01

Other Documents

PLANNING STATEMENT REF. SP16-1028 DATED AUGUST 2017

ADDENDUM PLANNING STATEMENT REF. SP16-1028 REV A DATED NOVEMBER 2019

STATEMENT OF COMMUNITY INVOLVEMENT DATED NOVEMBER 2019

AFFORDABLE HOUSING VIABILITY STATEMENT DATED AUGUST 2017

EXECUTIVE SUMMARY DATED AUGUST 2017

DAYLIGHT AND SUNLIGHT STUDY (NEIGHBOURING PROPERTIES) DATED 25 NOVEMBER 2019
INTERNAL DAYLIGHT SUNLIGHT STUDY (WITHIN DEVELOPMENT) DATED 7 AUGUST 2017

DESIGN AND ACCESS STATEMENT 5HT ISSUE REV D DATED 29 NOVEMBER 2019
TOWNSCAPE AND VISUAL IMPACT ASSESSMENT REPORT REV D DATED 29 NOVEMBER 2019
ARCHAEOLOGICAL ASSESSMENT AND HERITAGE STATEMENT REF. R12865 DATED AUGUST 2017
ARCHAEOLOGICAL EVALUATION AND WATCHING BRIEF REF. 1342 DATED OCTOBER 2018
HERITAGE STATEMENT REF. 2051.6.1 DATED NOVEMBER 2019

PURPOSE BUILT STUDENT ACCOMMODATION MANAGEMENT PLAN REV A DATED 17 JULY 2017
PARTY WALL STRATEGY REF. 16.129.10.SR.003 DATED

TRANSPORT ASSESSMENT REF. 17-060-01-TN01A DATED AUGUST 2017
TRAVEL PLAN REF. 17-060-01 TN03 DATED AUGUST 2017
TRANSPORT TECHNICAL NOTE DATED 9 OCTOBER 2018
FRAMEWORK CONSTRUCTION TRAFFIC MANAGEMENT PLAN REF. TN04-FTCMP DATED 9 OCTOBER 2018
TRANSPORT TECHNICAL NOTE TN05 - SERVICING AND DELIVERIES STRATEGY DATED 5 DECEMBER 2019
TRANSPORT TECHNICAL NOTE DATED 11 DECEMBER 2019
TRANSPORT TECHNICAL NOTE DATED 13 JANUARY 2020

ARBORICULTURAL ASSESSMENT REF. RT-MME-12564 REV B DATED AUGUST 2017
ARBORICULTURAL SUPERVISION LETTER REF. RT-MME-129470 REV B DATED 1 NOVEMBER 2018
PRELIMINARY ECOLOGICAL APPRAISAL DATED AUGUST 2017 RT-MME-124667-01 REV A
PRELIMINARY BAT ROOST ASSESSMENT AND NOCTURNAL EMERGENCE BAT SURVEY REF. RT-MME-124667-02 REV A DATED AUGUST 2017

FLOOD RISK ASSESSMENT AND SURFACE WATER STRATEGY SUSTAINABLE DRAINAGE ASSESSMENT REF. 694-FRA-01 DATED JULY 2017
AIR QUALITY ASSESSMENT DATED AUGUST 2017
BREEAM PRE-ASSESSMENT AND ENERGY STATEMENT REF. R1930 DATED OCTOBER 2019
CONTAMINATION ASSESSMENT REF. 530-R-01 DATED SEPTEMBER 2016

818607-2736-MA-00-GF-DR-L-00121 LANDSCAPE STRATEGY S4 - P04

2736-MA-00-ZZ-DR-A-00105 - S4-P07 SPA ROAD ELEVATION
2736-MA-00-ZZ-DR-A-00110 - S4-P05 SPA ROAD RENDERED ELEVATION
2736-MA-00-ZZ-DR-A-00111 - S4-P02 SPA ROAD RENDERED SECTIONS

2736-MA-00-ZZ-DR-A-00106 - S4-P04 SPA ROAD STREET VIEW
2736-MA-00-ZZ-DR-A-00107 - S4-P04 AERIAL VIEW
2736-MA-00-ZZ-DR-A-00109 - S4-P02 SPA GARDENS VIEW

Time limit for implementing this permission and the approved plans

1. The development hereby permitted shall be begun before the end of three years from the date of this permission.

Reason:

As required by Section 91 of the Town and Country Planning Act 1990 as amended.

2. The development hereby permitted shall not be carried out otherwise than in accordance with the following approved plans:

2736-MA-00-GF-DR-A-00103 Site _ Ground Floor Plan S4-P07
 2736-MA-00-ZZ-DR-A-00104 _ Floor Plans S4-P18
 2736-MA-00-ZZ-DR-A-00122 GA_ Elevation to Spa Road S4-P07
 2736-MA-00-ZZ-DR-A-00120 GA Building Elevations S4-P08
 2736-MA-00-GF-DR-A-001004 Site _ Roof Plan S4-P01
 2736-MA-00-ZZ-DR-A-00130 Floor Plans Accessible Studios S4-P01

Reason:

For the avoidance of doubt and in the interests of proper planning.

Permission is subject to the following Pre-Commencements Condition(s)

3. CONTAMINATION

a) Prior to the commencement of development, a detailed remediation strategy to bring the site to a condition suitable for the intended use by removing unacceptable risks to human health, buildings and other property and the natural and historical environment shall be submitted to and approved by the Local Planning Authority. The scheme shall ensure that the site will not qualify as contaminated land under Part 2A of the Environmental Protection Act 1990 in relation to the intended use of the land after remediation.

b) The approved remediation scheme (if one is required) shall be carried out in accordance with its terms prior to the commencement of development, other than works required to carry out remediation, unless otherwise agreed in writing by the Local Planning Authority. The Local Planning Authority shall be given two weeks written notification of commencement of the remediation scheme works.

c) Following the completion of the works and measures identified in the approved remediation strategy, a verification report providing evidence that all works required by the remediation strategy have been completed shall be submitted to and approved in writing by the Local Planning Authority.

d) In the event that potential contamination is found at any time when carrying out the approved development that was not previously identified, it shall be reported in writing immediately to the Local Planning Authority, and a scheme of investigation and risk assessment, a remediation strategy and verification report (if required) shall be submitted to the Local Planning Authority for approval in writing, in accordance with a-c above. In the event that the contamination identified presents an unacceptable risk to controlled ground waters, the Environment Agency must be notified.

Reason

To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other off-site receptors in accordance with saved policy 3.2 'Protection of amenity' of the Southwark Plan (2007), strategic policy 13' High environmental standards' of the Core Strategy (2011) and the National Planning Policy Framework 2012.

4. DEMOLITION ENVIRONMENTAL MANAGEMENT PLAN

No demolition work shall take place until a demolition environmental management plan has been submitted to and approved by the Local Planning Authority. The demolition environmental management plan shall include the following information:

- A detailed specification of demolition works including consideration of environmental impacts (noise, dust, emissions to air) and the required remedial measures;
- Site management contact details;
- A commitment to adopted and implement the ICE Demolition Protocol;
- Routing of site traffic;
- Waste storage, separation and disposal.

All demolition work shall be undertaken in strict accordance with any approved demolition environmental management plan. Working hours shall be limited to 0800-1800 Monday to Friday, 0900-1400 on Saturdays and no working on Sundays and public holidays.

Reason:

To ensure that occupiers of neighbouring premises and the wider environment do not suffer a loss of amenity by reason of pollution and nuisance, in accordance with Strategic Policy 13 'High environmental standards' of the Core Strategy (2011), Saved Policy 3.2 'Protection of amenity' of the Southwark Plan (2007), and the National Planning Policy Framework (2019).

5. CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN

No development excluding demolition shall take place until a construction environmental management plan (CEMP) has been submitted to and approved in writing by the Local Planning Authority. The CEMP shall oblige the applicant, developer and contractors to commit to current best practice with regard to construction site management and to use all best endeavours to minimise off-site impacts

A copy of the CEMP shall be available on site at all times and shall include the following information:

- o A detailed specification of construction works at each phase of development including consideration of all environmental impacts and the identified remedial measures including continuous monitoring of noise and airborne particulates and vibration in locations to be agreed with the Council's Environmental Protection Team;
 - o Engineering measures to eliminate or mitigate identified environmental impacts e.g. hoarding height and density, acoustic screening, sound insulation, dust control measures, emission reduction measures, location of specific activities on site, etc.
 - o Arrangements for a direct and responsive site management contact for nearby occupiers during demolition and/or construction (signage on hoardings, newsletters, residents liaison meetings, etc.)
 - o A commitment to adopt and implement of the ICE Demolition Protocol and Considerate Contractor Scheme
 - o Site traffic - Routing of in-bound and outbound site traffic, one-way site traffic arrangements on site, location of lay off areas, etc.;
 - o Site waste Management - Accurate waste stream identification, separation, storage, registered waste carriers for transportation and disposal at appropriate destinations.
 - o Working hours;
-

o Transport and highways impacts - the parking of vehicles of site operatives and visitors; construction vehicle routing; loading and unloading of plant and materials; storage of plant and materials used in constructing the development; wheel washing facilities;

All demolition and construction work shall be undertaken in strict accordance with the approved CEMP and other relevant codes of practice, unless otherwise agreed in writing by the Local Planning Authority.

Reason

To ensure that occupiers of neighbouring premises and the wider environment do not suffer a loss of amenity by reason of pollution and nuisance, in accordance with Strategic Policy 13 'High environmental standards' of the Core Strategy (2011), Saved Policy 3.2 'Protection of amenity' of the Southwark Plan (2007), and the National Planning Policy Framework (2019).

6. HISTORICAL BUILDING RECORDING

Before any work, including all demolition, hereby authorised begins, the applicant shall secured the implementation of a programme of archaeological building recording in accordance with a written scheme of investigation, which shall be submitted to and approved in writing by the Local Planning Authority.

Reason

In order that the archaeological operations are undertaken to a suitable standard as to the details of the programme of works for the archaeological building recording in accordance with Strategic Policy 12 - Design and Conservation of The Core Strategy 2011, Saved Policy 3.19 Archaeology of the Southwark Plan 2007 and the National Planning Policy Framework 2019.

7. TREE PROTECTION MEASURES

Prior to works commencing, including any demolition, an Arboricultural Method Statement shall be submitted to and approved in writing by the Local Planning Authority.

a) A pre-commencement meeting shall be arranged, the details of which shall be notified to the Local Planning Authority for agreement in writing prior to the meeting and prior to works commencing on site, including any demolition, changes to ground levels, pruning or tree removal.

b) A detailed Arboricultural Method Statement showing the means by which any retained trees on or directly adjacent to the site are to be protected from damage by demolition works, excavation, vehicles, stored or stacked building supplies, waste or other materials, and building plant, scaffolding or other equipment, shall then be submitted to and approved in writing by the Local Planning Authority. The method statements shall include details of facilitative pruning specifications and a supervision schedule overseen by an accredited arboricultural consultant.

c) Cross sections shall be provided to show surface and other changes to levels, special engineering or construction details and any proposed activity within root protection areas required in order to facilitate demolition, construction and excavation.

The existing trees on or adjoining the site which are to be retained shall be protected and both the site and trees managed in accordance with the recommendations contained in the method statement. Following the pre-commencement meeting all tree protection measures shall be installed, carried out and retained throughout the period of the works, unless otherwise agreed in writing by the Local Planning Authority. In any case, all works must adhere to BS5837: (2012) Trees in relation to demolition, design and construction and BS3998: (2010) Tree work - recommendations.

If within the expiration of 5 years from the date of the occupation of the building for its permitted use any retained tree is removed, uprooted is destroyed or dies, another tree shall be planted at the same place and that tree shall be of such size and species, and shall be planted at such time, as may be specified in writing by the Local Planning Authority.

Reason

To avoid damage to the existing trees which represent an important visual amenity in the area, in accordance with the National Planning Policy Framework 2019 and policies of the Core Strategy 2011: SP11 Open spaces and wildlife; SP12 Design and conservation; SP13 High environmental standards, and Saved Policies of the Southwark Plan 2007: Policy 3.2 Protection of amenity; Policy 3.12 Quality in Design; Policy 3.13 Urban Design and Policy 3.28 Biodiversity.

8. ARCHAEOLOGICAL EVALUATION

Before any work hereby authorised begins excluding demolition to ground slab level only (no grubbing out of foundations), the applicant shall secure the implementation of a programme of archaeological evaluation works in accordance with a written scheme of investigation shall be submitted to and approved in writing by the Local Planning Authority.

Reason

In order that the applicants supply the necessary archaeological information to ensure suitable mitigation measures and/or foundation design proposals be presented in accordance with Strategic Policy 12 - Design and Conservation of The Core Strategy 2011, Saved Policy 3.19 Archaeology of the Southwark Plan 2007 and the National Planning Policy Framework 2019.

9. ARCHAEOLOGICAL MITIGATION

Before any work hereby authorised begins, excluding demolition to ground level only (no grubbing out of foundations), the applicant shall secure the implementation of a programme of archaeological mitigation works in accordance with a written scheme of investigation, which shall be submitted to and approved in writing by the Local Planning Authority.

Reason

In order that the details of the programme of works for the archaeological mitigation are suitable with regard to the impacts of the proposed development and the nature and extent of archaeological remains on site in accordance with Strategic Policy 12 - Design and Conservation of The Core Strategy 2011, Saved Policy 3.19 Archaeology of the Southwark Plan 2007 and the National Planning Policy Framework 2019.

10. TREE PROTECTION - FOUNDATION WORKS

Before any work hereby authorised begins excluding demolition to ground level only (with no grubbing out of foundations), details of the foundation works including changes to levels to be used in the construction of this development, showing how the roots will be protected, shall be submitted to and approved in writing by the Local Planning Authority. Details shall include the use of trial holes or trenches to check for the position of roots. The development shall not be carried out otherwise than in accordance with any such approval given. All works shall adhere to BS5837: Trees in relation to demolition, design and construction (2012) and National Joint Utility Group, Guidance 10 - Guidelines For The Planning, Installation And Maintenance Of Utility Apparatus In Proximity To Trees (Issue 2).

Piling or any other foundation designs using penetrative methods shall not be permitted other than in accordance with details submitted to and approved by the Local Planning Authority (in consultation with the Environment Agency) for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to groundwater. The development shall

be carried out in accordance with the approved details.

Reason

To avoid damage to the existing trees which represent an important visual amenity in the area, in accordance with The National Planning Policy Framework 2019 and policies of the Core Strategy 2011: SP11 Open spaces and wildlife; SP12 Design and conservation; SP13 High environmental standards, and Saved Policies of the Soutwark Plan 2007: Policy 3.2 Protection of amenity; Policy 3.12 Quality in Design; Policy 3.13 Urban Design and Policy 3.28 Biodiversity.

11. PILING

Piling or any other foundation designs using penetrative methods shall not be permitted other than in accordance with details submitted to and approved by the Local Planning Authority (in consultation with the Environment Agency) for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to groundwater. The development shall be carried out in accordance with the approved details.

Reason

To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other off-site receptors in accordance with saved policy 3.2 'Protection of amenity' of the Soutwark Plan (2007), strategic policy 13' High environmental standards' of the Core Strategy (2011) and the National Planning Policy Framework 2019.

12. SURFACE WATER DRAINAGE

No works shall commence (excluding demolition to ground level only with no grubbing out of foundations), until details of a surface water drainage strategy, incorporating sustainable drainage principles, which achieves a reduction in surface water run-off rates as detailed in the Flood Risk Assessment (prepared by CSG Consulting Engineers Ltd, dated July 2017) during a 1% Annual Exceedance Probability (AEP) event, including 40% allowance for Climate Change, have been submitted to and approved in writing by Local Planning Authority. The site drainage must be constructed to the approved details.

Reason

To minimise the potential for the site to contribute to surface water flooding in accordance with saved policy 3.9 Water of the Soutwark Plan, Strategic policy 13 of the Core Strategy (2011) and guidance in the Sustainable Design and Construction SPD (2009).

Permission is subject to the following Above Grade Condition(s)

13. DETAILED DRAWINGS

Prior to any above grade works hereby authorised begins, detailed drawings and section drawings at a scale of at least 1:10 through:

- the facades;
- the balconies;
- parapets; and
- heads, cills and jambs of all openings

to be used in the carrying out of this permission shall be submitted to and approved by the Local Planning Authority. The development shall not be carried out otherwise than in accordance with any such approval given.

Reason

In order that the Local Planning Authority may be satisfied as to the quality of the design and details in accordance with saved policies 3.12 Quality in Design and 3.13 Urban Design of the Southwark Plan 2007.

14. SECURED BY DESIGN

a) Prior to the commencement of works above grade, details of the security measures to minimise the risk of crime and to meet the specific security needs of the development (in accordance with the principles and objectives of Secured by Design) shall be submitted to and approved in writing by the Local Planning Authority.

b) Prior to first occupation of the development hereby approved, a satisfactory Secured by Design inspection must take place. The resulting Secured by Design certificate shall be submitted to and approved by the Local Planning Authority.

Reason

In pursuance of the Local Planning Authority's duty under section 17 of the Crime and Disorder Act 1998 to consider crime and disorder implications in exercising its planning functions and to improve community safety and crime prevention, in accordance with: the National Planning Policy Framework 2019; Strategic Policy 12 (Design and Conservation) of the Core Strategy 2011, and; Saved Policy 3.14 (Designing out crime) of the Southwark Plan 2007.

15. HARD AND SOFT LANDSCAPING

Before any above grade work hereby authorised begins, detailed drawings of a hard and soft landscaping scheme showing the treatment of all parts of the site not covered by buildings (including cross sections, surfacing materials of any parking, access, or pathways layouts, materials and edge details), shall be submitted to and approved in writing by the Local Planning Authority. The landscaping shall not be carried out otherwise than in accordance with any such approval given and shall be retained for the duration of the use.

The planting, seeding and/or turfing shall be carried out in the first planting season following completion of building works and any trees or shrubs that is found to be dead, dying, severely damaged or diseased within five years of the completion of the building works OR five years of the carrying out of the landscaping scheme (whichever is later), shall be replaced in the next planting season by specimens of the same size and species in the first suitable planting season. Planting shall comply to BS: 4428 Code of practice for general landscaping operations, BS: 5837 (2012) Trees in relation to demolition, design and construction and BS 7370-4:1993 Grounds maintenance Recommendations for maintenance of soft landscape (other than amenity turf).

Reason:

So that the Council may be satisfied with the details of the landscaping scheme, in accordance with: Chapters 8, 12, 15 and 16 of the National Planning Policy Framework 2019; Strategic Policies 11 (Open Spaces and Wildlife), 12 (Design and conservation) and 13 (High Environmental Standards) of The Core Strategy 2011, and; Saved Policies 3.2 (Protection of Amenity), 3.12 (Quality in Design) 3.13 (Urban Design) and 3.28 (Biodiversity) of the Southwark Plan 2007.

16. GREEN ROOFS FOR BIODIVERSITY

Before any above grade work hereby authorised begins, details of the biodiversity (green/brown) roof(s) shall be submitted to and approved in writing by the Local Planning Authority. The biodiversity (green/brown) roof(s) shall be:

- * biodiversity based with extensive substrate base (depth 80-150mm);
 - * laid out in accordance with agreed plans; and
-

* planted/seeded with an agreed mix of species within the first planting season following the practical completion of the building works (focused on wildflower planting, and no more than a maximum of 25% sedum coverage).

The biodiversity (green/brown) roof shall not be used as an amenity or sitting out space of any kind whatsoever and shall only be used in the case of essential maintenance or repair, or escape in case of emergency.

The biodiversity roof(s) shall be carried out strictly in accordance with the details so approved and shall be maintained as such thereafter.

Discharge of this condition will be granted on receiving the details of the green/brown roof(s) and Southwark Council agreeing the submitted plans, and once the green/brown roof(s) are completed in full in accordance to the agreed plans. A post completion assessment will be required to confirm the roof has been constructed to the agreed specification.

Reason:

To ensure the development provides the maximum possible provision towards creation of habitats and valuable areas for biodiversity in accordance with: Policies 2.18 (Green Infrastructure: the Multifunctional Network of Green and Open Spaces), 5.3 (Sustainable Design and Construction), 5.10 (Urban Greening) and 5.11 (Green Roofs and Development Site Environs) of the London Plan 2016; Strategic Policy 11 (Design and Conservation) of the Core Strategy 2011, and; Saved Policy 3.28 (Biodiversity) of the Southwark Plan 2007.

17. MATERIAL SAMPLES

Prior to above grade works commencing, material samples of all external facing materials, including a 1sqm sample panel of brickwork, to be used in the carrying out of this permission shall be presented on site and approved in writing by the Local Planning Authority. The development shall not be carried out otherwise than in accordance with any such approval given.

Reason:

In order to ensure that these samples will make an acceptable contextual response in terms of materials to be used, and achieve a quality of design and detailing in accordance with the National Planning Policy Framework 2019, Strategic Policy 12 - Design and Conservation of the Core Strategy 2011 and Saved Policies: 3.12 Quality in Design and 3.13 Urban Design of the Southwark Plan 2007.

18. NESTING FEATURES

Prior to the commencement of above grade works, details of bat nesting features to be incorporated in the development shall be submitted to and approved in writing by the Local Planning Authority. No less than 3 x bat tubes shall be provided and the details shall include the exact location, specification and design of the habitats on the main elevation of the building facing the park. The bat tubes shall be installed with the development in accordance with the approved details and prior to the building.

Reason

To ensure the development provides the maximum possible provision towards creation of habitats and valuable areas for biodiversity in accordance with policies: 5.10 and 7.19 of the London Plan (2016), Saved Policy 3.28 of the Southwark Plan (2007) and Strategic Policy 11 of the Core Strategy (2011).

19. VENTILATION AND AIR QUALITY

a) Prior to the commencement of above grade works, the scheme of mechanical ventilation for the

development, including an appropriate inlet, appropriate outlet, filtration mechanism, details of sound attenuation for any necessary plant and any management, has been submitted to and approved by the Local Planning Authority. The accommodation shall be fitted with a silent running extract ventilation system that will achieve compliance with Building Regulations Approved Document F and L. The development shall not be carried out otherwise than in accordance with any approval given and shall be carried out before the first occupation of the development.

b) Prior to first occupation of the development, a validation report shall be submitted to the Local Planning Authority for approval in writing.

Reason:

In order to ensure that the ventilation of the residential elements is adequate and is protected from environmental noise and pollution and will not detract from the appearance of the building in the interests of amenity in accordance with the National Planning Policy Framework (2019), Strategic Policy 13 High Environmental Standards of the Core Strategy (2011) and Saved Policy 3.2 Protection of Amenity of the Southwark Plan (2007).

20. CYCLE PARKING

Prior to the commencement of above grade works, details (1:50 scale drawings, technical specification and product information sheets) of the facilities to be provided for the secure and covered storage of cycles for residents and staff, including the Brompton bike storage, and the facilities for the storage of visitor cycles shall be submitted to and approved in writing by the Local Planning Authority. Thereafter, such facilities shall be retained and the space used for no other purpose and the development shall not be carried out otherwise in accordance with any such approval given.

Reason

To ensure that satisfactory safe and secure bicycle parking is provided and retained for the benefit of the users and occupiers of the building in order to encourage the use of alternative means of transport and to reduce reliance on the use of the private car in accordance with: the National Planning Policy Framework 2019; Strategic Policy 2 (Sustainable Transport) of the Core Strategy, and; Saved Policy 5.3 (Walking and Cycling) of the Southwark Plan 2007.

Permission is subject to the following Pre-Occupation Condition(s)

21. PLANT NOISE

Prior to first occupation of the development, details of the validation test, associated noise levels and any necessary mitigation for any plant shall be submitted to and approved by the Local Planning Authority. The Rated sound level from any plant, together with any associated ducting shall not exceed the Background sound level (LA90 15min) at the nearest noise sensitive premises. The Specific plant sound level shall be 10dB(A) or more below the background sound level in this location. For the purposes of this condition the Background, Rating and Specific Sound levels shall be calculated fully in accordance with the methodology of BS4142:2014. The plant and equipment shall be installed and constructed in accordance with the approval given and shall be permanently maintained thereafter.

Reason:

To ensure that occupiers of neighbouring premises do not suffer a loss of amenity by reason of noise nuisance or the local environment from noise creep due to plant and machinery in accordance with the National Planning Policy Framework (2019), Strategic Policy 13 High Environmental Standards of the Core Strategy (2011) and Saved Policy 3.2 Protection of Amenity of the Southwark Plan (2007).

Permission is subject to the following Compliance Condition(s)

22. INTERNAL NOISE LEVELS

The development shall be designed to ensure that the following internal noise levels are not exceeded due to environmental noise:

Bedrooms - 35dB LAeq T+, 30 dB LAeq T*, 45dB LAFmax T *
Communal living rooms - 35dB LAeq T +

* - Night-time 8 hours between 23:00-07:00
+ - Daytime 16 hours between 07:00-23:00.

Reason:

To ensure that the occupiers and users of the development do not suffer a loss of amenity by reason of excess noise from environmental and transportation sources in accordance with Strategic Policy 13 'High environmental standards' of the Core Strategy (2011), Saved Policies 3.2 'Protection of amenity' and 4.2 'Quality of residential accommodation' of the Southwark Plan (2007), and the National Planning Policy Framework 2019.

23. HOURS OF USE OF OUTDOOR AMENITY AREAS

Other than for maintenance purposes, repair purposes or means of escape, the outdoor amenity areas (garden and roof terraces) shall not be used outside of the following hours: 7am to 9pm on Mondays to Sundays (including Bank Holidays)

Reason:

To ensure that occupiers of neighbouring premises do not suffer a loss of amenity by reason of noise nuisance in accordance with: the National Planning Policy Framework (2019), Strategic Policy 13 (High Environmental Standards) of the Core Strategy (2011), and Saved Policy 3.2 (Protection of Amenity) of the Southwark Plan (2007).

24. FLOOD RISK ASSESSMENT

The development shall be constructed in accordance with the finished floor levels and mitigation measures as detailed in the Flood Risk Assessment Surface Water Strategy and Sustainable Drainage Assessment by CSG (dated July 2017), unless an alternative flood risk assessment is submitted to and approved by the Local Planning Authority.

Reason:

To ensure: the development is designed safely in reference to flood risk in accordance with The National Planning Policy Framework (2019), Strategic Policy 13 High Environmental Standards of the Core Strategy (2011) and Saved Policy 3.9 Water of the Southwark Plan (2007).

25. ENERGY STATEMENT

The development shall be constructed in accordance with the energy efficiency measures, CHP and provision of photovoltaic panels to achieve a minimum 40% reduction in carbon dioxide emissions as detailed in the Energy Statement and BREEAM Pre-Assessment by Focus Consultants (dated August 2017), unless an alternative energy assessment is submitted to and approved by the Local Planning Authority.

Reason:

To ensure the proposal complies with the National Planning Policy Framework (2019), Policy 5.2 of the London Plan (2016), Strategic Policy 13 - High Environmental Standards of the Core Strategy (2011) and Saved Policies 3.3 Sustainability and 3.4 Energy Efficiency of the Southwark Plan (2007).

26. ROOFS TO BE USED ONLY IN EMERGENCY

The roofs of the building hereby permitted shall not be used outside the terrace areas annotated on the approved drawings shall not be used other than as a means of escape and shall not be used for any other purpose including use as a roof terrace or balcony or for the purpose of sitting out.

Reason:

In order that the privacy of neighbouring properties may be protected from overlooking from use of the roof area in accordance with the National Planning Policy Framework (2019), Strategic Policy 13 High environmental standards of the Core Strategy (2011) and Saved Policy 3.2 'Protection of Amenity' of the Southwark Plan (2007).

27. RESTRICTION ON THE INSTALLATION OF TELECOMMUNICATIONS EQUIPMENT

Notwithstanding the provisions of Part 16 The Town & Country Planning (General Permitted Development) Order 2015 (as amended or re-enacted) no external telecommunications equipment or structures shall be placed on the roof or any other part of a building hereby permitted.

Reason:

In order to ensure that no telecommunications plant or equipment which might be detrimental to the design and appearance of the building and visual amenity of the area is installed on the roof of the building in accordance with: the National Planning Policy Framework (2019), Strategic Policy 12 (Design and Conservation) of the Core Strategy (2011), and; Saved Policies 3.2 (Protection of Amenity) and 3.13 (Urban Design) of the Southwark Plan (2007).

28. REFUSE STORAGE

Before the first occupation of the building hereby permitted, details of the refuse storage arrangements shall be submitted to and approved by the Local Planning Authority. The development shall be operated in accordance with the approved collection arrangements for the duration of the development.

The refuse storage shall be provided as detailed on the drawings hereby approved and shall be made available for use by the occupiers of the premises prior to the first occupation of the building. The facilities provided shall thereafter be retained and shall not be used or the space used for any other purpose.

Reason

To ensure that the refuse will be appropriately stored within the site thereby protecting the amenity of the site and the area in general from litter, odour and potential vermin/pest nuisance in accordance with: the National Planning Policy Framework 2019; Strategic Policy 13 (High Environmental Standards) of the Core Strategy 2011, and; Saved Policies 3.2 (Protection of Amenity) and 3.7 (Waste Reduction) of the Southwark Plan 2007.

Permission is subject to the following Special Condition(s)**29. BREEAM REPORT AND POST CONSTRUCTION REVIEW**

- a. Prior to first occupation of the development hereby permitted, the Local Planning Authority shall receive from the applicant and give written approval of an interim report/letter (together with any supporting evidence) from the licensed BREEAM assessor. The report/letter shall confirm that sufficient progress has been made in terms of detailed design, procurement and construction to be reasonably well assured that the development hereby approved will, once completed, achieve the agreed BREEAM Standards.
- b. Within six months of first occupation of the development hereby permitted, a certified Post Construction Review (or other verification process agreed with the local planning authority) shall be submitted to and approved in writing by the Local Planning Authority, confirming that the agreed BREEAM standards have been met.

Reason

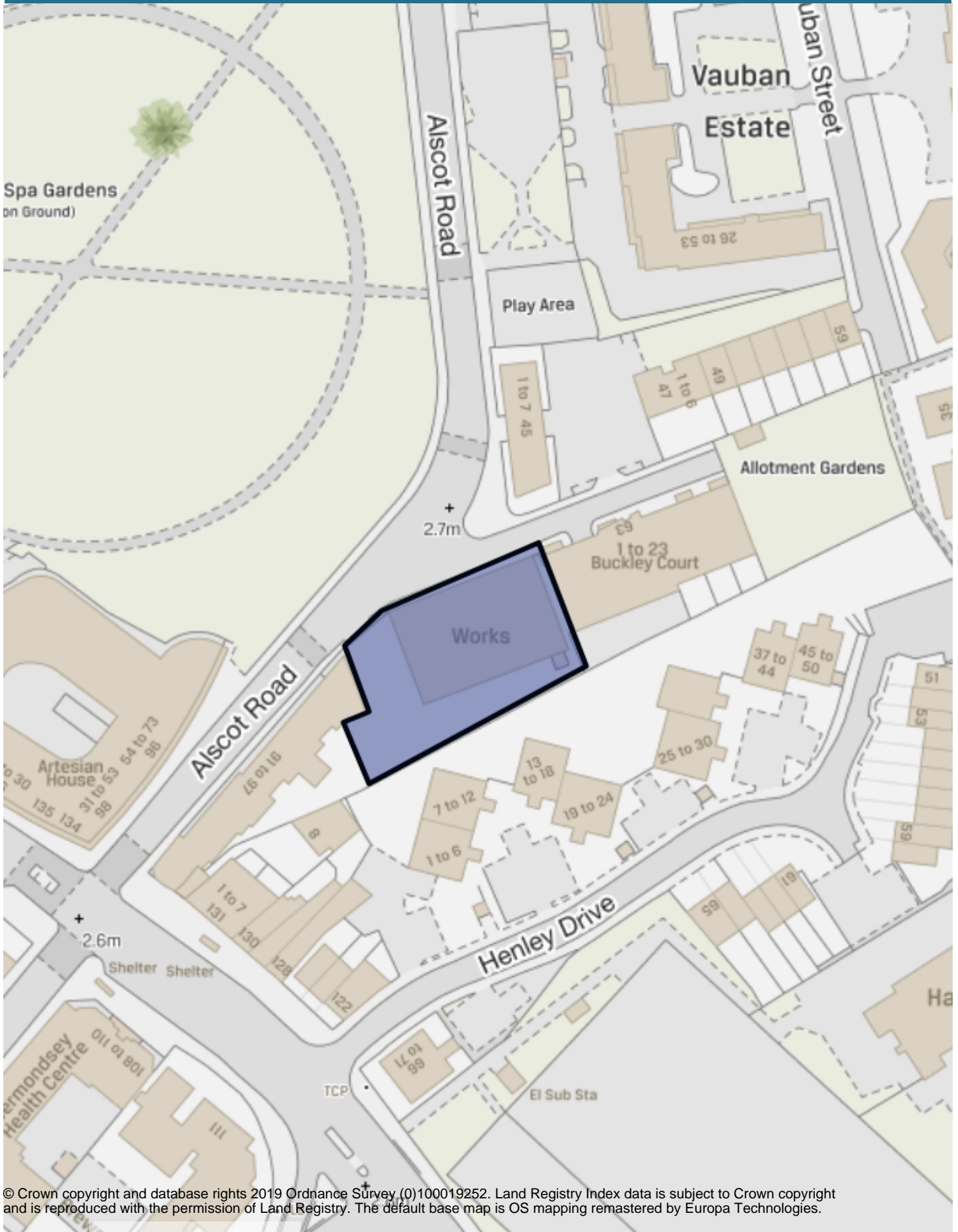
To ensure the proposal complies with: The National Planning Policy Framework 2019; Strategic Policy 13 (High Environmental Standards) of The Core Strategy 2011, and; Saved Policies 3.3 (Sustainability) and 3.4 (Energy Efficiency) of the Southwark Plan 2007

30. ARCHAEOLOGY REPORT SITE WORK

Within six months of the completion of archaeological site works, an assessment report detailing the proposals for post-excavation works, publication of the site and preparation of the archive shall be submitted to and approved in writing by the Local Planning Authority and that the works detailed in this assessment report shall not be carried out otherwise than in accordance with any such approval given.

Reason

In order that the archaeological interests of the site are secured with regard to the details of the post-excavation works, publication and archiving to ensure the preservation of archaeological remains by record in accordance with Strategic Policy 12 - Design and Conservation of the Core Strategy 2011, Saved Policy 3.19 Archaeology of the Southwark Plan 2007 and the National Planning Policy Framework 2019.



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18-Feb-2020

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Item No. 6.2	Classification: Open	Date: 3 March 2020	Meeting Name: Planning Committee
Report title:	Development Management planning application: Application 18/AP/2295 for: Full Planning Application Address: 77-89 ALSCOT ROAD, LONDON SE1 3AW Proposal: Redevelopment of site to provide 143 student bedrooms in a building ranging from 3- to 7-storeys (plus basement) and ancillary bin store, cycle store, laundry and office/reception, car parking, substation, associated landscaping, and alterations to the vehicle access. Removal of a street tree on Alscot Road and works to the highway.		
Ward(s) or groups affected:	South Bermondsey		
From:	Director of Planning		
Application Start Date 30/07/2018		Application Expiry Date 29/10/2018	
Earliest Decision Date 02/09/2018			

RECOMMENDATION

1. a) That planning permission be granted, subject to conditions and the applicant entering into an appropriate legal agreement.
- b) That in the event that the requirements of a) are not met by 3 June 2020, the director of planning be authorised to refuse planning permission (if appropriate) for the reasons set out in paragraph 217.

EXECUTIVE SUMMARY

2. This application is referred to the planning committee as it is a major application for which five or more objections have been received.
3. The proposal is for the redevelopment of this light industrial site with a student housing building of three to seven storeys, plus a basement level. It would provide 143 student bedrooms as well as the associated communal rooms, reception, laundry, cycle and refuse storage. The front area and rear gardens would be landscaped and a rear car parking area provided.
4. The proposed student housing development would be a direct let scheme, that is, it is not linked to any specific University or college. While the site is outside a town centre, it is in a comparatively central part of the borough, and the location requirement is removed in the emerging student housing policy P5 of the New Southwark Plan. A payment in lieu of £5.7m is proposed for affordable housing as it is not practical to include conventional housing on site and a feasible amount of student housing on this

relatively small site. This payment in lieu is above the maximum reasonable payment for a viable development as agreed by the council's expert assessor, and is equivalent to 35% affordable housing.

5. The massing of the building is considered appropriate fronting onto Bermondsey Spa Gardens, and its architectural detailing. It would provide good quality student housing and would not cause unacceptable harm to the amenity of neighbouring properties. Planning obligations would secure the necessary highway works, transport improvements, travel plan and management arrangements. Proposed conditions would ensure the proposal accords with policies on sustainability, archaeology, biodiversity and flood risk.
6. The application is recommended for approval, subject to conditions and completion of a section 106 agreement.

BACKGROUND INFORMATION

Site location and description

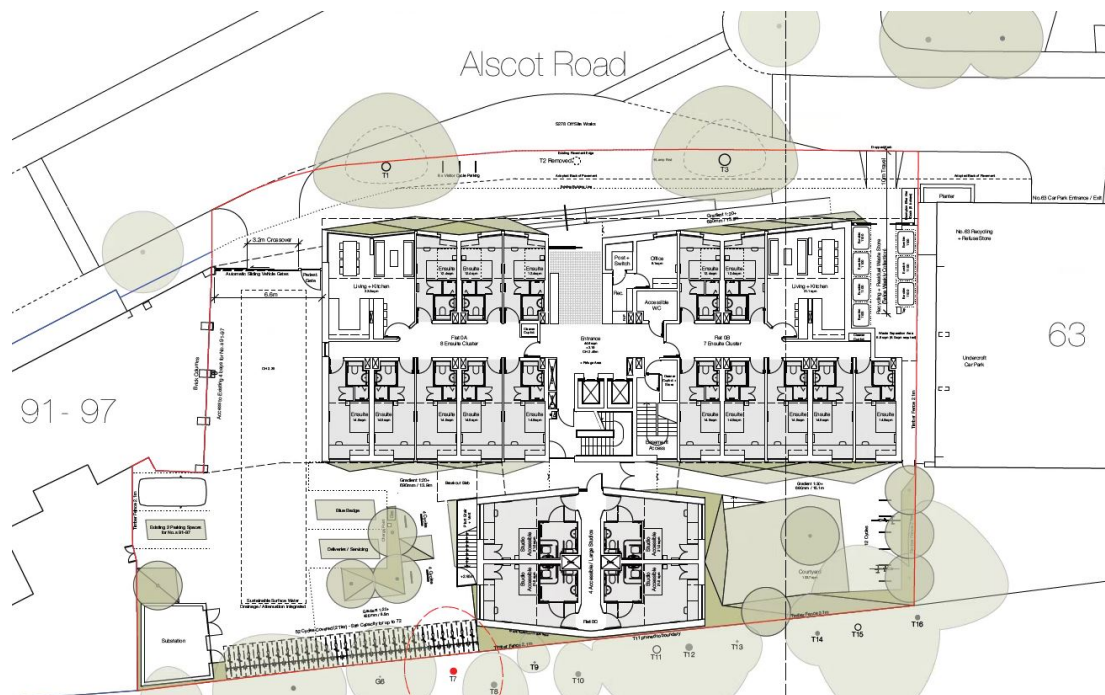
7. The site is on the southern side of Alscot Road, facing onto Bermondsey Spa Gardens. A 5.6m high building, constructed in the late 1970s from brick and metal cladding, covers 600sqm of the site. It is currently used for artist workshops and was previously used by a legal publishing business as a Class B1c light industrial use. The rest of the site is hard-standing, used for car parking, and the entrance gates also provide access to undercroft parking along the western boundary for the adjoining block of flats. The application site includes the pavement in front of the site which has three large street trees. Excluding this area of public highway, the site has an area of 1,260sqm (0.126 hectares).
8. It is within the urban density zone, flood zone 3, and the air quality management area. The site has a PTAL rating of 2, although the area immediately to the west has a PTAL of 3, and immediately to the south has a PTAL of 4. There are bus services along Grange Road to the west, and Bermondsey Underground station is a 1km walk.
9. To the north are Bermondsey Spa Gardens, which are designated as borough open land. Further north, on Spa Road, are the former Bermondsey public library and Bermondsey municipal offices, which are grade II listed buildings. These are 150m from the application site and are the closest listed buildings.
10. The site adjoins residential properties on three of its boundaries. To the east is Buckley Court, a 5-storey block of flats, and beyond this allotments at the eastern end of Alscot Road. To the south are three-storey blocks of flats on Henley Drive with their communal gardens and car parking. To the west is nos. 91-97 Alscot Road, a five-storey residential building. Also to the west on the north side of Alscot Road is the larger Artesian House with ground floor dentist and health centre and flats above, which rises from five storeys to nine storeys closest to the application site.
11. The nearest conservation areas are the Thorburn Square Conservation Area, 180m to the south-east, and the Bermondsey Street Conservation Area 210m to the north-west.

Details of proposal

12. This application proposes to redevelop this site with a student housing scheme. The existing building would be demolished, and a building of between three and seven storeys constructed to provide 143 student bedrooms (for 143 student bed spaces)

and communal rooms. During the application period, the applicant has been in discussions with different higher education institutions (HEIs) and provided letters of support from these HEIs, however in order to support the increased payment in lieu now proposed, the scheme would be direct let, rather than have a nominations agreement with an HEI. The applicant is seeking consent for term-time use of the development for student housing and also for letting to students only during the summer recess as well.

13. A basement under part of the building would provide a plant room, common room, flexible room (for use as a cinema or gym for example) and laundry.
14. One of the three street trees in front of the site near the centre of the proposed building would be removed. The pavement at the front of the site would be widened by setting the building further back than the existing, and the recess at ground floor level allows for some planting to be included in front of the windows. The ground floor of the main part of the building would provide a reception area in the centre of the frontage and a staff office, as well as 19 student bedrooms and two shared living rooms and kitchens. A refuse store, accessed from the front pavement would be located on the eastern side, for the students and the vehicle access on the western side.



Proposed ground floor plan

15. The upper six floors of the main building and upper two floors of the three-storey section would contain a further 124 student bedrooms. There are three typical room layouts: 104 x en-suite rooms (14.5sqm), four larger rooms with en-suite (19.5sqm), and 35 studio rooms (21.7sqm to 23.8sqm - eight of which would be accessible studios). The lower four floors are each arranged as two clusters, with the communal rooms at each end of the building for the lower floors. The top two floors would be studios without communal rooms.
16. The building would be five storeys high (14.5m) at the western side and this height forms the main shoulder height of the frontage. Two further storeys to take the building to seven-storeys (20.0m) high across most of the width would be set 1.4m back from the front façade, and step down to six storeys (17.2m) at the eastern side.

The building would be 42.5m wide and 15m deep.

17. At the rear an addition is proposed up to the southern boundary; this would be 6.3m high, 11m deep and 13.8m wide to provide four accessible studios per floor for two storeys, and with a smaller third floor above to provide another two studio rooms.
18. The front façade frame is proposed to be built in a glass reinforced concrete (GRC), with angled brick panels and the windows creating a regular pattern to the middle four floors. The upper two levels would include a frame as a form of colonnade, with the wall set back from the front and rear façades, and be in white brick.



Visual of the front façade showing the proposed articulation

19. The vehicle access on the western side of the site would be retained and adjusted, leading to four car parking spaces. Two spaces would be for nos. 91-97 Alscot Road to reprovide existing spaces, and two for the development (one blue badge and one for servicing) with electric vehicle charging points. Covered cycle parking would be provided in this area along the rear boundary as well as Sheffield stands here and along the eastern boundary. A single storey substation 2.7m high, 4.5m by 5.2m wide would be located in the south-western rear corner of the site.
20. A communal garden area is proposed in the south-eastern corner of the site to form the main amenity area for the students. Smaller amenity spaces include a small terrace (2.7sqm) accessed from a shared living room/kitchen on each floor, and a covered terrace at fifth floor level (11.6sqm). The main roof would be a green roof with PV panels, and the small roofs at third, fourth and fifth floor levels would be green roofs.

Amendments

21. Amended drawings were received which raised the ground floor level to address the flooding risk concern. By reducing the ceiling heights throughout the building, the overall building heights was not increased. The façade materials were changed from GRC panels to be in brick, and the top two floors changed from a render finish to a white brick. The landscaping was amended following officer comment and also to

allow a second door to be added to the substation. Cycle parking at the rear of the site has been increased from 52 spaces to 72 spaces.

22. The applicant chose to make additional changes following discussions with HEIs, who would require a higher number of studio rooms and fewer cluster rooms. These changes resulted in a reduction from the 155 bedrooms originally proposed to the 143 bedrooms now proposed. Updated floorplans for the fifth and sixth floors were provided to show the revised room arrangements, replacing the original cluster flats and communal rooms with studios. The applicant chose to remove terraces on the front at fifth and sixth floors.
23. During the application, the applicant provided revised documents (e.g. the flood risk assessment) and drawings. The applicant also chose to provide additional documents to try to reduce the number of pre-commencement conditions, such as a written scheme of investigation for archaeology.

Planning history

24. See Appendix 3 for the relevant planning history of the application site.

Planning history of adjoining and nearby sites

25. 11-13 Spa Road – current application, 160m to the north-west of the site:
 - 17/AP/3281 – Demolition of existing buildings and construction of a part 4, 5, and 6 storey building to form 185 students rooms (sui generis), communal student facilities, plant room, cycle storage, gym, recycling & refuse facilities and associated works.

This application is included for consideration elsewhere on this agenda.

Buckley Court 63 Alscot Road:

- 10/AP/2824 – Clearance of site and erection of a part 4 / part 5 storey building to provide 23 new homes (6x 1 bed, 12 x 2 bed, 4 x 3 bed & 1 x 4 bed) including 7 no. affordable units and bicycle and car parking, refuse / recycling facilities, access, landscaping and amenity areas.
Decision date: 7/1/2011 Decision: Grant with legal agreement. Constructed.

91-97 Alscot Road:

- 0200427 – Erection of new 4 storey building containing 14 flats with parking and gardens.
Decision date: 7/8/2002 Decision: Granted.
- 02/AP/1748 – Construction of a 5 storey building comprising 14 flats with parking and gardens (Amendment to planning permission dated 07/08/02 LBS Reg 0200427).
Decision date: 5/2/2003 Decision: Granted. Constructed.

KEY ISSUES FOR CONSIDERATION

Summary of main issues

26. The main issues to be considered in respect of this application are:
 - Principle of development in terms of land use;
 - Environmental impact assessment;

- Design;
- Density;
- Quality of accommodation;
- Affordable housing;
- Impact of proposed development on the amenity of adjoining occupiers;
- Archaeology;
- Sustainable development implications;
- Trees, landscaping and ecology;
- Transport and highways;
- Planning obligations and Community Infrastructure Levy (CIL);
- Community involvement and engagement;
- Community impact and equalities assessment;
- Human rights and;
- Positive and proactive statement.

27. These matters are discussed in detail in the Assessment section of this report.

Legal context

28. Section 38(6) of the Planning and Compulsory Purchase Act (2004) requires planning applications to be determined in accordance with the development plan, unless material considerations indicate otherwise. In this instance the development plan comprises the London Plan (2016), the Core Strategy (2011), and the Saved Southwark Plan (2007).
29. There are also specific statutory duties in respect of the Public Sector Equalities Duty which are highlighted in the relevant sections below and in the overall assessment at the end of the report.

Adopted planning policy

National Planning Policy Framework (NPPF)

30. The National Planning Policy Framework (NPPF) is a material consideration. The revised NPPF was published in February 2019 which sets out the national planning policy and how this needs to be applied. The NPPF focuses on sustainable development with three key objectives: economic, social and environmental.
31. Paragraph 212 states that the policies in the Framework are material considerations which should be taken into account in dealing with applications. The following sections are relevant:

Chapter 2 Achieving sustainable development
 Chapter 5 Delivering a sufficient supply of homes
 Chapter 6 Building a strong, competitive economy
 Chapter 8 Promoting healthy and safe communities
 Chapter 9 Promoting sustainable transport
 Chapter 11 Making effective use of land
 Chapter 12 Achieving well-designed places
 Chapter 14 Meeting the challenge of climate change, flooding and coastal change
 Chapter 15 Conserving and enhancing the natural environment
 Chapter 16 Conserving and enhancing the historic environment.

The London Plan 2016

32. The London Plan is the regional planning framework and was adopted in 2016. The relevant policies of the London Plan 2016 are:
- Policy 3.3 Increasing housing supply
 - Policy 3.4 Optimising housing potential
 - Policy 3.5 Quality and design of housing developments
 - Policy 3.8 Housing choice
 - Policy 3.9 Mixed and balanced communities
 - Policy 3.10 Definition of affordable housing
 - Policy 3.11 Affordable housing targets
 - Policy 3.12 Negotiating affordable housing on individual private residential and mixed use schemes
 - Policy 3.13 Affordable housing thresholds
 - Policy 3.18 Education facilities
 - Policy 4.4 Managing industrial land and premises
 - Policy 4.10 New and emerging economic sectors
 - Policy 4.12 Improving opportunities for all
 - Policy 5.2 Minimising carbon dioxide emissions
 - Policy 5.3 Sustainable design and construction
 - Policy 5.7 Renewable energy
 - Policy 5.9 Overheating and cooling
 - Policy 5.10 Urban greening
 - Policy 5.11 Green roofs and development site environs
 - Policy 5.12 Flood risk management
 - Policy 5.13 Sustainable drainage
 - Policy 5.14 Water quality and waste water infrastructure
 - Policy 5.15 Water use and supplies
 - Policy 5.21 Contaminated land
 - Policy 6.3 Assessing effects of development on transport capacity
 - Policy 6.5 Funding Crossrail and other strategically important transport infrastructure
 - Policy 6.9 Cycling
 - Policy 6.10 Walking
 - Policy 6.13 Parking
 - Policy 7.1 Lifetime neighbourhoods
 - Policy 7.2 An inclusive environment
 - Policy 7.3 Designing out crime
 - Policy 7.4 Local character
 - Policy 7.5 Public realm
 - Policy 7.6 Architecture
 - Policy 7.8 Heritage assets and archaeology
 - Policy 7.14 Improving air quality
 - Policy 7.15 Reducing and managing noise, improving and enhancing the acoustic environment and promoting appropriate soundscapes
 - Policy 7.19 Biodiversity and access to nature
 - Policy 8.2 Planning obligations
 - Policy 8.3 Community Infrastructure Levy.

Core Strategy 2011

33. The Core Strategy was adopted in 2011 providing the spatial planning strategy for the borough. The strategic policies in the Core Strategy are relevant alongside the saved Southwark Plan (2007) policies. The relevant policies of the Core Strategy 2011 are:

Strategic Policy 1 – Sustainable development
 Strategic Policy 2 – Sustainable transport

Strategic Policy 5 – Providing new homes
 Strategic Policy 6 – Homes for people on different incomes
 Strategic Policy 8 – Student homes
 Strategic Policy 11 – Open spaces and wildlife
 Strategic Policy 12 – Design and conservation
 Strategic Policy 13 – High environmental standards
 Strategic Policy 14 – Implementation and delivery.

Southwark Plan 2007 (July) - saved policies

34. In 2013, the council resolved to 'save' all of the policies in the Southwark Plan 2007 unless they had been updated by the Core Strategy with the exception of Policy 1.8 (location of retail outside town centres). Paragraph 213 of the NPPF states that existing policies should not be considered out of date simply because they were adopted or made prior to publication of the Framework. Due weight should be given to them, according to their degree of consistency with the Framework. The relevant policies of the Southwark Plan 2007 are:

Policy 1.1 Access to Employment Opportunities
 Policy 1.4 Employment sites outside the Preferred Office Locations and Preferred Industrial Locations
 Policy 2.5 Planning Obligations
 Policy 3.1 Environmental Effects
 Policy 3.2 Protection of Amenity
 Policy 3.3 Sustainability Assessment
 Policy 3.4 Energy Efficiency
 Policy 3.6 Air Quality
 Policy 3.7 Waste Reduction
 Policy 3.9 Water
 Policy 3.11 Efficient Use of Land
 Policy 3.12 Quality in Design
 Policy 3.13 Urban Design
 Policy 3.14 Designing Out Crime
 Policy 3.19 Archaeology
 Policy 3.28 Biodiversity
 Policy 4.2 Quality of residential accommodation
 Policy 4.4 Affordable Housing
 Policy 4.7 Non self-contained housing for identified user groups
 Policy 5.1 Locating Developments
 Policy 5.2 Transport Impacts
 Policy 5.3 Walking and Cycling
 Policy 5.6 Car Parking
 Policy 5.7 Parking Standards for Disabled People and the Mobility Impaired
 Policy 5.8 Other Parking.

Southwark Supplementary Planning Documents

35. The following Supplementary Planning Documents issued by the council are material considerations:

2015 Technical Update to the council's Residential Design Standards SPD 2011
 Design and Access Statements SPD (2007)
 Development Viability SPD (2016)
 Draft Affordable Housing SPD (2011)
 Section 106 Planning Obligations and CIL SPD (2015)
 Sustainable Design and Construction SPD (2009)

Sustainability Assessment SPD (2009).

GLA Supplementary Planning Guidance

36. The following Supplementary Planning Guidance issued by the GLA are material considerations:

Mayor of London Housing Supplementary Planning Guidance (2017)
Homes for Londoners: Affordable Housing and Viability SPG (2017)

Emerging planning policy

37. The draft development plan documents of the draft New London Plan and draft New Southwark Plan are material considerations that can be given weight.

Draft London Plan

38. The draft New London Plan was published by the GLA on 30 November 2017 and the first and only stage of consultation closed on 2 March 2018. Minor suggested changes to the plan were published on 13 August 2018 and an Examination in Public (EIP) began on 15 January 2019 and closed in May 2019.
39. The Inspector's report and Panel Recommendations were issued to the Mayor of London in October 2019. The Mayor then issued his intentions to publish the London Plan along with a statement of reasons for not including all of the Inspector's recommendations to the Secretary of State. The Secretary of State was due to respond to the Mayor before 17 February 2020. Until the London Plan reaches formal adoption it can only be attributed limited weight.
40. The draft New London Plan is the strategic plan which sets out an integrated economic, environmental, transport and social framework for the development of London for the period from 2019 to 2041. However the annual housing targets are set for the first ten years only of the Plan. A range of consultation responses were received to the draft policies from London councils, individuals, businesses, campaign groups, community groups, government bodies etc.
41. Due to the stage it has reached, just before its adoption, the New London Plan can be given weight in decision making, and it is noted that the GLA when commenting upon referable applications does accord substantial weight to many of the emerging policies. The following policies are relevant to this proposal:

GG4: Delivering the homes Londoners need

D1: London's form, character and capacity for growth

D2: Infrastructure requirements for sustainable densities

D3: Optimising site capacity through the design-led approach

D4: Delivering good design

D5: Inclusive design

D6: Housing quality and standards

D7: Accessible housing

H1: Increasing housing supply

H4: Delivering affordable housing

H15: Purpose built student accommodation

E4: Land for industry, logistics and services to support London's economic function

HC1: Heritage conservation and growth

G5: Urban greening

G6: Biodiversity and access to nature

G7: Trees and woodlands
 S11: Improving air quality
 S12: Minimising greenhouse gas emissions
 S112: Flood risk management
 S113: Sustainable drainage
 T4: Assessing and mitigating transport impacts
 T5: Cycling.

New Southwark Plan

42. For the last five years the council has been preparing the New Southwark Plan (NSP) which will replace the saved policies of the 2007 Southwark Plan and the 2011 Core Strategy. The council concluded consultation on the Proposed Submission version (Regulation 19) on 27 February 2018. The New Southwark Plan Proposed Submission Version: Amended Policies January 2019 consultation closed in May 2019.
43. The New Southwark Plan Submission Version – Proposed Modifications for Examination was submitted to the Secretary of State in January 2020 for Local Plan Examination. It is anticipated that the plan will be adopted in late 2020 following an Examination in Public. As the NSP is not yet adopted policy, it can only be attributed limited weight. Nevertheless paragraph 48 of the NPPF states that decision makers may give weight to relevant policies in emerging plans according to the stage of preparation of the emerging plan, the extent to which there are unresolved objections to the policy and the degree of consistency with the Framework.
44. Paragraph 48 of the NPPF states that decision makers may give weight to relevant policies in emerging development plans according to the stage of preparation, the extent to which there are unresolved objections to the policy and the degree of consistency with the NPPF. As the NSP is not yet adopted policy, it cannot be attributed full weight as a whole, but individual policies can be given weight (as set out below).
45. The evidence base to support the NSP is substantially complete. The NPPF states that the more advanced the preparation of the plan, the more weight can be given. The NSP has been subject to six rounds of consultation and comprehensive consultation reports have been prepared at each stage in response to representations. The council received 332 representations to the Proposed Submission Version (2018) and as a result some policies were amended and further consultation took place in 2019. The council received 131 representations to the Amended Policies consultation. A full consultation report incorporating comments from both stages of the Regulation 19 consultation was prepared alongside Submission. The council is meeting various community planning interest groups, as well as preparing Statements of Common Ground with individuals and organisations who will be taking an active part in the EiP.
46. In response to the various rounds of consultation on the NSP, a variety of comments and objections were received from individuals, groups and businesses. Where no objections were received a draft policy can be given more weight than for policies where objections were received and have not been resolved, particularly where there is little change from current adopted policies. For example, the following NSP policies can be given moderate weight as no objections were received or they are very similar to policies in the development plan:
 - P12 Design of places
 - P13 Design quality
 - P14 Residential design – objections were received to the earlier version of this policy titled ‘Optimising the delivery of new homes.’ The changes made in the

2019 version relate to the removal of the density matrix in line with the draft New London Plan. The draft policy uses standards which are the same as adopted policy and the Residential Design Standards SPD.

- P15 Designing out crime
 - P17 Efficient use of land
 - P22 Archaeology
 - P32 Business relocation
 - P48 Public transport
 - P49 Highway impacts
 - P50 Walking
 - P52 Cycling
 - P53 Car parking (no substantial objections were received, comments related to minimising residential car parking)
 - P55 'Protection of amenity
 - P58 Green infrastructure
 - P59 Biodiversity
 - P60 Trees
 - P61 Reducing waste
 - P63 Contaminated land and hazardous substances
 - P64 Improving air quality
 - P67 Reducing flood risk
 - P68 Sustainability standards.
47. Where draft policies are different from the adopted policy (or are completely new policies) and objections were received, the specifics of those objections and the differences from the adopted policy need to be considered for each planning application proposal. For example,
- P27 Access to employment and training – objection was received relating to the financial burden.
 - P29 Office and business development – objections related to the two year marketing justification and differentiation of B Class uses.
 - P65 Reducing noise pollution and enhancing soundscapes – the agent of change principle in the NPPF must also be considered.
48. Where objections were received to a draft policy and these have not been resolved through revisions, that policy can have only limited weight. In these instances, the degree of change from adopted policy on these topics should also be considered. Examples of these policies include:
- P1 Social rented and intermediate housing – this amends the tenure split in the saved Southwark Plan policy 4.4. The amended policy in 2019 introduced a fast track method for schemes at 40% affordable housing, although this is linked to the draft New London Plan.
 - P5 Student homes – objections were received to the December 2017 version P24 regarding the viability of providing affordable housing or a payment in lieu.
 - P54 Parking standards for disabled people and mobility impaired people.
 - P69 Energy – objections that the December 2017 version P62 being too onerous for the carbon reductions.
49. The NSP responds positively to the NPPF, by incorporating area visions, development management policies and 82 site allocations which plan for the long term delivery of housing. The NSP responds to rapid change which is occurring in Southwark and London as a whole, and responds positively to the changing context of the emerging

New London Plan.

50. In line with paragraph 48 of the NPPF, as both the New London Plan and the New Southwark Plan are at an advanced stage of preparation (the New London Plan further progressed) both can be afforded some material weight and this is detailed in the report where relevant to particular policy issues.

Consultation

51. Details of consultation undertaken in respect of this application are set out in paragraph 221 onwards below and Appendices 1 and 2.
52. Statutory consultation was undertaken on the proposed development including neighbour letters, sites notices and a press notice in Southwark News. The applicant undertook community engagement consulting on the proposals prior to the submission of the planning application. A consultation engagement summary was submitted to support the application to this effect. Further information can be found in paragraph 219 below.

Summary of consultation responses

53. 37 comments were received from members of the public and two organisations regarding the proposed development. 30 of these were objections, and the 7 in support were from two organisations. The issues raised by the submitted objections are summarised as:

- Loss of the existing use
- Student housing being inappropriate for the residential area
- Lack of affordable housing
- Over development and cumulative impacts
- The proposal is too high
- Harm to Bermondsey Spa Gardens
- Harm to neighbour amenity
- Insufficient infrastructure in the area
- Highways impacts
- Loss of the street tree
- Increased litter.

54. The comments in support were in regard to:

- Improved accessibility for students by including audio navigation
- Support comments from staff at Kintore Way Nursery School and Children's Centre that it would be an improvement on the current building on the site, support the student housing as students have undertaken placements at Kintore Way, and the developer has discussed potential improvements at the school.

55. These matters are covered in detail in the remainder of this report.

ASSESSMENT

Principle of proposed development in terms of land use

Loss of employment space on the site

56. The lawful use of the site is as Class B1(c) light industrial and was previously

occupied by a legal publishing company who left the premises as it was no longer a suitable location and had outdated facilities. That company has relocated to Morden. Since 2016, the site has been occupied by an arts organisation that provides affordable workspace for artists, but only on a temporary basis to prevent the site being vandalised or squatted until the redevelopment. Public objections have been received to the loss of the existing use.

57. The site is outside any Strategic Industrial Location or Preferred Industrial Location designation, and it does not meet the criteria of saved policy 1.4 of the Southwark Plan (as it does not have direct access to a classified road, is not within the Central Activities Zone nor a Strategic Cultural Zone). The light-industrial use of the site is not protected by adopted planning policies, and there is no in principle objection to the redevelopment of this brownfield site.
58. It is noted that emerging London Plan policy E7 'Industrial intensification, co-location and substitution' seeks to protect industrial sites. Part c of the draft policy states that non-designated industrial sites should only be redeveloped for mixed use or residential development where there is: 1) no reasonable prospect of the site being used for industrial and related purposes, storage, waste management, utilities etc; or 2) it has been allocated in the development plan for residential or mixed use development; or 3) industrial floorspace is provided as part of the mixed-use intensification. This strategic London-wide policy is in draft, but has been through its Examination in Public and has weight.
59. This 0.12 hectare Alscot Road site might be suitable for redevelopment for light industrial use, however the proximity of the abutting residential properties would require careful design and mitigation to protect neighbour amenity. The site is not allocated in the current or emerging development plan (so part 2 of the draft policy is not applicable), and no industrial floorspace is proposed in the planning application (so part 3 of the draft policy is not addressed). Officers are of the view that the adopted policies within the council's planning documents for the borough, particularly saved policy 1.4 of the Southwark Plan, carry more weight than this draft policy within the emerging regional-level London Plan. Therefore, the redevelopment of this site for a student residential use, instead of a light industrial use or mixed use that re-provides industrial space, should not be refused for this reason.
60. Turning to the emerging New Southwark Plan, draft policy P29 'Office and business development' at part 3 states that development resulting in a loss of employment floorspace must provide a financial contribution towards training and jobs for local people. Part 3 is a recent addition in the January 2020 submission version. Objections were received to the earlier version of this draft policy, however the thrust of the policy is similar to adopted policy 1.4 of the Southwark Plan and the reference in the Planning Obligations SPD (for payments on schemes which reduce employment space in protected employment locations). As set out above, this Alscot Road site does not meet the locational requirement of policy 1.4 and so is not in a protected employment location where the loss of employment floorspace triggers a payment. On this basis, officers consider the adopted policy to have more weight than the emerging policy, and a payment is not required.
61. Draft New Southwark Plan policy P32 'Business Relocation' requires a relocation strategy where small or independent businesses would be displaced by a development. The strategy must demonstrate how potential options have been explored to support existing businesses on sites subject to a planning application for redevelopment that are at risk of displacement as a result of potential redevelopment. The applicant has provided a note on the arts charity SET that has occupied the site since 2016 providing affordable space for artists. SET temporarily occupies otherwise

vacant properties, with the understanding it is a temporary arrangement, at low rent and with a short notice period in the lease. The applicant states that SET have a six month contract with a two month rolling break clause, and has found alternative accommodation in another location. As this site is being occupied by an organisation that is fully aware of the short-term basis, with no option for it to be a long-term basis given the applicant's intended redevelopment of the site, the information provided is considered to sufficiently address this emerging policy.

Provision of student accommodation

62. The site has no allocation in the adopted development plan or draft New Southwark Plan, and is outside any AAP or Opportunity area. Planning policies within the London Plan, Core Strategy and saved Southwark Plan, and within the draft New Southwark Plan and draft New London Plan where they can be given weight, apply to the consideration of this application.
63. Objections were received to the proposed student housing use of the site on the grounds that the location is inappropriate for students and out of character in this residential area, and the cumulative impact of this proposal and the current student housing proposal on Spa Road. Concerns were raised that local services and infrastructure would not be able to cope with the additional population. Comments were received that luxury student developments do not address the need for housing, and cause rising rental charges in London.
64. Student housing is considered as non self-contained accommodation and a "sui generis" use in the Use Classes Order. Student housing is however considered as housing for monitoring purposes through the council's and GLA's monitoring reports. The Core Strategy sets a target of providing at least 24,450 net new homes between 2011 and 2026. The council's London Plan (2016) target is a minimum ten year target of 27,362 homes between 2015 and 2025, i.e. a rate of 2,736 per year. It is noted that the draft New London Plan sets lower targets for the borough (of 23,550 over 10 years) compared with the adopted London Plan of 27,362 over 10 years.
65. The proposed student housing would contribute towards the borough's housing, at a rate of 2.5 student bedrooms being counted as a single home (as set out in the December 2019 draft London Plan, paragraph 4.1.9). With 143 student rooms proposed, the development would count as 57 homes towards meeting the council's housing targets.
66. The council can demonstrate a 5 year supply of housing land, plus the necessary 20% buffer required by the housing delivery test. Through its assessment of the deliverable housing sites in the borough, the 5 year housing land supply with an additional 20% buffer has been identified (and exceeded). This Alscot Road site is not an identified proposal site in any current AAP nor the emerging NSP, therefore its redevelopment for housing has not been anticipated by the borough-wide assessment of deliverable housing sites.
67. While this application site would be appropriate for Class C3 residential development to contribute to the council's general housing supply as part of the windfall allowance for small sites, it has not been assumed for such development in calculating the 5 year housing land supply and buffer. The proposed student housing scheme would not compromise the council's ability to meet its strategic housing targets set in the Core Strategy and London Plan, particularly as student housing contributes towards the borough's housing and given the relatively small size of the site.
68. There is support for student housing in the adopted Southwark policies, London Plan

and Mayor of London's Housing SPG, and within the emerging New Southwark Plan and draft London Plan. These policies are summarised below.

69. London Plan policy 3.18 'Education facilities' requires boroughs to support and maintain London's international reputation as a centre of excellence in higher education, and policy 4.10 'New and emerging economic sectors' at part b requires borough to *"give strong support for London's higher and further education institutions and their developments, recognising their needs for accommodation"*. London Plan policy 3.8 'Housing choice' requires local planning authorities to identify the ranges of needs likely to arise within their areas and ensure that (h) *"strategic and local requirements for student housing meeting a demonstrable need are addressed by working closely with stakeholders in higher and further education and without compromising capacity for conventional homes"*. The supporting text in paragraphs 3.52-3.53C set out further detail, including reference that there could be a requirement for some 20,000-31,000 student places over the 10 years to 2025, but that *"addressing these demands should not compromise capacity to meet the need for conventional dwellings"*. The supporting text also notes that Southwark is one of four central boroughs where 57% of provision for new student accommodation has been concentrated, reflecting the clustering of the HEIs in and around central London.
70. The Mayor of London's Housing SPG in section 3.9 states that specialist student accommodation makes an essential contribution to the attractiveness of London as an academic centre of excellence.
71. Core Strategy strategic policy 8 'Student homes' is consistent with the London Plan and acknowledges there is a need for student housing in Southwark, by stating that development will meet the needs of universities and colleges for new student housing whilst balancing the building of student homes with other types of housing, such as affordable and family housing. This would be achieved by 1) allowing student homes within the town centres and places with good access to public transport services, providing that these do not harm the local character, and 2) requiring 35% of student developments as affordable housing, with a cross reference to strategic policy 6 'Homes for people on different incomes'.
72. Saved policy 4.7 of the Southwark Plan relates to non-self contained accommodation (including student accommodation), and states that it will normally be permitted where 1) the need for and suitability of the accommodation can be demonstrated; 2) its provision does not result in a significant loss of amenity to neighbouring occupiers; 3) there is adequate infrastructure in the area to support any increase in residents and; 4) a satisfactory standard of accommodation, amenities and facilities are provided.
73. These requirements of saved policy 4.7 link into the Residential Design Standards SPD, which sets out at section 4.3 sets out the further information required of a student housing scheme:

"Student housing can be in the form of halls of residence, cluster flats or self-contained units. To ensure that the appropriate levels of student accommodation are supplied in the borough without prejudicing the development of general needs housing, planning applications for student accommodation will have to be accompanied with evidence that there is an identified need for this type of housing, including:

- *A letter from a recognised educational establishment*
- *Confirmation that the accommodation will be affordable to the identified user group*

- *Details of security arrangements*
 - *Details of the long-term management and maintenance arrangements of the student accommodation.*”
74. In terms of emerging policy, both the draft London Plan and draft New Southwark Plan have specific student housing policies.
75. Draft London Plan policy H15 ‘Purpose-built student accommodation’ states in part A that boroughs should seek to ensure the local and strategic need for purpose-built student accommodation is addressed provided that; 1) the development contributes to a mixed and inclusive neighbourhood; 2) it is secured for students; 3) the majority of bedrooms and all affordable student accommodation is secured through a nomination agreement for occupation by students of one or more higher education providers; 4) the maximum level of accommodation is secured as affordable student accommodation and; 5) the accommodation provides adequate functional living space and layout. Part B of emerging policy H15 states that boroughs, student accommodation providers and higher education providers are encouraged to deliver student accommodation in locations well-connected to local services by walking, cycling and public transport, as part of mixed-use regeneration and redevelopment schemes.
76. The supporting text for draft policy H15 states that purpose built student accommodation contributes to meeting London’s overall housing need, and is not in addition to need. It requires 3,500 student bed spaces to be provided annually across London; this is a higher annual figure than the range of the adopted London Plan, suggesting that the need for student housing has increased since 2016. This strategic London-wide need has not been broken down into borough-level targets in the draft London Plan. To demonstrate there is a need for new student housing development, accommodation must be operated directly by an HEI or have an agreement in place with one or more HEIs to provide housing for its students (i.e. a nomination agreement).
77. The draft New Southwark Plan policy P5 states:
- “Development of purpose-built student housing must:*
1. *Provide 10% of student rooms as easily adaptable for occupation by wheelchair users; and*
 2. *When providing direct lets at market rent, provide 35% of the Gross Internal Area of the floorspace as conventional affordable housing, as per policy P4, as a first priority. In addition to this, 27% of student rooms must be let at a rent that is affordable to students as defined by the Mayor of London; or*
 3. *When providing student rooms for nominated further and higher education institutions at affordable student rents as defined by the Mayor of London, provide 35% conventional affordable housing subject to viability, as per policy P4.”*
78. The first reason listed in support of this policy is that there is a need for more student accommodation across the whole of London which needs to be balanced with making sure Southwark has enough sites for other types of homes, including affordable and family homes. The affordable housing element of the current application is considered in a separate section below.
79. The evidence base behind the NSP includes a background paper on student housing (dated December 2019). It refers to the council’s Strategic Housing Market Assessment (SHMA) Update 2019 which found over 21,000 students aged 20 or over reside in the borough during term time, and 23,500 places at HEIs in Southwark. At

least 50% of these students live in private rented accommodation, and 15% live with their parents. There are some 7,800 bedspaces in purpose built student accommodation in the borough for Southbank University, King's College, University of the Arts, and in independent halls of residence. The evidence base background paper also refers to the SHMA confirming an acute need for affordable homes in the borough of 2,077 net affordable homes annually, which is a significant increase from the 2014 SHMA of 799 affordable homes annually.

80. When assessing the principle of a student housing scheme, these policies require consideration of the need for student housing, the location of the proposal, and management of the student accommodation. Later sections of this report will consider the affordable housing, quality of accommodation and transport aspects of this proposal that are referred to in these policies as well.

Need for student housing

81. There are several HEIs in the borough, including London South Bank University, Kings College London, UAL and LSE with teaching facilities and student accommodation. There are a number of developments providing direct let student housing in the borough. The proposed accommodation in this scheme would be 'direct let' to students, rather than associated with one particular HEI. Nonetheless it would contribute towards the borough's and London's stock of purpose built student accommodation. In this respect, the application addresses London Plan policy 3.8 and draft London Plan policy H15.
82. The applicant has provided a report titled "Study of Need" by Jeremy Leach Research Limited dated November 2017. This sets out that there are 38 higher education institutions in London mainly within the central area that includes Southwark. The full time student numbers at these central HEIs has grown by 8% since 2010-11 with significant growth envisaged in the next ten years, albeit with considerable uncertainties regarding Brexit. The Study of Need report also looked at the pipeline of planning permissions and current applications in London and in Southwark, however this 2017 report was written over two years ago. As a more recent update, the council's student housing background paper in the NSP evidence base notes there are eight live planning applications that include student housing. Of these eight applications: two are this Alscot Road scheme and the Spa Road scheme; 2 have resolutions to grant (Capital House and Canada Water Masterplan); one at 272 St James Road is awaiting its appeal decision; and 3 are current 2019 applications at 89-111 Borough High Street, Paris Gardens and Eagle Wharf. The seven schemes total 2,162 student rooms, with no figure put to the Canada Water outline scheme given the inherent flexibility within the masterplan.
83. From the Alscot Road site, 23 HEIs are within a 40 minute journey by public transport or cycle. The report concludes the Alscot Road site would be able to serve students at the following locations:
- HEIs in the central and eastern areas of London such as Goldsmiths, Kings, LSE and Queen Marys.
 - Campuses within the borough at Elephant and Castle, Camberwell and London Bridge.
 - Future HEI campuses in Elephant and Castle and any established through the redevelopment of Canada Water and Old Kent Road.
84. The applicant's report assessed the 2011 census data for the Grange ward (as the site was previously in Grange ward until the recent boundary change when it became part of South Bermondsey). It found that 12.3% of the ward population were full time

students, which was the third highest percentage of any Southwark ward. It also found that the 5,460 people living in all-student households across the borough, 798 of these people were living in Grange ward (15% of the total). Despite this high number of students recorded in the 2011 census, a far lower proportion of these students living in Grange ward were living in hall of residence-type accommodation (only 10%) compared with Cathedrals (60%) or Chaucer (36%) – indicating that the private rented sector was providing accommodation for students in this area.

85. In response to the requirements of the Residential Design Standards SPD, the applicant has provided a series of letters from different HEIs during the application to show their support for additional accommodation and interest in this proposal. Firstly from Goldsmiths and University of London, then from Kaplan and lastly from LSE, however the applicant has confirmed recently that it intends it to be a direct let scheme. These rent levels are higher than the Mayor of London's definition of "affordable student accommodation" levels (as required by the London Plan 2015 and Housing SPG on direct let schemes), however as set out further in the Affordable Housing section below, Officers have prioritised the contribution towards affordable housing rather than to reducing student housing rents.
86. The applicant engaged with HEIs during the application period to ensure the proposal is attractive to students as it was intended to be a nominations agreement scheme. The applicant's discussions with universities at workshop meetings resulted in changes to the type of student rooms being included in the proposal (more studios and shared communal spaces to encourage social interaction, replacing a large common room at ground floor with a flexible space cinema and gym at the basement).
87. Many of the public objections received refer to the proposal changing the character of the quiet residential neighbourhood of mainly families. The site is not within the vicinity of other purpose built student accommodation schemes in the borough. The nearest sites hosting purpose built student accommodation are located approximately 800m to the west around Great Dover and Tabard Streets in the Borough area, or 800m north at Butler's Wharf. The next nearest scheme is located over 1,600m east on Lower Road in Rotherhithe.
88. There is however another application for 185 student bedrooms at a site in Spa Road currently under consideration under planning application ref. 17/AP/3281. The site is located 160m to the north across Spa Gardens. However, given the lack of other purpose built schemes within the wider area, were both schemes to be granted planning consent and implemented, it is not considered that together they would impact the neighbourhood in terms of the mix of uses and inclusivity. On this basis the proposed land use is considered to be broadly in conformity with the new London Plan policy. While the objections are noted, introducing a modest amount of student housing into a mainly residential area is not considered to cause harm.
89. The proposal is considered to address a need for student housing within London and could be used to serve students of HEIs within the borough. Providing student housing in this location may also assist in freeing up private rental housing which is currently occupied by students for conventional housing needs.

Location

90. The site is not within a town centre, and has a relatively low PTAL of 2, however as set out in more detail below it is in a relatively accessible location to relative to a number of HEIs.

University	Distance from the site
LSBU	1.5 miles
Kings College	2.6 miles
Goldsmith's	2.7 miles
LSE	2.8 miles
Queen Mary's	3.2 miles
University of Greenwich	3.4 miles
UCL/Birkbeck/SOAS	3.8 miles
Imperial	5.3 miles

91. The site is approximately 10 minutes walk from Bermondsey Underground station with the Jubilee line providing access to Waterloo (to walk to the LSE campus or change for Charing Cross), and there are 7 bus routes within a 10 minute walk of the site (routes 1, 78, C10, 381, 188, 47 and N199).
92. Draft policy P5 of the New Southwark Plan removes the reference in Core Strategy policy 8 part 1 to siting student housing in town centres and places with good access to public transport. Without such a locational restriction, the draft policy allows in principle for student housing to be located anywhere in the borough. The December 2019 student housing document of the evidence base for the NSP notes that the draft policy does not have a location and accessibility point, commenting that "*the borough is considered to be very accessible and therefore the restriction on location and accessibility is not necessary*" and that "*we would encourage students to use active travel as well as public transport which therefore limits the need for a location requirement within the policy.*"
93. This proposal is in line with the emerging NSP policy direction for the acceptability of student housing on this site outside a town centre and without an especially high PTAL rating. While the weight that can be given to policy P5 is limited due to the objections received to it, these objections were in terms of the affordable housing and viability aspects rather than no longer directing student housing to town centres and places with good access to public transport. The proposal would comply with emerging policy P5 in terms of part 1 (set out further in the Quality of Accommodation section), and part 2 in terms of the affordable housing contribution which is considered in a later section of this report.
94. The applicant submitted a report titled "Report on Access and Amenities" which summarises the public transport, cycle links and walking routes around the site and the associated journey times to HEIs, and the local facilities in the area that students could make use of, as well as attractions and places of interest in Bermondsey such as the parks, markets and pubs. While not in a town centre the site is relatively close to central London, with public transport links towards HEIs.
95. Public transport and cycling options in the area include:
- The Bermondsey Underground station being a 10 minute walk. The Jubilee line would link the site with King's College, LSE and Courtauld Institute at Waterloo, Ravensbourne at North Greenwich, University of East London at Stratford. Other higher education establishments can be reached by changing from the Jubilee Line to:
 - the Overground at Canada Water to reach Goldsmiths at New Cross Gate.
 - London South Bank University at Elephant and Castle, and the various universities in Bloomsbury (e.g. UCL, SOAS, Birkbeck) via the Northern line.
 - University of Westminster via the Bakerloo line.

- There are seven bus routes within a ten minute walk from the site:

Bus route	Closest bus stop to the site	Destinations of that route
1 (and N1)	Grange Road	New Oxford Street – Canada Water
47	Jamaica Road	Shoreditch – Bellingham/Catford Bus Garage
78	Grange Road	Shoreditch – Nunhead
188	Jamaica Road	Russell Square – North Greenwich
381 (and N381)	Jamaica Road	Waterloo – Peckham
C10	Abbey Street/Jamaica Road	Victoria – Canada Water
N199	Abbey Street/Jamaica Road	Trafalgar Square – Bromley

- Cycle links – the Cycle Superhighway along Jamaica Road to the north of the site (currently under construction), and the Quietway cycle route along Willow Walk is to the south of the site, linking Greenwich to Bloomsbury. London South Bank University would be approximately 12 minutes by cycle, and other HEIs in central London a 20-30 minute cycle ride away.

96. The site is considered to be sufficiently accessible by various means to a range of HEIs and local shops and amenities. In view of the changes to the council's student housing policy by the draft New Southwark Plan policy P5, the location of student housing in this location is considered acceptable in principle.

Management

97. A student management strategy has been provided, to address two requirements of the Residential Design Standards SPD. The applicant intends for Derwent Living to be the accommodation managers, who currently manage over 25,000 residential and student accommodation units in the country – including in Camberwell. Derwent intends to have a manager and customer service assistant on the reception Monday to Friday 9am to 5pm. A 24 hour helpdesk would be available to contact a manager and maintenance staff to attend out of hours calls (e.g. a fire alarm, or to fix the heating) but is reviewing the option of a night-time security service or a resident warden to monitor student behaviour. Feeds from CCTV cameras in and around the building would be fed to the reception during staffed hours, and off-site out of these hours. There would be an electronic access control to prevent unauthorised access to the building. Derwent would maintain the landscaping, be responsible for day to day repairs and health and safety equipment, weekly kitchen inspections, and longer-term redecoration and building fabric works. Derwent would engage with the local community through annual meetings. The submitted student management strategy states that the amenity areas are likely to be subject to a curfew at night (considered further below in the Neighbour Amenity section). Derwent operates a deposit and guarantor policy so that students can be fined and if necessary expel repeat offender students. Further comment on the student management plan is set out in the Transport section below, but for this consideration section on the proposed use, sufficient information has been provided to address the requirements of the SPD.
98. In conclusion, the use of this site for student housing is considered acceptable in principle. The provision of 143 student bedspaces would contribute towards achieving the student housing target in the London Plan, and contribute towards the borough's housing supply (equivalent to 57 homes). While it is not within a town centre to comply with part 1 of Core Strategy policy 8, it is within a relatively central location in the borough to be close to HEIs, public transport, shops and services. With the direction of

travel in the emerging New Southwark Plan student housing policy that removes this location restriction, and in view of the relatively modest scale of this scheme, it is considered acceptable in principle. The use for student accommodation only (in term time and summer holiday) and the management plan would be secured by planning obligations.

Environmental impact assessment

99. The scale of development proposed by this application does not reach the minimum thresholds established in the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 that would otherwise trigger the need for an environmental impact assessment. The proposal's location and nature do not give rise to significant environmental impacts in this urban setting sufficient to warrant a requirement for an EIA. An EIA for this proposed development is not required.

Design

100. The NPPF stresses the importance of good design and states in paragraph 124 that:

“Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people.” Policy SP12 of the Core strategy states that *“Development will achieve the highest possible standards of design for buildings and public spaces to help create attractive and distinctive places which are safe, easy to get around and a pleasure to be in.”* Saved policy 3.12 of the Southwark Plan asserts that developments should achieve a high quality of both architectural and urban design, enhancing the quality of the built environment in order to create attractive, high amenity environments people will choose to live in, work in and visit. When considering the quality of a design, the fabric, geometry and function of the proposal are included as they are bound together in the overall concept for the design. Saved policy 3.13 asserts that the principles of good urban design must be taken into account, including the height, scale and massing of buildings, consideration of the local context, its character and townscape as well as the local views and resultant streetscape.

101. Objections were received to the height and massing of the proposal being inappropriate for the context, and being overly prominent when viewed from the Spa Gardens. As set out below the design of the proposal is considered to be acceptable.

Context, bulk and scale

102. This site sits in an open situation looking across the expanse of Bermondsey Spa Gardens. The application proposes a single building larger in scale than adjacent buildings to front onto the Gardens, but still considerably smaller than the large bulk of the nearby Artesian House which rises to nine-storeys and which also looks over and borders the Gardens. The mass of the proposed building would be seen within the setting of the street trees and park trees, such that it is only the upper floors that project above the tree line to create a minor and justifiable focal point at the south-east corner of the Gardens. As viewed from the Gardens, the scale of the building is appropriate.
103. The site also relates to the more intimate streetscape created by the four and five storey buildings along Alscot Road itself, including the block of nos. 91-97 Alscot Road and Buckley Court which are immediately adjacent to the site. The proposed building has a shoulder height of 5-storeys to relate to these lower street buildings with the upper two storeys rising above and set back from this base. The colonnade at the fifth floor is intended to provide a graduation between the main façade and the recessed

top floors, and enhance the overall composition of the building.

104. In close townscape views it is the building's lower 5-storey portion which would more visible and which would set the overall perceived scale of the building. Although the overall building is larger, and in a rather different style than adjacent buildings, this lower 5 storey element would be of a similar order of scale as these neighbouring buildings. Its scale and bulk is considered acceptable.
105. The general form of the proposed main building, as a straight forward building which expresses its residential use, is appropriate. Its frontage and depth would align with the two adjoining buildings. The link block between the main building and nos. 91-97 Alscot Road steps down in height, and is effective in helping to integrate the proposal with the existing streetscape and in negotiating the angle of the street as it changes direction.

Architecture, materials and detailing

106. The architecture of the building, as an expressed frame with solid and glass infill panels, would create an attractive and elegant building within the streetscape and as viewed across the Gardens. The sets of angled panels on the front elevation would add depth to the composition and create interesting patterns of shade and light. The horizontal division of the block into a base, middle and a top is also an important part of its overall composition.
107. The proposed building would stand out as high quality object, in a deliberately contrasting style to the recent buildings on either side with its GRC frame. The infill material was changed from GRC panels to brickwork and the top two storeys are now to be constructed in a pale brick (rather than render), to relate better to the context of brick buildings either side of the site and around Bermondsey Spa Gardens. The rear and sides of the building are a composition of expressed frame and brick infill panels. Although simpler than the front elevation, these elevations and lower rear addition are straightforward and successful.
108. Further details of the materials, sample panels, and detailed drawings would be secured by proposed conditions to ensure this high quality appearance is carried through to the completed building.
109. The scheme has been designed with Secure by Design principles, for example in terms of the layout, lighting, detailing of doors and windows. The Met Police has recommended this be conditioned, and it is an indication of exemplary design listed in the Residential Design Standards SPD. The applicant however will not agreed to a condition as it considers the required technical standards for the windows, internal doors, internal security etc to be too onerous for this student housing scheme and to go against the intended management regime. For example compartmentalising the clusters on each floor would affect the ability for students to socialise with friends on other floors within the building. The proposal would add a more active frontage onto the street to increase surveillance of the area compared to the existing building. On balance, the arguments for not following the full secure by design methodology are accepted for this particular building type.
110. In conclusion, while larger and taller than most of the surrounding buildings, the proposal would sit well within the frontage context surrounding Bermondsey Spa Gardens. Subject to the conditions, the proposal would comply with policies 7.4, 7.5 and 7.6 of the London Plan, Core Strategy policy 12, and saved policies 3.12 and 3.13 of the Southwark Plan.

Density

111. London Plan (2016) policies 3.3 and 3.4 seek to increase housing supply and optimise housing potential through intensification and mixed use redevelopment. Table 3.2 of the London Plan suggests a density of 200-450 habitable rooms per hectare for a site in the urban area with a PTAL of 2-3. Core Strategy policy 5 “Providing new homes” sets the expected density range for new residential development across the borough. This site is within the urban density zone, where a density of 200-700 habitable rooms per hectare is anticipated. Southwark Plan policy 3.11 requires developments to ensure they maximise efficient use of land.
112. The objections received to the public consultation refer to the proposal being an overdevelopment and too high density for the site and area which is already overcrowded and lacks sufficient infrastructure.
113. The Residential Design Standards SPD sets out the method for calculating density on primarily conventional residential developments and mixed use schemes. Counting each student bedroom as a habitable room and the communal living and kitchens being counted as habitable rooms gives a total of 153 habitable rooms in the proposal.
114. With a site area of 1,260sqm, and a total of 153 habitable rooms, the proposed density is 1,214 habitable rooms per hectare. This exceeds the maximum of the expected range for the urban density zone.
115. Core Strategy policy 5 states that “*within the opportunity areas and action area cores the maximum densities set out above may be exceeded when developments are of an exemplary standard of design*”. The site is neither within an opportunity area nor an action area core, however the council often applies the requirement to achieve an exemplary standard of design in other areas where the expected density range is exceeded. The Residential Design Standards SPD sets out a list of criteria for demonstrating an exemplary standard in a conventional housing scheme: some are not as relevant to a student housing scheme, such as the provision of bulk storage.
116. Density gives a numerical measure of the amount (intensity) of development and provides an indication of whether the scale of development is likely to be appropriate in different parts of the borough. A density above the expected range would not of itself necessarily lead to a conclusion that the scheme should be judged unacceptable. If it can be demonstrated that the scheme would achieve a high standard of design, including quality of accommodation, and there are no adverse impacts arising to neighbour amenity for example, then the higher density of the scheme would not be a reason to warrant refusing planning permission. The emerging New Southwark Plan and New London Plan both reduce the emphasis on numeric density ranges (and remove the density table 3.2 of the adopted London Plan) and instead put more emphasis on the quality of design.
117. The quality of the proposed student rooms, the design of the building, and its resulting impacts (as set out in the separate section above on “Design” and the section below on “Quality of residential accommodation”) are all acceptable and do not suggest an overdevelopment of the site. The impacts of the proposal, including its impacts on neighbouring amenity and transport, are discussed in detail in other sections of this assessment; subject to the conditions and obligations identified the proposal would not cause harm to indicate this density is not acceptable. Therefore the proposal is considered to comply with the above mentioned policies for density, and would make efficient use of land as required by saved policy 3.11.

Quality of accommodation

Rooms

118. A variety of bedroom sizes are proposed, from the smaller en-suite rooms at 14.5sqm, larger en-suite rooms at 19.2sqm, to the studios of 23.8sqm and one of 27.7sqm. This offers a variety of room types for students to choose between, and a resulting range of rental prices. Each room would have space for a bed, desk, shelves and wardrobe, and full height window and a ceiling height of 2.42m (above the minimum height of 2.3m and an indication of exemplary design). Each room would be near to a communal kitchen and living room, and have access to the basement common room and flexible space.
119. The rooms on the ground to fourth floor levels are arranged into two clusters per floor, generally of 12 rooms sharing a 34sqm combined kitchen, dining and living room. The floorplans are stacked from ground to fourth floor, while the top two floors are the larger studio units. This would help reduce noise nuisance between the proposed units and is a further indication of an exemplary design in the Residential Design Standards SPD.

Accessibility

120. Eight (5%) of the rooms would be accessible studios for wheelchair users, and a further 44 are capable of being adapted by removing a partition wall within the structural frame to combine two bedrooms into one larger room. Two lifts would provide level access throughout. The entrance to the building has changed during the application, mainly by increasing the ground floor level to address the flooding risk. A ramp is now shown outside the building, next to the steps to reach the reception area - from where the floor is level to the lifts. A condition regarding the detail of this entrance area is proposed to ensure wheelchair users can use this main entrance with a ramp or a lift platform. The applicant is considering other aids for disabled student residents, such as a navigation aid within the building for those with sight loss that uses Bluetooth and a student's mobile phone. The design has given sufficient consideration to accessibility.

Outlook

121. Nearly half the bedrooms would face north onto the road and park, and over half would face over the rear garden either facing south from the main rear wall, or east or west from the three-storey rear addition, to give each unit a suitable outlook. The bedrooms at the ground level would have a defensible strip of planting in front of their windows to afford some privacy. The outlook from the student bedrooms, and the communal rooms would be good.

Daylight and sunlight

122. The submitted daylight and sunlight report assessed the daylight provision to the proposed student rooms in their original configuration (when there were 155 bedrooms, plus communal rooms), using the Average Daylight Factor (ADF) test. The part of each en-suite room taken up by the bathroom or storage was not included in the ADF test. Of the 163 rooms assessed, 162 would meet the ADF target value; the one room that fails is a communal combined living, kitchen, diner with an ADF of 1.78% which is below the 2% for a kitchen-diner but above the 1.5% for a living room. While the floorplans for the top two floors have been amended since the daylight test was done, the daylight provision to these rooms would remain good.

123. In terms of daylight distribution, 159 (98%) of the 163 tested rooms would see daylight distribution to over 80% of the room area, which is a very good result.
124. All of the student rooms would be single aspect, with the rooms on the front elevation facing north and so won't receive sunlight. Of the 86 rooms that face within 90 degrees of south, 77 (90%) would receive sunlight levels that meet or exceed the BRE annual total of 25%, while the other nine rooms would receive at least 15%.
125. Overall the daylight and sunlight provision to the proposed student accommodation would be good, contributing to a high quality of living accommodation and an exemplary design standard.

Amenity space

126. There is no planning policy standard for the minimum provision of outdoor amenity space for student housing. This proposal includes: a 133sqm garden at the rear; four smaller balconies (each 2.7sqm) on the front towards the western end; and a covered terrace of 11sqm at fifth floor at the front and western end.
127. The basement common room (42sqm), and flexible room (potentially a cinema or gym of 35sqm) would provide further indoor amenities for the students. These outdoor and indoor amenities total 230sqm and are considered sufficient for the scale of student housing proposed.
128. Students would also have ready access to Bermondsey Spa Gardens. In recognition of the additional maintenance costs to the council from this increased use of the park, and to allow for improvement works (such as planting, seating, additional bins, paths and potential entrance changes), a financial contribution has been requested from the applicant (£56,500) to the council to use in the Spa Gardens.

Noise

129. The submitted noise assessment sets out the existing noise environment following noise survey work at the site, with road and distant rail being the main noise sources. Noise intrusion into the student rooms from road noise can be controlled by using standard double glazing to achieve the council's noise criteria. Mechanical ventilation, trickle vents and opening windows would provide ventilation to the student rooms. Following input from the Environmental Protection Team, conditions are proposed regarding the internal noise levels, plant noise, ventilation and air quality, to ensure a suitable living environment for future student occupiers.
130. In conclusion, the proposal would provide high quality living accommodation for students, with a range of room sizes, with good consideration of accessibility, shared facilities, good daylight and outlook, and sufficient amenity space. It would provide good functional living spaces and layout for future student occupiers as required by the draft London Plan policy.

Affordable housing

131. London Plan policy 3.8 states that the provision of affordable family housing should be a strategic priority for borough policies, and policy 3.9 promotes mixed and balanced communities (by tenure and household income). Further details on the definition of affordable housing, targets, and requiring the maximum reasonable amount of affordable housing on major schemes are included in policies 3.10, 3.11, 3.12, and 3.13 of the London Plan. Core Strategy policy 8 'Student homes' requires 35% of student developments as affordable housing, in line with policy 6 'Homes for people

on different incomes' which requires as much affordable housing on developments of 10 or more units as is financially viable, and at least 35%. Saved policy 4.4 "Affordable housing" of the Southwark Plan seeks at least 35% of all new housing as affordable, and a tenure split of 70% social rented to 30% intermediate in the urban zone. The council's adopted Affordable Housing SPD and the draft Affordable Housing SPD clarify the Southwark Plan and Core Strategy policy framework, and set out the approach in relation to securing the maximum level of affordable housing in proposed schemes, with a sequential test for delivering affordable housing.

132. Emerging New Southwark Plan policy P5 "Student homes" in part 2 states "*when providing direct lets at market rents, provide 35% of the Gross Internal Area of the floorspace as conventional affordable housing, as per policy P4, as a first priority. In addition to this, 27% of student rooms must be let at a rent that is affordable to students as defined by the Mayor of London*". The reason for the policy is clear that this is to balance the need for student accommodation with the provision of other types of housing such as affordable and family homes.
133. Planning policies and emerging development plan documents also refer to affordable student housing, such as NSP policy P5 mentioned above. The London Plan (2016) at paragraph 3.53B requires an element of affordable student accommodation where a provider of student accommodation does not have a nominations agreement. The Mayor of London's Housing SPG provides further information on student housing, including affordable student accommodation. The draft London Plan policy H15 has a requirement for purpose built student accommodation schemes to provide the maximum level of affordable student accommodation (of at least 35% or subject to the viability tested route). It should be noted that the London Plan does not require purpose built student housing schemes to provide a contribution to affordable general needs housing.
134. The lack of affordable housing was referred to in the objections received to this application.
135. Taking the affordable student accommodation first, none is proposed in this application. While the draft London Plan specific requirement for affordable student housing is noted (policy H15 part 4), the borough's priority is for conventional affordable housing. Officers consider that although there would be some benefit to providing affordable student housing, this benefit would be significantly outweighed by the borough's pressing need for general needs affordable housing, and that this should take priority over the provision of affordable student accommodation. Southwark is one of the top four London Boroughs in terms of the provision of student housing, and already contributes significantly to London's student housing needs. In reviewing the viability of the scheme therefore the payment in lieu has been considered in terms of a contribution towards general needs affordable housing, rather than for use in reducing the rent levels of students occupying the site. Including affordable student housing within the development would adversely affect the overall viability, and therefore the contribution the development could make to general needs affordable housing.
136. When taking account of the habitable rooms in the scheme (student bedrooms, living rooms and kitchens over 11sqm) and counting any rooms that are over 27.5sqm as two rooms, there are a total of 164 habitable rooms in the proposal. To comply with the Core Strategy policy a 35% on-site provision would be 57 habitable rooms of affordable housing (split as 40 social rent and 17 intermediate tenure). This method of calculation has been carried out in accordance with that described in the December 2019 student housing evidence base document. The Affordable Housing SPD and draft Affordable Housing SPD set out the sequential test of firstly on-site provision,

then if this is not possible off-site provision, and finally if off-site provision is not possible, requiring an in lieu payment in exceptional circumstances.

137. No on-site affordable housing is proposed in this application. The reasons for this relate to the practicality and suitability of the site to accommodate both student housing and affordable housing. This is a relatively small site at 1260sqm, with a frontage of 43m and an average depth of 28m which needs to re-provide car parking spaces (and turning areas) on the western side of the site for the neighbouring building. Providing two separate stairs and lift cores, entrances, cycle storage and refuse stores to serve both uses would significantly affect the ground floor area and the efficiency of the floor plans at each level. As residential habitable rooms would generally be larger than the student rooms in the scheme, a 35% provision by habitable room would result in the affordable housing taking a proportionally larger floor area than the student housing. The resulting area for student housing would provide only 70-75 student rooms. The applicant considers this size of student housing would be too small to be practicable, and the scheme would not proceed. The quality of the affordable housing would be limited when using the form of the proposed building; three flats per floor could be provided on one side of the building, two would effectively be single aspect (as the flank would face onto the flank of Buckley Court at close range) and one would likely be single aspect towards the road. Providing private amenity spaces would also affect the design of the front elevation, and adding balconies at the rear may raise neighbour amenity issues. These reasons are accepted for why on-site affordable housing provision is not proposed on this site as part of a student housing scheme.
138. The applicant, Alumno, has other student housing sites in the borough that are occupied. As a student housing provider, it does not have alternative sites where off-site affordable housing could be provided.
139. The council's draft Affordable Housing SPD states at 6.3.9 that *“New housing developments in Southwark may, in exceptional circumstances, provide affordable housing by making a pooled contribution instead of providing the affordable housing on-site or through the developer securing their own off-site affordable housing site. The sequential test must be followed to justify that at least as much affordable housing as would have been provided if the minimum 35% affordable housing requirement were achieved on-site. A minimum of £100,000 of pooled contribution per habitable room of affordable housing will be required. To ensure that the maximum reasonable proportion of affordable housing is negotiated on each development we will determine the exact amount required (above £100,000 per affordable habitable room) using a robust viability assessment.”*
140. As set out in paragraph 6.3.9 of the draft SPD, the viability appraisal must justify that at least as much affordable housing is being provided as would have been provided if the minimum 35% affordable housing requirement were achieved on-site. The requirement for a financial appraisal for any application that has an affordable housing requirement is further established under the council's Development Viability SPD.
141. For this scheme, a 35% provision would be 57 habitable rooms, resulting in a minimum expected contribution of £5.7m as an in lieu payment to the council to use for providing affordable housing.
142. In line with the Affordable Housing SPD, a financial appraisal was submitted to allow an assessment of the maximum level of affordable housing that could be supported by the development. The appraisal was reviewed by BPS on behalf of the council. Following the review of the appraisal, Officers have concluded the most beneficial approach for this proposal would be to accept a payment in lieu for the affordable

housing. The Core Strategy requires as much affordable housing as is financially viable and the London Plan requires the maximum reasonable amount. The in lieu payment proposed by the applicant, as justified through the financial appraisal, would need to meet both of these criteria.

143. The applicant is proposing a payment in lieu of £5.7m which is equivalent to 35% affordable housing using the £100,000 per habitable room rate set out in the draft Affordable Housing SPD. The payment in lieu exceeds the maximum reasonable amount of affordable housing that the development can provide, at £1.017m above the figure the council's consultants considers the scheme can viably sustain. Therefore Officers are satisfied that the proposed approach to affordable housing is acceptable and would maximise the provision of affordable housing.
144. By providing the maximum viable payment in lieu, the proposal accords with Core Strategy policy 8 part 2 and policy 6 part 1 which require 35% affordable housing and as much affordable housing as is financially viable. The payment in lieu and viability reviews would be secured by a planning obligation. A viability review would be secured through the s106 agreement should the scheme not be implemented within two years of the permission. A further late stage viability review would be required to ensure the maximum payment in lieu is provided; as the student housing is not typical for sale housing and the value relies on the rent levels achieved it is proposed that this late stage review be carried out after the first full academic year of occupation of the development.

Conclusion on affordable housing

145. The London Plan, Core Strategy and saved Southwark Plan contain policies which seek the maximum reasonable and financially viable amount of affordable housing in proposed developments. These policies at national, London and borough levels allow for a commuted sum in exceptional circumstances, and the NPPF acknowledges that there may be circumstances where an in lieu payment can be justified. Where it is clear that a payment in lieu approach would deliver more (and more appropriate) affordable housing, a commuted sum is acceptable.
146. The council would use a payment in lieu in its New Council Homes Delivery Programme to deliver truly affordable housing. The payment in lieu of £5.7 million offered by the applicant is substantial and could deliver a number of new affordable homes, and a higher number than could be provided on site. The acceptability of the offered payment in lieu is based on the specific merits of this proposal, taking account of all the material considerations highlighted above. It is also consistent with the approach taken on other consented purpose built student housing schemes. It is considered that the council's own New Council Homes Delivery Programme is the most effective way to provide affordable housing, to the extent that any departure from the on-site preference of the NPPF, London and Southwark Plan is justified (for the above reasons based on the specific merits of this student housing proposal).

Impact of proposed development on amenity of adjoining occupiers and surrounding area

147. Core Strategy policy 13 "High environmental standards" seeks to avoid amenity and environmental problems. Saved policy 3.1 "Environmental effects" of the Southwark Plan seeks to prevent development from causing material adverse effects on the environment and quality of life. Saved policy 3.2 "Impact on amenity" of the Southwark Plan states that planning permission for development will not be granted where it would cause a loss of amenity to present and future occupiers in the surrounding area, or on the application site.

148. References to the increased noise and disturbance from a large number of students on the site, to the 7 storey building harming the outlook to neighbouring properties and the removal of the street tree causing a loss of privacy were included in the objections received.

Outlook and privacy

149. The existing single storey building covers a portion of the site and does not overlook surrounding residential properties. Any redevelopment of this site would have a larger massing and would introduce new overlooking to neighbouring properties from upper floor windows. The Residential Design Standards SPD seeks separation distances of a minimum of 12m at the front of the building (and any elevation that fronts onto a highway) and a minimum of 21m at the rear of the building; where these minimum distances cannot be met, the applicants must provide justification through the Design and Access Statement.
150. The north-facing windows of the proposed front elevation would look onto the Spa Gardens, and would be 15m from the side windows of 45 Alscot Road (which face a highway). The western end of the proposed building would be 24m from the windows of Artesian House, and at an oblique angle. These distances would prevent the proposed windows from causing a material loss of privacy. The massing of the building would not have an overbearing impact on the outlook of these properties on the northern side of Alscot Road.
151. The front and rear building lines of the main building would align with those of nos. 91-97 Alscot Road and Buckley Court. Nos. 91-97 has no side windows in its flank wall. Buckley Court has windows in its western wall that would look onto the blank flank wall of the proposal, but these are secondary windows to the main outlooks from these flats to the front and rear that would remain. The massing of the 7-storey building would not have an overbearing impact on the outlook to these adjoining neighbours. The proposed three-storey rear addition would be set away from the rear boundaries with nos. 91-97 and Buckley Court, and would not have an intrusive impact on their outlook nor their rear gardens and balconies.
152. The Henley Drive properties to the south of the site are blocks set within communal gardens. The closest parts are the northern halves of two blocks containing nos. 7-12 and nos. 13-18, with the buildings set 3m and 6m from the application site boundary respectively. The proposed rear elevation on its western edge would align with the rear façade of nos. 91-97 Alscot Road (set 11.8m to 13m from the southern boundary), and the proposed windows would be 16.5m from the rear and side windows of nos. 7-12 Henley Drive. The orientation of the proposed building is at 35 degrees to the Henley Drive block, resulting in oblique angles between the rear and side windows, rather than direct face-to-face views.
153. The rear elevation on the eastern side would align with the rear elevation of the adjacent Buckley Court, and be set at least 9m from the southern boundary. The south-facing windows would be 17m from the rear and side windows of nos. 13-18 Henley Drive. Again, the relative orientation between the two buildings would assist in reducing the overlooking possible, and the proposed windows are in a similar location to those on the rear elevation of the adjoining Buckley Court. The existing boundary tree planting, which would be supplemented by the proposed landscaping, would provide some screening in summer months. The communal garden area between the two Henley Drive blocks would not be overlooked from the rear addition, and the massing of the rear addition would help in screening views down into the garden from the upper levels of main part of the building.

154. A third block on Henley Drive (nos. 25-36) is further to the east and so at greater distance from the proposed building. The north-west facing windows in these flats are at least 15m from the site boundary. The proposal is considered not to have an overbearing impact on the outlook of these windows, nor to cause a material loss of privacy.
155. The east-facing windows of the proposed rear addition at ground and first floor levels would be 13m from the garden boundary with Buckley Court, and the second floor windows 15.8m away. These windows would be perpendicular to the rear windows of Buckley Court, and angled away from the Henley Court windows. The west-facing windows of the rear addition would be 21m from the rear boundary with nos. 91-97 Alscot Road at ground and first floor, and 24m away at second floor level. These windows are almost perpendicular to the rear windows of nos. 91-97.
156. Due to the distance and orientation of the windows, the rear windows of the proposal would not lead to a material loss of privacy to the Henley Drive. The proposed building with its increasing height from two to seven storeys would not have an intrusive impact on the outlook of the Henley Drive properties, being two-storeys high on the boundary, and increasing to seven storeys at least 9m from the boundary, and primarily due to the orientation of the Henley Drive blocks.
157. The substation in the south-western corner of the site would be 2.7m high, 4.5m wide along the boundary with Henley Drive and 5.2m wide along the boundary with nos. 91-97. Due to its relatively low height along the boundary with the two communal gardens of the neighbouring blocks, it is considered not to be intrusive to the outlook of these neighbouring properties nor their amenity spaces.
158. A condition is proposed to prevent the flat roofs being used as terraces (outside the defined terrace areas) in the interest of neighbour amenity (both privacy and noise).

Daylight and sunlight

159. A daylight and sunlight report was submitted that considered the daylight and sunlight impacts to the habitable rooms in surrounding residential properties:
- 45-46 Alscot Road
 - Buckley Court (63 Alscot Road)
 - 7-12 Henley Drive
 - 13-18 Henley Drive
 - 19-44 Henley Drive
 - 128-130 Grange Road
 - 131 Grange Road
 - Artesian House.
160. The report follows the Building Research Establishment's (BRE's) 2011 guidance. The calculations are based on computer models of the massing of existing and proposed buildings; the models do not include the impact of existing or proposed trees and boundary walls/fences. The BRE guidance states that it is intended as advisory guidance for building designers and planners, but is not mandatory and should not be seen as an instrument of planning policy. Although it gives quantitative guidelines these should be interpreted flexibly as daylight and sunlight levels are only one aspect of site layout design. The Residential Design Standards SPD refers to the BRE methodology for daylight and sunlight tests as the appropriate means of assessing impacts on neighbouring properties.

161. The submitted report assesses the vertical sky component (VSC), the no sky line (NSL) where room layouts are known, and the annual probable sunlight hours (APSH) to the windows and rooms of these listed neighbouring properties. A reduction in daylight is likely to be noticeable if the resulting VSC or NSL levels are lower than 0.8 of the existing levels (i.e. more than a 20% loss). The results are summarised below as follows:

Vertical sky component (VSC)

	Total windows assessed	Windows that pass	Windows that fail
45-46 Alscot Road	15	11	4
Buckley Court	29	23	6
7-12 Henley Drive	9	6	3
13-18 Henley Drive	12	4	8
19-44 Henley Drive	41	41	0
128 Grange Road	4	4	0
129 Grange Road	2	2	0
130 Grange Road	4	4	0
131 Grange Road	34	34	0
Artesian House	30	30	0
Total	180	159 (88%)	21 (12%)

162. The windows that fail the VSC test are within the following properties:

- 45-46 Alscot Road – the four windows that fail the VSC test are in the side wall that faces over one part of Alscot Road. The resulting VSC levels of 16-17% VSC are relatively good for an urban area, and appear to be secondary windows to rooms that also have larger front or rear-facing windows (which pass the VSC daylight test). These VSC reductions would not harm the amenity of these flats.
- Buckley Court – the six windows that fail the VSC test are on the side elevation of this block of flats, and are secondary windows to the bedrooms (which have their principal windows at the front of the building) and combined kitchen/living/dining rooms (which have principal windows at the rear elevation). The front and rear windows would retain good VSC levels, and the daylight distribution to these rooms remains good, so the loss of daylight to these smaller side windows would not harm the overall amenity of these flats.
- 7-12 Henley Drive – three windows in the side wall of this block at ground, first and second floor levels would experience a reduction in VSC of more than 20%, however their remaining VSC levels at 20-25% VSC would be good. The larger front and rear facing windows would also retain good VSCs, so the overall amenity of these flats would be maintained.
- 13-18 Henley Drive – the 8 windows that fail the VSC test are located on the rear and side walls of this block at ground, first and second floor. These windows would retain good VSC values of 17-25.8%. The windows at the front of the block would not be affected by the proposal. The overall amenity of these flats would remain good.

Daylight distribution (no sky line – NSL test)

163. The daylight distribution test was only undertaken to properties where the layouts are known, and therefore not all those properties with affected VSC values have been

tested:

	Total rooms tested	Rooms that pass	Rooms that fail
Buckley Court	11	11	0
130 Grange Road	3	3	0
131 Grange Road	16	16	0
Artesian House	12	12	0
Totals	42	42 (100%)	0 (0%)

164. Of the four properties tested, none would experience a significant reduction in daylight distribution.

165. The daylight distribution test for the Henley Drive properties was not carried out as their layouts were not known to undertake the quantitative test.

- Due to the orientation of the proposal relative to the 7-12 Henley Drive properties, the massing is considered unlikely to result in a significant change in daylight distribution to the rooms served by the rear windows. It may have more of an impact on the daylight distribution to the rooms served by the small side windows, however these side windows appear to serve bathrooms, or the kitchen part of the combined kitchen and living room (also served by a larger window) – i.e. non-habitable rooms. The resulting VSC values for these side windows remained good at 20-25%, suggesting a good amount of daylight would reach the windows, so that any reduction in daylight distribution within the rooms would not harm the overall amenity of these properties.
- Similarly, for blocks 13-18 Henley Drive, the side windows are likely to serve non-habitable rooms. The rear facing windows are unlikely to have significant reduction in daylight distribution due to their orientation relative to the massing of the proposed building and the distance to the boundary. The front windows would not be affected by the proposal. The resulting VSC values of 17-26% to the side and rear windows suggest good daylight provision, so that any reduction in daylight distribution would not harm the overall amenity of these properties.

Sunlight (annual probable sunlight hours – APSH test)

166. Neighbouring residential properties that have a habitable room window facing within 90 degrees of south were tested for the sunlight impacts.

	Total rooms tested	Rooms that pass both annual and winter hours tests	Rooms that fail annual hours	Rooms that fail winter hours
45-46 Alscot Road	11	6	0	5
Buckley Court	23	17	6	0
13-18 Henley Drive	3	3	0	0
19-44 Henley Drive	4	4	0	0
131 Grange Road	16	16	0	0
Artesian House	21	21	0	0
Total	78	67 (86%)	6 (8%)	5 (6%)

167. The five windows in 45-46 Alscot Road that fail for the winter hours test are two side windows, and three front windows (which are recessed and set below the projecting balcony above). There are other windows to these flats that would continue to receive winter sunlight hours above the recommended minimum (including another window on the front elevation that serves the same room), and all windows would pass the annual probable sunlight hours test.
168. The six windows in Buckley Court that fail the annual test are the side windows in the western wall. These are secondary windows. The larger south-facing windows in the rear façade retain good sunlight provision, so these flats would retain annual sunlight hours above the recommended levels.
169. The proposed building would not cause a significant loss of sunlight to surrounding properties that would cause harm to their residential amenity.

Overshadowing

170. The BRE guidance states that at least half of an amenity area should receive at least two hours of sunlight on 21 March.
171. The tallest part of the proposal aligns with the front and rear facades of Buckley Court to the east and nos. 91-97 Alscot Road to the west. The three storey rear addition is set away from the eastern boundary, so while it may overshadow the rear garden in the late afternoon, it would not prevent the rear garden of Buckley Court from receiving at least two hours of sunlight hours on 21 March. Similarly, as it is set away from the western boundary with nos. 91-97 Alscot Road, it may affect sunlight early in the morning, but would not prevent the rear garden of this neighbour receiving at least two hours of sunlight on 21 March.
172. The shared gardens of the Henley Drive properties are to the south of the site, therefore the sunlight provision to these gardens would not be affected by the proposed building to the north.
173. The shadow from the proposed building would track across the south-eastern portion of the Bermondsey Spa Gardens from sunrise until between 2pm and 3pm on 21 March. However, given the two hectare size of the Gardens (including the play centre and adventure playground), at least half of the Gardens would continue to receive over two hours of sunlight on 21 March. Therefore, the proposed building would not have a significant overshadowing impact to the public park.

Noise and disturbance

174. The number of students in this scheme within a residential area is likely to be higher than the number of residents in a traditional residential development of flats or houses on this site. The design of the scheme, and proposed conditions seek to minimise the likely noise and disturbance to surrounding properties. The communal rooms are at the front of the building so that their windows open onto the Alscot Road, rather than to the rear, which would help limit noise escape from the larger communal rooms where students may gather.
175. The outdoor amenity spaces would each be able to contain a limited number of students. The submitted Design and Access Statement sets out the management policy: *“Amenity areas would be subject to a curfew at night and managed by wardens on site and facilities management will have robust procedures in place to manage this*

and the terms of the licence means that students can be fined and if necessary expelled if appropriate. The facilities management team will operate a deposit and guarantor policy which provided further security relating to student behaviour.” It is considered reasonable to limit the hours of use of the outdoor areas to ensure no undue noise or disturbance would occur from the outdoor areas (the garden and terraces), a condition is proposed to prevent them being used after 9pm and before 7am.

176. The moving in days are likely to have the most disturbance with students arriving and unpacking. If not effectively managed, this would likely disturb neighbouring residential properties from the comings and goings of vehicle movements, and so is considered further in the transport section below.
177. The submitted noise assessment considers the likely noise from plant within the proposal, and sets design criteria for the plant (which has yet to be selected) to ensure it does not cause harm to neighbour amenity. Further information of the plant would be required by condition.
178. The submitted Construction Environment Management Plan was reviewed by EPT, and it would need to be amended to include all the environmental factors in particular noise, dust and working conditions aimed at minimising the impact of the construction on the neighbouring premises. A condition is proposed to require a revised CEMP to be submitted for approval prior to works starting.
179. Subject to proposed conditions to require a CEMP, to prevent the use of the roofs, restrict the hours of use of the amenity spaces, and further details of the plant, the proposal is considered not to cause significant harm to the amenity of surrounding residential properties through loss of privacy, daylight or sunlight, nor overbearing impact. The proposal would comply with strategic policy 13 of the Core Strategy, and saved policies 3.1 and 3.2 of the Southwark Plan.

Archaeology

180. The site is not within an Archaeological Priority Zone (APZ) but is located close to the Borough, Bermondsey and Rivers APZ and there is some archaeological potential for the site area, particularly with regard to prehistoric and Saxon to post-medieval deposits, structures and finds. Previous archaeological investigations nearby, such as the evaluation by MoLAS in 1993 on another site in Alscot Road, revealed two north/south aligned ditches. One contained some prehistoric flint artefacts and is probably therefore prehistoric or at the latest Roman in date. The other contained no dating evidence but had a similar fill to the first and is also thought to be early in date, probably prehistoric or Roman. Both ditches were cut into the natural subsoil and were sealed by a post-medieval ploughsoil.
181. As a basement is proposed it would be appropriate for an archaeological watching brief to be maintained during development's groundworks. A written scheme of investigation for a watching brief was provided by the applicant, which is considered acceptable, and compliance with this document would be secured by a condition. Subject to this condition, the proposal would accord with London Plan policy 7.8, strategic policy 12 of the Core Strategy, and saved policy 3.19 of the Southwark Plan.

Sustainable development implications

Energy and BREEAM

182. An energy assessment was provided as part of the application, detailing how carbon

emissions would be reduced by the inclusion of passive design measures, the building fabric, CHP and 140sqm of PV panels on the roof. Together the measures would reduce carbon emissions by 44.5% compared with a Building Regulations 2013 Part L compliant building. This exceeds the requirements of a minimum of 35% reduction in the London Plan policy 5.2 for a non-domestic development, and no off-set payment is necessary. Compliance with the approved energy assessment (including the provision of PV panels) would be secured by condition.

183. The BREEAM pre-assessment report indicates how sufficient credits can be acquired in the subsequent design and construction phases to ensure an Excellent rating is achieved. The mandatory requirements and a score of 73.3% are shown (above the 70% requirement for an Excellent rating) based on the targeted credit. This would be secured by a proposed condition, to ensure compliance with Core Strategy policy 13 for sustainable construction, and draft NSP policy P68.

Air quality

184. An air quality assessment was submitted which assesses the suitability of the site for the student housing and whether any significant air quality impacts are expected as a result of the construction (e.g. as a result of dust) and operation of the proposal (e.g. from CHP emissions and vehicle traffic). Construction dust and plant emissions would be minimised through the Construction Environment Management Plan. CHP emissions would be in line with the GLA's Sustainable Design and Construction SPG, and with limited on site parking the predicted vehicle emissions would not be significant, particularly when compared with the lawful use of the site.
185. EPT has reviewed the submitted air quality report. A mechanical ventilation system is proposed with appropriate filters to address the NO₂ levels in the area. EPT will require specific details of the system prior to installation to ensure it would provide a suitable air quality for the future student residents. Subject to this condition, EPT is satisfied that the assessment covers the main areas of concerns and concurs with its recommendations.

Ground conditions and contamination

186. A submitted site investigation report summarises the desk study and intrusive investigation work undertaken, a basement impact assessment and assesses the potential contamination risk with the redevelopment of this light industrial site. Prior to the construction of the existing building, the site contained terrace houses, although nearby sites contained industrial processes in a glue factory, tannery and dye works. The existing building was previously used by a wood firm, with underground storage of solvents that were filled with foam in 1998. Five sample boreholes and four trial pits were dug on the site, finding the 1.8m deep made ground, and laboratory testing of the samples was undertaken. Traces of asbestos, esters and lead were found in the samples, but the made ground was generally not found to be contaminated. Monitoring of the areas around and underneath the underground storage tanks would be needed during demolition, excavation of the basement and construction. Clean topsoil would be needed for the soft landscaped areas. EPT has reviewed the submitted material and has no objections to the proposed works. Conditions are proposed to secure the remediation measures are carried out and the verification is provided, to ensure the site is suitable for occupation and to protect ground water.

Flood risk and drainage

187. The site is within flood zone 3 but benefits from the Thames flood defences. The original flood risk assessment was not acceptable to the Environment Agency and so

was amended and the finished ground floor level of the proposed building has been raised. The Environment Agency has reviewed the revised information and has withdrawn their objection. Compliance with the revised flood risk assessment and finished floor level would be required by a condition.

188. The existing building and hard standing currently cover the site; the proposal with its soft landscaping at the rear and green roof would reduce surface water run off. Below ground attenuation would be included to further reduce run off rates to the sewer; this is indicated to be beneath the servicing access. Compliance with the submitted drainage strategy would be secured by a condition.
189. Subject to conditions to secure the BREEAM rating of Excellent, energy strategy measures, contamination remediation measures, flood mitigation, surface water drainage and air quality measures, the proposal would comply with policies 5.2, 5.3, 5.7, 5.9, 5.12, 5.13, 5.14, 5.15, 5.21 and 7.14 of the London Plan, policy 13 of the Core Strategy, saved policies 3.1, 3.2, 3.3, 3.4, 3.6 and 3.9 of the Southwark Plan.

Trees, landscaping and ecology

190. An arboricultural report was submitted which considers the three London Plane trees on Alscot Road and the trees close to the rear boundary of the site (in the Henley Drive gardens), and the impact of the proposed development on nearby trees. One street tree would be removed, the other two would require pruning, and those at the rear of the site are very close to the boundary.
191. The street tree to be removed is a category B tree that would be located right in front of the proposed entrance to the building. The existing pavement is very narrow in front the site due to these trees, and the roots have disrupted the pavement levels and kerb stones resulting in an uneven surface for pedestrians. Setting the proposed building line back from the existing building and relaying the pavement as part of the highway works would improve this by widening the pavement and allow the new paving surface to fit better around the retained trees. The Urban Forester considers the removal acceptable providing suitable mitigation is secured in a planning obligation. A contribution of £26,100 (indexed) would be secured by a planning obligation, equivalent to the calculated CAVAT value of this tree, which the council can use to plant replacement trees in the area. The two street trees to be retained would require pruning as their canopies overhang the site, and as council street trees the works would need to be done with the agreement of the Highways team. The roots of these street trees would have been affected by the foundations of the existing building, meaning the construction of the proposed building is unlikely to cause significant damage to their roots.
192. One tree in Henley Drive is in poor structural condition and so the submitted report recommends its removal, however it is outside the application site and would require the owner's consent. The other trees close to the boundary would be pruned back to the boundary. Ways to protect nearby trees and their roots during demolition, construction and resurfacing of the site are suggested in the submitted arboricultural report. A condition is proposed regarding tree protection and further details for agreement by the Urban Forester.
193. Nine trees are proposed in the rear garden and parking areas as additional tree planting, which would help maintain tree cover and assist in providing screening from the proposed windows during the summer months.
194. The planters along the front of the proposed building would provide a buffer between the pavement and ground floor windows, and similarly at the rear, planting strips

would separate the windows from the paths. The rear amenity area and parking area would include new tree planting, and the species have been discussed with the urban forester and ecologist. The landscaping is well-considered and fits in with the concept of the building.

195. A preliminary ecological assessment, bat roost assessment, bat emergence survey and an invasive plant species survey were submitted. Japanese Knotweed is present on site and the submitted report sets out the method of its treatment and removal. Bats have been recorded in the local area and may use Bermondsey Spa Gardens for foraging. The existing building has potential to be used by roosting bats, and so further survey work was carried out. Bats were recorded crossing the site, but no bats were recorded emerging from the building. The Ecology Officer considers the submitted reports acceptable. Compliance with the Japanese Knotweed removal strategy would be conditioned. Biodiversity enhancements within the proposal include the planting within the landscaping and green roofs, and nesting boxes for birds and bats. Conditions to secure these and further details are proposed.
196. Subject to the conditions relating to tree protection measures, tree planting, landscaping, green roofs, bird and bat boxes, and removal of Japanese Knotweed, and planning obligations for the highway works and replacement street tree planting, the proposal would comply with policies 5.10, 5.11 and 7.19 of the London Plan, policies 11 and 13 of the Core Strategy, and saved policies 2.5 and 3.28 of the Southwark Plan.

Transport and highways issues

197. London Plan policies on transport seek to ensure major developments are located in accessible locations, and support improvements to sustainable transport modes. Core Strategy policy 2 encourages sustainable transport to reduce congestion, traffic and pollution. Policies 5.1 "Locating developments", 5.2 "Transport impacts", 5.3 "Walking and cycling", 5.6 "Car parking" and 5.7 "Parking standards for disabled people and the mobility impaired" seek to direct major developments towards transport nodes, provide adequate access, servicing, facilities for pedestrians and cyclists, and to minimise car parking provision while providing adequate parking for disabled people.
198. The site abuts the eastern end of Bermondsey Spa Gardens and the Alscot Road footways connect with Bermondsey tube station (a 10 minute walk), the bus routes on the nearby Grange Road and to the walking routes running through the neighbouring Bermondsey Spa Gardens. The footways also links northwards with the riverside walk/riverboat service along River Thames. This site is close to various cycle routes in this locality including the contiguous LCN22 on Grange Road/Crimscott Street and Quietways on Willow Walk. The site is within Grange CPZ which operates weekdays from 0800hrs to 1830hrs.
199. The setting back of this development from Alscot Road is welcomed, creating a generous pedestrian footpath and a pedestrian entrance that levels with the footway at the centre of the proposed building. The road section abutting this site at the curved Alscot Road junction is badly damaged and prone to ponding and would need to be resurfaced. Pedestrians would benefit from the re-arrangement of this junction comprising the construction of an extended raised table around it to serve a dual purpose of slowing vehicles down and providing crossing facility, especially as the proposed pedestrian entrance to this development faces this junction.
200. The highways works would be secured by a planning obligation, including replacing the paving and kerb in front of the site, constructing a build-out in front of the entrance and raised tables on Alscot Road to provide safe crossing points for the expected

increase in pedestrian footfall, to construct the vehicle crossover to current standard and to provide a dropped kerb for the refuse store. A Traffic Management Order would be needed also to convert the single yellow lines fronting the vehicle access to double yellow lines. The Highway Authority also wishes to adopt the strip of land between the highway boundary and the proposed building line on Alscot Road to achieve a 2.4m wide public highway (minimum), and this would be included as an obligation.

201. A condition is proposed requiring design and method statements for the basement construction given how close it to the public highway. Other comments from the Highways team regarding the need for a site survey prior to commencement, and drainage can be used as informatives.
202. The proposed cycle parking was increased during the application from the original 52 spaces to 72 spaces provided in two-tier cycle storage racks and in Sheffield stands, and additional capacity for a further 20 spaces. A Brompton bike store (with bikes available for the students to hire) would accommodate a further eight cycles. The provision of 80 spaces on-site would exceed the minimum provision required by the London Plan (of one space per two beds), but would be less than the requirements of the New Southwark Plan (of one space bed); additional cycle parking could be provided in the rear garden if demand is shown through the travel plan monitoring, however this would result in a smaller rear garden area. Further details of the appearance and gas-assisted mechanism to make the two-tier cycle parking easier to use would be required by condition.
203. Students are likely to attend HEIs in central London however the current Santander cycle hire scheme does not extend to the application site. A financial contribution (£43,598 indexed) would be secured to be used towards a new docking station in the nearby area to expand the network and encourage this form of sustainable travel.
204. Grange CPZ provides parking control in this vicinity on weekdays. There are a few car club spaces close to this development on Henley Drive, Spa Road, Balaclava Road, Grange Walk and Enid Street. The proposal includes four spaces; two existing car parking spaces for nos 91-97 Alscot Road would be reprovided, one disabled car parking bay and one delivery bay. This is considered to be an adequate provision given this site's characteristics.
205. The applicant has proposed the retention of the existing vehicle access leading to the proposed car parking/servicing area, with slight modification to improve visibility and include gates with automatic opening/closing mechanisms. Vehicle tracking diagrams have been provided to show how cars using the four undercroft parking spaces beneath nos. 91-97 Alscot Road can easily manoeuvre within the site with the proposed building in place, and to show how vehicles using the rest of the parking area can enter and leave in forward gear. The visibility splays from the revised vehicle access are acceptable to the Highways team.
206. Concerning the vehicle movements ensuing from this proposal, interrogation of comparable sites' travel surveys within TRICS travel database has revealed that this development proposal would produce two two-way vehicle movements in the morning or evening peak hours. When compared to the five two-way vehicle movements in the morning or evening peak hours that are estimated for the existing building on this site, the proposal would result in fewer vehicle movements in the peak hours. It is also not expected that this proposed development would produce any significant servicing trips during the morning or evening peak hours and throughout the day. Therefore on a day to day basis, the proposal would not have any noticeable adverse impact on the existing vehicular traffic on the adjoining roads. A servicing bond and associated monitoring fee would be secured through the section 106 agreement.

207. The peak time for vehicles associated with the development would be at the beginning of the academic year when students move in. The moving in process would be managed over two weekends each academic year to stagger the arrival of students; each student would be advised of the date and time to take up occupancy of their room, with an appointment time to arrive and unload (within the site, using pay and display bays on Alscot Road, or single yellow lines). The facilities management reserves the right to refuse access to students or parents ignoring these timings. While the submitted management strategy broadly outlines the process, further detail would be required of the moving in arrangements to ensure the disruption to the public highway is minimised. A planning obligation would prevent future occupiers from being eligible for CPZ parking permits, except for blue badge holders.
208. Although this site is in an area with a low PTAL rating, with the nearest bus route on Grange Road providing 24 two-way buses per hour, it is within practical walking distances of Bermondsey tube station. A contribution towards improving the bus service would be secured (£58,857 indexed) which is considered a proportionate amount for the number of students in the development. The applicant has proposed travel plan measures encompassing provision of cycle parking facilities and public transport information for staff and residents; an updated travel plan would be required by any permission to detail how sustainable transport modes would be encouraged. Further financial contributions (totalling £40,000 indexed) would be secured to provide the one bus stop on Grange Road near the site with the countdown passenger information system, and new longer shelter to improve the infrastructure.
209. The site is not large enough to allow a refuse vehicle to enter, turn and exit, therefore the bin store has been located at the front of the building to allow ready access by collectors from the public highway. It would be next to the bin store for Buckley House. Collection would be wholly by private contractor collection, likely to be twice a week. The store has been sized to contain seven Eurobins (three for waste, four for recycling), using the volume calculations for a residential development but allowing for a twice weekly collection.
210. The highway works along the front of the site would include provided a dropped kerb to assist the movement of the bins. A condition is proposed to confirm the waste collection arrangements and to require the bin storage shown to be provided, and an informative regarding collection by a commercial operator. Subject to this condition, the proposal would comply with saved policy 3.7 of the Southwark Plan.
211. Subject to the items to be secured by planning obligations in terms of the highway works, travel plan, contributions to bus frequency, bus infrastructure and cycle docking station, student management plan for the moving in/out periods and preventing the issue of CPZ permits, and conditioning the provision of the cycle parking and refuse store, the proposal does not raise significant transport or highway safety issues. It would comply with transport policies in the London Plan, Core Strategy policy 2, saved policies 5.1, 5.2, 5.3, 5.6 and 5.7 of the Southwark Plan.

Planning obligations and Community Infrastructure Levy (CIL)

212. Section 143 of the Localism Act states that any financial contribution received as community infrastructure levy (CIL) is a material “local financial consideration” in planning decisions. The requirement for payment of the Mayoral or Southwark CIL is therefore a material consideration, however the weight attached is determined by the decision maker.
213. The Mayoral CIL2 is required to contribute towards strategic transport investments in

London as a whole, primarily Crossrail, while Southwark's CIL will provide for infrastructure that supports growth in Southwark. The rate for Southwark CIL for this development is £109/sqm (indexed). In this instance it is estimated that a Mayoral CIL2 payment of £201,682.32 and Southwark CIL payment of £435,006.67 would be payable in the event planning permission is granted and implemented. Final figures would be subject to the relevant technical formulas and indexation following any grant of planning permission. Payment of the Mayoral CIL would accord with policy 8.3 of the London Plan.

214. The following table sets out the required site specific mitigation to be secured by a section 106 agreement, and the applicant's position with regard to each point:

Planning obligation	Mitigation	Applicant's position
Student housing use only	Restrict to only student housing occupation (and summer lets only to students)	Agreed
Student housing management	Management plan for day to day operation of the student housing and to detail the moving in/our arrangements to minimise disruption to the public highway.	Agreed
Affordable housing contribution	Payment in lieu of £5.7m (indexed) to be paid in phases on implementation (25%), practical completion (50%) and occupation (25%).	Agreed
Affordable housing contribution viability review	Require a viability review if the scheme is not implemented within two years of the permission date Late stage review at first full year of occupation.	Agreed
Car parking management	A car parking management plan showing 1(one) disabled car parking space plus 1(one) servicing space within this site for the student housing, and two parking bays for no. 91-97 Alscot Road, and how these all would be managed.	Agreed
Delivery and servicing plan	And the associated servicing deposit (£7,150 indexed) and monitoring fee (£1,600 indexed).	Agreed only if required prior to occupation (and not implementation)
Parking permit restriction	Prevent future occupiers from being eligible for permits in the CPZ (except blue badge holders).	Agreed
Employment and enterprise	Allow for local procurement and supply chain measures during construction and after construction.	Agreed
Highway works	Section 278/38 agreement for highway works including: <ul style="list-style-type: none"> • Repave the footway fronting the development including new kerbing 	Agreed

	<p>on Alscot Road using materials in accordance with Southwark's Streetscape Design Manual (precast concrete slabs and granite kerbs).</p> <ul style="list-style-type: none"> • Construct a build-out in front of the proposed entrance to reduce vehicle speeds and provide an extra footway area for pedestrians. • Construct a raised entry table on the junction of Alscot Road and its dead end arm to provide a level crossing for pedestrians and reduce speeds of vehicles approaching the junction. • Convert the two humps on Alscot Road on either side of the development into raised tables to provide safer and extra crossing points for the expected increase in pedestrian footfall due to the development. • Resurfacing of the road in front of the site and between the raised tables. • Vehicle crossover to be constructed to the relevant SSDM standards (DS132). • Provide dropped kerb access for the refuse bin store. • Promote Traffic Management Order to convert the single yellow lines fronting the vehicle access into the development to double yellow lines. • Provide the strip of land between the highway boundary and proposed building line on Alscot Road for adoption by the Highway Authority to achieve 2.4m minimum width. 	
Street tree removal and additional maintenance fee	<p>Contribution of £26,100 (indexed) calculated using the CAVAT method for the removal of one street tree that the council will use to plant replacement trees in the area.</p> <p>Contribution of £6,400 (indexed) for the additional maintenance of the street trees close to the façade of the proposal.</p>	Agreed
Spa Gardens contribution	£56,500 (indexed) towards improvement works in the Gardens and the enhanced maintenance costs from the students using the park	Agreed only if unspent moneys are returned after three years
Transport and travel plan measures	<p>Securing the provision of sustainable travel measures - e.g. Brompton cycle hire scheme, £40,000 (indexed) contribution for bus shelter replacement and Countdown installation, £58,857 (indexed) contribution to bus service improvements, £43,598</p>	Agreed

	(indexed) contribution to cycle hire docking station.	
Administration and monitoring fee	Payment to cover the costs of monitoring these necessary planning obligations, calculated as 2% of £174,955 = £3,499.10 (Plus the £1,600 monitoring fee for delivery and servicing as mentioned above).	Agreed

215. These obligations are necessary in order to make the development acceptable in planning terms, and to ensure the proposal accords with policies 2.5 of the Southwark Plan, Core Strategy policy 14 and London Plan policy 8.2, and the Section 106 Planning Obligations and CIL SPD. The total GEA triggers the local procurement requirement, however it is not over 5,00sqm and so does not trigger the construction phase jobs requirement of the Planning Obligations and Community Infrastructure Levy SPD.
216. In the absence of a legal agreement to secure the items and mitigation listed in the table above, the proposal would be contrary to saved policies 2.5 and 4.4 of the saved Southwark Plan 2007, Core Strategy policy 13, London Plan policies 3.12 and 8.2, and section 5 of the NPPF.
217. In the event that a satisfactory legal agreement has not been entered into by 3 June 2020, the director of planning be authorised to refuse planning permission (if appropriate) for the following reason:

“The proposal fails to provide an appropriate mechanism for securing the in lieu payment for affordable housing, the highways works and financial contributions towards replacement tree planting and transport mitigation. The proposal therefore fails to demonstrate conformity with strategic planning policies and fails to adequately mitigate the particular impacts associated with the development in accordance with saved policies 2.5 'Planning obligations' and 4.4 'Affordable Housing' of the Southwark Plan (2007), Strategic Policies 8 'Student Housing' and '14 'Delivery and implementation' of the Core Strategy (2011), and London Plan (2016) policies 3.12 'Negotiating affordable housing' and' 8.2 'Planning obligations', as well as guidance in the council's Section 106 Planning Obligations and Community Infrastructure Levy SPD (2015).”

Community involvement and engagement

218. While pre-application consultation is not a legal requirement for a scheme of this type, it is encouraged by the council. The application was submitted in summer 2018 before the council's publication of the Development Consultation Charter. The applicant has completed the Engagement Summary template nonetheless, which is appended as Appendix 5. The main engagement activities at pre-application stage were the consultation event held over two days in March 2018 (where 3,000 local residents were invited to a public exhibition), meeting local groups and organisations, ward councillors and cabinet members. A dedicated website was set up for this project by the applicant as well. The applicant used the council's pre-application service.
219. The applicant also engaged with higher educational institutions. The discussions with universities at workshop meetings resulted in changes to the type of student rooms being included in the proposal – e.g. fewer studios and more shared communal spaces to encourage social interaction, replacing a large common room at ground floor with a flexible space cinema and gym at the basement.

220. Following the submission of the planning application, the council advertised it by neighbour letters, site notices and a press notice. The objections and comments received from the local community and statutory consultees are summarised later in this report. The amendments made by the applicant during the course of the application, to reduce the number of bedrooms, amend the cycle parking provision and front entrance ramp did not significantly change the physical appearance of the proposal nor raise issues that would require reconsultation.

Consultation responses and how the application addresses the concerns raised

Consultation responses from members of the public

221. Summarised below are the material planning considerations raised in the objections and supportive comments from members of the public.

Comments in objection

222. Objections were received from 30 households which have been summarised as follows:
223. **Loss of existing use** – Loss of workshop employment space. Loss of the artist space; artists that engage with the local community. A cultural space should be included on the ground floor.
224. Officer response: The lawful Class B1c use of the site is not protected by adopted planning policy in this location. The current temporary use of the site as artists workshops is to ensure the building is occupied to prevent squatting and vandalism, with the artist collective renting the building on a temporary basis. There is no policy requirement for a cultural facility to be included in the redevelopment
225. **Student housing** - The area is not a student accommodation zone and there are no major higher education institutions within easy access. The site has a low PTAL rating, is not in a town centre, and has limited ways of commuting, so the proposal does not comply with policy. No education partner has been identified so this is a speculative proposal. Southwark already has fulfilled its quota for student accommodation.

Student housing would be out of character with this popular, peaceful, revitalised residential area. The area is not suitable for student accommodation and would be inundated with students. Students would not try to integrate into the existing community, and will not be long-term residents. Introducing a transient population brings no benefit to the community. Students would be shoehorned into a small site with few amenities. Impact of so many students on existing residents having fewer amenities, fewer transport links, higher density and increased risk of noise and antisocial behaviour. The rooms could be let out for holiday type lets especially over the summer holidays, which will change the character of the neighbourhood. If it goes ahead the area would no longer be suitable for families and residents would relocate. If approved it would need to be restricted to prevent it becoming an HMO.

226. Officer response: Various HEIs can be reached by sustainable transport modes from the site, and the emerging NSP policy on student housing removes the town centre location requirement. While this is a mainly residential area, the introduction of the student housing scheme of this scale is considered not to cause harm to the character of the area. The use as student housing only would be secured by a planning obligation.
227. **Lack of affordable housing** - No affordable housing is proposed. This residential

area is in dire need of affordable housing, flats for local families and for the local community, not student accommodation. The lack of profit for the developer by including affordable housing should not be a reason to allow a student housing scheme. These “luxury” student developments give nothing to the need for homes/housing but are a factor in rising rental charges and property “inaffordability” in London. Putting family housing on the site would make good use of having a park so close.

228. Officer response: No on-site affordable housing is proposed, but the payment in lieu to the council would be used to provide affordable housing in the borough. The provision of purpose-built student housing may free up standard housing currently being rented by students.
229. **Over-development and cumulative impact** - The site is in need of improvements but this is an over-development. There is no benefit to the local community, only profit for the developer. Such high density of the scheme on a small site, and particularly with such a transient population. The immediate area is already over the council’s guidelines. Cumulative impact on population density increasing with this proposed student development and the other on Spa Road, when there is already so much student housing in the borough and not enough affordable housing. The approval of two such developments in a family area would radically change this quiet residential neighbourhood and feel of the community.
230. Officer response: The proposed density is high and above the expected range for the urban density zone, however the design and quality of accommodation, and the resulting impacts on townscape, neighbour amenity, transport etc are (subject to conditions and planning obligations) acceptable. The introduction of this and the Spa Road student housing scheme would not result in an over-concentration of student housing in this mainly residential area (with the nearest existing purpose built student housing being 900m away at Great Dover Street), and would contribute towards a mixed community.
231. **Height** - Unacceptable height, scale, massing and overshadowing. Seven storeys would be discordant, out of keeping in relation to local context, taller than anything else on the street and would break the uniformity of the street. It would dominate the south side of Alscot Road, harming the local character and impact negatively on surrounding buildings. It would create a dark street between Artesian House and the site. It should be the same height as the buildings either side. The description of a “3-7 storey building” is not defined enough and makes a huge difference whether based on three or seven storeys, with no mention of how many rooms this accommodation will have.
232. Officer response: The proposal is taller than the adjoining buildings, but lower than Artesian House opposite the site. The five-storey shoulder height would relate to the Alscot Road streetscape, and the façade design is of a more refined style to the nearby buildings. The submitted drawings of the part three-storey, part seven-storey building accurately depict the proposal, and the description referred to the number of student rooms.
233. **Harm to the park** - The setting of Spa Gardens with the listed buildings on the other side creates a well-composed and distinct urban character and streetscape which will be eroded if the existing heights and massing are not respected. Another large building overlooking the park that would hem in and enclose the Spa Gardens so that it loses its open feel. Overshadowing in an area that already lacks space and sunlight. Students using the park at all hours making it unwelcome, anti-social behaviour, disturbance to neighbouring properties, and unsuitable for families and children

(further stretching police and council resources). Disruption during building work.

234. Officer response: From the Gardens the seven storey-proposal would be viewed alongside the 9-storey end of Artesian House and the 5-storey buildings either side of the site, and partly screened by nearby trees. The architecture of the front façade (with a 5-storey shoulder height and upper two storeys recessed) is considered an acceptable height and massing in these views from the park. Its massing would not cause significant overshadowing of the Gardens. The proposal includes indoor amenities and outdoors spaces for the student residents so it is not reliant on the Gardens to provide amenity space. A construction management plan would be required by condition.
235. **Neighbour amenity** – Noise and disturbance - Harm due to noise nuisance with such a significant number of students on a small site and in an area without obvious local night time economy attraction to students. Balconies adding to the noise. Students moving in for short-term tenancies with a high turnover would have no obligation to ensure good relations with neighbours. The Spa Road area is already very noisy on a Saturday night with music, motorbikes and parties; a tall building will amplify noise and cause it to echo. The council's noise nuisance team are already understaffed and cannot respond in a timely manner. The submitted noise management plan only talks about optional noise measurements in communal areas. Short-term lets in the summer would have late night activity, noise, litter. Impact on the peaceful, spiritual retreat/refuge of those using the Tibetan Buddhist Centre.

Outlook - At seven storeys high it will substantially crowd views from surrounding properties. Intrusive by building right on the boundary with no. 91, loss of privacy to neighbouring properties. Harm to the Henley Drive properties with some undesirable overlooking aspects.

Overshadowing - From the massing of the proposal.

236. Officer response: A condition is proposed restricting the hours of use of the terraces and garden, and a management plan would be required by a planning obligation to minimise noise to neighbouring properties. The site is 160m from the Tibetan Buddhist Centre. The massing of the building would not cause significant daylight and sunlight impacts to neighbouring properties, nor to their outlook.
237. **Insufficient infrastructure and transport** - Negative impact on sustainability of local service provision. The influx of residents is likely to put unacceptable strain on local amenities, shops, park, local doctors/dentist surgeries, pub, roads, bus and tube services which are already at capacity. The Sainsbury's already has empty shelves and rubbish overflowing which will only get worse with more people. The character of the park (as a pleasant and quiet family-utilised public space) would be dramatically altered by the residency of significant numbers of students. The area is already overcrowded and lacks infrastructure; it needs more investment in public services such as a leisure centre, sports/community centre. Without improvements to the bus frequency, the development is not sustainable. Given students are likely to not have their own cars they will rely heavily on the two bus lines that service the area, which are already beyond capacity. Morning rush hour buses are already full of school children, buses pass without stopping as they are full; this will only get worse.
238. Officer response: The payment of Southwark CIL can be used by the council towards projects in the neighbourhood and wider borough. Students may use the public transport services in the area and the proposal has incorporated cycle parking and a cycle hire scheme for future residents too. Contributions to bus service improvements and bus stop infrastructure would be secured to mitigate the transport impacts of the

development.

239. **Highway impacts** - it is virtually impossible to drive down Alscot Road past the site due to the parked cars and narrow road, and traffic cutting through the area. The proposal will have a high transitory turnover and the road will be unnavigable at the times when terms begin. More traffic means more noise. Alscot Road cannot support a yearly turnover of 150+ tenants moving in and out with cars, trucks and vans and insufficient parking onsite and on the road. The vehicle access at the side is too small to allow for emergency access.
240. Officer response: a management plan for the moving in days would be required to reduce impacts on the busiest day for vehicles coming to the site. Fire Brigade access would be provided at the front of the building. Highway works to improve the pedestrian environment and resurface the road would be secured.
241. **Litter** – the area has problems with litter and fly-tipping which will only get worse with more people living in the area. The residents' bins under no. 91 Alscot Road are always full.
242. Officer response: The application makes sufficient refuse storage for the development itself, and does not affect the bin storage at no. 91 Alscot Road.
243. **Loss of a street tree** - The tree is an important feature, as well as protecting privacy between the east facing flats of Artesian and west facing flats of St Christopher House.
244. Officer response: A contribution would be required for the loss of a category B street tree (to fund replacement planting) and towards the additional cost of maintaining the two retained trees. There is sufficient distance between neighbouring properties without the tree in place to prevent a material loss of privacy.
245. **Other matters** - These objections were raised to the developer during the community consultation. The council has an obligation to its paying residents to reject the proposal. Residents need to be listened to. The neighbour letters gave only 20 days for comment, not 21.
246. Officer response: The statutory consultation period of 21 days was given, and all comments received (even after this date) have been considered and summarised above. The application has been assessed against planning policy, as set out in the assessment sections above.
247. **Non-planning matters**: Loss of views and reduction in property value. Building right up against buildings will affect roof drainage.
248. Officer response: These are not material planning considerations.

Comments in support

249. Seven letters of support were received from two organisations summarised as:
250. Six in support from staff and governors of Kintore Way Nursery School and Children's Centre – the applicant has contacted the school and discussed potential improvements to the nursery's outdoor play area and building as part of the applicant's local community engagement. The school considers the plans to be beneficial to the neighbourhood, sensitive and of high quality, and improve on the building currently on the site. It would bring a new vibe into the area and would blend in well with the area.

Alumno has considered the environment in the plans. Alumno have had some success in other areas and want to replicate that in Bermondsey while being sensitive to local needs. Many students have undertaken their placements at Kintore Way from various universities and the nursery would want to support the provision of further student accommodation in the local area. Impressed by the Brompton Bike hire proposal.

251. Officer response: The improvements to the nursery are not related to the student housing proposal and are not necessary in planning terms to make the scheme acceptable.
252. One support from a non-profit organisation called Wayfindr which developed the world's first standard for accessible audio navigation for persons with sight loss. Wayfindr supports the applicant's proposal which will include audio navigation, as a first for student accommodation and a great leap forward in accessible living spaces for students with disabilities. It would also aid their integration into the wider community by linking with local amenities and public transport, and provide opportunities for further research.
253. Officer response: The use of this innovative technology would make the proposal more accessible for visually impaired students beyond the physical form of the development.

Consultation responses from internal consultees

254. Summarised below are the material planning considerations raised by internal consultees.
255. Environmental Protection Team:
- Comments incorporated above, with conditions proposed regarding internal noise levels, plant noise, air quality, ventilation, verification of the remediation works, and a Construction Environmental Management Plan.
256. Local Economy Team:
- The size and use classes for this development do not trigger any obligations in the construction and end phases.
257. Comments from the Highways department, Flood and Drainage team and the Ecologist have been incorporated into the assessment sections above.

Consultation responses from external consultees

258. Summarised below are the material planning considerations raised by external consultees, along with the officer's responses.
259. Environment Agency:
- The revisions to raise the ground floor finished floor level allowed the EA to withdraw its initial objection.
260. Officer response: A condition is proposed to ensure the development is constructed in accordance with the revised FRA.
261. Historic England:
- Did not need to be consulted.
262. London Fire Bridge:
- Request an undertaking that access for fire appliances (required by Building

Regulations) and adequate water supplies for fire fighting would be provided.

263. Officer response: The applicant has since confirmed access and water supplies would be provided with a dry riser outlet on every level in the stair enclosure and a dry riser inlet on the front elevation, and that there is an existing hydrant is in front of the site.
264. London Underground:
- Has no comment.
265. Metropolitan Police:
- The development could achieve the security requirements of Secured by Design, particularly with on-going involvement of the Designing Out Crime Office, and recommends a condition to achieve Secured by Design accreditation.
266. Officer response: The applicant does not agree to this condition, as set out in the preceding Design section of the assessment.
267. Natural England:
- Has no comment.
268. Thames Water:
- Has no objection with regard to water network infrastructure capacity, waste water network and waste water process infrastructure capacity. Request a condition for a piling method statement given the proximity to a strategic sewer. Other comments can be used as informatives on any permission.
269. Officer response: This condition and informatives have been included.

Community impact and equalities assessment

270. The Public Sector Equality Duty (PSED) contained in Section 149 (1) of the Equality Act 2010 imposes a duty on public authorities to have, in the exercise of their functions, due regard to three “needs” which are central to the aims of the Act:
1. The need to eliminate discrimination, harassment, victimisation and any other conduct prohibited by the Act.
 2. The need to advance equality of opportunity between persons sharing a relevant protected characteristic and persons who do not share it. This involves having due regard to the need to:
 - Remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic
 - Take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it
 - Encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.
 3. The need to foster good relations between persons who share a relevant protected characteristic and those who do not share it. This involves having due regard, in particular, to the need to tackle prejudice and promote understanding.
271. The protected characteristics are: race, age, gender reassignment, pregnancy and maternity, disability, sexual orientation, religion or belief, sex, marriage and civil partnership.

272. The council must not act in a way which is incompatible with rights contained within the European Convention of Human Rights.
273. The council has given due regard to the above needs and rights where relevant or engaged throughout the course of determining this application.

Human rights implications

274. This planning application engages certain human rights under the Human Rights Act 2008 (the HRA). The HRA prohibits unlawful interference by public bodies with conventions rights. The term 'engage' simply means that human rights may be affected or relevant.
275. This application has the legitimate aim of providing student housing through the redevelopment of a brownfield site. The rights potentially engaged by this application, including the right to a fair trial and the right to respect for private and family life are not considered to be unlawfully interfered with by this proposal.

Positive and proactive engagement: summary table

276. The council has published its development plan and Core Strategy on its website together with advice about how applications are considered and the information that needs to be submitted to ensure timely consideration of an application. Applicants are advised that planning law requires applications to be determined in accordance with the development plan unless material considerations indicate otherwise.
277. The council provides a pre-application advice service that is available to all applicants in order to assist applicants in formulating proposals that are in accordance with the development plan and core strategy and submissions that are in accordance with the application requirements.

Was the pre-application service used for this application	Yes
If the pre-application service was used for this application, was the advice given followed?	Yes
Was the application validated promptly?	Yes
If necessary/appropriate, did the case officer seek amendments to the scheme to improve its prospects of achieving approval?	Yes
To help secure a timely decision, did the case officer submit their recommendation in advance of the statutory determination date?	No

Conclusion

278. There is no policy objection to the loss of the light industrial use of this site as it is outside the strategic and preferred industrial locations, and does not meet the criteria of saved policy 1.4 of the Southwark Plan.
279. There is support in the London Plan, Core Strategy and Southwark Plan for student housing and it counts towards the borough's housing delivery. Core Strategy policy 8 part 1 directs student housing to town centres and places with good access to public

transport services. The site is not within a town centre and while it has a low PTAL rating of 2 it is next to sites with higher PTAL ratings and is in a relatively accessible part of the borough for students to travel to HEIs. It is noted that emerging NSP policy P5 'Student homes' removes the location restriction on student housing. Whilst the weight ascribed to the NSP is limited, given the council's stated intention, through the submission of the NSP, to remove the locational requirements for student housing, it would be difficult to justify refusal of planning permission based on the site being outside one of the areas identified under the Core Strategy.

280. No affordable housing is proposed within the redevelopment due to the size of the site and the impact it would have on the size of a student housing scheme. A payment in lieu is proposed of £5.7m, which equates to 35% affordable housing by habitable room. In this regard the proposal complies with part 2 of Core Strategy policy 8.
281. The design of the building is appropriate for this site fronting onto Bermondsey Spa Gardens, stepping down in scale from the nine-storey Artesian House, to the five-storey adjoining buildings and three-storey blocks on Henley Drive, and the revised materials better reflect the context.
282. The proposal would provide a high standard of accommodation for student residents, by the size of rooms, daylight provision, good outlook, communal facilities and amenity spaces. It would not cause significant harm to the amenity of neighbouring properties, nor to the sunlight levels of the Gardens, and a condition relating to the use of outdoor spaces is proposed in the interest of neighbour amenity.
283. Conditions are proposed to secure the sustainability aspects (e.g. carbon reduction, BREEAM excellent, flood risk), potential archaeological impacts, biodiversity and flood risk mitigation. Highway works, management plan and transport contributions would be secured by the legal agreement to ensure the development makes appropriate improvements to the local area to mitigate its impacts.
284. Subject to the proposed conditions and completion of an appropriate legal agreement to secure the necessary planning obligations, the proposal is considered to accord with the development plan and emerging policies, and a grant of planning permission is recommended.

BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
Southwark Local Development Framework and Development Plan Documents	Place and Wellbeing Department 160 Tooley Street London SE1 2QH	Planning enquiries telephone: 020 7525 5403 Planning enquiries email: planning.enquiries@southwark.gov.uk Case officer telephone: 0207 525 0254 Council website: www.southwark.gov.uk

APPENDICES

No.	Title
Appendix 1	Consultation undertaken
Appendix 2	Consultation responses received
Appendix 3	Relevant planning history
Appendix 4	Recommendation
Appendix 5	Engagement summary for the Development Consultation Charter

AUDIT TRAIL

Lead Officer	Simon Bevan, Director of Planning	
Report Author	Victoria Crosby, Team Leader	
Version	Final	
Dated	19 February 2020	
Key Decision	No	
CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER		
Officer Title	Comments Sought	Comments included
Strategic Director of Finance and Governance	No	No
Strategic Director of Environment and Leisure	No	No
Strategic Director of Housing and Modernisation	No	No
Director of Regeneration	No	No
Date final report sent to Constitutional Team		19 February 2020

Consultation undertaken

Site notice date: 10/08/2018

Press notice date: 02/08/2018

Case officer site visit date: 10/08/2018

Neighbour consultation letters sent: 07/08/2018

Internal services consulted

Flood Risk Management & Urban Drainage

Highways Development and Management

Waste Management

Ecology

Design and Conservation Team

Urban Forester

Archaeology

Highways Licensing

Planning Policy

Environmental Protection Team

Local Economy Team

Statutory and non-statutory organisations

Thames Water

Environment Agency

Natural England

London Fire & Emergency Planning Authority

Thames Water

London Underground

Metropolitan Police Service (Designing Out Crime)

Transport for London

EDF Energy

Neighbour and local groups consulted:

Flat 14 Solarium Court 105 Alscot Road
 Flat 15 Solarium Court 105 Alscot Road
 Flat 23 Solarium Court 105 Alscot Road
 Flat 24 Solarium Court 105 Alscot Road
 Flat C Mervyn House 105 Grange Road
 129 Grange Road London SE1 3AL
 49 Alscot Road London SE1 3AU
 The Grange 103 Grange Road London
 Flat D Mervyn House 105 Grange Road
 Bermondsey Health Centre 108-110 Grange
 Road London
 Flat 23 Brewster House 111 Grange Road
 65 Henley Drive London SE1 3AR
 66 Henley Drive London SE1 3AR
 64 Henley Drive London SE1 3AR
 Flat 6 Brewster House 111 Grange Road
 Flat 10 Brewster House 111 Grange Road
 Flat 11 Brewster House 111 Grange Road
 Flat 9 Brewster House 111 Grange Road
 Flat 7 Brewster House 111 Grange Road

Flat 8 Brewster House 111 Grange Road
 Flat 7 45 Alscot Road London
 3 Vauban Estate Vauban Street London
 30 Vauban Estate Vauban Street London
 29 Vauban Estate Vauban Street London
 27 Vauban Estate Vauban Street London
 28 Vauban Estate Vauban Street London
 31 Vauban Estate Vauban Street London
 35 Vauban Estate Vauban Street London
 46 Vauban Estate Vauban Street London
 47 Vauban Estate Vauban Street London
 45 Vauban Estate Vauban Street London
 43 Vauban Estate Vauban Street London
 44 Vauban Estate Vauban Street London
 16 Vauban Estate Vauban Street London
 22 Goodwin Close London SE16 3TR
 23 Goodwin Close London SE16 3TR
 21 Goodwin Close London SE16 3TR
 19 Goodwin Close London SE16 3TR
 20 Goodwin Close London SE16 3TR

24 Goodwin Close London SE16 3TR
 28 Goodwin Close London SE16 3TR
 29 Goodwin Close London SE16 3TR
 27 Goodwin Close London SE16 3TR
 Flat 13 Solarium Court 105 Alscot Road
 Flat 11 Solarium Court 105 Alscot Road
 Flat 12 Solarium Court 105 Alscot Road
 Flat 16 Solarium Court 105 Alscot Road
 Flat 20 Solarium Court 105 Alscot Road
 Flat 21 Solarium Court 105 Alscot Road
 Flat 19 Solarium Court 105 Alscot Road
 Flat 17 Solarium Court 105 Alscot Road
 Flat 18 Solarium Court 105 Alscot Road
 Flat 3 Solarium Court 105 Alscot Road
 Flat 4 Solarium Court 105 Alscot Road
 Flat 2 Solarium Court 105 Alscot Road
 Wardens Flat Brewster House 111 Grange Road
 Flat 1 Solarium Court 105 Alscot Road
 Flat 5 Solarium Court 105 Alscot Road
 Flat 9 Solarium Court 105 Alscot Road
 Flat 10 Solarium Court 105 Alscot Road
 Flat 8 Solarium Court 105 Alscot Road
 Flat 6 Solarium Court 105 Alscot Road
 Flat 7 Solarium Court 105 Alscot Road
 Flat 22 Solarium Court 105 Alscot Road
 57 Alscot Road London SE1 3AU
 59 Alscot Road London SE1 3AU
 55 Alscot Road London SE1 3AU
 51 Alscot Road London SE1 3AU
 53 Alscot Road London SE1 3AU
 Flat 1 45 Alscot Road London
 Flat 5 45 Alscot Road London
 Flat 6 45 Alscot Road London
 Flat 4 45 Alscot Road London
 Flat 2 45 Alscot Road London
 Flat 3 45 Alscot Road London
 Flat A Mervyn House 105 Grange Road
 Flat B Mervyn House 105 Grange Road
 Flat 25 Solarium Court 105 Alscot Road
 62 Henley Drive London SE1 3AR
 63 Henley Drive London SE1 3AR
 67 Henley Drive London SE1 3AR
 71 Henley Drive London SE1 3AR
 123 Grange Road London SE1 3AL
 70 Henley Drive London SE1 3AR
 68 Henley Drive London SE1 3AR
 69 Henley Drive London SE1 3AR
 54 Henley Drive London SE1 3AR
 55 Henley Drive London SE1 3AR
 53 Henley Drive London SE1 3AR
 51 Henley Drive London SE1 3AR
 52 Henley Drive London SE1 3AR
 56 Henley Drive London SE1 3AR
 60 Henley Drive London SE1 3AR
 61 Henley Drive London SE1 3AR
 59 Henley Drive London SE1 3AR
 57 Henley Drive London SE1 3AR
 58 Henley Drive London SE1 3AR
 124 Grange Road London SE1 3AL
 Flat 15 Brewster House 111 Grange Road
 Flat 16 Brewster House 111 Grange Road
 Flat 14 Brewster House 111 Grange Road
 Flat 12 Brewster House 111 Grange Road
 Flat 13 Brewster House 111 Grange Road
 Flat 17 Brewster House 111 Grange Road
 Flat 21 Brewster House 111 Grange Road
 Flat 22 Brewster House 111 Grange Road
 Flat 20 Brewster House 111 Grange Road
 Flat 18 Brewster House 111 Grange Road
 Flat 19 Brewster House 111 Grange Road
 Flat 4 Brewster House 111 Grange Road
 Flat 5 Brewster House 111 Grange Road
 Flat 3 Brewster House 111 Grange Road
 Flat 1 Brewster House 111 Grange Road
 Flat 2 Brewster House 111 Grange Road
 36 Vauban Estate Vauban Street London
 34 Vauban Estate Vauban Street London
 32 Vauban Estate Vauban Street London
 33 Vauban Estate Vauban Street London
 2 Vauban Estate Vauban Street London
 20 Vauban Estate Vauban Street London
 19 Vauban Estate Vauban Street London
 17 Vauban Estate Vauban Street London
 18 Vauban Estate Vauban Street London
 21 Vauban Estate Vauban Street London
 25 Vauban Estate Vauban Street London
 26 Vauban Estate Vauban Street London
 24 Vauban Estate Vauban Street London
 22 Vauban Estate Vauban Street London
 23 Vauban Estate Vauban Street London
 37 Vauban Estate Vauban Street London
 50 Vauban Estate Vauban Street London
 51 Vauban Estate Vauban Street London
 5 Vauban Estate Vauban Street London
 48 Vauban Estate Vauban Street London
 49 Vauban Estate Vauban Street London
 52 Vauban Estate Vauban Street London
 8 Vauban Estate Vauban Street London
 9 Vauban Estate Vauban Street London
 7 Vauban Estate Vauban Street London
 53 Vauban Estate Vauban Street London
 6 Vauban Estate Vauban Street London
 40 Vauban Estate Vauban Street London
 41 Vauban Estate Vauban Street London
 4 Vauban Estate Vauban Street London
 38 Vauban Estate Vauban Street London
 39 Vauban Estate Vauban Street London
 42 Vauban Estate Vauban Street London
 25 Goodwin Close London SE16 3TR
 26 Goodwin Close London SE16 3TR
 Flat 4 47 Alscot Road London
 Flat 5 47 Alscot Road London
 Flat 3 47 Alscot Road London

Flat 1 47 Alscot Road London
 Flat 2 47 Alscot Road London
 Flat 6 47 Alscot Road London
 Unit D 63 Alscot Road London
 Unit F 63 Alscot Road London
 Unit B And C 63 Alscot Road London
 Unit A 63 Alscot Road London
 Unit E 63 Alscot Road London
 30 Goodwin Close London SE16 3TR
 1 Vauban Estate Vauban Street London
 First Floor And Second Floor Flat 128
 Grange Road London
 42 Goodwin Close London SE16 3TR
 107 Grange Road London SE1 3BW
 10 Vauban Estate Vauban Street London
 14 Vauban Estate Vauban Street London
 15 Vauban Estate Vauban Street London
 13 Vauban Estate Vauban Street London
 11 Vauban Estate Vauban Street London
 12 Vauban Estate Vauban Street London
 34 Goodwin Close London SE16 3TR
 35 Goodwin Close London SE16 3TR
 33 Goodwin Close London SE16 3TR
 31 Goodwin Close London SE16 3TR
 32 Goodwin Close London SE16 3TR
 36 Goodwin Close London SE16 3TR
 40 Goodwin Close London SE16 3TR
 41 Goodwin Close London SE16 3TR
 39 Goodwin Close London SE16 3TR
 37 Goodwin Close London SE16 3TR
 38 Goodwin Close London SE16 3TR
 Flat 27 Artesian House 136 Grange Road
 Flat 5 95 Alscot Road London
 Flat 6 95 Alscot Road London
 Flat 4 95 Alscot Road London
 Flat 2 95 Alscot Road London
 Flat 3 95 Alscot Road London
 Flat 7 95 Alscot Road London
 Flat 4 97 Alscot Road London
 Flat 1 91 Alscot Road London
 Flat 3 97 Alscot Road London
 Flat 1 97 Alscot Road London
 Flat 2 97 Alscot Road London
 Flat 4 93 Alscot Road London
 Flat 5 93 Alscot Road London
 Flat 3 93 Alscot Road London
 19 Henley Drive London SE1 3AP
 17 Henley Drive London SE1 3AP
 18 Henley Drive London SE1 3AP
 22 Henley Drive London SE1 3AP
 26 Henley Drive London SE1 3AP
 27 Henley Drive London SE1 3AP
 25 Henley Drive London SE1 3AP
 23 Henley Drive London SE1 3AP
 24 Henley Drive London SE1 3AP
 9 Henley Drive London SE1 3AP
 10 Henley Drive London SE1 3AP
 8 Henley Drive London SE1 3AP
 6 Henley Drive London SE1 3AP
 7 Henley Drive London SE1 3AP
 11 Henley Drive London SE1 3AP
 15 Henley Drive London SE1 3AP
 16 Henley Drive London SE1 3AP
 Flat 1 93 Alscot Road London
 Flat 2 93 Alscot Road London
 Flat 6 93 Alscot Road London
 Flat 10 93 Alscot Road London
 Flat 1 95 Alscot Road London
 Flat 9 93 Alscot Road London
 Flat 7 93 Alscot Road London
 Flat 8 93 Alscot Road London
 Flat 2 91 Alscot Road London
 Flat 19 Artesian House 136 Grange Road
 Flat 20 Artesian House 136 Grange Road
 Flat 18 Artesian House 136 Grange Road
 Flat 16 Artesian House 136 Grange Road
 Flat 17 Artesian House 136 Grange Road
 Flat 21 Artesian House 136 Grange Road
 Flat 25 Artesian House 136 Grange Road
 Flat 26 Artesian House 136 Grange Road
 Flat 24 Artesian House 136 Grange Road
 Flat 22 Artesian House 136 Grange Road
 Flat 23 Artesian House 136 Grange Road
 Ellen Brown Play Centre 145 Grange Road
 London
 Artesian House 94 Alscot Road London
 Flat 3 91 Alscot Road London
 Flat 4 91 Alscot Road London
 Artesian House 134 Grange Road London
 Flat 14 Artesian House 136 Grange Road
 Flat 15 Artesian House 136 Grange Road
 Flat 13 Artesian House 136 Grange Road
 Artesian House 135 Grange Road London
 Flat 12 Artesian House 136 Grange Road
 Flat 62 Artesian House 96 Alscot Road
 20 Henley Drive London SE1 3AP
 21 Henley Drive London SE1 3AP
 14 Henley Drive London SE1 3AP
 12 Henley Drive London SE1 3AP
 13 Henley Drive London SE1 3AP
 28 Henley Drive London SE1 3AP
 43 Henley Drive London SE1 3AR
 44 Henley Drive London SE1 3AR
 42 Henley Drive London SE1 3AP
 40 Henley Drive London SE1 3AP
 41 Henley Drive London SE1 3AP
 45 Henley Drive London SE1 3AR
 49 Henley Drive London SE1 3AR
 50 Henley Drive London SE1 3AR
 48 Henley Drive London SE1 3AR
 46 Henley Drive London SE1 3AR
 47 Henley Drive London SE1 3AR
 32 Henley Drive London SE1 3AP
 33 Henley Drive London SE1 3AP

31 Henley Drive London SE1 3AP
 29 Henley Drive London SE1 3AP
 30 Henley Drive London SE1 3AP
 34 Henley Drive London SE1 3AP
 38 Henley Drive London SE1 3AP
 39 Henley Drive London SE1 3AP
 37 Henley Drive London SE1 3AP
 35 Henley Drive London SE1 3AP
 36 Henley Drive London SE1 3AP
 5 Henley Drive London SE1 3AP
 Flat 3 Buckley Court 63 Alscot Road
 Flat 4 Buckley Court 63 Alscot Road
 Flat 2 Buckley Court 63 Alscot Road
 Living Accommodation The Grange 103
 Grange Road
 Flat 1 Buckley Court 63 Alscot Road
 Flat 5 Buckley Court 63 Alscot Road
 Flat 9 Buckley Court 63 Alscot Road
 Artesian House 138 Grange Road London
 Flat 31 Artesian House 98 Alscot Road
 Flat 11 Artesian House 137 Grange Road
 Flat 9 Artesian House 137 Grange Road
 Flat 10 Artesian House 137 Grange Road
 Flat 32 Artesian House 98 Alscot Road
 Flat 36 Artesian House 98 Alscot Road
 Flat 37 Artesian House 98 Alscot Road
 Flat 35 Artesian House 98 Alscot Road
 Flat 33 Artesian House 98 Alscot Road
 Flat 34 Artesian House 98 Alscot Road
 Flat 1 Artesian House 137 Grange Road
 Flat 2 Artesian House 137 Grange Road
 Flat 30 Artesian House 136 Grange Road
 Flat 28 Artesian House 136 Grange Road
 Flat 29 Artesian House 136 Grange Road
 Flat 3 Artesian House 137 Grange Road
 Flat 7 Artesian House 137 Grange Road
 Flat 8 Artesian House 137 Grange Road
 Flat 6 Artesian House 137 Grange Road
 Flat 4 Artesian House 137 Grange Road
 Flat 5 Artesian House 137 Grange Road
 Flat 38 Artesian House 98 Alscot Road
 Flat 53 Artesian House 98 Alscot Road
 Flat 55 Artesian House 96 Alscot Road
 Flat 52 Artesian House 98 Alscot Road
 Flat 50 Artesian House 98 Alscot Road
 Flat 51 Artesian House 98 Alscot Road
 Flat 56 Artesian House 96 Alscot Road
 Flat 60 Artesian House 96 Alscot Road
 Flat 61 Artesian House 96 Alscot Road
 Flat 59 Artesian House 96 Alscot Road
 Flat 57 Artesian House 96 Alscot Road
 Flat 58 Artesian House 96 Alscot Road
 Flat 42 Artesian House 98 Alscot Road
 Flat 43 Artesian House 98 Alscot Road
 Flat 41 Artesian House 98 Alscot Road
 Flat 39 Artesian House 98 Alscot Road
 Flat 40 Artesian House 98 Alscot Road
 Flat 44 Artesian House 98 Alscot Road
 Flat 48 Artesian House 98 Alscot Road
 Flat 49 Artesian House 98 Alscot Road
 Flat 47 Artesian House 98 Alscot Road
 Flat 45 Artesian House 98 Alscot Road
 Flat 46 Artesian House 98 Alscot Road
 Flat 10 Buckley Court 63 Alscot Road
 Flat 8 Buckley Court 63 Alscot Road
 Flat 6 Buckley Court 63 Alscot Road
 Flat 7 Buckley Court 63 Alscot Road
 Flat 66 Artesian House 96 Alscot Road
 Flat 67 Artesian House 96 Alscot Road
 Flat 65 Artesian House 96 Alscot Road
 Flat 63 Artesian House 96 Alscot Road
 Flat 64 Artesian House 96 Alscot Road
 Flat 68 Artesian House 96 Alscot Road
 Flat 72 Artesian House 96 Alscot Road
 Flat 73 Artesian House 96 Alscot Road
 Flat 71 Artesian House 96 Alscot Road
 Flat 69 Artesian House 96 Alscot Road
 Flat 70 Artesian House 96 Alscot Road
 Flat 11 Buckley Court 63 Alscot Road
 125 Grange Road London SE1 3AL
 128 Grange Road London SE1 3AL
 Flat Above 129 Grange Road London
 Flat 23 Buckley Court 63 Alscot Road
 130A Grange Road London SE1 3AL
 130 Grange Road London SE1 3AL
 3 Henley Drive London SE1 3AP
 4 Henley Drive London SE1 3AP
 2 Henley Drive London SE1 3AP
 77-89 Alscot Road London SE1 3AW
 1 Henley Drive London SE1 3AP
 Flat 15 Buckley Court 63 Alscot Road
 Flat 16 Buckley Court 63 Alscot Road
 Flat 14 Buckley Court 63 Alscot Road
 Flat 12 Buckley Court 63 Alscot Road
 Flat 13 Buckley Court 63 Alscot Road
 Flat 17 Buckley Court 63 Alscot Road
 Flat 21 Buckley Court 63 Alscot Road
 Flat 22 Buckley Court 63 Alscot Road
 Flat 20 Buckley Court 63 Alscot Road
 Flat 18 Buckley Court 63 Alscot Road
 Flat 19 Buckley Court 63 Alscot Road

Re-consultation: n/a

Consultation responses received

Internal services

Flood Risk Management & Urban Drainage
 Highways Development and Management
 Waste Management
 Ecology
 Design and Conservation Team
 Urban Forester
 Archaeology
 Highways Licensing
 Environmental Protection Team
 Local Economy Team

Statutory and non-statutory organisations

Thames Water
 Environment Agency
 Natural England
 Historic England
 London Fire & Emergency Planning Authority
 London Underground
 Metropolitan Police Service (Designing Out Crime)

Neighbour and local groups consulted:

61 Henley Drive London SE1 3AR	4 Grange Yard London SE1 3AE
57 Henley Drive London SE1 3AR	Apartment 1 91 Alscot Road London
Flat 4 91 Alscot Road London	15 Buckley Court 63 Alscot Road London
Flat 62 Artesian House 96 Alscot Road	9 Cube House 5 Spa Road London
Flat 3 Artesian House 137 Grange Road	14 Woodmill Street London SE16 3GG
Flat 6 Buckley Court 63 Alscot Road	14 Woodmill Street London SE16 3GG
Flat 7 Buckley Court 63 Alscot Road	Kagyu Samye Dzong London, 15 Spa Road
27 Costermonger Building London SE16	London SE16 3SA
3GA	96 Alscot Road London SE1 3GG
27 Costermonger Building 10 Arts Lane	25 Costermonger Building 10 Arts Lane
London	London
Flat 71 Artesian House 96 Alscot Road	104 1 Haven Way London
Flat 70 Artesian House 96 Alscot Road	56 Southwark Park Road London SE16 3RS
15 Spa Road London SE16 3SA	Flat A 71-73 Rye Lane Peckham SE15 5EX
Tibetan Buddhist Centre 15 Spa Road	Flat 26, Costermonger Building 10 Arts Lane
London	London
Flat 62, Artesian House London SE1 3GG	Flat 27 Ockham Building 10 Limasol Street
27 Whitmore Building 3 Arts Lane London	London
4 Hepburn Building 51 Grange Walk London	1-24 And 66-71 Henley Drive London
6 Limasol Street London SE16 3GE	Flat 634 2 Haven Way London
5 Costermonger Building 10 Arts Lane	330 St James's Rd London SE1 5JX
London	52-58 Arcola Street London E8 2DJ
KSD Tibetan Buddhist Centre 15 Spa Road	97-102 Grange Road London SE1 119
London	

Relevant planning history

Reference and Proposal	Status
09/EQ/0063 Redevelopment of existing industrial site into residential units	Pre-Application Enquiry Closed 17/06/2009
17/EQ/0373 Redevelopment of site to provide 170 student bedrooms (Use Class C2) in a building of part 6-, part 7-, part 8-storeys and ancillary student uses comprising bin store, cycle store, laundry and office/reception at ground floor, 5 parking spaces 70 cycle spaces and associated landscaping	Pre-Application Enquiry Closed 16/11/2017
17/EQ/0453 Follow up pre-application advice for the redevelopment of site to provide 148 student bedrooms (Use Class C2) in a building of part 5-, part 6-, part 7-storeys and ancillary student uses comprising bin store, cycle store, laundry and office/reception at ground floor, parking spaces cycle spaces and associated landscaping.	Pre-Application Enquiry Closed 29/05/2018

RECOMMENDATION

This document shows the case officer's recommended decision for the application referred to below.
This document is not a decision notice for this application.

Applicant	Mr Ron Plunz Alumno Student (Alscot) Limited	Reg. Number	18/AP/2295
Application Type	Major application	Case Number	32-132
Recommendation	Pending Legal Agreement		

Draft of Decision Notice

Planning Permission was **GRANTED** for the following development:

Redevelopment of site to provide 143 student bedrooms in a building ranging from 3- to 7-storeys (plus basement) and ancillary bin store, cycle store, laundry and office/reception, car parking, substation, associated landscaping, and alterations to the vehicle access. Removal of a street tree on Alscot Road and works to the highway.

77-89 Alscot Road London SE1 3AW

In accordance with application received on 12 July 2018

and Applicant's Drawing Nos.:

Proposed Plans

Context elevation from park PROPOSED 300 S28 received 10/12/2019
 Elevation Front/North-West PROPOSED 310 S25 received 10/12/2019
 Elevation Rear/South East PROPOSED 320 S26 received 10/12/2019
 Elevation Rear/South East PROPOSED (Without Trees) 321 S4 received 10/12/2019
 Elevation Side/North-East PROPOSED 330 S23 received 10/12/2019
 Elevation Side/South-West PROPOSED 340 S24 received 10/12/2019
 Front Facade Detail Typical PROPOSED 350 S25 received 10/12/2019
 Basement PROPOSED 090 S27 received 24/10/2018
 Ground Floor PROPOSED 100 S36.3 received 08/03/2019
 First Floor PROPOSED 110 S28 received 09/11/2018
 Second floor PROPOSED 120 S28 received 24/10/2018
 Third Floor PROPOSED 130 S28 received 14/02/2020
 Fourth Floor PROPOSED 140 S28 received 24/10/2018
 Fifth Floor PROPOSED STUDIOS 150B S31 received 22/01/2019
 Sixth Floor PROPOSED 160B S28 received 22/01/2019
 Roof plan PROPOSED 170 S28 received 24/10/2018
 Typical Room Types PROPOSED 180 S18 received 22/01/2019
 Landscape PROPOSED 190 S26 received 14/02/2020
 Cross Section PROPOSED 200 S25 received 22/01/2019
 Substation Elevations PROPOSED 360 S1 received 06/11/2018

Other Documents

Site location plan received 12/07/2018
 Student Housing - Full Accommodation Schedule 10th December 2018 received 08/03/2019

Time limit for implementing this permission and the approved plans

1. The development hereby permitted shall not be carried out otherwise than in accordance with the following approved plans:

(see list above)

Reason:

For the avoidance of doubt and in the interests of proper planning.

2. The development hereby permitted shall be begun before the end of three years from the date of this permission.

Reason:

As required by Section 91 of the Town and Country Planning Act 1990 as amended.

Permission is subject to the following Pre-Commencements Condition(s)

3. ARBORICULTURAL METHOD STATEMENT

Prior to works commencing, including any demolition, an Arboricultural Method Statement shall be submitted to and approved in writing by the Local Planning Authority.

a) A pre-commencement meeting shall be arranged, the details of which shall be notified to the Local Planning Authority for agreement in writing prior to the meeting and prior to works commencing on site, including any demolition, changes to ground levels, pruning or tree removal.

b) A detailed Arboricultural Method Statement showing the means by which any retained trees on or directly adjacent to the site are to be protected from damage by demolition works, excavation, vehicles, stored or stacked building supplies, waste or other materials, and building plant, scaffolding or other equipment, shall then be submitted to and approved in writing by the Local Planning Authority. The method statements shall include details of facilitative pruning specifications and a supervision schedule overseen by an accredited arboricultural consultant.

c) Cross sections shall be provided to show surface and other changes to levels, special engineering or construction details and any proposed activity within root protection areas required in order to facilitate demolition, construction and excavation.

The existing trees on or adjoining the site which are to be retained shall be protected and both the site and trees managed in accordance with the recommendations contained in the method statement. Following the pre-commencement meeting all tree protection measures shall be installed, carried out and retained throughout the period of the works, unless otherwise agreed in writing by the Local Planning Authority. In any case, all works must adhere to BS5837: (2012) Trees in relation to demolition, design and construction and BS3998: (2010) Tree work - recommendations.

Reason:

To avoid damage to the existing trees which represent an important visual amenity in the area, in accordance with the National Planning Policy Framework (2019) and policies of the Core Strategy (2011) SP11 Open spaces and wildlife; SP12 Design and conservation; SP13 High environmental standards, and Saved Policies of the Southwark Plan (2007) 3.2 Protection of

amenity; Policy 3.12 Quality in Design; Policy 3.13 Urban Design and Policy 3.28 Biodiversity.

4. CONSTRUCTION MANAGEMENT PLAN

No works shall take place until a construction environmental management plan (CEMP) for the site has been devised and submitted for the approval of the Local Planning Authority. The CEMP shall oblige the applicant, developer and contractors to commit to current best practice with regard to site management and to use all best endeavours to minimise off site impacts. A copy of the CEMP shall be available on site at all times and shall include the following information:

- o A detailed specification of construction works including consideration of all environmental impacts and the identified remedial measures, including comprehensive noise/dust suppression measures and continuous monitoring of noise and airborne particulates in locations to be agreed with the Council's Environmental Protection Team;
- o Engineering measures to eliminate or mitigate identified environmental impacts e.g. acoustic screening, sound insulation, dust control, emission reduction, location of specific activities on site, etc.;
- o Arrangements for direct responsive contact for nearby occupiers with the site management during construction (signage on hoardings, newsletters, resident's liaison meetings);
- o A commitment to adopt and implement of the ICE Demolition Protocol and Considerate Contractor Scheme;
- o Site traffic controls - Routing of in-bound and outbound site traffic, one way site traffic, lay off areas, etc.;
- o Waste Management - Accurate waste identification, separation, storage, registered waste carriers for transportation and disposal to appropriate destinations;
- o Working hours - including limiting Saturday operation hours and no work on Sundays;
- o Transport and highways impacts - Using transport operators with a minimum of 'Silver' membership of FORS; restricting deliveries during the school arrival/departure times (0800hrs-0900hrs and 1500hrs-1600hrs); construction vehicle routing; penalties relating to turning away delivery vehicles (not complying with scheduled delivery times and banning construction vehicles not adhering to the agreed routing of vehicles, consolidation of deliveries); site layout plans for each phase of the development (showing loading areas, operators' parking spaces, location of wheel washing facilities, vehicle entrance arrangement, and on-site routing of traffic); wheel washing facilities; and an undertaking to sweep the adjoining highway daily.

All construction work shall then be undertaken in strict accordance with the plan and relevant codes of practice, unless otherwise agreed in writing by the Local Planning Authority.

Reason:

To ensure that occupiers of neighbouring premises and the wider environment do not suffer a loss of amenity by reason of unnecessary pollution or nuisance, in accordance with strategic policy 13 'High environmental standards' of the Core Strategy (2011) saved policy 3.2 'Protection of amenity' of the Southwark Plan (2007) and the National Planning Policy Framework (2019).

5. EXCAVATION PROTECTION

No development shall take place (excluding demolition) until a design and method statement detailing how the Alscot Road public highway adjoining the site is to be protected during the excavation and construction of the basement of the development has been submitted to and approved by the Local Planning Authority. The excavation and construction works shall be undertaken in accordance with the approved statement.

Reason:

To protect the structural integrity of the pavement and roadway during the excavation and construction of the basement level.

6. WHEELCHAIR ACCESS DETAILS

No development shall take place (excluding demolition) until details (including floorplans and sections as necessary) of the ground floor entrance to provide wheelchair users a step-free entrance from the outside of the front facade to the lift core have been submitted to and approved by the Local Planning Authority. The development shall be undertaken in accordance with the approved details.

Reason:

To ensure the development is accessible for wheelchair users, in accordance with policy 7.2 of the London Plan (2016).

7. PILING METHOD STATEMENT

No piling shall take place until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) has been submitted to and approved in writing by the Local Planning Authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement.

Reason:

The proposed works will be in close proximity to underground sewerage utility infrastructure. Piling has the potential to impact on local underground sewerage utility infrastructure.

Permission is subject to the following Grade Condition(s)

8. BIRD AND BAT BOXES

Prior to the commencement of above grade works details of the bat boxes, and bird boxes/bricks to be incorporated in the development shall be submitted to and approved in writing by the Local Planning Authority. The details shall include the exact location, specification and design of the habitats. The boxes / bricks shall be installed with the development in accordance with the approved details and prior to the first occupation of the building.

Reason:

To ensure the development provides the maximum possible provision towards creation of habitats and valuable areas for biodiversity in accordance with policies: 5.10 and 7.19 of the London Plan (2016), Saved Policy 3.28 of the Southwark Plan (2007) and Strategic Policy 11 of the Core Strategy (2011).

9. HARD AND SOFT LANDSCAPING

Before any above grade work hereby authorised begins, detailed drawings of a hard and soft landscaping scheme showing the treatment of all parts of the site not covered by buildings (including cross sections, surfacing materials of any parking, access, or pathways layouts, materials and edge details), shall be submitted to and approved in writing by the Local Planning Authority. The landscaping shall not be carried out otherwise than in accordance with any such approval given and shall be retained for the duration of the use.

The planting, seeding and/or turfing shall be carried out in the first planting season following completion of building works and any trees or shrubs that is found to be dead, dying, severely damaged or diseased within five years of the completion of the building works OR five years of the carrying out of the landscaping scheme (whichever is later), shall be replaced in the next

planting season by specimens of the same size and species in the first suitable planting season. Planting shall comply to BS: 4428 Code of practice for general landscaping operations, BS: 5837 (2012) Trees in relation to demolition, design and construction and BS 7370-4:1993 Grounds maintenance Recommendations for maintenance of soft landscape (other than amenity turf).

Reason:

So that the Council may be satisfied with the details of the landscaping scheme, in accordance with: Chapters 8, 12, 15 and 16 of the National Planning Policy Framework 2019; Strategic Policies 11 (Open Spaces and Wildlife), 12 (Design and conservation) and 13 (High Environmental Standards) of The Core Strategy 2011, and; Saved Policies 3.2 (Protection of Amenity), 3.12 (Quality in Design) 3.13 (Urban Design) and 3.28 (Biodiversity) of the Southwark Plan 2007.

10. VENTILATION AND AIR QUALITY

a) Prior to the commencement of above grade works, the scheme of mechanical ventilation for the development, including an appropriate inlet, appropriate outlet, filtration mechanism, details of sound attenuation for any necessary plant and any management, has been submitted to and approved by the Local Planning Authority. The accommodation shall be fitted with a silent running extract ventilation system that will achieve compliance with Building Regulations Approved Document F and L. The development shall not be carried out otherwise than in accordance with any approval given and shall be carried out before the first occupation of the development.

b) Prior to first occupation of the development, a validation report shall be submitted to the Local Planning Authority for approval in writing.

Reason:

In order to ensure that that the ventilation of the residential elements is adequate and is protected from environmental noise and pollution and will not detract from the appearance of the building in the interests of amenity in accordance with the National Planning Policy Framework (2019), Strategic Policy 13 High Environmental Standards of the Core Strategy (2011) and Saved Policy 3.2 Protection of Amenity of the Southwark Plan (2007).

11. SAMPLE MATERIALS/PANELS/BOARDS

Prior to above grade works commencing, material samples and a 1m x 1m sample-panel(s) of all external facing materials and brickwork (showing bond and mortar mix) to be used in the carrying out of this permission shall be presented on site/submitted to and approved in writing by the Local Planning Authority. The development shall not be carried out otherwise than in accordance with any such approval given.

Reason:

In order to ensure that these samples will make an acceptable contextual response in terms of materials to be used, and achieve a quality of design and detailing in accordance with the National Planning Policy Framework (2019), Strategic Policy 12 - Design and Conservation of the Core Strategy (2011) and Saved Policies 3.12 Quality in Design and 3.13 Urban Design of the Southwark Plan (2007).

12. DETAILED DRAWINGS

Prior to the commencement of above grade works, section detail-drawings at a scale of at least 1:10 through:

- the facades;
- the balconies;
- parapets; and

- heads, cills and jambs of all openings

to be used in the carrying out of this permission shall be submitted to and approved by the Local Planning Authority. The development shall not be carried out otherwise than in accordance with any such approval given.

Reason:

In order that the Local Planning Authority may be satisfied as to the quality of the design and details in accordance with saved policies 3.12 Quality in Design and 3.13 Urban Design of the Southwark Plan (2007).

13. ELECTRIC VEHICLE CHARGING POINTS

Prior to the commencement of above grade works, details of the number, appearance and positioning of the electric vehicle charging facilities to be provided in the car parking area shall be submitted to and approved in writing by the Local Planning Authority and the development shall not be carried out otherwise than in accordance with any such approval given. The electric vehicles charging points shall be installed prior to first occupation of the development, and remain for as long as the development is occupied.

Reason:

To ensure the safety of motorists, cyclists and pedestrians in accordance with the National Planning Policy Framework 2019; Strategic Policy 2 (Sustainable Transport) of The Core Strategy 2011, and; Saved Policy 5.2 (Transport Impacts) of the Southwark Plan 2007.

14. CYCLE STORAGE DETAILS

Prior to the commencement of above grade works, details (1:50 scale drawings) of the facilities to be provided for the secure and covered storage of cycles for residents and staff, and including the Brompton bike store, and the facilities for the storage of visitor cycles shall be submitted to and approved in writing by the Local Planning Authority. Thereafter the cycle parking facilities provided shall be retained and the space used for no other purpose, and the development shall not be carried out otherwise in accordance with any such approval given.

Reason:

In order to ensure that satisfactory safe and secure cycle parking facilities are provided and retained in order to encourage the use of cycling as an alternative means of transport to the development and to reduce reliance on the use of the private car in accordance with: the National Planning Policy Framework 2019; Strategic Policy 2 (Sustainable Transport) of the Core Strategy 2011, and; Saved Policy 5.3 (Walking and Cycling) of the Southwark Plan 2007.

Permission is subject to the following Pre-Occupation Condition(s)

15. BREEAM REPORT AND POST CONSTRUCTION REVIEW

(a) Prior to first occupation of the development hereby permitted, the Local Planning Authority shall receive from the applicant and give written approval of an interim report/letter (together with any supporting evidence) from the licensed BREEAM assessor. The report/letter shall confirm that sufficient progress has been made in terms of detailed design, procurement and construction to be reasonably well assured that the development hereby approved will, once completed, achieve the agreed BREEAM Standards.

(b) Within six months of first occupation of the development hereby permitted, a certified Post Construction Review (or other verification process agreed with the local planning authority) shall be submitted to and approved in writing by the Local Planning Authority, confirming that the agreed BREEAM standards have been met.

Reason:

To ensure the proposal complies with the National Planning Policy Framework (2019), Strategic Policy 13 - High Environmental Standards of The Core Strategy (2011) and Saved Policies 3.3 Sustainability and 3.4 Energy Efficiency of the Southwark Plan (2007).

16. PLANT NOISE

Prior to first occupation of the development, details of the validation test, associated noise levels and any necessary mitigation for any plant shall be submitted to and approved by the Local Planning Authority. The Rated sound level from any plant, together with any associated ducting shall not exceed the Background sound level (LA90 15min) at the nearest noise sensitive premises. The Specific plant sound level shall be 10dB(A) or more below the background sound level in this location. For the purposes of this condition the Background, Rating and Specific Sound levels shall be calculated fully in accordance with the methodology of BS4142:2014. The plant and equipment shall be installed and constructed in accordance with the approval given and shall be permanently maintained thereafter.

Reason:

To ensure that occupiers of neighbouring premises do not suffer a loss of amenity by reason of noise nuisance or the local environment from noise creep due to plant and machinery in accordance with the National Planning Policy Framework (2019), Strategic Policy 13 High Environmental Standards of the Core Strategy (2011) and Saved Policy 3.2 Protection of Amenity of the Southwark Plan (2007).

17. CONTAMINATION REMEDIATION

a) The excavation and construction works shall be undertaken in accordance with the Soil Consultants report ref 10165/OT/Rev0 and dated 11 May 2018 and Symbiotic remediation Strategy 911 R01 ref dated August 2018, unless an alternative remediation strategy is submitted to and approved by the Local Planning Authority.

b) Following the completion of the measures identified in the approved remediation strategy, and prior to occupation of the development a verification report providing evidence that all work required by the remediation strategy has been completed shall be submitted to and approved by the Local Planning Authority.

c) In the event that contamination is found at any time when carrying out the approved development that was not previously identified, it shall be reported in writing immediately to the Local Planning Authority, and a scheme of investigation and risk assessment, a remediation strategy and verification report (if required) shall be submitted to the Local Planning Authority for approval in writing, in accordance with a-b above.

Reason:

To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors in accordance with saved policy 3.2 'Protection of amenity' of the Southwark Plan (2007), strategic policy 13' High environmental standards' of the Core Strategy (2011) and the National Planning Policy Framework (2019).

18. REFUSE STORAGE AND COLLECTION

Before the first occupation of the development, details of the refuse collection arrangements shall be submitted to and approved by the Local Planning Authority. The development shall be operated in accordance with the approved collection arrangements for the duration of the development.

The refuse storage shall be provided as detailed on the drawings hereby approved and shall be made available for use by the occupiers of the premises prior to the first occupation of the building. The facilities provided shall thereafter be retained and shall not be used or the space used for any other purpose.

Reason:

To ensure that the refuse will be appropriately stored within the site and collected regularly thereby protecting the amenity of the site and the area in general from litter, odour and potential vermin/pest nuisance in accordance with: the National Planning Policy Framework (2019), Strategic Policy 13 (High Environmental Standards) of the Core Strategy (2011), and Saved Policies 3.2 (Protection of Amenity) and 3.7 (Waste Reduction) of the Southwark Plan (2007).

Permission is subject to the following Compliance Condition(s)

19. RESTRICTION ON THE INSTALLATION OF TELECOMMUNICATIONS EQUIPMENT

Notwithstanding the provisions of Part 16 The Town & Country Planning (General Permitted Development) Order 2015 (as amended or re-enacted) no external telecommunications equipment or structures shall be placed on the roof or any other part of a building hereby permitted.

Reason:

In order to ensure that no telecommunications plant or equipment which might be detrimental to the design and appearance of the building and visual amenity of the area is installed on the roof of the building in accordance with: the National Planning Policy Framework (2019), Strategic Policy 12 (Design and Conservation) of the Core Strategy (2011), and; Saved Policies 3.2 (Protection of Amenity) and 3.13 (Urban Design) of the Southwark Plan (2007).

20. WRITTEN SCHEME OF INVESTIGATION

The construction of the development shall be undertaken in accordance with the Written Scheme of Investigation for an Archaeological Watching Brief by Lanpro Services (dated September 2018), unless an alternative Written Scheme of Investigation is submitted to and approved by the Local Planning Authority.

Reason:

In order that the archaeological operations are undertaken to an acceptable standard and that legitimate archaeological interest in the site is satisfied, in accordance with: the National Planning Policy Framework (2019), Strategic Policy 12 (Design and Conservation) of the Core Strategy (2011), and Saved Policy 3.19 (Archaeology) of the Southwark Plan (2007).

21. JAPANESE KNOTWEED

The construction and operation of the development shall be carried out in full accordance with the Japanese Knotweed Survey and Method Statement by Middlemarch Environmental (dated June 2018), unless an alternative Statement is submitted to and approved by the Local Planning Authority.

Reason:

Japanese Knotweed is an invasive plant, the spread of which is prohibited under the Wildlife and Countryside Act. Without measures to prevent its spread as a result of the development there would be the risk of an offence being committed and avoidable harm to the environment occurring.

22. DRAINAGE STRATEGY

The development shall be constructed in accordance with the Drainage Statement by Fluid Structures dated 10/07/2018 and Indicative Drainage Layout drawing dated May 2018 (received 14 September 2018), unless an alternative drainage strategy is submitted to and approved by the Local Planning Authority.

Reason:

To ensure the development includes sufficient sustainable urban drainage measures in accordance with the National Planning Policy Framework (2019), Strategic Policy 13 High Environmental Standards of the Core Strategy (2011) and Saved Policy 3.9 Water of the Southwark Plan (2007).

23. ENERGY STATEMENT

The development shall be constructed in accordance with the energy efficiency measures, CHP and provision of photovoltaic panels to achieve a minimum 40% reduction in carbon dioxide emissions as detailed in the Energy Assessment version 2.0 by Silcock Dawson and Partners (dated June 2018), unless an alternative energy assessment is submitted to and approved by the Local Planning Authority.

Reason:

To ensure the proposal complies with the National Planning Policy Framework (2019), Policy 5.2 of the London Plan (2016), Strategic Policy 13 - High Environmental Standards of the Core Strategy (2011) and Saved Policies 3.3 Sustainability and 3.4 Energy Efficiency of the Southwark Plan (2007).

24. FLOOD RISK ASSESSMENT

The development shall be constructed in accordance with the finished floor levels and mitigation measures as detailed in the Flood Risk Assessment (Rev C) by Fluid Structures (dated 19/10/2018), unless an alternative flood risk assessment is submitted to and approved by the Local Planning Authority.

Reason:

To ensure: the development is designed safely in reference to flood risk in accordance with The National Planning Policy Framework (2019), Strategic Policy 13 High Environmental Standards of the Core Strategy (2011) and Saved Policy 3.9 Water of the Southwark Plan (2007).

25. ROOFS TO BE USED ONLY IN EMERGENCY

The roofs of the building hereby permitted shall not be used outside the terrace areas annotated on the approved drawings, and the roof of the substation shall not be used other than as a means of escape and shall not be used for any other purpose including use as a roof terrace or balcony or for the purpose of sitting out.

Reason:

In order that the privacy of neighbouring properties may be protected from overlooking from use of the roof area in accordance with the National Planning Policy Framework (2019), Strategic Policy 13 High environmental standards of the Core Strategy (2011) and Saved Policy 3.2 'Protection of Amenity' of the Southwark Plan (2007).

26. HOURS OF USE OF OUTDOOR AMENITY AREAS

Other than for maintenance purposes, repair purposes or means of escape, the outdoor amenity areas (rear gardens and roof terraces) shall not be used outside of the following hours: 7am to 9pm on Mondays to Sundays (including Bank Holidays)

Reason:

To ensure that occupiers of neighbouring premises do not suffer a loss of amenity by reason of noise nuisance in accordance with: the National Planning Policy Framework (2019), Strategic Policy 13 (High Environmental Standards) of the Core Strategy (2011), and Saved Policy 3.2 (Protection of Amenity) of the Southwark Plan (2007).

27. INTERNAL NOISE LEVELS

The development shall be designed to ensure that the following internal noise levels are not exceeded due to environmental noise:

Bedrooms - 35dB LAeq T+, 30 dB LAeq T*, 45dB LAFmax T *

Living rooms- 35dB LAeq T +

Dining room - 40 dB LAeq T +

* - Night-time 8 hours between 23:00-07:00

+ - Daytime 16 hours between 07:00-23:00.

Reason:

To ensure that the occupiers and users of the development do not suffer a loss of amenity by reason of excess noise from environmental and transportation sources in accordance with Strategic Policy 13 'High environmental standards' of the Core Strategy (2011), Saved Policies 3.2 'Protection of amenity' and 4.2 'Quality of residential accommodation' of the Southwark Plan (2007), and the National Planning Policy Framework 2019.

28. REPLACEMENT TREE PLANTING

If within the expiration of 5 years from the date of the occupation of the building for its permitted use any retained tree is removed, uprooted is destroyed or dies, another tree shall be planted at the same place and that tree shall be of such size and species, and shall be planted at such time, as may be specified in writing by the Local Planning Authority.

Reason:

To replace any retained or new trees that die in order to retain tree coverage and an important visual amenity in the area, in accordance with the National Planning Policy Framework (2019) and policies of the Core Strategy (2011) SP11 Open spaces and wildlife; SP12 Design and conservation; SP13 High environmental standards, and Saved Policies of the Southwark Plan (2007) 3.2 Protection of amenity; Policy 3.12 Quality in Design; Policy 3.13 Urban Design and Policy 3.28 Biodiversity.

Informatives

- 1 With regard to surface water drainage, Thames Water would advise that if the developer follows the sequential approach to the disposal of surface water we would have no objection. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. Should you require further information please refer to the Thames Water website urldefense.proofpoint.com

The development is within 15m of a strategic sewer as such the development could cause the assets to fail if appropriate measures are not taken. Please read the Thames Water guide Working Near Our Assets to ensure the workings will be in line with the necessary processes you need to follow if you are considering working above or near TW pipes or other structures.

There are public sewers crossing or close to the development. If you are planning significant work near Thames Water sewers, it is important that you minimize the risk of damage. TW will

need to check that the development does not reduce capacity, limit repair or maintenance activities, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting TW pipes.

Thames Water requests that the Applicant should incorporate within their proposal, protection to the property by installing a positive pumped device, or equivalent reflecting technological advances, to avoid the risk of backflow at a later date, on the assumption that the sewerage network may surcharge to ground level during storm conditions. Fitting only a non return valve could result in flooding to the property should there be prolonged surcharge in the public sewer. If as part of the basement development there is a proposal to discharge ground water to the public network, this would require a Groundwater Risk Management Permit from Thames Water.

A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. TW expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 02035779483. Application forms should be completed on line.

A Trade Effluent Consent will be required for any Effluent discharge other than a 'Domestic Discharge'. Any discharge without this consent is illegal and may result in prosecution. Domestic usage for example includes toilets, showers, washbasins, baths, private swimming pools and canteens. Typical Trade Effluent processes include: Laundrette or Laundry, PCB manufacture, commercial swimming pools, photographic or printing, food preparation, vehicle washing, metal plating or finishing, chemical manufacture, treated cooling water and any other process which produces contaminated water. Pre treatment, separate metering, sampling access etc, may be required before the Company can give its consent. Applications should be made on the TW website or alternatively to Waste Water Quality, Crossness STW, Belvedere Road, Abbeywood, London. SE2 9AQ. Telephone: 020 3577 9200.

Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres per minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.

- 2 By way of further advice, the Council will expect the Construction Environmental Management Plan (required by condition) to follow current best construction practice, including the following:
 - o Southwark Council's Technical Guide for Demolition & Construction 2016, available from <http://southwark.gov.uk/air-quality/the-main-causes-of-air-pollution>
 - o S61 of Control of Pollution Act 1974,
 - o The London Mayors Supplementary Planning Guidance 'The Control of Dust and Emissions During Construction and Demolition',
 - o The Institute of Air Quality Management's 'Guidance on the Assessment of Dust from Demolition and Construction' and 'Guidance on Air Quality Monitoring in the Vicinity of Demolition and Construction Sites',
 - o BS 5228-1:2009+A1:2014 'Code of practice for noise and vibration control on construction and open sites',
 - o BS 7385-2:1993 Evaluation and measurement for vibration in buildings. Guide to damage levels from ground borne vibration,
 - o BS 6472-1:2008 'Guide to evaluation of human exposure to vibration in buildings - vibration sources other than blasting,
 - o Greater London Authority requirements for Non-Road Mobile Machinery, see: <http://nrmm.london/>,
 - o Relevant CIRIA and BRE practice notes.

Environmental parameters for construction:

Parameter	Trigger (Amber)	Action (Red)
Environmental Noise Unit - dB(A)	75 dB(A) Laeq 5min (short term) 70 dB(A) Laeq 10hr (daily)	80 dB(A) Laeq 5min (short term) 75 dB(A) Laeq 10hr (daily)
Environmental Dust Units - PM10	200ug/m-3 15 min	250ug/m-3 15min
Vibration especially buildings	1mm/sPPV for occupied residential and educational buildings 3mm/sPPV for occupied commercial premises where work is not of an vibration sensitive nature or for potentially vulnerable unoccupied 5mm/sPPV for other unoccupied buildings	
Hoardings	Min height 2.3m Min density 7kg/m ²	

- 3 The refuse and recycling storage shown on the approved plans would be sufficient only with twice-weekly collections. The store has been sized by the applicant on the basis of using a commercially provided waste collection service (at the applicant's cost), rather than the Council service. The applicant is advised that the Council would not provide more frequent collections than the standard weekly service to facilitate the small bin store shown, i.e. the future property manager would not be able to request a twice weekly waste collection service from the Council.

Engagement Summary Template for the Development Consultation Charter (validation requirement)

Before your application goes live and is validated the template needs to be completed and submitted.

Site: 77-89 Alscot Road, Bermondsey

Address: 77-89 Alscot Road, Bermondsey

Application reference: 18/AP/2295

List of meetings:

Meetings	Date	Attendees	Summary of discussions
Pre-application meetings	25 th October 2017 30 th November 2017 23 rd April 2018	Council officers (Victoria Crosby and Martin McKay as well as representatives from transport and highways) alongside Ron Plunz from Alumno, Cat Fraser from Turley (agent), Duncan Greenaway from Greenaway Architecture (architect) and at the latter meeting, Doug Birt (viability)	Principle of development, proposed design and various elements of the emerging scheme. Also included discussion on the proposed consultation strategy and viability.
Councillor meetings		Cllr Mark Williams in his capacity as Cabinet Member for Regeneration and New Homes Councillor Damian O'Brien (as a Grange Ward Councillor up to May 2018) Meeting with Councillor Leo Pollak as both a local ward councillor for South Bermondsey post May 2018, and also as the Cabinet Member for Social Regeneration, Great Estates and New Council Homes. We met with Leo twice.	Introducing Alumno, the wider project team and the development site Discussion about the demand for the product in this area, its benefits for the wider local community and various elements of the emerging scheme – including the proposed consultation strategy. The discussion also focussed on possible contribution towards the local community.

		<p>Meeting with Sunny Lambe as a local ward councillor for South Bermondsey</p> <p>Meeting with Liane Werner as a local ward councillor for South Bermondsey</p> <p>Council Leader Peter John, Director of planning Simon Bevan and Kevin Fenton as Director of Health and Wellbeing</p> <p>Councillor Johnson Situ, Cabinet Member for Growth, Development and Planning</p>	
Resident group meetings		<p>Bermondsey Spa Preservation Society & Kagyu Samye Dzong Centre (Buddha Centre)</p> <p>Nursery St Saviours</p>	<p>Introducing Alumno, the wider project team and the development site and proposals.</p> <p>Discussion about the demand for the product in this area and various elements of the emerging scheme – including the proposed consultation strategy.</p>
Local Charities		<p>United St Saviour's Charity</p>	<p>Introducing Alumno, the proposal and intention to pioneer a wayfinding system for vision impaired people with aim to collaborate for the benefit of wider community benefit in Southwark.</p>
Local Neighbours		<p>Kintore Way Nursery, Headteacher Rebecca Sherwood and Deputy Sarah Lee. Several meetings</p>	<p>Introducing Alumno, the proposal and investigating the potential of a collaboration on art, inclusion and wellbeing of local families and children.</p>

Meeting with temporary users of the site	15th March 2018	Mr Joshua Field	Introducing Alumno, the proposal and arranging contact with another more suitable empty property.
Design Review Panel	N/A	N/A	N/A

List of public consultation events carried out to date or planned:

Public consultation events	Date	Attendees	Summary of feedback
Public exhibition	17 th and 19 th March 2018	<p>A public exhibition of the proposed development was held on over two days, on 17th and 19th March 2018 at Setchell and Longfield TRA Hall in Bermondsey. The date and timings were chosen in response to some suggestions made by the Preservation Group. This allowed local people to provide their views and discuss particular areas of interest or concern.</p> <p>3,583 public exhibition invitations were sent out to local residents and businesses informing them of the proposals and inviting them to the event.</p> <p>The letters also provided contact details for the project team and details of the consultation website which contained further information about the project and mechanisms for submitting online feedback.</p> <p>In addition to publicity around the consultation events, Alumno hand-delivered a letter to addresses adjacent to the site in advance of issuing invitations. This letter made an introduction to Alumno and the forthcoming</p>	<p>Thematic breakdown of feedback:</p> <p>All feedback received as part of our pre-application consultation has been reviewed and is summarised below (a single respondent's responses could be recorded more than once, if they gave feedback on a number of topics).</p> <p>The responses recorded were:</p> <p>Design/Height/Density – 18 respondents commented on the design of the development, including the height and the density of the proposals. Several respondents felt the scheme was too tall and should be reduced in height, with some referencing overlooking concerns. A number of respondents also felt the fundamental design of the proposal was positive, and would make an attractive addition to the local built environment.</p> <p>“We like the design but it is top heavy at present, removing a floor would improve the design.”</p> <p>“The design looks stunning and would complement the area. However, I would like to see one floor removed from the plan as the current proposed building height is too high.”</p> <p>“I am concerned about the height of the building, it is important this is kept low especially around the park and takes into consideration of the density of the housing”</p> <p>Infrastructure pressure – 16 respondents queries whether local infrastructure could</p>

		<p>proposals prior to wider publicity. Following the exhibition, Alumno also sent an additional letter to residents on Henley Drive, immediately to the south of the site, to encourage additional responses from these residents.</p> <p>The Bermondsey Spa Preservation Group circulated news of the exhibition to local community groups and contacts in its network, and subsequently encouraged people to provide feedback via Alumno's stand-alone consultation website.</p> <p>Invitations were sent to relevant elected representatives and local groups inviting them to attend the public exhibition and submit their feedback. This was in addition to individual meetings arranged separately to the exhibition.</p> <p>To make it as easy as possible for local people to find out about the proposals, a project website was created – www.bermondseypastudents.co.uk - so residents could view information about the proposals online. The website also offered a simple way for people to comment on the plans and get in touch for further information.</p> <p>We welcomed 22 people to the exhibition and through our various means of leaving feedback, received 22 individual pieces of feedback from local people.</p>	<p>cope with the additional pressure that the propose development's new residents would bring. Issues raised included pressure on local GP services and transport system.</p> <p>"I do not believe that local public transport infrastructure or health services can cope with an influx of extra bodies on this scale."</p> <p>"It would be overburdensome on local transport and amenities to bring in so many new residents in such a dense way." "Transport around the area is already incredibly stretched. The Jubilee Line runs services almost back to back peak time and still the platforms get crowded with waiting passengers at Bermondsey. The local buses, too, are barely coping."</p> <p>Student numbers and disruption – 10 respondents expressed concern about the number of students that are already either in the area or due to be housed in the area, accounting for existing accommodation, the potential development of Alumno's proposals and that of other nearby planning applications. Several respondents raised the issue of added noise disruption that Alumno's scheme could bring to Bermondsey Spa Gardens.</p> <p>"I am generally concerned about the number of students in the developments planned for the immediate area and the impact this will have"</p> <p>"Over 100 seems too many, what with the plans for another way over-crammed student block in spa road. It will have a big impact on the peace in this little neighbourhood."</p> <p>"Students have no regard for an area where they are staying for just a year or so, so the area will go down. Students by their very nature are young, so parties both in the residence and public areas will be disturbing to the elderly and families." Management – 5 respondents queried how the development will be managed, and</p>
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			<p>requested further information about the measures that will be taken to ensure neighbours' are not negatively impacted by the proposals.</p> <p>"How are you planning to deal with students arrival every year if you only have 2 parking spaces for staff. Are you going to use the street as your parking space on arrival day?"</p> <p>"Management of the building is crucial and high standards of both maintenance and behaviour are crucial as this is an area with a strong community and family base."</p> <p>"What are your plans for the units during the summer period when the students are not at university? Any 'Air bnb' style lettings would be extremely disruptive with anti-social behaviour and noise at night/early mornings with people arriving and leaving."</p> <p>Miscellaneous – a small number of respondents raised specific issues that were not shared by other respondents. These included queries about the drainage strategy and whether continued access to the rear of neighbouring 91 Alscot Road will be maintained by the existing strip of adjoining land.</p>
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Refer to checklist in the development consultation charter for pre-application consultation requirements dependent on the scale of the proposed development.

We believe every relevant element of the development consultation charter for this scheme – as a 'strategic applications - lower range' has been fulfilled.

Evidence of consideration of the following (this list is not exhaustive):

Demographic context:

- **Who occupies the site?** After the last regular tenant (LawPack) moved out, the building needed to be secured against squatting and vandalism. This was done via a temporary letting arrangement with SET Centre specializing in temporary occupation of otherwise disused spaces. Set Centre sub-lets the space in the form of desks to a small number of artists on a temporary basis as they fully understand the nature of the tenancy and the restrictive quality of the former warehouse.

● **Will they need to be relocated? On what basis? Will they be expected to return?** The rental agreement is only temporary and depends on regular renewal agreement to keep safeguarding the building. Alumno have liaised with Set Centre and successfully arranged contact with another unused property owner in considerably more suitable location (adjacent to the White Cube Gallery). We understand that their agent negotiated terms successfully.

- **Due regard to how the development might impact people differently depending on their race, age, gender reassignment, disability, sexual orientation, religion or belief, or sex.** The development has considered these aspects and there are no negative impacts. These points will however also be addressed by the University's policy (as the tenant). Our intention of pioneering a wayfinding system for visually impaired people should be noted.
- **How the development fosters good relations between different groups in the community.** We propose a bespoke nature / bird themed public art piece, a pioneering way finding system for people with visual impairments, offering managed access for the common room/ cinema space and introducing a Brompton Bike hire scheme. We have engaged with the local Nursery (Kintore Way) to explore ways in which we could contribute to the wellbeing of local families and children
- **Are there neighbours in close proximity?** Yes

Cultural setting:

- Is the site in conservation area? No
- Is the building listed? No
- Is the site/building a place of community interest? No

Highways:

- **How is the site accessed?** Front door and gated rear courtyard.
- **Will there be an increase in traffic during construction and once the new development is completed?** Modest and managed increase during construction and mediated as described in our transport statement. The scheme when in operation is a car free development and therefore no increase in traffic is anticipated.

Other engagement:

The project team conducted a minimum of two letter drops to the blocks of flats immediately adjacent to the development site to maintain our communication with these residents, in addition to our public exhibition work.

Website: <http://bermondseypastudents.co.uk/>, which has been publicly accessible from the first day of the public exhibitions

Ways to feedback responses were:

A number of methods to provide feedback were used and publicised in consultation materials, including:

- Feedback forms: these were available at the public exhibition, and attendees were encouraged to fill them in with their comments
- Email address: ron.plunz@alumnodevelopments.com ;

- Post: FREEPOST RRAJ-KGLE-AYTR, 198 High Holborn, London WC1V 7BD.
- Telephone: 020 7434 2384 (answered during normal office hours, Monday to Friday);
- Website: <http://bermondseypastudents.co.uk/>, which has been publicly accessible from the first day of the public exhibitions

Support & Objection- public consultation summary

All feedback received as part of our pre-application consultation has been reviewed and is summarised below (a single respondent's responses could be recorded more than once, if they gave feedback on a number of topics. The responses recorded were:

- **Design/Height/density – 18 respondents** commented on the design of the development, including the height and the density of the proposals. Several respondents felt the scheme was too tall and should be reduced in height, with some referencing overlooking concerns. A number of respondents also felt the fundamental design of the proposal was positive, and would make an attractive addition to the local built environment.

"We like the design but it is top heavy at present, removing a floor would improve the design."

"The design looks stunning and would complement the area. However, I would like to see one floor removed from the plan as the current proposed building height is too high."

"I am concerned about the height of the building, it is important this is kept low especially around the park and takes into consideration of the density of the housing"

- **Infrastructure pressure – 16 respondents** queries whether local infrastructure could cope with the additional pressure that the proposed development's new residents would bring. Issues raised included pressure on local GP services and transport system.

"I do not believe that local public transport infrastructure or health services can cope with an influx of extra bodies on this scale."

"It would be overburdensome on local transport and amenities to bring in so many new residents in such a dense way."

"Transport around the area is already incredibly stretched. The Jubilee Line runs services almost back to back peak time and still the platforms get crowded with waiting passengers at Bermondsey. The local buses, too, are barely coping."

- **Student numbers and disruption – 10 respondents** expressed concern about the number of students that are already either in the area or due to be housed in the area, accounting for existing accommodation, the potential development of Alumno's proposals and that of other nearby planning applications. Several respondents raised the issue of added noise disruption that Alumno's scheme could bring to Bermondsey Spa Gardens.

"I am generally concerned about the number of students in the developments planned for the immediate area and the impact this will have"

"Over 100 seems too many, what with the plans for another way over-crammed student block in spa road. It will have a big impact on the peace in this little neighbourhood."

"Students have no regard for an area where they are staying for just a year or so, so the area will go down. Students by their very nature are young, so parties both in the residence and public areas will be disturbing to the elderly and families."

- **Management – 5 respondents** queried how the development will be managed, and requested further information about the measures that will be taken to ensure neighbours' are not negatively impacted by the proposals.

"How are you planning to deal with students arrival every year if you only have 2 parking spaces for staff. Are you going to use the street as your parking space on arrival day?"

"Management of the building is crucial and high standards of both maintenance and behaviour are crucial as this is an area with a strong community and family base."

"What are your plans for the units during the summer period when the students are not at university? Any 'Air bnb' style lettings would be extremely disruptive with anti-social behaviour and noise at night/early mornings with people arriving and leaving."

Miscellaneous – a small number of respondents raised specific issues that were not shared by other respondents. These included queries about the drainage strategy and whether continued access to the rear of neighbouring 91 Alscot Road will be maintained by the existing strip of adjoining land.

How have objections been addressed?

Design and Height

Alumno have carefully designed a scheme to be in line with the existing pattern of Alscot Road, and that complements neighbouring buildings – providing a continuity between the heights of Buckley Court to the east of Alscot Road and Artesian House to the West corner of the road. The proposals

will pull back the building line so it is located further away from the road, which helps to mitigate against overshadowing of the park.

By setting the building back Alumno are also intending to provide a substantial improvement to the section of Alscot Road in front of the site, which is at present very narrow and difficult to navigate for pedestrians. The proposed building has also been designed with consideration to the Henley Drive properties and to reduce any overlooking of residents, which is evident in the sequential setting back of the upper floors.

Infrastructure

The proposed development's impact on local services will be considered by statutory consultees and the local planning authority as part the planning process, and planning consent will only be granted if this is assessed to be of an acceptable level. The impact of this scheme is mitigated in a number of ways by consisting of student residents rather than other uses such as conventional housing.

For transport services, a student accommodation scheme has the benefit of residents living with more varied schedules than would normally be the case, due to scattered academic timetables, as opposed to conventional full-time employment commitments that coincide with peak travel hours. In the case of health services, this is also something that is commonly provided in part by higher education institutions, and offers a convenient alternative to local services for students.

Student numbers and management

Alumno operates all of its schemes on the basis of purpose-built, fully-managed developments. This means that there will be management staff on-site at all times that will monitor and enforce the strict standards of behavior that Alumno expects of all its residents. While we aim to create a welcoming environment for all the students, any anti-social behaviour will not be tolerated and any residents breaching the clear and strict rules and regulations outlined within their tenancy agreement face appropriate disciplinary action, including the termination of tenancy.

The management team serve as a point of contact for neighbours should they wish make contact with building's operators, and they will seek to engage with local residents and community organisations to work closely with local people on any issues.

The annual move-in process will be a carefully managed process over two weekends each academic year. To stagger arrivals, each student will be advised of a date and time to take up occupancy of their room. During 'move-in' days we will provide an increased management presence and, in order to minimise disruption, we will provide a methodical approach to the appointment times that students can arrive and unload. Students will move out over a longer, staggered time period, which means impact on the local community are further minimised. This period will also be closely monitored.

Summary of how the relevant Social Regeneration Charter, Place Action Plan and Community Investment Plan have been considered.

The development site for planning application 18/AP/2295 falls outside of the geographical scope of the Council's Social Regeneration Charter – which focuses on Old Kent Road and Canada Water - and their Place Action Plans, which are relevant to locations with Area Action Plans.

In relation to the Community Investment Plan, this was introduced by Southwark Council in the summer of 2019 to create a clear programme for how local Community Infrastructure Levy is spent, 'crucially balancing the need to ensure local CIL is used to support growth and tackling inequalities'. Accordingly to information available on the Council's website:

'Over the coming months officers will consult with ward forums regarding the boundaries and the additional theme for the area. We are committed to working with ward forums and community groups to ensure local CIL is spent as efficiently as possible and I look forward to attending opening ceremonies and launch events very soon.'

Whilst the pre-application and post submission engagement that has been conducted with the local community in and around Alscot Road has focused on the development proposals, were the application to be approved and CIL contributions transferred to the Council, we would be happy to play a full and active role in continuing to work with the Council to ensure CIL contributions were used to support the additional growth of the local area – in addition to the delivery of our scheme – and to continue to help tackle local inequalities.

Provide examples of all consultation materials

The **engagement summary** will be a validation requirement for any planning application. It should clearly set out how the feedback received has been addressed and how the community has shaped the proposed development. Where comments have not been addressed, this should be detailed and justified. This will be used to inform officer and committee reports.

Appendix 1 - public exhibition invitation



The owner/occupier
 Re: development at 78-89 Alscot Road
 Address 1
 Address 2
 Address 3
 Address 4

8 March 2018

Dear Sir/Madam,

Invitation to public exhibition: redevelopment proposals for 78-89 Alscot Road, Bermondsey

I would like to invite you to a public consultation on proposals to redevelop the land at 78-89 Alscot Road for student accommodation. The site is occupied by a warehouse on the south edge of Bermondsey Spa Gardens.

Alumno is a company which specialises in developing student accommodation. Established in 2006, we have since delivered many projects across the country working with students of universities including Goldsmiths, Queen Mary University of London and the University of the Arts London. We are particularly proud of our work in Southwark, including three projects such as the redevelopment of the former town hall in Peckham.

Our developments create high-quality accommodation in buildings that are designed to high standards and managed on full-time basis by an on-site team so that we develop good relationships with our neighbours. We want to make a positive contribution through our projects, and often work with local groups and organisations.

The views of the community and neighbours are very important to this. We would like to discuss our proposals with you before submitting a planning application and hope you will be able to join us at our public exhibition:

When – Saturday 17th March, 10am – 2pm and Monday 19th March, 3pm – 8.30pm

Where – Setchell and Longfield TRA Hall, Junction of Hazel Way and Alscot Way, London SE1 5XN

If you are unable to attend, we will also be publishing details of our plans online, where you can view and comment on the proposals from Saturday 17th March by visiting www.alumnobermundsey.co.uk. Alternatively you can call 020 7434 2384 or email Ron.Plunz@alumnogroup.com for more information.

Yours faithfully,

David Campbell
 Managing Director

Appendix 2 – Distribution area of exhibition invitations



Appendix 3 – Stakeholder invite

Dear Clr Johnson

I am writing to invite you to a public consultation on Alumno Group's development proposals for student accommodation at 78-88 Alscot Road. I have attached for your information a copy of the public invitation letters containing further information about Alumno and their proposals, which shall be delivered to all local residents in the next few days.

The details of the consultation events, held as an exhibition over two days, are as follows:

- **When:** Saturday 17th March, 10am – 2pm and Monday 19th March, 3pm – 8.30pm
- **Where:** Setchell and Longfield TRA Hall, Junction of Hazel Way and Alscot Way, London SE1 5XN

Residents will be able to view and provide feedback on the development proposals for the site as well as speak to members of the project team who will be on hand to answer any questions. If you are unable to attend either event the information exhibited will also be online from 17 March on www.alumnobermondsey.co.uk.

Kind regards,
Sami


Sami Dodangeh
For and on behalf of Alumno Group

Appendix 4 – Consultation website

Bermondsey Park Students

Search

The Proposals Scheme Management Project Team News Background About Us Contact Feedback



Home

Search

Welcome to Alumno's consultation website for our development proposals for 78-89 Alscot Road.

Alumno is bringing forward proposals for high quality purpose-built student accommodation at this underutilised site. We are consulting with the community on our plans before submitting a planning application, and would appreciate all feedback on the proposals. You can submit your views [here](#).

Recent Posts

[Consultation events – 17 and 19 March](#)

Appendix 5 – Exhibition boards (1)



Welcome

Thank you for taking the time to attend this exhibition on Alumno's proposals for 78-89 Ascot Road. We hope you find this event helpful.

Please ask a member of the project team if you have any questions.



Alumno is an award-winning specialist student accommodation developer, delivering projects from inception through to operation working closely with universities and other key stakeholders. We have successfully delivered projects from Scotland over the Midlands to London, all integrated into an urban context where we place great emphasis on sophisticated and sympathetic architecture to integrate successfully into existing communities.

Our approach is to liaise with communities, to listen and to create an environment beneficial for both the student community and neighbours. We have done so successfully and provided both sustainable and affordable accommodation for around 3,000 students which resulted in benefits for the local community in terms of amenities and job creation.

78-89 Ascot Road, Birmingham City Centre - Student Housing Redevelopment

Overseas Architecture

Appendix 5 – Exhibition boards (2)



Alumna's Track Record

Student Accommodation in Southwark



Alumna have extensive experience working with the London Borough of Southwark having provided three student schemes. These are at Hampton Street, Rockham Road and the former Southwark Townhall including Theatre Packham.

Southwark Town Hall, for example, was completed in summer 2010 delivering 155 student rooms through good design and considerable 24hr management, while creating a café, affordable artist studios and a new state of the art home for Theatre Packham.

We have also worked together with the Gosauk Garden community to create a public plaza to serve both the theatre and the welcoming entrance into the Gosauk garden estate.

10-16 Albert Road, Bermondsey Spa, Garden - Student Housing Redevelopment

© Alumna Architects

Appendix 5 – Exhibition boards (3)



Alumno In Other Cities

Focus on Placemaking

In 2017 we won the Royal Incorporation of Architects in Scotland (RIAS) Best Residential award for our Flows Place and also the Prix Awards student development in Aberdeen.

We have also been nominated for Best Relativement of the RIBA London Awards for our Southwark Town Hall student development in London.

Norwich, All Saints Green included the refurbishment of an old coachhouse at the rear of the student accommodation.

We provided a public plaza, artwork with reference to the history of the building, high quality landscaping, up-cycled amenity areas and a stone parking pocket.

The area is now very popular with neighbors and workers stopping over at the Alumno which took residency in the old coachhouse.



Durham, Sherston Park included the creation of a new college community for Durham University, at the heart of the long term vision for Sherston Park.

So with an existing residential community, the regeneration of a double Edwardian college site, blends sensitive renovation and addition with modern intervention.

All stakeholders' initial objections have been met, as a result of their ongoing consultation was key.

The creation of new public parking, sculpture garden and party wall has enhanced the local environment and allowed the new community to integrate.



Leamington Spa - The Union investigated the chances of re-visit all existing buildings and within a small pocket park.

Since completing the channel, being building and the landscape we realized how much this helped a new basis of life for a previously unloved part of Leamington Spa.


The cultural all has been provided in very close collaboration with Anthony Frost who is an important and well known artist from Leamington Spa and was very well received by the city and the local community.




75-85 Wood Quay, Sarnoddy, Glas Gabbra - Student housing development

© Alumno Architects Ltd

Appendix 5 – Exhibition boards (4)



Community + Management



Being a good neighbour is important to us.

Management Alumna will be working alongside an experienced facilities management team, such as iStockart, that has extensive experience in managing student housing developments throughout the UK.

While we aim to create a welcoming environment for all the students, any anti-social behaviour will not be tolerated and any residents breaching the standard conditions and regulations outlined within their tenancy agreement will lose their accommodation.

Neighbourhood + Community The Management team will have a full-time presence at the building. The team will seek to engage with local Residents Associations and community organisations to working closely with local people through meetings to address any issues. Students will be involved to provide feedback and engage in discussions where appropriate.

Car Parking - The development will be very car-refer for students with the provision of around two spaces for staff and disabled residents. Students will also not be permitted to bring cars to the site and park in the surrounding area. Students will be encouraged to use more sustainable means of transport, such as cycling, walking and public transport.


Move-in Process This will be a managed process over two weeks (and) each academic year. To stagger arrivals, each student will be given a date and time to take up occupancy of their room.

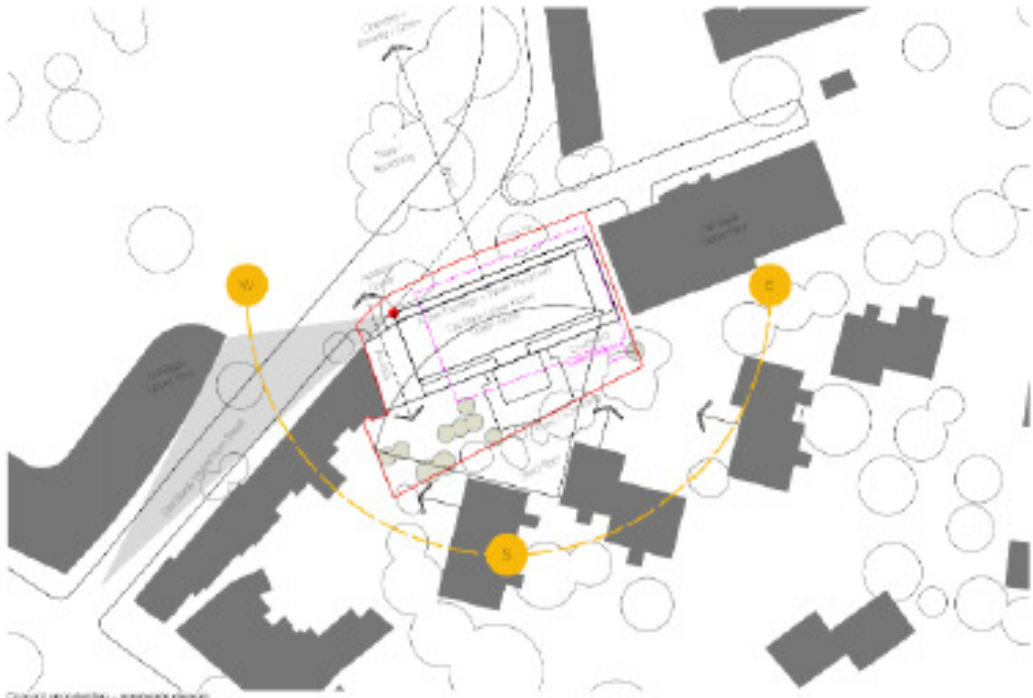
During move-in days we will provide an increased management presence and, in order to minimise disruption, we will provide a methodical approach to the apartment times that students can arrive and unload. Students will move-out over a longer staggered time period, which means impact on the local community are further minimised. This period will also be closely monitored.

78-82 Alcot Road, Sennelsay Gas Gardens - Student Housing Redevelopment

Greenway Architects

Appendix 5 – Exhibition boards (5)

 Design Principles



Concept opportunities – amenity diagram


The scheme makes best use of urban land with good access to amenities and public transport, breathing new life, investment and functionality into the site.

We have sought to replace existing building with a more appropriate and dynamic building in terms of design quality, function and sustainability.


We will create a well-served pedestrian network in front of the site bringing a more civic environment through high-quality landscaping, an active frontage and legible access points.

We will provide a mix of room types, sizes and affordability on site to meet needs and provide choice.

We have been working closely with Cityweek through a pre-application consultation process to find the best solution for the site and surroundings.



Section through amenity



Plot elevation in context

20-24 Wood Road, Doncaster, City Gardens – Student Housing Redevelopment

Greenway Architects

Appendix 5 – Exhibition boards (6)



Design Evolution



Inspiration - Geometric shapes



Inspiration - Tone, color and material composition



Inspiration / precedent - Sculptural facade



Expressive structure - single edge horizontal table expressed



Expressive shading - variety of elements to create single edge table with depth to the composition and create secondary columns of light and shade



Expressive facade for - panel panels create a unique rhythm



Dynamic composition of combined complementary elements



Continuity and panels

Inspiration / precedent - Geometric facade panels
Tehran Alizad Front, Tehran; New York, Spire Gardens - Student Housing Redwoodpoint



Evolution of the proposed form - select how sections flow vertically separate

Tehran Alizad Front, Tehran; New York, Spire Gardens - Student Housing Redwoodpoint

Greenway Architecture

Appendix 5 – Exhibition boards (7)



Design Proposal



View looking N of proposed site from 1st floor level looking from the north side of the Garden


View looking N of proposed site from 1st floor level looking from the east end of Wood Road



1st floor level view of proposed site looking N from the east end of Wood Road

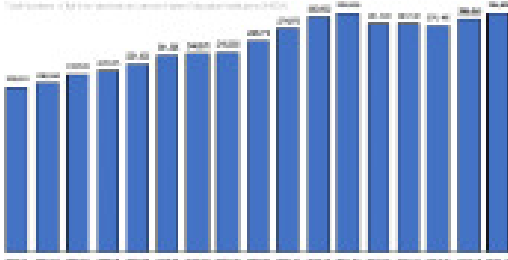
View looking N of proposed site from 1st floor level looking from the east end of Wood Road

Appendix 5 – Exhibition boards (8)



Student Housing Need + Next Steps

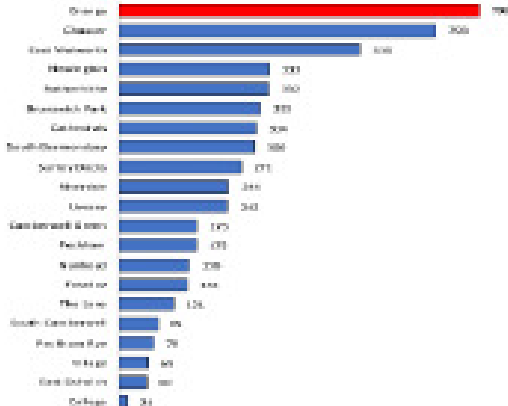
Need for student housing in London The growth in full-time student numbers in recent years in London has not been matched by an increase in provision of accommodation by universities. Currently in London just 21% of students who are in need of accommodation (ie not living at home) are able to be housed in purpose-built student accommodation compared to the UK average of 38%. Overall full-time student numbers in London has risen steadily since the Millennium and are close to an all-time peak.



Research shows that there is a significant gap between accommodation availability and demand in the central region of London (which Southwark sits in) when the student numbers of universities in this area are taken into account.

	UK	London	Accredited Campuses - Central and Region (14)	Accredited Campuses - East Side Region (6)	Accredited Campuses - 1001
A. Total full-time students (HEA 2016)	1,748,000	280,400	144,400	13,000	280,000
B. Number of students who live at home people	544,000	70,400	35,400	12,000	40,000
C. Total need of accommodation (2016)	1,204,000	210,000	109,000	1,000	240,000
D. Supply of new student accommodation (Managed/Control Private Sector)	488,700	50,000	30,000	6,000	30,000
E. Control Area member (2016)	407,000	38,000	30,000	2,000	30,000
F. All Level of Provision (2016)	10,000	10,000	10,000	10,000	10,000


There is evidence that the number of student households in the local area is high, especially in Gange ward.




Next steps - Following this public consultation with local residents we will review feedback and take on board comments prior to discussing with the local authority. We hope to submit a planning application in the coming months.

For further information you can contact:

Managing Director
David Campbell




Development Manager
Ron Plutz




More information on Alumio can be found at: alumiodevelopments.com

Architect
Duncan Greenway
Greenway Architecture




Planning Consultant
Catherine Foster




GL Hoam


Structural Engineer
Karlton Wiles
Fluid Structures



Mechanical + Electrical Engineer
Paul Ross
Strook Dawson & Partners



Tree Specialist + Arborist
Emma Hoyle
Crown Consultants



Thank you - We very much appreciate your interest in our proposals and would be happy to answer any questions.

Please do take a minute to fill in a response form, or take one away to send back to us later.

78-89 Abchurch Lane, London EC4N 3DF, Southwark Council - Student Housing Regeneration | Greenway Architecture

Appendix 6 – Feedback form



Feedback Form

78-89 Alscot Road Development Proposals

Name	
Address	
Email	
Telephone	

Our proposals are still in progress, and this exhibition provides us with an invaluable opportunity to hear your views, which we aim to address as the scheme evolves. Your views are important to us, and all feedback is welcomed.

This form can either be returned to us in person, or if you wish to take the form away to complete, please return to: FREEPOST RRAJ-KGLE-AYTR, Lexington Communications, 136 High Holborn London WC1Y 7BD.

The information displayed today is available on our consultation website, where feedback can also be submitted online: <http://www.alumnobermondsey.co.uk>

Do you have any general comments about the proposals?

Your name and address are optional, but we require to support our comments. Copies may be made available to the local planning authority and we may use your comments. We also require that your personal details are not placed on the public record. Under the Data Protection Act 1998 and subsequent regulations, we have a legal duty to protect any personal information we collect from you and will not pass your details to any third parties.

OPEN**COMMITTEE:****PLANNING COMMITTEE****MUNICIPAL YEAR 2019-20****NOTE:**

Original held in Constitutional Team; all amendments/queries to Tim Murtagh/Gerald Gohler, Constitutional Team, Tel: 020 7525 7187/7420

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