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Item No. 8.1	Classification: Open	Date: 20 July 2020	Meeting Name: Planning Committee
Report title:	Development Management planning application: Application 19/AP/2087 for: Full planning application Address: EAGLE WHARF 90-96 PECKHAM HILL STREET LONDON SE15 5JT Proposal: Redevelopment of site comprising the demolition of existing retail warehouse building in (Use Class A1) and construction of two buildings at four and six storeys in height. The application scheme will provide a creative Digital Hub workspace (Use Class B1/D1) and student accommodation incorporating 393 student bedrooms (sui generis Use Class) and associated communal facilities and associated communal facilities. The scheme includes highway improvements, landscaping, blue badge car parking, and cycle parking spaces for students and visitors.		
Ward(s) or groups affected:	Peckham		
From:	Director of Planning		
Application Start Date 18/06/2019		Application Expiry Date 17/09/2019	
Earliest Decision Date 20/11/2019			

RECOMMENDATIONS

1. That planning permission be granted subject to conditions and the applicant entering into to an appropriate legal agreement.
2. That in the event that the requirements of (1) are not met by 25 September 2020, the director of planning be authorised to refuse planning permission (if appropriate) for the reasons set out in paragraph 291.

EXECUTIVE SUMMARY

3. This application is for decision by the planning committee as it is a major application for which five or more objections have been received.
4. The proposal is for the redevelopment of an A1 Use Class retail warehouse. The proposed development would provide student housing for University of the Arts, with 393 student rooms within two buildings of four to six storeys. Part of the ground floor is described by the applicant as a Digital Hub workspace, providing a space for the local community to meet and learn digital skills and as a start up work space for individuals and small businesses in the creative arts. The student accommodation would have associated communal rooms, reception, laundry room and cycle storage. The Digital Hub would have separate cycle storage. Landscaped courtyard spaces and a shared communal refuse store would also be provided.
5. One of the joint applicants, the University of the Arts London (UAL), is the largest Arts University in Western Europe and has two major academic institutions (Camberwell College of Arts and London College of Communication at Elephant and Castle) located within the London Borough of Southwark. The academic provision at Camberwell has

recently doubled in size (including the provision of a Creative Computing Institute) and the proposed development will play a vital role in supporting all of these facilities. To date, UAL have relied almost exclusively on private sector student accommodation secured via nomination agreements and leases. These are often at high rents and subject to large annual increases and with limited social and welfare services. UAL's cohort of students is in the region of 20,000. The proposed student accommodation would be exclusively for UAL's own students. UAL's existing student accommodation in Camberwell has 290 rooms and the proposal for 393 student rooms would help in addressing their student's need for accommodation.

6. The accommodation is being developed, owned and run by UAL predominantly for students enrolled at the nearby UAL Camberwell College of the Arts campus in Peckham Road. A payment in lieu of £4 million is proposed for affordable housing to be delivered through the council's own programmes as it is not practical to include conventional affordable housing on site. The sum offered is substantially in excess of the maximum amount which could be supported as evidenced by the viability assessment.
7. The massing and detailed architectural treatment is considered appropriate in the context of the adjacent Mountview Academy building and the listed buildings fronting Peckham Hill Street. The immediate setting and views of the listed buildings would be preserved. The student housing would be good quality and the proposal would not be detrimental to the amenity of neighbouring properties. Planning obligations would secure the in lieu affordable housing payment, and reviews of the viability in the case of a delayed start and post-construction, employment, public realm and transport improvements and highway works. It would also secure the rents and management arrangements for the student accommodation, and the use and access to the Digital Hub space. Proposed conditions would ensure the proposal accords with policies on archaeology, trees, design, transport, ecology, landscaping, amenity, flooding and energy.

BACKGROUND INFORMATION

Site location and description

8. The site comprises 0.38 hectares (ha) of previously developed land and is located on the western side of Peckham Hill Street within the designated Peckham town centre. This brownfield site is bounded by Bonar Road to the north, Surrey Canal to the west and the recently completed development at 90-96 Peckham Hill Street to the south (Mountview Academy – approved by permission reference 16/AP/2649).



9. The existing building on site is set back from the main road and comprises a two storey retail building (Class A1) with a gross internal floor space of 1958m², constructed of dark brick and corrugated metal. The site is vacant, but was previously in use as a timber merchant (Whitten Timber). To the front of the existing building is a customer car park with approximately 40 vehicle parking spaces. The car park was also used as a delivery area. The site is currently accessed via both Peckham Hill Street and Bonar Road.
10. The site is located within the Peckham Hill Street Conservation Area and is adjacent to the Rye Lane Conservation Area (to the south) but does not include any listed buildings. The site is located immediately north of three grade II listed buildings (Nos. 98-108, 102-104 and 106-108 Peckham Hill Street) and immediately west of a group of locally listed buildings (78-88 Peckham Hill Street).
11. The site is located within the Peckham and Nunhead Action Area, the Peckham Core Action Area, the Urban Density Zone, an Air Quality Management Area, Flood Zone 1 and within a Critical Drainage Area (CDA).
12. Surrey Canal is located directly to the west and is designated as Metropolitan Open Land (MOL) and a Site of Importance for Nature Conservation (SINC).
13. The council's Geographical Information System (GIS) shows a small section of the site as being within MOL. However, this layer has not been drawn correctly on the GIS and that the site is not MOL/SINC. This would be amended when the New Southwark Plan (NSP) is adopted.
14. Surrey Canal provides a north-south pedestrian and cyclist link from the Peckham town centre towards Burgess Park.
15. The site is well served by public transport and has an excellent Public Transport Accessibility Level (PTAL) rating of 6a. The site is not within a Controlled Parking Zone (CPZ). Peckham Hill Street is within the bus priority network and several local bus routes are within walking distance to the site, with the closest being 70 metres away. The site is also within walking distance (approximately 12 minutes) to Peckham Rye station offering services on the London Overground and Southern Rail networks.

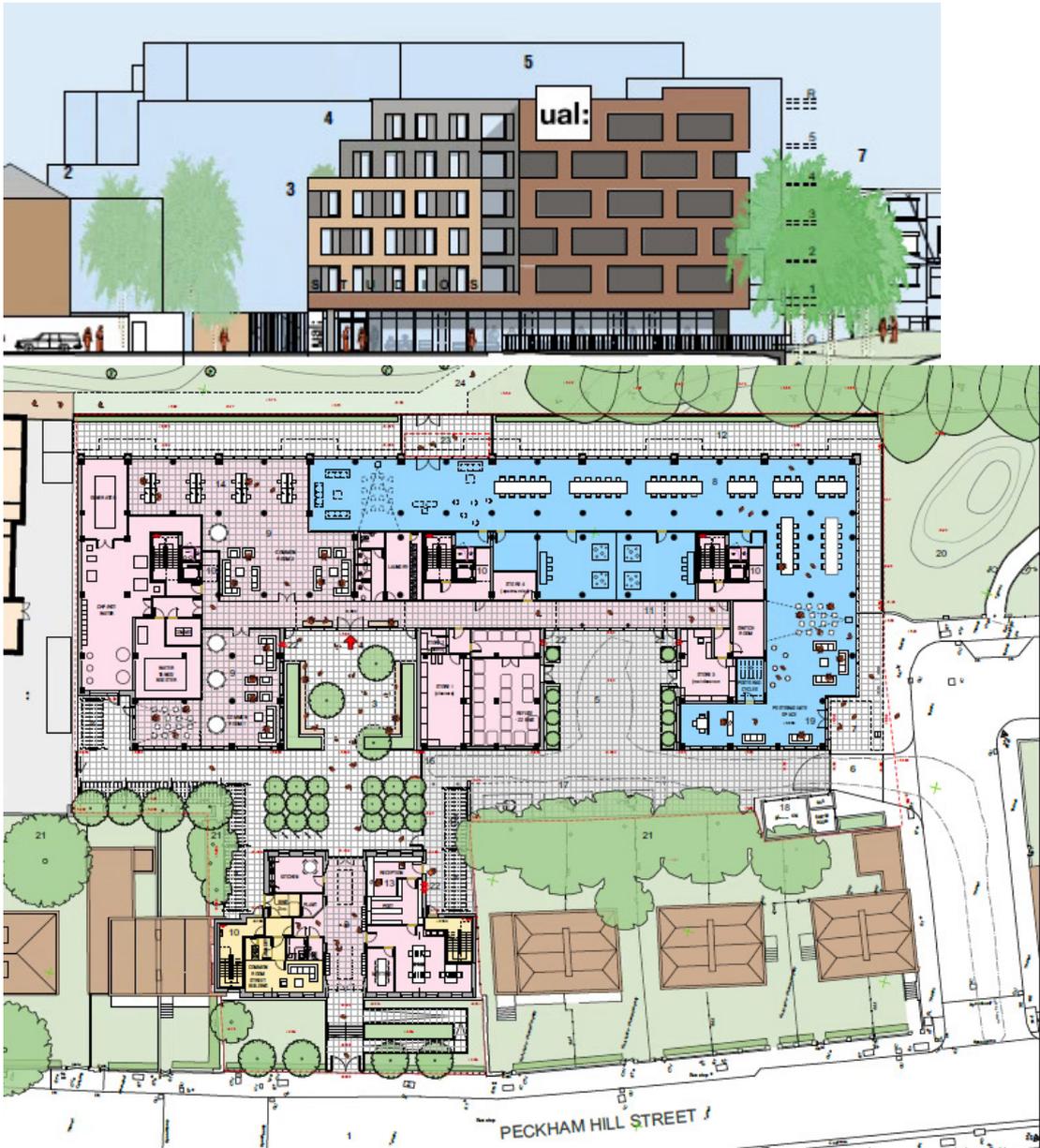
16. In the emerging New Southwark Plan, the site is within an Archaeological Priority Zone, and within the wide setting consultation area of the proposed borough view of St Paul's Cathedral from One Tree Hill.

The surrounding area

17. The surrounding area is predominantly residential in character with a mix of high and low density housing. Immediately to the south of the site is the newly constructed Mountview Academy (planning permission reference 16/AP/2649), a part three- four- and five-storey building comprising teaching, rehearsal and administrative accommodation, theatre (Class D1), and cafe/restaurant/bar (Class A3/A4). Further to the south are Peckham Library, Peckham Pulse Leisure Centre, and Peckham Square, which the council has permission to redevelop.
18. The site is located within, but on the edge, of the town centre and adjacent to residential uses, away from the main parade of shops and services, and outside of protected shopping frontages.
19. The site is a short walk from University of Arts London's (UAL) campus at the Camberwell College of Arts on Peckham Road and UAL's campus at the London College of Communication at Elephant and Castle is easily accessible by public transport or by bicycle.

Details of proposal

20. A mixed use development comprising of a creative Digital Hub workspace (dual Class B1/D1) and student accommodation (sui generis) is proposed. A total of 393 student bedrooms would be provided with the accommodation being owned and run by the University of Arts London for its own students, ; predominantly those enrolled at the nearby UAL Camberwell College of the Arts campus in Peckham Road. The floor area of the student accommodation would be 10,993sqm and the Digital Hub (Class B1/D1) would have a floor area of 753sqm.
21. It is proposed to demolish the existing building and to construct two buildings at four and six storeys in height.
22. The six storey building would be the main building located on the western side of the site. It would have a parapet height of 18.8m, and would step down to the (east) elevation in the form of three smaller 'pavilions' (at a height of 12,4m) which would be centred around landscaped courtyards at ground floor level. This building would be 159m long, and front onto the Surrey Canal to the rear (west).



23. The Digital Hub would be on part of the ground floor of the six storey building (shown in blue above) and the remainder of the ground floor would provide common rooms for students, a generator room, water tank, storage areas and refuse storage facilities. The upper floors would comprise student accommodation, arranged as 393 student bedrooms with shared living rooms and kitchens.
24. The applicant's vision for the proposed Digital Hub is that it would help create the pathways for local people to engage with and enjoy careers in London's creative economy. The Digital Hub would house two key functions:
 - A space for people of the local community to meet and learn digital skills.
 - Start up work space for individuals and small businesses in the creative arts.
25. The Use Class for the Digital Hub would be B1/D1 and the hours of operation requested are from 7am to 10 pm during weekdays and between 9 am and 5pm on Saturdays, with no opening on Sundays.
26. The Digital Hub represents the latest phase in UAL's evolution and would nurture creative businesses crucial to the Borough's and London's on-going success as a global hub for creative business.
27. The Digital Hub will be run and managed by UAL as a completely separate facility to the student housing with a standalone access on Bonar Road. No access to Canal Park is provided, however the building has been designed so that in the future, with the approval of the council, access could be taken directly from Surrey Canal.
28. UAL has committed to operate the facility on a not for profit basis and whilst it will need to cover running costs, it is not the intention to run the Digital Hub as a commercial facility.
29. The layout of the Digital Hub would allow it to be flexible and adapt to the needs of future users. The layout plan of the Digital Hub is indicative and it is anticipated that it would have the following key features:
 - A large reception area with break out informal seating that can accommodate meetings and events of up to 50 people.
 - Two or more presentation areas with seating for 16 people arranged around a projecting screen
 - Business start-up desk space and separate workshops that could accommodate between 50 and 70 people.
30. The four storey infill building would front Peckham Hill Street, measuring 10.5m high and 26m wide. It would provide 30 student rooms on the first to third floors (with shared kitchens and living rooms) and associated uses such as a reception and a post room on the ground floor. The building would provide pedestrian and cycle access to the student accommodation via a reception, which would have 24-hour security.



31. A single storey building comprising a substation, gas and switch room is also proposed on the northern part of the site.
32. Three blue badge car parking spaces would be provided within the courtyard.
33. It is proposed to replace the existing vehicular crossover from Peckham Hill Street at the front of the site with a continuous footpath across the site frontage.
34. The pedestrian access from Peckham Hill Street would only be used by students and visitors and would also provide access to 208 cycle parking spaces within the ground floor landscaped area. 198 of the cycle spaces would be long stay, two tier type, for students (at a rate of 1 space per 2 students) and five Sheffield stands would provide 10 short stay spaces for visitors.
35. The front garden outside the four storey building would incorporate a ramp which would lead down to the entrance level. This would enable students to cycle down the ramp before dismounting and walking their bikes through the building to the secure cycle storage area in the courtyard to the rear.
36. Users of the Digital hub would have access to 2 short stay spaces outside the entrance along Bonar Road and 12 long-stay cycle spaces which would be provided in a secure area within the building and accessed via the reception space. The long-stay cycle spaces would be the two tier type.
37. The current vehicular access from Bonar Road would be maintained and would be used for delivery / service vehicles.
38. Existing mature trees on and adjacent to the site would be protected and retained with additional planting provided within a shared surface courtyard area between the two buildings. The main building would be set away from the Surrey Canal by approximately 3.5m with a hedge and railing along the rear boundary of the site.
39. A Listed Building Consent application (20/AP/1259) has also been submitted and is currently under consideration. Listed building consent is required as the proposed four storey infill building would abut the adjacent listed building at 98 Peckham Hill Street and this listed building would need to be underpinned.

Additional information submitted

40. The proposal has seen a number of additional documents submitted following the receipt of feedback through the consultation process, but the physical development has not changed during the course of the assessment.
41. The additional information submitted includes:
- Pedestrian Visibility Splay drawing – drawing no 3782-003 – prepared by Caneparo Associates (14 May 2020)
 - Substation plans and elevations – drawing no P38 (dated 12th May 2020) – prepared by Stephen Marshall Architects
 - Proposed indicative surface and foul water drainage design – drawing no A/HBEAGLEWHARF.10 rev P4 – prepared by Mayer Brown
 - CIL Additional Information Form (dated 13.01.2020) – completed by Rolfe Judd Planning
 - Bat Activity Surveys (dated 01.06.2020) – prepared by 4 Acre Ecology Limited
 - Delivery & Servicing Plan (dated May 2020) prepared by Caneparo Associates
 - Transport Issues letter (dated 19.05.2020) summarising agreed points – prepared by Caneparo Associates
 - Flood Risk Assessment & Drainage Strategy 3rd Issue(dated June 2019) – prepared by Mayer Brown
 - Overshadowing study dated 26 June 2020.

Planning history

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

KEY ISSUES FOR CONSIDERATION

Summary of main issues

43. The main issues to be considered in respect of this application are:
1. Principle of the proposed development in terms of land use;
 2. Environmental impact assessment;
 3. Student rents, affordable housing and viability ;
 4. Accommodation mix including wheelchair housing;
 5. Density;
 6. Quality of accommodation;
 7. Design, layout and impact on, heritage assets;
 8. Landscaping and trees;
 9. Impact on Metropolitan Open Land (MOL);
 10. Impact of proposed development on amenity of adjoining occupiers and surrounding area;
 11. Energy and sustainability;
 12. Ecology and biodiversity;
 13. Air quality;
 14. Ground conditions and contamination;
 15. Water resources and flood risk;
 16. Archaeology;
 17. Transport, parking, highways and servicing
 18. Security and management of anti-social behaviour;
 19. Employment and training
 20. Planning obligations (S.106 undertaking or agreement);
 21. Mayoral and borough community infrastructure levy (CIL);
 22. Other matters:
 23. Community involvement and engagement;

- 24. Consultation responses, and how the application addresses the concerns raised;
 - 25. Consultation responses from external consultees;
 - 26. Community impact and equalities assessment;
 - 27. Human rights implications, and
 - 28. Positive and proactive statement.
44. These matters are discussed in detail in the 'Assessment' section of this report.

Legal context

45. 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.
46. 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 and material considerations

The National Planning Policy Framework (NPPF) February 2019

47. 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. 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:

- 2 Achieving sustainable development
- 5 Delivering a sufficient supply of homes
- 7 Ensuring the vitality of town centres
- 8 Promoting healthy and safe communities
- 9 Promoting sustainable transport
- 11 Making effective use of land
- 12 Achieving well-designed places
- 15 Conserving and enhancing the natural environment
- 16 Conserving and enhancing the historic environment.

The London Plan (2016)

48. The London Plan is the regional planning framework and was adopted in 2016. The relevant policies of the London Plan 2016 are:

- Policy 2.15 Town Centres
- 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 4.6 Support for and Enhancement of Arts, Culture, Sport and Entertainment
 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 6.13 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)

49. 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 2 Sustainable Transport
 Strategic Policy 4 Places for Learning, Enjoyment and Healthy Lifestyles
 Strategic Policy 5 Providing new homes
 Strategic Policy 6 Homes for People on different incomes
 Strategic Policy 8 Student Homes
 Strategic Policy 10 Jobs and businesses
 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)

50. 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 1.7 Development within Town and Local Centres
- 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 3.15 Conservation of the historic environment
- Policy 3.16 Conservation Areas
- Policy 3.18 Setting of Listed Buildings, Conservation Areas and World Heritage Sites
- Policy 3.19 Archaeology
- Policy 3.25 Metropolitan Open Land (MOL)
- 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 5.4 Public Transport Improvements
- Policy 5.6 Car Parking
- Policy 5.7 Parking Standards for Disabled People and the Mobility Impaired
- Policy 5.8 Other Parking.

Peckham and Nunhead Area Action Plan 2014

51. The Peckham and Nunhead Area Action Plan (PNAAP) was adopted on 26 November 2014 and sets out the planning framework for delivering development in Peckham and Nunhead. The AAP identifies a “wider action area” and a “core action area” the latter of which is expected to be the focus of development and intensification.
52. The application site is within the core action area, within the Peckham North character area, and next to proposal site PNAAP 10 ‘Eagle Wharf’ – i.e. the Mountview site.
53. The following policies are relevant in this AAP:

- Policy 1 – Peckham town centre shopping
- Policy 7 - Community facilities
- Policy 13 - The road network
- Policy 15 - Residential parking
- Policy 16 - New homes
- Policy 17 - Affordable and private homes
- Policy 18 - Mix and design of new homes
- Policy 20 - Trees
- Policy 21 - Energy
- Policy 22 - Waste, water, flooding and pollution
- Policy 23 - Public realm
- Policy 24 - Heritage

Policy 25 - Built form
Policy 26 - Building heights
Policy 27 – Land Use
Policy 28 – Transport and movement
Policy 29 – Built Environment
Policy 30 – Natural environment
Policy 48 - Presumption in favour of sustainable development
Policy 49 - Section 106 planning obligations and community infrastructure levy

Southwark Supplementary Planning Documents (SPD)

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

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

GLA Supplementary Planning Guidance

55. The following Supplementary Planning Guidance issued by the GLA are material considerations:
Homes for Londoners: Affordable Housing and Viability SPG (2017)

Emerging planning policy

56. 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 New London Plan

57. The draft New London Plan was published on 30 November 2017 and the first and only stage of consultation closed on 2 March 2018. Following an Examination in Public, the Mayor then issued the Intend to Publish London Plan.
58. The Secretary of State responded to the Mayor in March 2020 where he expressed concerns about the Plan and has used his powers to direct changes to the London Plan. The London Plan cannot be adopted until these changes have been made.
59. The draft New London Plan is at an advanced stage. Policies contained in the Intend to Publish (ItP) London Plan published in December 2019 that are not subject to a direction by the Secretary of State carry significant weight. 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.

GG4: Delivering the homes Londoners need
SD6: Town centres and high streets
SD7: Town centres: development principles and Development Plan Documents
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
 E9: Retail, markets and hot food takeaways
 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
 T6.1: Residential parking.

New Southwark Plan

60. 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. These two documents comprise the Proposed Submission Version of the New Southwark Plan.
61. These documents and the New Southwark Plan Submission Version (Proposed Modifications for Examination) were submitted to the Secretary of State in January 2020 for Local Plan Examination. The New Southwark Plan Submission Version (Proposed Modifications for Examination) is the council's current expression of the New Southwark Plan and responds to consultation on the NSP Proposed Submission Version. This version will be considered at the Examination in Public (EiP).
62. It is anticipated that the plan will be adopted in late 2020 following an EiP. 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. Draft policies most relevant to this application are:

Policy P1 Social rented and intermediate housing
 Policy P5 Student homes
 Policy P12 Design quality
 Policy P13 Design quality
 Policy P14 Residential Design
 P15 Designing out crime
 Policy P17 Efficient use of land
 Policy P20 Conservation of the historic environment and natural heritage
 Policy P27 Access to employment and training
 Policy P34 Towns and local centres
 Policy P46 Community uses
 Policy P49 Highways impacts
 Policy P50 Walking

Policy P52 Cycling
Policy P54 Parking standards for disabled people and the mobility impaired
Policy P55 Protection of amenity
Policy P59 Biodiversity
Policy P60 Trees
Policy P63 Contaminated land and hazardous substances
Policy P67 Reducing flood risk
Policy IP3 Community infrastructure levy (CIL) and section 106 planning obligations

Consultation

63. Details of consultation undertaken in respect of this application are set out in and Appendices 1 and 2.
64. Statutory consultation was undertaken on the proposed development including neighbouring letters, site notices and a press notice in Southwark News. The applicant undertook community engagement consulting on the proposals prior to the submission of the planning application, and during the course of the application, resulting in several amendments to the scheme. Further information can be found in paragraph 40 above and paragraphs 298 to 302 below.

Summary of consultation responses

65. One round of consultation was undertaken by the council and 17 representations, of which 12 objected, were received from members of the public.
66. The issues raised by the submitted objections are summarised as:
- A more suitable use would be a use that improves health care facilities in the area
 - Noise nuisance, anti-social behaviour, loss of light and privacy and close proximity to neighbours
 - The design would be out of keeping with the character of the area and the site would be overdeveloped
 - Traffic congestion, parking issues and inadequate public transport infrastructure
 - Environmental impact during the construction and potentially contaminated land
 - Loss of green space
 - Strain on existing community facilities
 - Lack of social and affordable housing, rent to buy and/or other housing schemes
 - Structural damage to properties in the vicinity.
67. One objector notified the council of their withdrawal of part of their objection in relation to noise and disturbance.
68. The five comments in support were in regard to:
- The Digital Hub as a good addition to Peckham
 - The scale, design and landscaping fronting the street as positive and in keeping with the local area
 - Highway works and works to the park would make Peckham Hill Street safer for highway users and pedestrians
 - A plaque should be erected on the rear of the building to reflect the site history.

Assessment

Principle of the proposed development in terms of land use

69. The site is identified in both the adopted development plan and the emerging New

Southwark Plan as being within the Peckham Major Town Centre, Peckham and Nunhead Action Area and Peckham Core Action Area. Planning policies within the London Plan, Core Strategy and saved Southwark Plan, and within the emerging New Southwark Plan and draft New London Plan where they can be given weight, apply to the consideration of this application. The site is not specifically allocated in either the adopted or emerging plans.

Loss of retail Use Class A space

70. The proposed development would result in the loss of the existing A1 use of the site as a timber yard. The site is not within a protected shopping frontage. Saved Policy 1.7 of the Southwark Plan states that within town and local centres, any A Use Classes “should be retained or replaced by an alternative use that provides a service to the general public and would not harm the vitality and viability of the centre”. Policy P34 of the Emerging New Southwark Plan states that the aim is to expand shopping space in town centres particularly at Peckham, Canada Water, Old Kent Road, Walworth Road and Elephant and Castle which have the most potential for growth. The policy goes on to say that other activities, including offices and community facilities, would also help to make these town centres more vibrant and independent. The sections below will consider whether the proposed B1/D1 use of the Digital Hub, and the student accommodation (sui generis) are appropriate uses for this town centre location. However, given the distance of the site from the core of Peckham town centre, and its dislocation from other retail uses, it is not considered that the loss of retail use in this location would harm the vitality or viability of Peckham town centre.

Proposed B1/D1 use

71. The proposal would provide a new site for UAL. The proposed Class B1/D1 use Digital Hub on part of the ground floor would provide a service to the general public as it would be used as a start-up studio space for UAL post graduate students and as a venue for outreach engagement with the local community allowing residents of all ages to be involved in creative computing. Peckham has developed a reputation as a creative and cultural hub and the proposed Digital Hub would help the creative industries in the town centre to flourish, thereby contributing to the vitality and viability of the town centre in accordance with Saved Policy 1.7 of the Southwark Plan. Both Class B1 and D1 uses are town centre uses. This would also be in keeping with the aims of the Peckham and Nunhead Area Action Plan.
72. The proposed B1 use would be in accordance with strategic policy 10 of the Core Strategy which supports the provision of additional business floorspace to help meet general demand for office in town and local centres and encourages the provision of flexible space to help meet the needs of the local office market. The number of jobs in Southwark would be increased as it is anticipated that the proposed B1 floorspace would create a suitable environment with opportunities for start up businesses by post graduate UAL students to contribute to the local economy.
73. Policy P34 of the Emerging New Southwark Plan states that town and local centres should be the main focus for new developments providing new shops, education, healthcare and community facilities, offices and workspaces, leisure facilities and entertainment venues. The proposed B1 use would comply with this policy as it would boost the local economy and would help make the town centre more vibrant and independent, which would reduce the amount of trips people need to make to reach their local jobs.
74. The Digital Hub would be directly linked to the new Creative Computing Institute at Camberwell College of Arts. The Digital Hub will act as a venue for outreach engagement with the local community allowing residents of all ages (school children to

pensioners) to learn Digital Skills and be involved in creative computing. Since 2018, UAL have been trialling, linked to the Creative Computer Institute (CCI), a new Digital Learning Centre housed in temporary accommodation in the grounds of its Wilson Road Institute. This centre has proved popular providing local people with opportunities to explore and learn new IT skills. Following the success of this facility UAL's aim is to relocate it to the proposed Digital Hub at Eagle Wharf thereby providing a permanent and expanded home for its teaching and community learning in IT skills.

75. The Digital Hub would offer opportunities to learn a range of Digital Skills from the essential skills through to more specialist digital skills in the Creative Arts.

76. Essential skills may include learning opportunities in areas such as:

- How to communicate, collaborate, and share on line.
- Find, manage and store digital information and content securely.
- Apply for services, buy and sell, and manage transactions on line.
- Find solutions to problems using digital tools and online services.

and learning in more specialist digital skills in Creative Arts may include areas such as:

- Creative Computer Programming
- Digital Design and Media Production
- Virtual reality applications.
- Digital Fabrication and Prototyping.

77. This facility would assist in creating stronger community links as local residents would interact whilst learning and developing digital skills.

78. The Digital Hub would also provide incubation space to help the creation of start-up businesses in the creative arts by providing:

- Shared workspace on favourable and flexible terms,
- A pool of shared support services to reduce overhead costs for start up businesses.
- Access to the academic excellence and world class facilities at the Creative Design Institute at Camberwell College of Art and other UAL colleges (e.g. London College of Communication, Chelsea Art College)
- Start-up coaching, mentoring and access to training sessions, business support and advice (coaching)
- Opportunities for start-ups to pitch their business to investors and industry experts. The Digital Hub is expected to support between 20 and 30 start-up businesses which at an average of 2.5 employees per company could create between 50 and 70 jobs.

79. UAL has stated it proposes to continue to engage fully with local people and local groups about ideas for the future of the Digital Hub and aim to facilitate a working group comprised of UAL, Ward Councillors and local community representatives of all ages, to ensure that the learning programmes provided would build on the best practice of the programmes that UAL already offer and best meet the needs of the local community.

80. In order to secure the benefits of the Digital Hub for local people the planning permission and accompanying S106 agreement would:

- Secure the construction of the building including the provision of the Digital Hub facility, including its size, location and its separate access from Bonar Road.

- Restrict the building to be used for uses in class B1/D1.
 - Commit UAL to operate it on a not for profit basis
 - Require UAL to commit to local consultation on how best the centre should be operated and will seek to form a working group to lead that consultation with representation from Councillors and council officers.
81. The Digital Hub would be in keeping with Strategic Policy 4 ‘Places for Learning, Enjoyment and Healthy Lifestyles’ of the Core Strategy. This policy seeks to provide a wide range of well used community facilities that provide spaces for many different communities and activities in accessible areas and encourages development to help create safe, healthy and mixed communities.
82. The proposed development would provide benefits to Peckham town centre and community. Between 30 and 40 jobs would be created (20 to 30 more than were employed at the timber yard) and it is estimated that investment associated with student expenditure would be in the region of £2m. These benefits are considered to far outweigh the loss of the existing retail warehouse. It would be complimentary Mountview Academy, Peckham Library and the council’s proposals for the improvements to Peckham Square.
83. The loss of the existing retail warehouse unit (Use Class A1) and the proposed flexible Class B1/D1 Digital Hub would be acceptable for this town centre location.

Provision of student accommodation

84. Objections were received to the proposed student housing use on the basis that the application does not include any information with regard to social and affordable housing, to help house current local residents. Objectors also raised concerns that the site should be used for more suitable needs for this neighbourhood such as improvements to transport infrastructure or doctor surgeries and that the student accommodation would detrimentally change the balance of the community from a good mix to being over-populated by students.
85. The NPPF makes reference to residential use in a town centre. The NPPF does not define residential use as a main town centre use, but it does state that residential development can play an important role in ensuring the vitality of town centres and should be encouraged on appropriate sites.
86. 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 the GLA’s monitoring reports. The Core Strategy sets a target of providing at least 24,450 net new homes between 2011 and 2026. The London Plan (2016) sets Southwark a minimum ten year target of 27,362 homes between 2015 and 2025, i.e. a rate of 2,736 per year. It is noted that the draft New London Plan sets lower targets for the borough (of 23,550 over 10 years) compared with the adopted London Plan of 27,362 over ten years.
87. The proposed non self-contained accommodation for students would contribute towards the borough’s housing targets on the basis of a 3:1 ratio. As such, the proposed 393 student rooms will contribute the equivalent of 131 new residential dwellings towards Southwark’s housing targets. Further, the draft London Plan sets an overall strategic requirement for purpose built student accommodation of 3,500 bed spaces to be provided annually. The proposed student accommodation will therefore assist Southwark and London as a whole in meeting housing need targets as well as providing much needed accommodation for students.
88. The New London Plan updates the ratio to 2.5:1. With 393 student rooms proposed,

the development would count as 157 homes towards meeting the council's housing targets.

89. The council can demonstrate a five year supply of housing land, plus the necessary 20% buffer required by the housing delivery test. Through its assessment of the deliverable housing sites in the borough, the five year housing land supply with an additional 20% buffer has been identified (and exceeded). The application site is not an identified proposal site in the current Area Action Plan nor the emerging New Southwark Plan, therefore its redevelopment for housing has not been anticipated by the borough-wide assessment of deliverable housing sites.
90. While this application site would be appropriate for Class C3 residential development to contribute to the council's general housing supply as part of the windfall allowance for small sites, it has not been assumed for such development in calculating the five year housing land supply and buffer. The proposed student housing scheme would not compromise the council's ability to meet its strategic housing targets set in the Core Strategy and London Plan, particularly as student housing contributes towards the borough's housing.
91. There is support for student housing in the adopted Southwark policies, (particularly within town centres and placed with good access to public transport, such as this site), 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:
92. 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 part b of policy 4.10 'New and emerging economic sectors' requires boroughs to "give strong support for London's higher and further education institutions and their developments, recognising their needs for accommodation". London Plan policy 3.8 'Housing choice' requires local planning authorities to identify the ranges of needs likely to arise within their areas and ensure that (h) "strategic and local requirements for student housing meeting a demonstrable need are addressed by working closely with stakeholders in higher and further education and without compromising capacity for conventional homes". The supporting text in paragraphs 3.52-3.53C set out further detail, including reference that there could be a requirement for some 20,000-31,000 student places over the ten years to 2025, but that "addressing these demands should not compromise capacity to meet the need for conventional dwellings". The supporting text also notes that Southwark is one of four central boroughs where 57% of provision for new student accommodation has been concentrated, reflecting the clustering of the HEIs in and around central London.
93. 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.
94. 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'.
95. 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.

96. 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.”

97. In terms of emerging policy, both the draft London Plan and draft New Southwark Plan have specific student housing policies.

98. 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.

99. 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).

100. 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 floor space 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.”
101. 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.
102. 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 that over 21,000 students aged 20 or above live in the borough during term time, and 23,500 places at HEIs in Southwark. At least 50% of these students live in private rented accommodation, and 15% live with their parents. There are some 7,800 bed spaces in purpose built student accommodation in the borough for London South Bank University, King's College, University of the Arts, and in independent halls of residence. The evidence base background paper also refers to the SHMA confirming an acute need for affordable homes in the borough of 2,077 net affordable homes annually, which is a significant increase from the 2014 SHMA of 799 affordable homes annually.
103. When assessing the principle of a proposed 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

104. There are several Higher Education Institutions (HEIs) in the borough, including London South Bank University, Kings College London, University of Arts London (UAL) and London School of Economics with teaching facilities and student accommodation. There are a number of developments providing direct let student housing in the borough. The proposed development would be a nomination scheme managed by UAL. All occupiers of the student residential accommodation within the application scheme will be students registered as attending UAL.
105. The council's student housing background paper in the NSP evidence base sets out the student schemes at that time. An update is set out below. There are nine live or recently approved planning applications that include student housing. Of these nine applications: the Spa Road scheme and the Alscot Road scheme which were recently resolved to be granted by the Planning Committee; the Canada Water Masterplan which has been granted planning permission; Capital House has a resolution to grant; 272 St James Road was allowed at appeal; and four are live applications at 89-111 Borough High Street, Paris Gardens, Glengall Road (Old Kent Road) and Eagle Wharf (the site). The eight schemes if approved and come forward would total 3,023 student rooms, with no figure put to the Canada Water outline scheme given the inherent flexibility within the masterplan.
106. The site is not within the vicinity of other purpose built student housing schemes in the borough. The nearest site hosting student housing are located approximately 850m to the west at UAL, which future occupants of the proposed development would attend

lectures.

107. The proposal is considered to address a need for student housing within London and would serve students of UAL. 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.
108. The proposed student accommodation would assist Southwark Council and London as a whole in meeting housing need targets as well as providing much needed accommodation for students. UAL are clear that additional student homes directly managed by themselves would improve their ability to attract students, and improve student welfare. In this respect, the application addresses London Plan policy 3.8 and draft London Plan policy H17.

Location

109. The site is within Peckham town centre and is well served by public transport and has an excellent Public Transport Accessibility Level (PTAL) rating of 6a indicating an excellent accessibility to public transport and reflecting the significant number of bus routes in the area and proximity to Peckham rail station. Peckham Hill Street is a Bus Priority Network and several local bus routes are within walking distance to the site, with the closest being just 70 metres away. The site is also within walking distance (approximately 12 minutes) to Peckham Rye station offering services on the London Overground and Southern Rail networks.
110. Core Strategy strategic policy 8 seeks to allow development of student homes within town centres and places with good access to public transport. This site would meet both criteria. It is noted that emerging New Southwark Plan policy P5 removes the reference to siting student housing in town centres and placed with good access to public transport.
111. Peckham is an ideal location for UAL to accommodate new student halls given the close proximity of their campus (Camberwell College of Arts) located approximately 850m to the west (12 minute walking distance). The UAL London College of Communication at Elephant and Castle is also easily accessibly from the site. The proposed development therefore addresses Policy 4.7 of the saved Southwark Plan and Policy 8 of the Core Strategy in respect of being in a location with adequate infrastructure.
112. The principle of student accommodation on this site is therefore appropriate due to the town centre location, excellent level of public transport accessibility and close proximity to UAL's established higher educational facilities.

Management

113. A student accommodation management plan has been provided, to address two requirements of the Residential Design Standards SPD. The proposed development would be managed by UAL. There would be 24/7 security on the site. It is recommended that the on-going management plan be secured in the legal agreement. This would ensure robust management of student occupation of the rooms including a prohibition on students bringing vehicles to the locality and to detail the moving in/our arrangements to minimise disruption to the public highway.
114. In conclusion, the student housing element of the proposal would be in compliance with national, strategic and local policies and guidance that encourage the provision of mixed use development on underused and underdeveloped brownfield sites. It accords with the NPPF (2019) by maximising the contribution from brownfield land and

making the most effective use of land to deliver much needed student accommodation (equating to the equivalent of 131 dwellings for the purposes of the GLA housing targets for Southwark) alongside a Digital Hub space for the benefit of UAL post graduate students and the local community. The site is in a town centre and in a highly accessible location close to public transport, shops and services.

115. It is recommended that if permission is granted it should be subject to planning obligations to secure the following:

- All occupiers of the student residential accommodation within the application scheme will be students registered as attending UAL
- Outside of term time, the rooms could be made available to students on courses at other London colleges or universities
- Student room rents are limited to those set out in the application (ranging from £180 to £275 per week) subject to indexation.
- An on-going student management plan.
- Provision of a 743sqm ground floor space (identified on the attached plan) consisting of a mix of UAL postgraduate start-up studios and Digital Training space which is made available to the local community and operated on a not for profit basis. A more detailed operation and management plan should be submitted for approval prior to occupation.

Environmental impact assessment

116. 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. An EIA for this proposed development is not required.

Affordable housing and viability

117. Emerging New Southwark Plan policy P5 "Student homes" differentiates between student housing provided as direct lets (i.e. not linked to a particular university or college so available to any student), and those provided as nominations schemes, (i.e. those provided by a particular university and only available to their students). In this case, the accommodation would be owned and managed by UAL and only available to its students, so it is a nominations scheme for the purposes of policy P5. For nominations schemes, part 3 of that policy states: "*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*".

118. 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.

119. The GLA defines affordable student housing as costing no more than 55% of the maximum Qualifying Maintenance Loan for a student living in London. For the year 2019/2020 the maximum loan was £11,672, so the maximum annual rent for an

affordable student room would be £6,420. Based on a 40 week tenancy, this would equate to £160.50 per week. UAL have argued that it is more beneficial to its whole student body to keep rents as low as they can across the board, rather than more heavily discounting some rooms at the expense of others.

120. The current application is a nominations scheme, but according to the GLA definition, none of the rooms would strictly meet the definition of affordable. The cheapest rooms (the non-ensuite cluster rooms) would be charged at £180 per week. Tenancies would be 40 or 50 week terms. Therefore whilst the scheme does not fully meet the criteria for part 3 of policy P5, it is clearly not a direct scheme, where rents tend to be much higher. Therefore it is reasonable to consider the affordable housing contribution in terms of assessing the maximum viable provision the development can provide.
121. Table 1 shows how the proposed rents compare to the rents in other recently submitted or approved schemes. Apart from the direct let St James's Road scheme, the proposed rents would be lower than the direct let private sector room rates listed, although the context and accessibility of the sites all differ.
122. Table 1 – Comparison of Proposed UAL Eagle Wharf and other nominated and private sector student room rents (note all rents priced at 2019/20 levels).

Address	Student rents: nomination	Student rents: direct let
43 Glengall Road (LSE, reported elsewhere on this agenda)	£169-£250 per week	
272 St James's Road, London, SE1 5JX		£167-£240 per week
The site Eagle Wharf, 90-96 Peckham Hill Street	£180-£275 per week	
77-89 Alscot Road, London SE1 3AW		£237-£283 per week in 2020
11-13 Spa Road, London, SE16 3RB		£245-£310 per week
Capital House, 42-46 Weston Street, London SE1 3QD		£290-£515 per week
6 Paris Gardens & 20-21 Hatfields, London, SE1 8DJ		£305-£505 per week

123. The applicant has offered an in lieu contribution of £4m. The council would use a payment in lieu in its New Council Homes Delivery Programme to deliver truly affordable housing. The lack of affordable housing was referred to in the objections received to this application.
124. When taking account of the habitable rooms in the scheme (393 student bedrooms and common areas) and counting any rooms that are over 27.5sqm as two rooms, there are a total of 473 habitable rooms in the proposal. To comply with the Core Strategy policy a 35% on-site provision would be 166 habitable rooms of affordable housing. 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.

125. No on-site affordable housing is proposed in this application. In the applicant's opinion, it would not be practical to provide conventional affordable housing on site due to the nature, layout and functionality of the development. The provision of two separate stairs and lift cores, entrances, cycle storage and refuse stores to serve both student and residential accommodation would significantly affect the ground floor area and the efficiency of the floor plans at each level. As residential habitable rooms would on average 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. Whilst it may have been possible given the configuration of the site to include conventional affordable housing in separate buildings fronting Peckham Hill Street, this would have been disruptive to the operation of the entrances, and would have affected the overall efficiency of the student layout and management. The applicant has put forward an entirely student scheme, and it must be determined on this basis. On balance, officers have concluded at the absence of on site conventional housing could be justified.
126. UAL has other college sites and student housing sites in London that are occupied. As a higher education institute, it does not have alternative sites in the borough where off-site affordable housing could be provided. It is accepted that given the nature of UAL, and the timetable for construction, it would not be practical for them to deliver off-site affordable housing.
127. 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."*
128. 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.
129. The adopted Supplementary Planning Document (SPD) relating to the provision of affordable housing pre-dates the Core Strategy and therefore the council have also developed a draft SPD that is dated June 2011. The draft SPD has been written to support the adopted Core Strategy which, as identified above, is clear in its requirements for student developments and affordable housing. In addition, it establishes a methodology to translate the requirements of the Core Strategy into an off-site contribution. Based on the provisions of the draft SPD, a policy compliant 35% provision would be 166 habitable rooms (the total habitable rooms is 473), off-site affordable housing contribution, would be £16,600,000.
130. The applicant has submitted a Financial Viability Assessment (FVA) in accordance with Affordable Housing SPD to allow an assessment of the maximum level of affordable housing that could be supported by the development. The appraisal was reviewed by BNP Paribas Real Estate (BNPP) on behalf of the council. Following this scrutiny, BNPP agreed that the development would have a deficit of £1.7 million based

on a target profit level of 15% of Gross Development Value (GDV). This low target profit level reflects the lower risk to the developer due to the agreement with UAL, but even on this lower target profit, the scheme is in deficit. The deficit arises because the residual land value of the scheme is less than the Benchmark Land Value set by the existing use (plus a 'premium' to release the land for development).

131. BNPP carried out a further sensitivity analysis to examine the impact of small changes to the assumptions such as rents and profit. Even with these adjustments, BNPP concluded that the scheme could only achieve a surplus of £0.57 million.
132. The Core Strategy requires as much affordable housing as is financially viable and the London Plan requires the maximum reasonable amount. Following a review of the appraisal, officers have concluded that the applicant's offer of an in lieu payment is the most appropriate means of contributing to affordable housing, and their offer of £4 million is significantly above the maximum viable amount as assessed by the FVA process. £4 million equates to £24,096 per habitable room of affordable housing, so substantially less than the £100,000 per room set out the Affordable Housing SPD. However, since the policies in both the adopted and emerging plans require the maximum amount 'subject to viability', it would be reasonable to accept this sum, particularly if the other benefits of the development are seen to outweigh this shortfall.

Conclusion on affordable housing

133. 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 or in lieu payment 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.
134. In this case the fact that this is a nominations scheme for UAL, who are an institution important to Peckham and Southwark, is given some weight. The fact that the rents are generally lower than rents in direct let schemes is also given weight, although it is noted that none of the rooms would meet the definition of 'affordable student rents' as set by the GLA. It is acknowledged that the payment in lieu of £4million is significantly in excess of the maximum amount which could be supported by a viable scheme, and the submitted information has been scrutinised for the council by expert valuers BNPP. Other aspects of the development such as the community access to the digital hub are also benefits which can be given weight. It is therefore concluded that, on balance, the offer of £4 million is acceptable as meeting the affordable housing obligations of the development. The scheme would be subject to early and late stage review provisions in the s106 agreement in order that additional profit, above the threshold target profit level, can be captured as an additional in lieu payment. This would be secured through the s106 agreement.

Unit mix including wheelchair housing

135. While policies within the development plan set the housing mix expected in a Class C3 housing scheme, there are no dwelling mix policies in terms of student housing. Policy D5 Inclusive Design of the Draft London Plan seeks to deliver an inclusive environment and meet the needs of all Londoners and requires development proposals to achieve the highest standards of accessible and inclusive design.
136. Policy P5 of the Draft New Southwark Plan requires development of purpose built student housing to provide adequately sized bedrooms and functional indoor communal living space and provide 10% of student rooms as easily adaptable for

occupation by wheelchair users.

137. A mix of room types would be provided to suit a range of needs and price points, including en-suite, non en-suite and studio rooms. The student rooms in the main building would be arranged in 'clusters', each with a maximum of nine rooms and shared kitchen and living spaces. The front building would provide 30 studios.
138. It is proposed that 5% of the total student bedrooms (20 out of 393) would be wheelchair accessible located in the main building, meeting the accessible space standards set out in Building Regulation required M4(3) 'wheelchair user dwellings'. All accessible rooms would include an accessible shower room and kitchenette. Each core would be accessible via stairs and lift, with a maximum of three cluster flats per core (and the lift cores linked by a central corridor in the main building so that wheelchair users can reach another lift if the closest lift fails). The rooms would all be fitted out to a base specification for a "typical" wheelchair user but the design, construction and space provided would allow for reasonable adaptations to meet the needs of individual residents. After the admissions procedure an applicant's needs would be assessed and any necessary adaptations carried out so that the accommodation is appropriate for the user.
139. This 5% provision would be less than the 10% sought by emerging policy P5 of the New Southwark Plan. The applicant submitted a document setting out that only one of a total of 60 accessible rooms were occupied in the 2019/20 academic year by UAL students. This represents 0.03% of the total number of UAL rooms (3,307 beds) and 0.005% of the total number of students within the University (i.e. 19,262 - 18/19 figure). The total number of accessible rooms provided by UAL is 60. It is understood that this level of demand for accessible accommodation has remained the case year on year. Officers are satisfied that in this case it would be acceptable to provide only 5% of wheelchair accessible bedrooms as it is likely that, based on historic demand, approximately 7 of the proposed 20 accessible rooms would be required.
140. The applicant also states that most students who use wheelchairs and/or have restricted mobility prefer, and would be offered as a first priority, accommodation close to campus. In the case of students attending Camberwell College of Arts and the Creative Computing Institute (which, due to its location, Eagle Wharf will principally be serving) this would be Gardens House and Portland House both of which directly adjoin the place at which their academic offering will be made. Taking this into account, the demand for accessible rooms at Eagle Wharf may be further reduced.
141. The rent of a fully fitted wheelchair accessible bedroom would be limited to the rate for a standard en-suite room to ensure that disabled students are not further financially disadvantaged by their disability.
142. It is recommended that the legal agreement includes the requirement that 20 wheelchair adaptable studios are to be provided of which 1 will be fully fitted out from first occupation, with others fitted out as demand arises.

Density

143. 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 200-700 habitable rooms per hectare for a site in the urban area with a PTAL of 4 to 6. 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.

144. Objectors raised concerns with regards to the proposed density of the development and alleged that it would amount to vast over development of the site where currently no one lives, and more open space is needed on the site.
145. 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 473 habitable rooms in the proposal. The space in the digital hub contributed a further 27 habitable room equivalents.
146. With a site area of 3,800 sqm, and a total of 500 habitable rooms, the proposed density is 1,316 habitable rooms per hectare. This exceeds the maximum of the expected range for the urban density zone.
147. 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 within an action area core, and so it is within the appropriate policy designation for considering a higher density development. 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.
148. 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.
149. The quality of the proposed student rooms, the design of the building, and its resulting impacts (as set out in the separate section below 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 the accommodation

150. Draft London Plan Policy H15 requires purpose built student accommodation to provide adequate functional living space and layout and emerging New Southwark Local Plan policy P24 requires the development of purpose built student housing to provide adequately sized bedrooms and functional indoor communal living space commensurate with the intended number of occupiers sharing the communal space.
151. There are no specific housing standards for student housing and given the different needs and management of student housing in comparison to conventional housing, it is not appropriate to apply standard residential design standards to student housing. The scheme has been designed specifically to the requirements of the University and

the proposed student accommodation would be well lit and ventilated with all habitable rooms having good levels of outlook and privacy. The bedrooms have been designed with an efficient and comfortable layout to provide sufficient space for a bed, desk and chair, and storage space for future occupants. A range of room types and sizes (from 10sqm to 27.5sqm) are proposed to suit a wide range of students.

152. The student accommodation would comprise a mix of en-suite and non en-suite rooms with shared kitchen and living room space. The wheelchair accessible rooms would all have their own kitchenette area and en-suite and some of the accessible rooms would also have access to shared kitchen facilities. There would be a maximum of 10 bed spaces per shared kitchen with additional communal space provided at ground floor in the form of a large common room area.
153. The proposed common room at the ground floor level of the main block would be accessible directly from the main courtyard space which would be passed through when walking between the front building and the main block. The total area of the two common rooms on the ground floor would be 255sqm. The common room area would be divided into three sections; a recreation area within the pavilion space and study and conversation areas which would overlook the park to the west. The internal layouts of the main block have been designed so that kitchens are located with views over Surrey Canal Park and to the city where possible.
154. The proposal would therefore provide sufficient and functional communal living space for future occupants with living space within each flat as well as the larger common room area at ground floor. Students would also have access to a communal laundry room at ground floor.
155. Officers consider that the proposed student accommodation would provide high quality accommodation with adequate and functional living space as well as adequately sized bedrooms and functional indoor communal living space, compliant with draft London Plan policy H17 and emerging New Southwark Local Plan policy P24.
156. The daylight and sunlight assessment also reviews the internal daylight levels of the proposed development. There are no specific standards for student study bedrooms or shared common rooms in student accommodation and although student housing should be classed as quasi-residential accommodation, given the short term and transient nature of the occupancy of the rooms for living accommodation, they fall somewhere between conventional residential premises and hotel/hostel use. As there are no designated targets for study bedrooms, the accepted practice is to apply the equivalent domestic bedroom standard of 1.0%ADF (Daylight Factor) to student study bedrooms. For the common rooms/living/kitchen/diners, the corresponding domestic living room standard of 1.5%ADF has been applied.
157. The plan of the main building is an “E” shape with three projecting rear wings in order to maximise the outlook from the study bedrooms. This plan-form creates inevitable corners and it is difficult to achieve good natural daylight conditions in rooms located in corners due to the reduced view of the sky resulting from the corner location. As the priority is to achieve good natural lighting conditions within the study bedrooms where the students will spend more of their time, the common rooms/shared living/kitchen/diners have been located in about half of these corner locations.
158. In the main building all of the study bedrooms will achieve an ADF value in excess of 1.0%ADF. However, 7 common rooms recorded ADF values below the 1.5%ADF target for an equivalent domestic living room. Of those 7 common rooms, 3 will be below 1.0%ADF. These rooms, respectively on the first, second and third floors, would sit one on top of each other and would be located in the recessed corner of the southern projected wing.

159. All of the study bedrooms in the building fronting Peckham Hill Street recorded ADF values above the equivalent 1.0%ADF target for domestic bedrooms.
160. All of the 393 study bedrooms will therefore achieve adequate levels of daylight. Of the 40 common rooms proposed seven would have an ADF below 1.5%ADF. This would on balance be acceptable as common rooms in student accommodation are not used in the same way as conventional domestic living rooms. The layout of the main building has prioritised achieving good daylight levels within the study bedrooms as this is where the occupants will spend more of their time.
161. The submitted noise impact assessment identifies that the dominant noise source affecting the site is from road traffic and that with the recommended mitigation measures the proposed student accommodation would achieve the necessary noise requirements. The council's environmental protection team recommends that permission includes a condition relating to internal noise levels to ensure that the occupiers and users of the development do not suffer a loss of amenity by reason of excess noise from environmental and transportation sources.

Design, layout and heritage assets

162. Objectors raised concerns that:

The height of the proposed buildings would be out of keeping with the immediate surrounding area – (being mainly three storey terraced housing with lower ground floors), that the six storey building would ruin the skyline for the surrounding homes and be a general eyesore to the area. The objectors consider that the height of the buildings should be lower and the style of the building should be more in keeping with the surrounding homes, e.g. yellow brick and more neutral colouring to better fit within a low rise residential area of Peckham.

163. The saved policies of the Southwark Plan, Core Strategy, London Plan and emerging Southwark Plan reinforce the principles of the NPPF which highlights the importance of good design. Good design is intended to reinforce the character of the context, responding to its urban setting and creating an attractive place. The proposed architectural design is assessed on its fabric, function and geometry. The site is within a conservation area and adjacent to listed buildings. In considering the impact of a proposal on a heritage asset such as a listed building, the local planning authority must have regard to planning legislation in its determination of a planning application. Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires that, when considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority shall have special regard to the desirability of preserving the building or its setting, or any features of special architectural or historic interest which it possesses. Section 72 of the Act requires that, with respect to any buildings or other land in a conservation area, when considering whether planning permission should be granted, special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area. In this context, "preserving", means doing no harm.
164. The proposed four-storey building on Peckham Hill Street would be comparable in height, massing and fenestration arrangements to the Georgian semi-detached houses on either side and to the adjacent Mountview Academy. The left-hand entrance block is adjacent the flank wall of No. 98, which is Grade II listed. This part of the proposed development required the submission of the associated application for Listed Building Consent, currently under consideration in ref. 20/AP/1259. The front block would replace four houses which once stood on the site fronting Peckham Hill Street and would follow the prevailing building line, continuing the street frontage.

165. From the courtyard elevation of the main building the massing of three pavilions would be sympathetic in scale to the Georgian housing on Peckham Hill Street.
166. The height and massing of the six storey main building would be appropriate to the open setting of the canal walk and the Peckham Hill Street Conservation Area. It would comply with the guidance in the conservation area appraisal, which identifies the development potential of the site, and would not appear overly dominant in this sensitive historic context. It is also considered that the main building would not harm the setting of the listed buildings to the east.
167. The NPPF highlights the importance of heritage assets and requires that developments conserve or enhance heritage assets and their settings and where there may be unjustified harm to a heritage asset or its setting this should be given considerable weight. In this case the proposal is not considered to cause any harm to heritage assets. Furthermore the substantial public benefits of this development, the provision of a the student accommodation and digital hub, providing high quality educational and community benefits can be taken into consideration in the when considering the impact of a development on its historic setting and officers are satisfied that this proposal complies with the requirements of the NPPF.
168. The proposed materials would reflect the main principles of the design and its distinctive parts. The main building would be formed of brickwork, with the base of the building a dark brick similar in appearance to the adjacent Mountview Academy. In contrast the upper floors would be in a soft brown coloured brick to represent timber and the historic use of the site. The darker brown brick of the projecting kitchens would reflect the colour of the Corten cladding found on the Mountview rehearsal room building. The use of a dark grey brick across the upper floors would provide detailing around windows and provide false windows on the east elevation where real windows can not be installed to protect residential amenity. The flat roof of this block would include areas of green roof and photo voltaic panels. The north elevation of the main building would provide the entrance to the creative Digital Hub and the glazed ground floor would activate the park frontage.
169. The block fronting Peckham Hill Street would reflect the adjacent Georgian houses and would repair the townscape. The brick buildings would pick up the stone datum, window width and cornice details.
170. The brown bricks of the proposed single storey substation would match the bricks of the proposed building facing the park to the west. With a depth of 4m, width of 6.9m and a height of 2.9m it would be a subordinate and functional building.
171. The detailed design is considered to be of a high quality that would help create a distinctive group of buildings, subject to the approval of material samples that would respond sensitively to its open historic setting and make a strong contribution to the conservation area and this part of Peckham.
172. It is recommended that any permission should be subject to conditions requiring the submission of details of the boundary treatment, detailed drawings and sample panels of the materials. These would ensure that the interests of visual and residential are safeguarded, and that the design quality is carried through to the constructed scheme.

Landscaping and trees

173. The infill building at the front of the site would include front gardens of a similar depth to those of the adjacent dwellings to continue the character of the street frontage and provide green open space to the front of the site. Mature trees would also be planted in

the 'back garden' area of the infill building, continuing the historic tree line along the rear gardens of dwellings along Peckham Hill Street and reflecting the urban grain of the area.

174. The proposed landscaped courtyards to the front of the main building, between the proposed pavilions, would provide greenery within the site and would reduce the visual impact of the built form. This would provide a pleasant external amenity space for students to enjoy whilst also being within the secure accommodation complex.
175. 'To the north of the site there is an opportunity to landscape the grassed area at the entrance to the park adjoining the Digital Hub to improve the visual amenity of this area. These public realm improvements would be secured by a planning obligation.
176. The proposed hedge along the western boundary with the park would be within the site boundary. The proposed ground floor plan illustrates gates on western boundary with park land. The council's parks team would not permit direct access from any residential or commercial property into the park. The applicant advised no direct access to the park is proposed and the only access to the park would be for emergency fire purposes as is the case with the existing timber yard use. The proposed landscaping is generally acceptable, but further details of the planting schedule would be secured by condition, along with the restriction of use of the proposed gate along the western boundary.
177. No trees would be removed. The applicant followed advice from officers that the building should be set back 3.5m from the western boundary of the site to protect and enhance the setting of the existing trees within Surrey Canal and would ensure an appropriate buffer for their ongoing maintenance and protection during construction. Conditions regarding tree protection measures and site supervision schedule would be secured by condition.
178. The parks and cemeteries team raised concerns that tree protection plans show hoarding and ground protection outside of the development site, on park land. Explicit permission from the parks service would be required under a licence for such proposals. They also advise that if any parks land is temporarily required to facilitate this development e.g. scaffold/hoarding etc. a licence shall be required from the parks service to permit any access and these matters would be covered by an informative.
179. No windows, doors or balconies would open onto or overhang park land and no heating/cooling or any mechanical plant would overhang or discharge onto park land. The proposed building has been set back to avoid any such situation.
180. Surrey Canal to the west of the site is designated as Metropolitan Open Land (MOL). The existing timber yard building has a long, blank façade which fronts the MOL. The proposed building would be set in from the boundary with a hedge along the western boundary. This combined with interesting design features would break up the rear elevation and would have a positive impact on the setting of the MOL in comparison to the existing warehouse building. It is considered that the proposed development would maintain the openness and landscape quality of the MOL as well as protect and enhance the landscape quality of the MOL.
181. It is recommended that a legal agreement includes :

The applicant will make a financial contribution up to a maximum of £25,000 for public realm improvements in the park adjoining the Digital Hub entrance at Bonar Road.

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

182. Saved Southwark Plan policy 3.2 states that planning permission will not be granted where it would cause loss of amenity, including disturbance from noise, to present and future occupiers in the surrounding area or on the application site. Policy P12 of the Draft New Southwark Plan requires development to be of a high standard of design with adequate daylight, sunlight and outlook for new and existing occupiers.
183. The site is currently underdeveloped and occupied by a low-rise building and car parking resulting in the neighbouring residential buildings having the benefit of a relatively open and unobstructed outlook, and receiving very good levels of natural daylight and sunlight. These existing levels are above Building Research Establishment (BRE) Guidelines targets and reasonable expectations for a built-up urban environment. As such, any meaningful redevelopment of the site would likely result in some loss of light and the BRE recommendations need to be considered with this in mind.
184. Objectors raised concerns about the height and positioning of the proposed building and that this would lead to loss of light and overshadowing of adjoining properties. It was stated that based on the orientation of the buildings opposite the development, across the Surrey Canal (to the west), the development would cause a significant loss of sunlight, particularly in the morning hours. Objectors suggested a lower lying building would be more in keeping with the local residential housing in the area and ensure that the current residents in the immediate area would not be negatively affected in terms of loss of light.
185. The submitted daylight and sunlight assessment considers the impact on daylight and sunlight for both neighbouring and future residents. The adequacy of daylight received by existing neighbouring dwellings is measured using two methods of measurement. The first is the use of Vertical Sky Components (VSC) which is then followed by the measurement of internal Daylight Distribution. The authors of the daylight and sunlight assessment did not have access to the interior of any of the existing neighbouring buildings and have therefore relied upon an external inspection and review of any publically available records to establish the extent and location of existing residential premises. They have assumed that all of the windows identified within those premises serve habitable rooms. However, photographs within the Assessment shows that some of the rooms are hallways, stair landings, bathrooms, WCs and general circulation space (i.e. not habitable rooms). The neighbouring buildings in residential use were tested: 4 to 21 Neville Close, 78 to 106 Peckham Hill Street (evens), 33-35 Bonar Road, Middleton House and 25 to 35 Jocelyn Street.

Loss of daylight: Vertical Sky Component (VSC)

186. The BRE guidance states that “If this VSC is greater than 27% then enough skylight should still be reaching the window of the existing building. Any reduction below this level should be kept to a minimum. If the VSC with the new development in place is both less than 27% and less than 0.8 times its former value, then the occupants of the existing building will notice the reduction in the amount of skylight”. There are however many circumstances where the VSC value is already below 27%. In such circumstances, it is permissible to reduce existing VSC values by a factor of 0.2 (i.e. 20%) so that the VSC value under “proposed” conditions remains more than 0.8 times its former value.
187. The BRE Guidelines recognise that alternative numerical values could be set where the pattern and nature of development is greater than the low density two storey

suburban housing model upon which the VSC targets are derived especially in denser urban environments.

188. The majority of the neighbouring properties would have proposed VSC values in excess of 27% and many neighbouring properties with existing VSC values below 27% would not have a VSC reduction by more than a factor of 0.2 (i.e 20%).

Vertical sky component (VSC)

	Windows assessed	Pass	Fail	No. of Failures between 21% - 38% loss
4 – 21 Neville Close	112	112	0	0
78 - 102 Peckham Hill Street	64	42	22	21
33 – 35 Bonar Road	7	7	0	0
Middleton House	41	41	0	0
25 -35 Jocelyn Street	54	52	2	2
Total	278	254 (91%)	24 (9%)	23 (8.3%)

189. All the windows at numbers 88, 98 and 100 Peckham Hill Street with existing VSC values below 27% would have proposed VSC values that would reduce by more than a factor of 0.2 (i.e. a loss of more than 20%).
190. Two ground floor windows at 35 Jocelyn Street with existing VSC values below 27% would have proposed VSC values that would reduce by more than a factor of 0.2 (i.e. a loss of more than 20%). A reduction of VSC in excess of 20% implies a noticeable reduction. The percentage losses were 25.85% and 26.13%. Both of those windows are however located below projecting external private amenity balconies and therefore suffer from the “canopy-effect” of those projecting balconies. In such circumstances the BRE Guidelines recommend that the “canopy-effect” of projections should be omitted when assessing VSC. If the daylight levels were measured without the balconies in place, they would comply with the guidelines.

Loss of daylight: no sky line (NSL)

191. Where the internal layouts of the neighbouring properties are known, the internal daylight distribution should be measured in addition to VSC to determine the extent of daylight penetration and direct sky visibility from within the room. The internal daylight distribution is measured by plotting the position of the “existing” and “proposed” no sky line (NSL) contour where the internal layouts of the neighbouring properties are known. The NSL simply follows the division between those parts of a room at a working plane that can receive some direct skylight from those that cannot.
192. When comparing the NSL for existing buildings against that proposed following development, BRE guidelines state that if the no sky line moves so that the area of the existing room which does receive direct skylight is reduced to less than 0.8 times its

former value ((ie more than a 20% reduction) then this will be noticeable to the occupants, and more of the room will appear poorly lit. The table below shows that the majority of residential rooms tested would receive direct skylight to acceptable levels.

Daylight distribution (no sky line – NSL test)

	Rooms tested	Pass	Fail	No. of Failures between 21% - 38% loss
4 - 21 Neville Close	73	71	2	1
78 - 106 Peckham Hill Street	53	46	7	2
33 - 35 Bonar Road	5	5	0	0
Middleton House	23	23	0	0
25 - 35 Jocelyn Street	50	50	0	0
Totals	204	195 (96%)	9 (4%)	3 (1.4%)

193. The daylight distribution to certain rooms of the following neighbouring residential rooms would reduce by more than 20%:

Address	Floor / Room	Percentage reduction in NSL
16 Neville Close	Ground floor Living room	46.5
15 Neville Close	Ground Floor Living room	20.1
100 Peckham Hill Street	Basement Kitchen	59
98 Peckham Hill Street	Basement unknown	79
	Ground floor	26
88 Peckham Hill Street	Basement bedroom	56.1
	Basement unknown	63
	Ground floor unknown	44.6
86 Peckham Hill Street	Basement unknown	56.3
84 Peckham Hill Street	Basement bedroom	55.5
82 Peckham Hill Street	Basement bedroom	55.3
80 Peckham Hill Street	Basement bedroom	24.2

Loss of sunlight

194. Annual probable sunlight hours (APSH) is a measure of sunlight that a given window may expect over a year period. The BRE guidance states that only windows with an orientation within 90 degrees of south need to be assessed.
195. The BRE's recommendation for sunlight is:
 "If this window reference point can receive more than one quarter (25%) of annual

probable sunlight hours (APHS), including at least 5% of annual probable sunlight hours during the winter months of 21 September and 21 March, then the room should receive enough sunlight.....any reduction in sunlight access below this level should be kept to a minimum. If the availability of sunlight hours are both less than the amounts given and less than 0.8 times their former value, either over the whole year or just during the winter months, then the occupants of the existing building will notice the loss of sunlight”.

196. The submitted daylight and sunlight assessment have however tested every window regardless of the use of the room served by each window, including glazed doors.

Only four properties along Peckham Hill Street, numbers 100, 98, 88 and 86, would not be in full compliance with the BRE Sunlight Standards in terms of sunlight to principal living rooms. The table below provides details of the total number of windows at these properties that fail the APSH test.

Sunlight (annual probable sunlight hours – APSH test)

	Windows tested	Passes both tests	Fail Total annual	Fail Winter hours	No. of Failures between 21% - 38% loss (Total)	No. of Failures between 21% - 38% loss (Winter)
4 - 21 Neville Close	112	112	0	0	0	0
78 - 106 Peckham Hill Street	48	38	7	7	1	2
33 - 35 Bonar Road	7	7	0	0	1	0
Middleton House	15	15	0	0	0	0
Total	182	172 (95%)	7 (4%)	7 (4%)	2 (1%)	2 (1%)

197. The rear extension of 100 Peckham Hill Street overshadows the lower windows in 100 Peckham Hill Street and 98 Peckham Hill Street. This means that the basement and ground floor windows in both of those properties receive very low levels of direct sunlight under existing conditions and even a small obstruction will appear as a disproportionately high reduction when expressed as a percentage of the current values. The change in absolute values is however relatively small as for 100 Peckham Hill Street both summer and winter sunlight would reduce from 4% to 1% and for 98 Peckham Hill Street the winter sunlight of two ground floor windows would respectively reduce from 3% to 2% and from 7% to 5%.
198. 88 Peckham Hill Street will continue to receive good levels of annual sunlight with only one basement window falling below the 25% target. That window did however record an APSH value of 21%, which is relatively good. The main shortfalls arise in winter where there will be three windows that do not meet the BRE recommendations. That said, those three windows recorded 3%, 2% and 3% Winter APSH against a target of 5% APSH. Given that two of those shortfalls occur at basement level, the results are not unreasonable.
199. At 86 Peckham Hill Street, one Winter Sunlight shortfall was recorded to a window at basement level where the winter APSH value of 3% will fall by 1% to 2% APSH. This change is so small as to make no material difference.

Overshadowing

200. The overshadowing report sets out the potential overshadowing impact on neighbouring gardens, numbers 80 to 106 (evens) Peckham Hill Street. as a result of the proposed development. The report concludes that there will be full compliance with

the BRE Overshadowing Standards as a result of the proposed development with the exception of one garden (88 Peckham Hill Street).

201. No 88 is directly to the north of the existing site access from Peckham Hill Street and therefore benefits from unobstructed sunlight at present. However, historically, there would have been 4 additional houses in this gap which would have caused overshadowing to this garden. Further, this garden does not achieve the BRE targets in the existing situation as only 35% of the garden receives more than 2 hours of sun on the ground at 21st March (Spring Equinox). This would fall to 5.08%.
202. Overall, this one digression from the BRE standards for overshadowing should not be considered to be significant and is clearly outweighed by the wider public benefits resulting from this development, particularly as this garden does not meet the BRE standards at present.

Loss of privacy

203. Objectors raised concerns that the height and size of the development would lead to direct views into properties at the other side of the Surrey Canal.
204. The Design Review Panel (DRP) at the application stage were more concerned with the properties on Peckham Hill Street and advised that further consideration should be given to the massing of the proposed pavilions in order to reduce overlooking to neighbouring properties and within the scheme itself. The scheme was amended in direct response to the DRP feedback, including increasing the distance between the proposed pavilions, removing windows on the eastern façade of the pavilions to restrict overlooking, stepping the height of the pavilions down to four storeys in the east, and further design development of the architectural facades.
205. Properties along Jocelyn Road and Grenard Court to the west of the site would be separated from the proposed development by the Surrey Canal and the existing substantial bank of trees, resulting in separation distances in excess of 40 metres. As such, the separation distances between the proposal and these residential properties are sufficient to prevent any significant overlooking.
206. The four-storey building at the front of the site would not include any side windows. The rear elevation of the infill building would be staggered with rear windows on the recessed element serving stairways and other non-habitable spaces and would not lead to undue overlooking to neighbouring properties on Peckham Hill Street. The projecting rear element would include upper floor windows serving habitable rooms. However, the projecting element would extend almost the full length of the neighbouring gardens and will therefore not allow for views into the most private areas of residential amenity space.
207. The east elevation of the main building would face towards the rear of the Peckham Hill Street properties and would have a separation distance of 15m from ground floor level. This would be closer than the adjacent Mountview building which has a separation distance of 21m and closer than the 21m sought by the Residential Design Standards SPD. The main building would however be staggered with the closest projecting elements having windows facing north and south, and blank elevations facing eastwards towards these residential properties, so that only angled views would be possible to towards the rear windows and gardens.
208. Ground floor windows along this elevation wouldn't allow for increased opportunity for overlooking and there is in excess of approximately 25-30 metres between upper floor windows in the recessed east elevation and the rear elevation of the existing neighbouring properties (see drawing below). Furthermore, the mature trees along the

boundary between the site and the properties along Peckham Hill Street would be retained and protected to ensure the development would not result in any perceived overlooking and further ensure the sense of privacy for neighbouring occupants.



- 209. Overall, the proposal would protect the residential amenity of neighbouring properties and would not result in undue overlooking or loss of privacy for neighbouring occupants.
- 210. It is recommended that any permission should be subject to a condition that the flat roofs of the development only be used in emergency and not as roof terraces in order to protect the privacy of neighbouring properties.

Light pollution

- 211. Objectors raised concerns that the demolition of the existing building and construction of two buildings at four and six storeys in height would have a negative affect on the adjoining properties and community due to light pollution.
- 212. It is however considered that the levels of light associated with the proposed development would not be excessive and would not substantiate a reason for refusal. It is recommended that permission is subject to a condition of details of the lighting to the building’s exterior and to the landscaping to ensure that appropriate lighting is in place next to the SINC.

Noise and vibration

- 213. Saved Policy 3.2 of the Southwark Plan seeks to ensure that developments do not harm the amenity of present or future occupiers in the surrounding area or on the site. Policy D13 of the Draft New London Plan outlines the ‘Agent of Change’ principle which places the responsibility for mitigating impacts from existing noise generating activities or uses on proposed new noise-sensitive development. Development should be designed to ensure that established noise generating uses remain viable and can continue to grow without unreasonable restrictions being placed on them.

214. Objectors raised concerns that the proposed development would lead to noise nuisance as this section of the Surrey Canal, which backs onto the site and, is a peaceful place. Objectors state that here was not a lot of noise from the timber yard and it used to shut in the evening and on Sundays whereas student accommodation never shuts and is rarely quiet. Adjoining properties are concerned about the noise the cycle storage facilities would create and inconvenience and disruptions during the building work process. Objectors request that a planning condition or planning obligation is imposed requiring that noise mitigation measures are put in place. Objectors are also concerned about the proximity of the proposed four storey buildings to nearby houses and any disturbance this may cause.
215. The submitted noise impact assessment identifies that the dominant noise source currently affecting the site is from road traffic.
216. It is recommended that any permission is subject to a Construction Management Plan condition to deal with noise during construction. It is unlikely that the cycle storage facilities would result in undue noise and inconvenience to nearby properties as they would be located within a courtyard.
217. There would be 24/7 security on the site and it is recommended that mitigation of any potential noise disturbance by students be secured through the Student Management Plan by the S106 legal agreement.
218. The council's environmental protection team recommended that permission is subject to a conditions relating to sound level from any plant and associated ducting and a construction management plan.
219. It is recommended that the hours of use of the Digital Hub be controlled by an appropriate condition as it would be used as a social hub for start-up studio space for UAL post graduate students and for outreach engagement with the local community.

Energy and sustainability

220. Paragraph 10 of the NPPF states that sustainable development should be pursued in a positive way and at the heart of the Framework is a presumption in favour of sustainable development.
221. The applicant states that a highly sustainable and energy efficient strategy was incorporated from the early stages of design. The main objective of the Energy Strategy is to provide a means of servicing the development with the smallest feasible carbon footprint, whilst prioritising reducing the risk of overheating.
222. The specification of high-performance building fabric and airtightness to reduce winter heat loss would reduce the required heating energy. Lighting demand would be reduced through the use of larger windows and LED type lights with presence detection used to decrease the electrical load.
223. During summer months natural ventilation would provide fresh air via either opening windows or vents adjacent to windows. Overheating of rooms would also be reduced by using glass in windows that would reduce solar radiation.
224. Energy efficient systems have been selected to further reduce the carbon emissions of the proposed buildings. The proposal would include energy efficiency measures such as combined heat and power (CHP) which would co-generate electricity and heat in a single combustion process. Mechanical ventilation with heat recovery system (MVHR) and provision of photovoltaic panels would also be utilised. Overall the proposed development would achieve a 35% carbon reduction against a Part L 2013 compliant

scheme in accordance with the minimum requirements of policy 5.2 of the London Plan. Compliance with the approved energy assessment (including the provision of PV panels) would be secured by condition.

225. The Sustainability Report includes a BREEAM Pre-Assessment outlining how the development would target an 'Excellent' rating. This would be conditioned.

Ecology and biodiversity

226. Objectors raised concerns that the development would take away valued green space for residents. The existing site is however covered by a building and hard surfaces.
227. The site is not designated as public open space, but is adjacent Surrey Canal, which would remain as a public open space and is designated as a Site of Importance for Nature Conservation (SINC).
228. The council's ecological officer recommended four conditions relating to a green roof, an ecological management plan, swift nesting boxes and sparrow terraces and bat boxes. It is recommended that permission be granted to three of the four suggested conditions, with the fourth, relating to green roofs, being subject to a feasibility study of the relationship with the green roof to the planned PVs.
229. The council's ecological officer recommended that ecological net gain is advised, and made recommendations regarding species to be used in the tree and hedge planting that would help a rare butterfly and use native species for biodiversity improvements. A landscaping condition would address these matters of detail.
230. The ecological officer is also considering the installation of bat friendly lighting along Surrey Canal and it is recommended that permission be granted subject to a S106 payment as mitigation. This would form part of the £25,000 secured for improvements to the park adjacent to the Digital Hub.
231. The proposal would be in keeping with policy 7.19 Biodiversity and Access to Nature of the London Plan and policy 3.28 Biodiversity of the Saved Southwark Plan. These policies require development proposals to make a positive contribution to the protection, enhancement, creation and management of biodiversity and states that developments would not be permitted which would damage the nature conservation value of SINCS.

Air quality

232. Objectors raised concerns that the environmental impact of the construction of the development would be large and that the associated traffic would add to pollution, and that during the construction of Mountview theatre several huge concrete mixer lorries were parked up on Goldsmith Road with their engines running all day. There are concerns that the development would run counter to the council's policy on cleaner air.
233. The submitted air quality assessment identifies and recommends a range of mitigation measures which are to form part of a dust management plan during construction. Officers recommend that permission be granted subject to a construction management plan condition which would include continuous monitoring of dust emissions.
234. The applicant further states that, once operational, the development is not expected to give rise to significant impacts on air quality. An air quality neutral assessment has shown that the proposed development would meet both the buildings and transport emission benchmarks and can be considered air quality neutral. Emissions from the

proposed CHP have been assessed as part of the scheme and the effect is determined to be 'negligible'. It is noted that the council's Environmental Protection Team had no objection in terms of air quality.

Ground conditions and contamination

235. Objectors raised concerns that there may be potential that the land is contaminated.
236. The submitted Geo-environmental and Geotechnical Report identifies the risk from potential soil contaminants and ground gas to future site users and construction workers to be low. The risk to buildings and structures is identified to be medium to low and any risks be minimised with appropriate concrete mix design. The risk posed to groundwater is identified to be negligible. Overall, the risks at site are identified to be negligible to low and a remediation strategy is proposed based on the conceptual site model and risk assessment to ensure the development is safe from geo-environmental risks.
237. The council's environmental protection team has no objection and recommends a condition relating to soil contamination to ensure the site is appropriately remediated for the proposed uses.

Water resources and flood risk

238. The submitted flood risk assessment (FRA) considers the impact of the proposed development in addition to the common ways in which flooding can occur. The FRA concludes that despite being within a critical drainage area, the site would be at very low risk of surface water flooding. Surface water run-off from the site would discharge via a network of pipes and gullies into the Thames Water combined sewer in Bonar Road at a peak discharge of 3l/s.
239. The development would be served by the existing combined sewer in Bonar Road for both foul and surface water drainage. A capacity check has been submitted and an application will be made to Thames Water at the detailed design stage in order to gain consent to connect to the public sewer. The FRA concludes that the total rate of discharge into the combined Thames Water sewer would be significantly lower than the existing arrangement and the proposed development is not at risk of flooding and can be carried out without increasing the risk of flooding to surrounding properties.
240. The greenfield rate for the development site is 3 l/s is acceptable to the council's flood and drainage team.

Archaeology

241. The submitted archaeological desk based assessment shows that a previous archaeological investigation within the site recorded prehistoric and post-medieval buried archaeology on site.
242. This negates the requirement for pre-determination archaeological evaluation in this instance. A geotechnical survey carried out in 2017 identified that remediation work was possibly carried out.
243. It is recommended that the archaeological interest be conserved by attaching conditions relating to mitigation, foundation design and reporting site work.
244. It is also recommended that permission be granted subject to a legal agreement including the requirement for a financial contribution of £11,171 (indexed) towards the council's cost of providing technical archaeological support, in line with the Section

106 and CIL SPD.

Transport, parking, highways, deliveries and servicing

245. The site has a Public Transport Accessibility Level of 6a, demonstrating an excellent level of accessibility, being in close proximity to Peckham Rye Station (750 metres from the site) and a number of local bus routes. The site is also within walking distance to a range of local amenities which future students will benefit from, including a range of retail shops along Peckham Hill Street, Rye Lane and Peckham Road. The site is also within walking distance of car club bays, with the closest being only 400 metres from the site on Marmont Road.

Parking

246. The parking on Bonar Road is currently not restricted. The development would be car free, with the exception of 3 disabled parking spaces. This would be in keeping with Saved Southwark Plan Policy 5.6 which requires all developments to minimise the number of car parking spaces provided and draft London Plan policy which states "Large-scale purpose-built shared living, student accommodation and other sui generis residential uses should be car-free". This would encourage students to use alternative, sustainable methods of transport.

247. Objectors raised concerns that the immediate area and its surroundings are already heavily congested with traffic and there would not be capacity in the nearby streets to accommodate any additional on-street car parking. Objectors also requested that, if this car free development is to go ahead, Bonar Road be included in the nearby CPZ so that resident parking and restrictions are enforced during the day to mitigate against the increased flow of vehicles into the area.

248. The car parking surveys carried out by the applicant along the immediate road sections surrounding the site included Peckham Hill Street, Buller Close, Goldsmith Road, Bonar Road, Lisford Street, Grenard Close and Jocelyn Street and were carried out between 0500hrs and 0330hrs on Tuesday/Wednesday 11 and 12 September 2018. The car parking survey found that on average 47(31%) of the calculated 150 on-street car parking spaces were unoccupied.

249. The New London Plan requires that all residential developments in a comparable location be 'car-free'. This development would be excluded from those eligible for car parking permits under any future CPZ operating in this locality. This would be covered by a planning obligation. The transport officer recommended that the legal agreement include the provision of 3 disabled car parking bays equipped with active electric vehicle charging points (EVCP's) and that the applicant make a financial contribution towards future extension of the CPZ to this area. Officers however consider that on balance the CPZ contribution is not justified since student living accommodation would be excluded in their lease from bringing a car to the site.

Transport infrastructure

250. Objectors raised concerns that there are already queues to get on the buses from Bonar Road onwards to Waite Street (to the north of the site) in the morning and despite the applicant's extensive document regarding this, local residents are still concerned that there is not the capacity for the existing buses to accommodate the extra users. Buses such as the 63 and 363 at capacity between 7.45 and 8.30am. Objectors also requested that if the development is granted planning permission the developer should provide a transport contribution to improve the bus service.

251. The council's transport policy team did not raise capacity on the bus network as an

issue. In terms of bus infrastructure the bus stop on Peckham Hill Street is on a narrow segment and currently has no shelter and passenger information system. The removal of this site's current vehicle entrance on this road presents an opportunity for the bus stop to be relocated to the area of the redundant vehicle access. To facilitate this the applicant would be required to safeguard a 2m wide footway behind the relocated bus stop. This would be secured in a planning obligation as part of the highways works.

252. Objectors also raised concerns that Peckham Rye station is getting busier and busier every week and requested that if the development is granted planning permission the developer should provide a transport contribution.
253. Officers do not consider that this would be appropriate as the council's transport policy team did not raise capacity on the train network as an issue.
254. Objectors raised concerns that Bonar Road is already a very busy short cut through Peckham and would not be able to cope with the additional traffic generated by the new development. Objectors speculated that the council would probably have to turn it into a one way street.
255. The above concerns are noted, but the applicant's Transport Assessment concludes that the proposed development would be appropriate for this location and could be successfully accommodated by the local transport network. There would only be a negligible change in traffic generation when compared to the existing use of the site. The information has been reviewed by officers who raised no objection and advised that the proposed development would not have any noticeable adverse impact on the existing vehicular traffic on the adjoining roads.

Deliveries and servicing

256. Vehicular access would be retained from Bonar Road, however, the position of this entrance would be re-located eastwards to provide access to the proposed car park and servicing area. Sliding gates would separate this area from the main courtyard area and student accommodation, The gates would set back from the footway to provide sufficient space for vehicles to wait off-street while the gates are opened.
257. Deliveries and servicing for the student accommodation would take place via the on-site car park accessed via the vehicle entrance from Bonar Road. The waste store for the student accommodation and Digital Hub would have direct access to the car park area.
258. The council's highways team advised that the pedestrian visibility splays of 2mx2m at the vehicle access off Bonar Road are acceptable. The proposal to use a private commercial service for waste collection is also acceptable.
259. The submitted delivery and service management plan (DSP) would need to be revised before it would be acceptable. This needs to be revised to include ways of consolidating deliveries and using transport operators with a minimum of 'Silver' membership of FORS. It is recommended that these outstanding matters be dealt with by requiring an amended DSP in the S106 legal agreement.
260. The refuse storage facilities would be adequate.
261. On moving in and moving out days, the servicing yard would be made available for parents and students to park in allocated time slots to prevent an overspill of vehicles onto the local highway network. It is recommended that the s106 agreement requires that a Student Management Plan be secured to ensure robust management of student

occupation of the rooms including a prohibition on students bringing vehicles to the locality and to detail the moving in/out arrangements to minimise disruption to the public highway.

Cycling and walking

262. Policy 6.9 Cycling of the London Plan (2016) requires development to provide secure, integrated, convenient and accessible cycle parking facilities.
263. The provision of 222 cycle parking spaces - 198 student cycle parking spaces within the courtyard area, 10 student short-stay cycle spaces outside of the main building complex, 12 cycle parking spaces within the car park adjacent to the Digital Hub and 2 visitor spaces - would be acceptable as it would exceed the requirements of the current London Plan (2016) and the New Southwark Plan standards. However, as only 5% of the cycle parking would be provided by Sheffield cycle stands it would be below the requirement that at least 25% of the cycle parking spaces be contained in Sheffield cycle stands. Given the site restrictions it is considered that the proposed cycle parking is acceptable in this case.
264. A room with 1 shower and changing facilities for staff cycling to work would be located on the ground floor of the block fronting Peckham Hill Street.
265. Officers queried the proposed public realm at the northern periphery of this site. It does not appear to serve any significant purpose in terms of linking this site to the pedestrian routes along the neighbouring Surrey Canal, as there is already a footpath beside this end of this site. While it may be more beneficial for an unrestricted public pedestrian route through this site officers are satisfied that this would not be possible as the entrance off Peckham Hill Street is only for residents and visitors and the provision of a public right of way would lead to security risks for students.
266. The parks and cemeteries team also raised concerns with regard to the installation of gates at the western boundary of this site beside Surrey Canal. No direct access to the park is proposed as the only access to the park would be for emergency fire purposes as is the case with the existing Whitten Timber use. This would be covered by an appropriate compliance condition.
267. The council's parks and cemeteries team also raised concerns with regard to pathways proposed across the council's park land, designated as public open space, on the western boundary. The applicant advised that the pathways are shown as "indicative future routes" on the Ground Floor and Site Plans and were added to show that at some point in the future, if there was a desire from both the council and UAL to access the ground floor digital studios directly from the park, then this could theoretically be achieved. They do not form part of the current proposals.
268. It is recommended that any permission is subject to a legal agreement including a contribution towards pedestrian and cycle route improvements within the vicinity of the application scheme (up to a maximum of £15,000). These improvements would not necessarily include Surrey Canal.

Student Travel Plan

269. A student travel plan has been submitted with the application which aims to put in place the management tools deemed necessary to enable the students of the site to make informed decisions about their travel, and at the same time minimise the adverse impacts of their travel on the environment. This would be achieved by the strategy for eliminating the barriers keeping students and visitors from using sustainable modes of transport. It is recommended that a condition requires that the student travel plan be

implemented and reviewed by the operator of the student accommodation.

Construction Management Plan

270. The submitted construction management plan (CMP) will need to be revised before it would be acceptable, to include a construction vehicle routing plan, using transport operators with a minimum of 'Silver' membership of FORS, contact details of site liaison officer, agreeing crane installation method with the council, an undertaking to sweep the adjoining highway daily, penalties relating to banning construction vehicles not adhering to the agreed routing of vehicles, consolidation of deliveries, plus site layout plans for each phase of the development showing loading area, operators' parking spaces, location of wheel washing facilities, vehicle entrance arrangement and on-site routing of traffic.
271. It is recommended that these outstanding issues be dealt with by including a Construction Management Plan in the S106 legal agreement.

Highways works

272. The developer would need to enter into a S278 agreement (and S38 agreement) regarding land for adoption by the council) for the necessary highway works such as:
- Repaving the footways including new kerbing fronting the development on Peckham Hill Street and both sides of Bonar Road, including the removal of bollards. Since the application site falls within the 'Heritage' designation the footway must be paved with Yorkstone natural stone slabs with 150mm wide granite kerbs;
 - Removal of crossover on Peckham Hill Street and reinstate footway;
 - The creation of an extended raised table around the bend on Peckham Hill Street and Bonar Road;
 - Reinstall the redundant crossover at the vehicle access on Bonar Road;
 - Promote a Traffic Regulations Order (TRO) to introduce short lengths of parking restrictions at the vehicle access on Bonar Road;
 - Repair any damages to the highway due to construction activities for the Development including construction work and the movement of construction vehicles; and Surface water from private areas is not permitted to flow onto public highway in accordance with Section 163 of the Highways Act 1980. Detailed drawings should be submitted as part of the s278 application confirming this requirement.
273. It is recommended that permission be granted subject to these matters being included in the legal agreement.
274. The council's highways team advised that prior to works commencing on site, including any demolition, a joint condition survey should be arranged with the highways team to catalogue condition of streets and drainage gullies. Informative about this, the need to design to SSDM standards, and the section 278 agreement would be included on any permission.

Security and anti-social behaviour

275. Objectors raised concerns that anti-social behaviour incidents would increase in the local area with 393 students on what would be a densely populated site, with site management only in place Monday to Friday until 6pm.
276. The proposed student accommodation would be separate from the proposed Digital Hub which has its own entrance from Bonar Road. The student accommodation can

only be accessed via a reception / security area on the ground floor of the Peckham Hill Street building and access in to the main areas of the student accommodation would not be possible without approval from on site staff.

277. The submitted Student Management Plan states that the site would be managed by dedicated site managers Monday to Friday 9am to 6pm. An out of hours support security team would personally attend to matters outside of these business hours. The student accommodation would therefore have 24/7 cover.
278. All UAL managed residences are assigned to the Accreditation Network UK (ANUK) Code of Practice. This code covers, among other matters, health and safety, maintenance and repair, and relationships between managers and student tenants.
279. The ground floor management office, located behind the reception, would be well positioned to monitor all students and visitors entering the building and those in the landscaped courtyard within the development. The Tenancy Agreement would have specific restrictions regarding student tenants undertaking any form of anti-social behaviour. The continual staff presence (Residence Manager and out-of-hours staff) and use of CCTV would also deter anti-social behaviour.
280. It is not expected that neighbours would be affected by the development during the summer months as the site would be managed in a similar manner as term time. Whilst undergraduate tenants generally wish to leave London during the summer, in this period, it is proposed to accommodate students undertaking language and other courses, and participants of the University's summer art course programme. These students would adhere to the same behavioural restrictions as imposed to full time tenants.
281. Residents may be affected by vehicle trips to and from the proposed student accommodation at the start and end of term when students move into and out of the premises. Whilst modes of transport would vary between private vehicles and taxis it is expected that students would arrive and depart within a relatively short timeframe and that the activity could give rise to congestion at certain times. UAL would formally manage this with the implementation of a pre-booking system and advise users that the courtyard space adjoining the digital hub would be available for vehicles to drop-off and pick-up of students.
282. The management team of the proposed student accommodation would actively seek a working relationship and engage with all stakeholders.
283. Officers consider that the proposed development would be safe, secure and would respect the character and amenity of the residential surrounding area and built environment. The applicant would be required to oblige to commitments within the Student Management Plan through a legal agreement.
284. Objectors were also concerned that security to adjoining gardens would be compromised as the cycle sheds would reduce the height of the adjoining garden walls and fences and make access easier should someone want to enter the back of adjoining gardens. Objectors suggested that the cycle sheds be moved further away from the perimeter walls or relocated elsewhere.
285. Officers consider that the proposed development would be more secure than the existing site as the boundary along the north elevation fronting Bonar Road would decrease as a larger proportion of the northern boundary would comprise the new building. Furthermore, the remaining wall along this elevation would be the same height as the existing wall and the digital hub on the ground floor and student accommodation above would provide passive surveillance.

Employment and training

286. It is estimated that the Digital Hub would provide approximately 30-40 jobs which is a significant uplift on the existing use which had 9 full time employees.
287. The scheme is large enough to trigger the construction phase employment and training requirements of the Section 106 and CILS SPD (or payments in lieu), and for local procurement in construction and operational phase. These would be secured in the section 106 agreement (set out in more detail below).

Planning obligations (S.106 undertaking or agreement)

288. The applicant is willing to enter into a legal agreement with the council to cover any relevant planning obligations. If a legal agreement is not provided it is recommended that planning permission be refused by reason of failure to mitigate the impact of the proposed development contrary to saved Policy 2.5 Planning Obligations of the Southwark Plan 2007. The contributions and obligations are:

Planning obligation	Mitigation	Applicant's position
Local Economy and Workspace		
Employment and training (during construction)	<ul style="list-style-type: none"> 22 jobs lasting a minimum of 26 weeks for unemployed Southwark residents. Where this is not possible to meet this requirement, a charge of £4,300 per job not provided will be applied; 22 Southwark residents trained in pre- or post-employment short courses. Where this is not possible to provide a payment a charge of £150 per resident will be applied; 6 new apprenticeship start or in work NVQ. Where this is not possible to provide a payment a charge of £1,500 per apprenticeship will be applied; 	Agreed
Employment and enterprise	Allow for local procurement and supply chain measures during construction and after construction.	Agreed
Digital Hub	Provision of a 743sqm ground floor space (identified on the attached plan) consisting of a mix of UAL postgraduate start-up studios and Digital Training space. Management, operation and promotion	Agreed

	strategy to be submitted and agreed prior to occupation.	
Link to UAL and Student Room Rents		
Restriction on the end user of the student accommodation	<p>All occupiers of the student residential accommodation within the application scheme will be students registered as attending University of the Arts London</p> <p>Student room rents are set at the levels specified in the application, subject to indexation</p> <p>Outside of term times the accommodation may be available to students attending course at UAL or other Higher education institutions</p>	Agreed
Student Management Plan		
Student Management Plan	To be secured to ensure robust management of student occupation of the rooms including a prohibition on students bringing vehicles to the locality, to control noise, and to detail the moving in/our arrangements to minimise disruption to the public highway.	Agreed
Housing and Viability		
Off Site Affordable Student Housing Contribution	<p>Payment of £4m (indexed) paid in tranches related to commencement, and occupation.</p> <p>Requirement for an early stage review in the event of the development not substantially commencing within 24 months of permission, and prior to third year of occupation</p> <p>.</p>	Agreed
Wheelchair Units	20 Wheelchair adaptable studios are to be provided of which 1 will be fully fitted out at first occupation.	Agreed
Public realm improvements		
Public realm improvements	Public realm improvement to an area in the park adjoining the Digital Hub entrance at Bonar Road (area shown on attached plan) and a financial contribution to the installation of bat friendly lighting along Surrey Canal.	Agreed

	The applicant will carry out the proposed landscaping works in accordance with a plan / specification to be agreed or a financial contribution of £25,000 to be agreed with the council.	
Transport and Highways		
Public Transport Infrastructure Contribution	Contribution towards the safeguarding of a strip of land at the front of the site for the possible future provision of a relocated bus stop. Payment of £75,000 towards these works;	Agreed
Highway works	<p>Requiring a s278 / s38 agreement to include:</p> <ul style="list-style-type: none"> • Repaving the footways including new kerbing fronting the development on Peckham Hill Street and both sides of Bonar Road, including the removal of bollards. Since the application site falls within the 'Heritage' designation the footway must be paved with Yorkstone natural stone slabs with 150mm wide granite kerbs; • Removal of crossover on Peckham Hill Street and reinstate footway; • The creation of an extended raised table around the bend on Peckham Hill Street and Bonar Road; • Reinstate the redundant crossover at the vehicle access on Bonar Road; • Dedication of a 2m wide strip of land supplementing the footway behind the required northbound bus shelter on Peckham Hill Street; • Provision of bus shelter/countdown facilities at the north and south bound two bus stops along this part of Peckham Hill Street; • Reconstruction / repositioning of the raised zebra crossing facility on Peckham Hill Street including resurfacing of the road segment 	Agreed

	<p>around it (to accommodate the associated bus stopping area);</p> <ul style="list-style-type: none"> • Promote a Traffic Regulations Order (TRO) to introduce short lengths of parking restrictions at the vehicle access on Bonar Road; • Repair any damages to the highway due to construction activities for the Development including construction work and the movement of construction vehicles. • Parking restrictions should be promoted at the vehicle access on Bonar Road to aid in vehicle movements in and out of the development. Surface water from private areas is not permitted to flow onto public highway in accordance with Section 163 of the Highways Act 1980. Detailed drawings should be submitted as part of the s278 application confirming this requirement. 	
Delivery and Servicing Plan	The servicing to site to be undertaken in line with the DSP.	Agreed
Delivery and Servicing Bond	The associated servicing deposit (£19,650 indexed) and monitoring fee (£1,600).	Agreed
Pedestrian / Cycle Improvements	Contribution of £15,000 towards pedestrian and cycle route improvements within the vicinity of the application scheme.	Agreed
Parking permit restriction	This development would be excluded from those eligible for car parking permits under any future CPZ operating in this locality.	Agreed
Disabled parking bays	The provision of 3 disabled car parking bays equipped with active electric vehicle charging points. Restriction on the release of the wheelchair parking spaces.	Agreed
Others		
Archaeology	Contribution towards the council's cost of	Agreed

	providing technical archaeological support (£11,171 for schemes of 10,000sqm+)	
Administration fee	Maximum contribution to cover the costs of monitoring these necessary planning obligations, calculated as 2% of £134,650 = £2,693.	Agreed

289. These obligations are necessary in order to make the development acceptable in planning terms, and to ensure the proposal accords with policy 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 content of the S106 complies with the requirements of the CIL Regulations 2010.
290. 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.
291. In the event that a satisfactory legal agreement has not been entered into by 25 September 2020, the director of planning be authorised to refuse planning permission (if appropriate) for the following reason:

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

Mayoral and borough community infrastructure levy (CIL)

292. 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.
293. 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.
294. The proposal is liable for Mayoral and Southwark CIL. The party responsible to pay CIL must submit CIL Form 2 (Assumption of Liability) and CIL Form6 (Commencement Notice) at least a day prior to material operations start on site. The applicant submitted a form to the council indicating a Southwark CIL payment of £542,100 and a Mayoral CIL payment of £1,025,590. The council will review the proposals CIL liability on receipt of CIL Form1 (CIL Additional Information) and Form2 (Assumption of Liability) and thereafter issue a Liability Notice.

Other matters

295. Objectors raised concerns that student housing would strain local facilities and that something more suitable needs to be planned for this neighbourhood such as increased transport or doctors surgeries. It is alleged that the local doctor's surgery (Lister Health Centre) already has a month long waiting list for doctor's appointments.
296. The transport issue has been discussed in the transport section of this report. Most students use services at home and the council acknowledge that there is a need for additional health facilities and this is reflected in the councils REG123 list.
297. The signage shown on the proposed plans is only indicative and an application for advertisement consent would be required prior to installation of any signage, unless it is permitted under express consent. This will be dealt with by an informative.

Community involvement and engagement

298. The applicant has undertaken extensive pre-application discussions with the council, local residents, councillors and other key local groups. Over 18 months in the lead-up to submission of the application, they consulted political stakeholders, Mountview Academy, local residents, and other stakeholder groups (Friends of Burgess Park, Peckham Vision, Peckham Society and Bell Gardens TRA).
299. An event hosted by UAL at the 'Playground' facility on Wilson Road was held on 15 May 2019 to update local stakeholders on UAL's digital projects in the area and to introduce the new proposals. A public exhibition event was then held on the 16 May 2019 where members of the local community, ward members and local community groups were invited to review the proposals and discuss the scheme with the applicant and representatives from the project team. Flyers were sent to over 3,000 addresses including residential and business addresses, inviting them to the public exhibition and outlining the proposed plans. During the event, feedback forms were provided to attendees that could be filled out on the day and returned at the exhibition or sent via email or post. A project website has also been created so that interested parties can find out more about the proposals and view the exhibition boards online.
300. The applicant's pre-application consultation resulted in various amendments to the scheme. The applicant and project team have responded positively to the feedback received to ensure that the proposals fully optimise the potential of the site whilst being mindful of neighbours and delivering the objectives of the existing and emerging policy framework.
301. The applicant advised that they would continue to engage proactively with the community throughout the various stages of the application and if relevant the construction process.
302. 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 in this report.

Consultation responses, and how the application addresses the concerns raised

Consultation responses from internal and divisional consultees

303. Summarised below are the material planning considerations raised by internal and

divisional consultees, along with the officer's response.

304. Environmental protection team:

No objection and recommend four conditions relating to internal noise levels, sound levels for plant and any associated ducting, construction management plan and land contamination.

Officer response to issue(s) raised:

Recommend that the application is granted subject to four conditions.

305. Highways team:

Acceptable, subject to conditions and issues raised with regards to pedestrian visibility splays and refuse vehicle tracking movement to be resolved prior to consent. Recommended that if consent is granted the developer must enter into a S278 agreement for the highways works.

Officer response to issue(s) raised:

All outstanding issues have been resolved and comments incorporated in the recommendation.

306. Archaeology:

Acceptable subject to conditions.

Officer response to issue(s) raised:

Included in the recommendation.

307. Flood risk management team:

No objection to the greenfield rate of 3l/s for the development site. Additional documents submitted have been reviewed and although slightly discharging above greenfield there is a fair amount of additional greening proposed and therefore it is acceptable.

Officer response to issue(s) raised:

Noted.

308. Ecologist:

Acceptable subject to conditions and a legal agreement to secure a commuted sum to install bat lighting in Surrey Canal.

Officer response to issue(s) raised:

Noted.

309. Parks and cemeteries team:

Acceptable but mentions general expectation of developments next to a park.

Officer comment:

Noted.

Consultation responses from external consultees

310. None consulted.

Community impact and equalities assessment

311. The council must not act in a way which is incompatible with rights contained within the European Convention of Human Rights
312. The council has given due regard to the above needs and rights where relevant or engaged throughout the course of determining this application.
313. 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.
314. The protected characteristics are: race, age, gender reassignment, pregnancy and maternity, disability, sexual orientation, religion or belief, sex, marriage and civil partnership.

Human rights implications

315. 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.
316. This application has the legitimate aim of providing student housing and a digital hub space through the proposed redevelopment. The rights potentially engaged by this application, including the right to a fair trial and the right to respect for private and family life are not considered to be unlawfully interfered with by this proposal.

Positive and proactive statement

317. 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.
318. The council provides a pre-application advice service that is available to all applicants in order to assist applicants in formulating proposals that are in accordance with the

development plan and core strategy and submissions that are in accordance with the application requirements.

Positive and proactive engagement: summary table

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

Conclusion

- 319. There is no policy objection to the loss of the A1 use of the site as a timber yard given the location outside of the main town centre retail area, and as it would be replaced by a B1/D1 use that would provide a service to the general public and would not harm the vitality and viability of the town centre.
- 320. The proposed development would provide benefits to Peckham town centre and community. Between 30 and 40 jobs would be created (20 to 30 more than were employed at the timber yard) and it is estimated that investment associated with student expenditure would be in the region of £2million. These benefits are considered to outweigh the loss of the existing retail warehouse.
- 321. There is support in the London Plan, Core Strategy and Southwark Plan for student housing and it counts towards the borough’s housing delivery targets.
- 322. No affordable housing is proposed within the development due to the size of the site and the impact it would have on the operation of the student housing scheme. A payment in lieu is proposed of £4m, which equates to around 8.4% affordable housing by habitable room. Whilst this is significantly below the policy requirement of 35%, the policy does recognise that affordable housing requirements must be assessed with regard to viability. An FVA was submitted and reviewed, and the expert surveyors for the council concluded that the viability of the development is marginal, and therefore the £4 million payment is substantially more than could be supported by a viable scheme. The contribution would be subject to reviews secured through the s106 agreement.
- 323. The design of the buildings is appropriate for this site. The buildings fronting onto Peckham Hill Street respect the established building line and heights of the adjacent grade II listed buildings and preserve their setting. The main building sits comfortably in terms of its scale, height, massing and architectural treatment in the context of the adjacent Surrey Canal and Mountview Academy.
- 324. The proposal would provide a high standard of accommodation for student residents, by the size of rooms, daylight provision, outlook, communal facilities and amenity spaces. The development would not cause significant harm to the amenity of neighbouring properties, in terms of privacy, outlook, daylight or sunlight levels, and the supervision of student behaviour would be secured through a student management plan
- 325. Conditions are proposed to secure the sustainability aspects (e.g. carbon reduction, BREEAM excellent) and biodiversity. There is no loss of trees, or impact on existing

trees, through the development. Highway works 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.

326. The application is a sustainable redevelopment of a brownfield site in a highly accessible town centre location. It would support the future success of UAL as an important contributor to the creative and cultural life of Peckham and Southwark. It is therefore recommended that planning permission be granted subject to the proposed conditions and completion of an appropriate legal agreement to secure the necessary planning obligations.

BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
Southwark Local Development Framework and Development Plan Documents	Chief Executive's 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

AUDIT TRAIL

Lead Officer	Simon Bevan, Director of Planning	
Report Author	Andre Verster, Team Leader Team Major and New Homes Team	
Version	Final	
Dated	30 June 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		1 July 2020