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Mr A Harrison



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Date: 17/08/2015

Dear Mr Harrison

TOWN & COUNTRY PLANNING ACT 1990 (as amended)
PRE-APPLICATION ENQUIRY

At: 18 AMELIA STREET, LONDON, SE17 3PY

Proposal: Demolition of existing building and the construction of a 8 storey hotel building.

I am writing further to your pre-application scheme submitted on 21st July 2015 and subsequent meeting with officers on 10th August 2015. This follows the consideration of earlier scheme and subsequent meeting on 1st May 2015.

Summary of Key Issues

- In general land use terms, the replacement of the existing building with a new building comprising a hotel development is acceptable in principle.
- Notwithstanding this acceptability in principle and the redevelopment opportunity arising, a successful scheme needs to respect the constraints and location of the site. The current proposal is considered to represent an overdevelopment of the site with significant harm resulting.
- The proposed building is concluded to be of an excessive bulk, scale and massing and would not provide for an appropriate design to the detriment of the character and amenities of the area.
- Given the excessive scale, massing and depth of the proposed building, coupled with the close proximity to adjacent residential windows (including those in the permitted building to the east), the proposal would result in an unreasonable loss of light and be overbearing and oppressive in appearance to the significant detriment of the living conditions of the neighbouring properties.
- A more suitable development scheme would be five storeys at the front of the site (with recessed top storey) with a further reduced scale at the rear to preserve residential living conditions.
- Further information is required to demonstrate that no adverse highways impacts would result including from servicing, deliveries and taxi movements.

Site Description

The site, measuring 0.03 hectares, contains an existing three storey building in use as a hotel with ground floor restaurant. It is located on the north side of Amelia Street.

To the west of the site, and immediately adjacent to the railway viaduct, there is an existing mixed

use nine storey building containing residential properties facing the proposal site. Planning permission has recently been granted for a mixed use scheme to the east of the site containing 3/4/5/7 storey buildings including 55 residential units (4 storeys fronting Amelia Street adjacent to the current proposal site). A current application is being considered for a development on the opposite side of Amelia Street comprising 54 residential units in a building of between 4 and 6 storeys.

The site is located within the Elephant and Castle Town Centre, the Central Activities Zone and the Elephant and Castle Opportunity Area.

It is also included within the *Rail Corridor* Character Area as defined in the Elephant and Castle SPD and forms part of one of the identified potential development sites (26), the eastern part of which is already subject to the planning permission noted above.

Evidence based studies are currently being prepared in support of a potential new Walworth Road Conservation Area. Although this site is not included in the boundary as currently drafted, a development proposal would be likely to impact upon on the setting of the new conservation area, were it to be adopted.

Proposed Development

The proposal seeks to demolition the existing building and the erection of a new eight storey hotel building, plus basement, containing 72 bedrooms with reception and ancillary facilities at ground floor level.

Land Use Issues

Located in the town centre and Central Activities Zone, with good accessibility by public transport, the site is considered to be suitable, in principle, for a replacement hotel development.

The existing building on the site is not unattractive or completely without architectural merit. It is however not considered to be of sufficient quality or importance to the townscape to be considered an undesignated heritage asset. As a result, no objection is raised to its demolition, so long as any building proposed to replace it would be of sufficiently high quality and contribute well to the evolving street scene.

It is important that the development satisfies other material planning issues including that it respects local character and protects the amenity of neighbouring properties. A successful redevelopment has the potential to result in enhancements to the street scene and contribute to the overall regeneration of the Elephant and Castle Opportunity Area.

Design and Appearance

Saved Policy 3.11 of the Southwark Plan requires that all developments should ensure that they maximise the efficient use of land, whilst ensuring that, among other things they protect the amenity of neighbouring occupiers or users and positively respond to the local context and complying with all policies relating to design. The policy goes on to state that the LPA will not grant permission for development that is considered to be an unjustified underdevelopment or over-development of a site. Saved policy 3.12 requires high quality urban design and saved policy 3.13 states that the principles of good urban design must be taken into account in all developments. This includes height, scale and massing of buildings, consideration of the local context, its character and townscape as well as the local views and resultant streetscape.

The proposals under consideration would replace the existing two storey hotel building with a new eight storey hotel development. Whilst it is acknowledged that this site has development potential and could be used more efficiently than the existing building, the proposals currently under consideration are considered to be an unjustified over development of the site. As discussed in more detail below, the height, scale and massing proposed is excessive and would fail to positively

respond to the local context. Officers also have concerns about the potentially harmful impact of a proposal of this scale on the amenity of future occupiers of the immediately adjacent, recently approved scheme. Whilst overlooking could be designed out, the scale of the scheme would appear overbearing and uncomfortable.

The height, scale and massing proposed is not considered acceptable. Whilst it is acknowledged that it has been reduced from nine to eight storeys since the initial pre application meeting, it has not been reduced to a scale that Officers could support. It is considered that the four storey part of the development recently approved at the neighbouring site sets an appropriate height for development on this site that should be responded to. Officers have clearly stated at both pre application meetings held in relation to this scheme, that a scheme that continues this four storey datum, with a sensitively designed, set back upper storey in addition, would represent the upper limit of what is acceptable here. At this height, it is considered that the scheme would respond more appropriately to the existing urban development patterns and townscape. Particularly, the secondary nature of Amelia Street, as tertiary to Walworth Road. It would also respond more appropriately to the carefully negotiated nature of the neighbouring scheme, whilst providing a subtle sense of mediation to the larger scale of the Printworks building. It is not considered that the Printworks should be seen as setting a precedent for height along this street, as this has been designed according to its very unique setting immediately adjacent to the railway viaduct. It is also considered that, at this scale a more 'neighbourly' relationship could be established with the approved scheme on the neighbouring site.

It is understood that the intention is to create an active frontage onto Amelia Street. This is welcomed in principle, subject to detailed design. A staggered building line is proposed along Amelia Street. It is unclear why this is necessary, as much of the surrounding area is defined by strong and consistent building lines. As a result of this, the servicing entrance would be forward of the main entrance, potentially compromising the legibility of the scheme. This should also be reconsidered.

The façade details proposed in the revised scheme show a material palette of concrete for the horizontal elements and, polycarbonate cladding for the main vertical elements. This is of some concern as it appears to make no reference to the surrounding townscape context that is characterised by a solid language of masonry buildings. Officers are concerned that this material palette has been proposed only in response to the potential overlooking concerns on this site and with no clear architectural intent. It is strongly recommended that the material palette is reconsidered, although it is noted that overlooking concerns will need to be addressed without resulting in visually monotonous, inactive facades.

Officers also have concerns about the hotel rooms proposed at basement level. Whilst it is acknowledged that these are not residential units, it is not clear that they would receive sufficient natural light given their reliance on a light well that is overhung at first floor level.

As such, the proposed building is concluded to be of an excessive scale and massing and would not provide for an appropriate design to the detriment of the character and amenities of the area.

Impact upon the neighbouring living conditions

The development would be in close proximity to the principle elevation of the adjacent Printworks development which includes predominantly single aspect flats facing the proposed building, and also to part of the permitted building to the east which, whilst containing no windows in that part of the proposed building fronting Amelia Street, does contain bedroom windows facing the flank boundary of the site to the rear.

Given the excessive scale, massing and depth of the proposed building as currently proposed, coupled with the close proximity to adjacent residential windows to habitable windows (including those in the permitted building to the east), the proposal would result in an unreasonable loss of light and be overbearing and oppressive in appearance to the significant detriment of the living conditions of neighbouring properties.

The height and massing of the proposed building should be significantly reduced in order to overcome such issues with further day and sun light testing carried out. A more suitable development scheme would appear to be of five storeys at the front of the site (with recessed top storey) with a further reduced scale at the rear to preserve residential living conditions. Further day and sun light testing should be carried out for such an option.

Careful design is also required in order to prevent unreasonable overlooking to neighbouring properties whilst ensuring acceptable elevational design.

Transport and highway issues

The proposal seeks a significant increase in the amount of hotel accommodation from that existing. A full transport assessment should be provided with any application.

The site is very well located for public transport and promoting sustainable transport trips. The cycle provision needs to be of a better quality using Sheffield stands. The design of the cycle storage in the basement is too small and no details are provided of how access is granted. The location of the bin stores is acceptable.

Further information is required on the nature of and the impact of servicing and deliveries. This should include the number, timing and type of trips and the vehicles being used along with the impact on the traffic flows on the street and where provision will be made for kerbside loading. The impact on the current parking arrangements will also need to be considered. It would not be acceptable to remove any residents permit bays, nor would it be acceptable to load and service the site that would cause a blockage to the traffic flows on Amelia Street. The uplift in the number of rooms is significant and deliveries associated with food and linen, for example, will be substantially higher than the existing use. These will take longer and be at different times, this could negatively impact local conditions.

The arrival and departure of guests will need to be fully considered. Hotels generate significant taxi traffic at varying hours. It will be necessary to provide details of how taxis will be managed in relation to the use, the impacts that might arise and how they will be managed on street. Similarly information on potential coach drop offs will need to be provided and justified.

Separate detailed highway requirements that have been previously forwarded to you also need to be taken into account.

Other issues

The development would be liable to both ***Southwark and Mayoral CIL***.

Located in an Air Quality Management Area an **air quality assessment** would be required with an application.

A **phase 1 land assessment** should be provided with an application following liaison with officers in the Council's Environmental Protection Team.

A **noise assessment** is required with an application, including an assessment of required plant and mitigation necessary in order to prevent disturbance to neighbouring residents.

A **Flood Risk and Drainage Assessment** should be provided with any application.

Conclusions

Whilst supportive of the general principle of redevelopment of this site, the development as currently proposed represents a significant overdevelopment of this small size, with resulting harm upon local townscape and the living conditions of adjacent residential properties (both existing and proposed). In the opinion of officers, as currently proposed this harm would clearly outweigh the benefits arising

from the development.

At your meeting with officers it was argued on behalf of the applicant that a development of a similar scale to that proposed is necessary for a viable redevelopment of this site. However, no evidence has been provided to justify this and from the Council's experience there is nothing to suggest that a reduced and more appropriate development in planning terms would not be viable. It is also considered not to be the case that the granting of planning permission on the site to the east has preventing redevelopment proceeding on this site. A development of reduced scale and intensity, which meets relevant planning policies, is capable of being achieved alongside both the existing and permitted neighbouring developments.

A more suitable development scheme would be five storeys at the front of the site (with recessed 5th storey) with a reduced scale at the rear to preserve residential living conditions and respect the townscape around the site.

I would not therefore encourage the submission of formal application on the basis of the scheme proposed, but would be pleased to offer further advice on a revised scheme which takes account of the advice in this letter.

The advice in this letter is the informal advice of officers based upon the information you have provided and is without prejudice to the Council's formal determination of any future planning application. Following receipt of an application, consultation and publicity will be carried out, which may result in further relevant issues arising.

Should you wish to discuss any matter with regard to this advice please contact me.

Yours sincerely

Rob Bristow
Group Manager (Major Applications)

Yours sincerely

David Cliff

Team Leader - Major Applications Team