

Contents

RECOMMENDATION	2
EXECUTIVE SUMMARY	2
BACKGROUND INFORMATION	3
Site location and description	3
Details of proposal.....	3
Planning history.....	6
KEY ISSUES FOR CONSIDERATION	6
Legal context.....	7
Adopted planning policy	7
Emerging planning policy	10
Principle of proposed development in terms of land use.....	13
Environmental impact assessment.....	22
Design	22
Density	24
Quality of accommodation.....	25
Affordable housing	26
Impact of proposed development on amenity of adjoining occupiers and surrounding area	29
Archaeology	35
Sustainable development implications	35
Energy and BREEAM.....	35
Trees, landscaping and ecology.....	37
Transport and highways issues.....	38
Planning obligations and Community Infrastructure Levy (CIL)	40
Community involvement and engagement.....	43
Community impact and equalities assessment	49
Human rights implications	50
Positive and proactive engagement: summary table.....	50
Conclusion.....	50
APPENDICES	52
AUDIT TRAIL	52

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

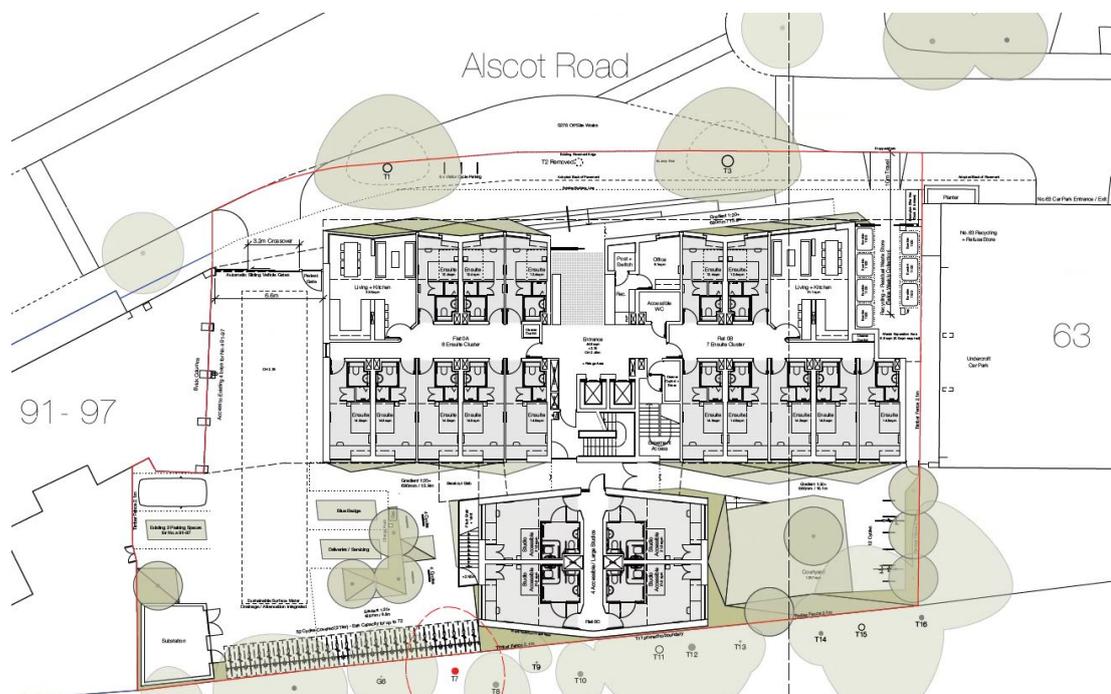
7. The site is on the southern side of Alscot Road, facing onto Bermondsey Spa Gardens. A 5.6m high building, constructed in the late 1970s from brick and metal cladding, covers 600sqm of the site. It is currently used for artist workshops and was previously used by a legal publishing business as a Class 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 is 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 per 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