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Item No. 6.1	Classification: Open	Date: 20 February 2024	Meeting Name: Planning Committee (Major Applications) A
Report title:	Development Management planning application: Application 22/AP/0850 for: Full Planning Permission Address: 31 Amelia Street, London SE17 3PY Proposal: Demolition of existing building on the site and erection of a mixed-use development comprising 744 sq. m. commercial floorspace (Class E) and student accommodation (146 rooms).		
Wards or groups affected:	Newington		
From:	Director of Planning and Growth		
Application Start Date	17.03.2022	Application Expiry Date	16.06.2022
Earliest Decision Date	04.11.2022	Extension of Time End Date	30.01.2024

RECOMMENDATIONS

1. That full planning permission be granted for application number 22/AP/0850, subject to conditions and the applicant entering into a satisfactory legal agreement.
2. That in the event that the legal agreement is not entered into by 16 July 2024 the director of planning and growth be authorised to refuse planning permission for 22/AP/0850, if appropriate, for the reasons set out in paragraph 297 of this report.

EXECUTIVE SUMMARY

3. Located in Elephant and Castle, to the west of Walworth Road, the application site is in the Major Town Centre, the Central Activities Zone and an Opportunity Area. It comprises an existing two storey commercial building. The site is next to the Low Line, a vision promoted by the council for a pedestrian public realm corridor adjacent to railway viaducts in the borough. Part of the site also falls within the Pullens Gardens Conservation Area.
4. This application seeks demolition of the existing building on site and proposes the construction of an 8-storey building plus a basement level to

provide 146 student rooms and 744 square metres of flexible commercial space (Use Class E).

5. The current building is a 1980s low-grade industrial workshop and is of no particular design merit. Its demolition is not resisted. The replacement building is relatively large, compared to the more domestic context to the west, but is of similar height to other recently built or consented mixed-use schemes that run along both sides of the railway viaduct. Its massing is not too bulky and is sufficiently well articulated, presenting a comfortable shoulder height towards the Pullen Estate and the small public park. The proposed building maintains the current building line onto Crampton Street as the main road and aligns with the viaduct's pedestrian underpass. It also makes adequate allowance for the extension of the Low-line project at its rear.
6. The proposed student housing development would be a direct-let scheme (i.e. not linked to any specific university or college) and would not include any affordable student rooms. The development would aid the delivery of affordable housing in the borough, which would be provided in the form of a payment-in-lieu of £5,110,000 because it is not practical to include on-site conventional housing alongside a feasible amount of student housing on this relatively small site given that Use Class E floorspace also needs to be re-provided. The payment-in-lieu would be used to directly support the delivery of affordable housing in the borough, thereby bringing benefits for the local community. This is a substantial benefit of the application.
7. The proposal would provide good quality student housing and would not cause unacceptable harm to the amenity of neighbouring properties.



Image 01: Visualisation of the development from Pullens Gardens

8. The Low Line would be promoted with active frontages towards the viaduct and the creation of a pedestrian route as this does not currently exist.

9. As the report explains, the proposal would make efficient use of a prominently located and under-utilised site to deliver a high quality and sustainable development that accords with the council's aspirations for the area.

PLANNING SUMMARY TABLES

10.

<u>Student housing</u>				
	Bed Count		Square Metres	
Floor	Studio beds	Accessible rooms	Cluster rooms	Area
Level 07	5	1	5	313
Level 06	9	1	5	401
Level 05	9	1	11	610
Level 04	9	1	11	610
Level 03	25	1	0	700
Level 02	25	1	0	700
Level 01	24	2	0	700
Total	146	8	32	4613

11.

<u>Commercial</u>			
Use class and description	Existing GIA	Proposed GIA	Change +/-
Use Class E	735sqm	744sqm	+9sqm

12.

<u>Carbon Savings and Trees</u>	
Criterion	Details
CO2 savings	62.8% improvement on Part L of Building Regs 2013
Trees	None lost and none proposed

13.

Greening, Drainage and Sustainable Transport Infrastructure			
Criterion	Existing	Proposed	Change +/-
Urban Greening Factor	N/A	0.383	+0.383
Greenfield Run Off Rate	N/A	6.0l/s*	N/A
Electric Vehicle Charging Points	0	0	0
Cycle parking spaces	0	126	+126
Biodiversity Net Gain	0	0.06	+0.06

14.

CIL and Section 106 (or Unilateral Undertaking)	
Criterion	Total Contribution
CIL (estimated)	£592,237.54
MCIL (estimated)	£277,672.73
Section 106 Contribution	As per the 'Planning Obligations' section of this report

BACKGROUND INFORMATION

Site location and description

Application site

15. The application site is 31 Amelia Street, on the corner of Amelia Street and Crampton Street. A two storey industrial style 'shed' with a large parking apron and enclosed by a tall palisade fence currently occupies the site and comprises 735 sq. m. (GIA) of commercial floorspace that falls within Use Class E. The site layout and architecture are typical of the late 1980s / early 1990s allowing for low-cost office, workshop or distribution activities.



Image 02 (above): Photograph of the existing site from Amelia Street

Surroundings

16. The site sits directly opposite Pullens Gardens which is to the west, a large public garden square that is fronted by residential terraces on its remaining sides. Those to the north are 4-storey tenement blocks that date from the late nineteenth century and form part of the neighbouring historic Pullens Estate, a notable part of the Pullens Gardens Conservation Area.
17. To the immediate north of the site is Flamingo Court (83 Crampton Street) a mixed-use development of offices with residential above that is a 5-storey towards the Pullens Estate, with a part 7/8-storey block at the rear onto the railway viaduct.
18. To the immediate south is the Royal Mail sorting office, which comprises similar modern, low-rise sheds and parking apron. There is a consented scheme (18/AP/0737) for a large scale mixed use development that steps in height from 4 to 7 storeys, but which is designed with a setback onto Crampton Street providing a considerably widened footway and landscaping zone around the site, including at its rear.
19. The railway line runs along the site boundary to the east. There are businesses within the railway arches which front the application site, including Husky Dance Studios at 29a Amelia Street.



Image 03 (above): Aerial image of the site (edged in red)

Designations

20. The following policy, socioeconomic and environmental designations apply to the application site:
 - Walworth Area Vision Boundary
 - Walworth Neighbourhood Plan Area
 - Elephant and Castle Major Town Centre
 - Elephant and Castle Strategic Cultural Quarter
 - Elephant and Castle Opportunity Area
 - Central Activities Zone
 - Air Quality Management Area
 - Walworth Village Archaeological Priority Area
 - Flood Zones 2 and 3
21. The site is not subject to a site allocation in the Southwark Plan.
22. The railway line to the east of site forms part of the Low Line Route 2 (Camberwell to River Thames) within the Southwark Plan.
23. Pullens Gardens is designated as Other Open Space (OOS).
24. A very small part of the site on the west falls within the Pullens Estate Conservation Area. The conservation area comprises properties in Amelia Street, Illiffe Street, Peacock Street, Penton Place and Crampton Street. The Walworth Road Conservation Area is located beyond the railway line over 110 metres to the east. On the south side of Manor Place, approximately 90 metres to the south of the application site, is a Grade II listed building.

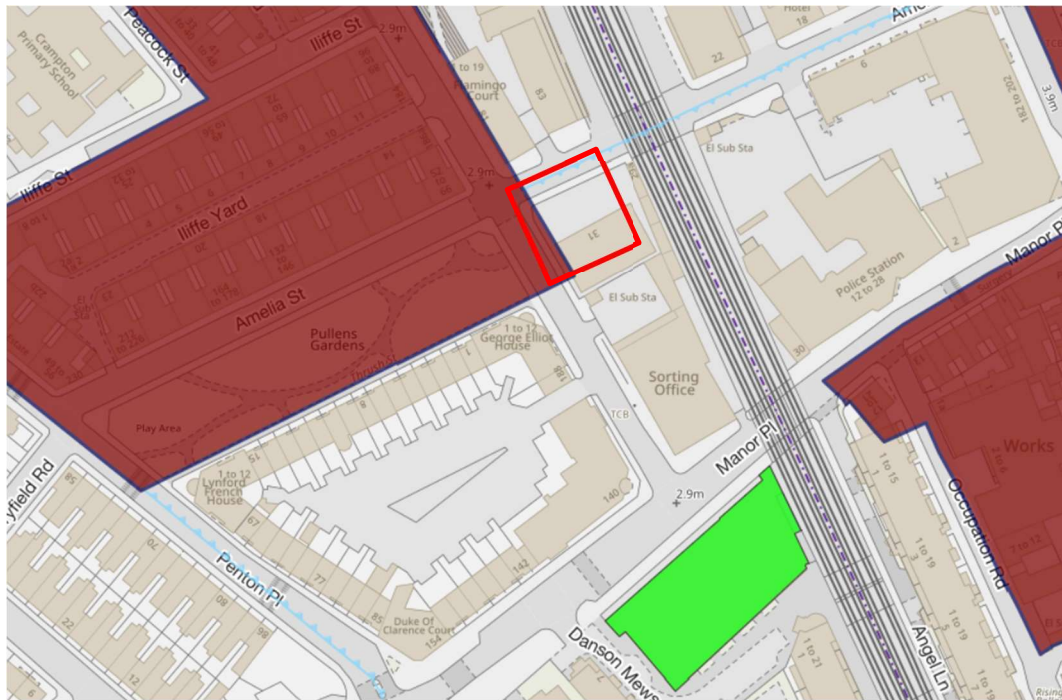


Figure 04 (above): Map showing the site (edged in red) in the context of heritage designations.

25. With respect to transport designations, the application site is:
 - within PTAL Zone 6b, representing the highest possible public transport accessibility level; and
 - within the West Walworth Controlled Parking Zone (operational from 08:30hrs to 18:30hrs on Monday to Friday).
26. The nearest transport hub is Elephant and Castle tube and mainline railway station, approximately a ten minute walk to the north. The pedestrian routes around the application site provide easy access to the bus stops and train stations.
27. All roads adjacent to the site are adopted highways.

Details of proposal

28. This application seeks full planning permission for the demolition of the building on site and redevelopment to provide an 8-storey building with setbacks at fourth and sixth storeys. The building's east elevation would run parallel with the railway viaduct and would promote the Low Line with active frontages.



Figure 05 (above): Visual of the proposed building from Amelia Street

29. The proposed building would deliver 146 student rooms (Class Sui Generis). These would take the form of:
 - 114 self-contained studios, 8 of which would be wheelchair accessible; and
 - 32 cluster rooms.
30. The building would provide ancillary facilities for the students including five separate communal amenity rooms on the upper floors totalling 288 sq. m. and a reception foyer with a communal lounge at ground floor. A 65 sq. m. roof terrace is proposed at sixth floor.
31. All 146 units would be let at market rate and be direct let. A financial contribution of £5,110,000 towards conventional affordable housing would be secured via Section 106 agreement in lieu of affordable housing on site.
32. The basement and ground floors would comprise 744 sq. m. of commercial floorspace in flexible Use Class E, replacing and improving the existing floorspace on site.
33. The positioning and layout of the building reflect the general building alignments within the adjoining streets and would provide good activation and informal surveillance of the existing and new public realm, including the potential Low Line route to the rear.



Figure 06: Proposed elevation bay study

34. At seven full storeys it is similar in height to recent developments that immediately align both sides of the railway viaduct, including the neighbouring rear block of Flamingo Court. The setbacks sufficiently push the tallest volume of the proposed built form to the rear of the site.

Planning history of the application site and nearby sites

35. Appendix 3 sets out in detail the full planning history for the site as well as details of relevant applications on adjoining or nearby sites. There is no relevant planning history on the application site.
36. To the immediate south is the Royal Mail sorting office, which presently comprises similar modern, low-rise sheds and parking apron. There is a consented scheme (18/AP/0737) for a large scale mixed use development that steps in height from 4 to 7 storeys, but which is designed with a setback onto Crampton Street providing a considerably widened footway and landscaping zone around the site, including at its rear, though this has not been implemented.

Pre-application engagement and mid-application amendments

37. This planning application was submitted following three pre-application enquiries (20/EQ/0302, 21/EQ/0036 and 21/EQ/0212).

38. The images below give a sense of the evolution of the design with regard to the massing over the course of the pre-application process:

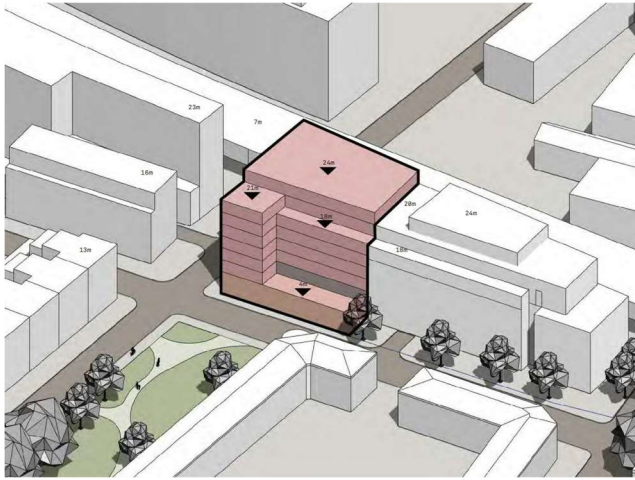


Image 07 (above): the proposed massing at first stage of pre-application engagement (20/EQ/0302)

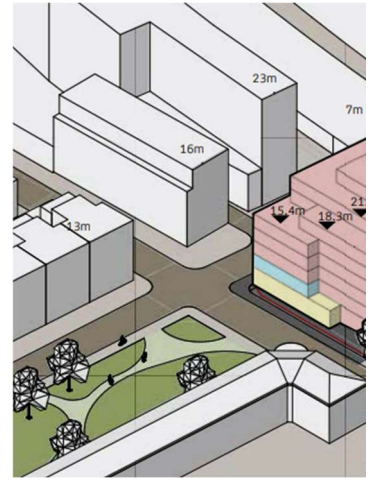


Image 08 (above): the proposed massing at second stage of pre-application engagement (21/EQ/0036)

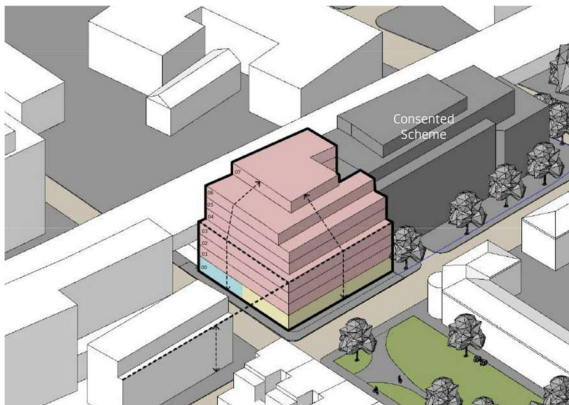


Image 09 (above): the proposed massing at final stage of pre-application engagement (21/EQ/0212)

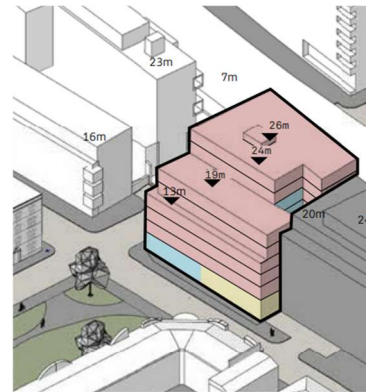


Image 10 (above): the proposed massing

39. During the course of this planning application the proposed development was amended in response to issues raised, including:

- Reduction in the number of student rooms from 152 to 146
- Increase in commercial floorspace from 726sq.m. to 744sq. m. through reduction in the cycle storage area (no change to the quantity of cycle parking)
- Amendment to internal layout at basement and ground floors
- Addition of a staircase to basement only
- Changes to layout of the cluster units

- Upper floor windows to the communal lounges re-configured to facilitate a singular central bay and 1.8m fire resisting returns to the external elevations
40. The site to the south is the Royal Mail sorting office which comprises low-rise sheds and a parking apron. There is a consented scheme (18/AP/0737) for a large scale mixed use development that steps in height from 4 to 7 storeys. This planning permission has not been implemented.

KEY ISSUES FOR CONSIDERATION

Summary of main issues

41. The main issues to be considered in respect of this application are:
- Consultation responses from members of the public and local groups
 - Principle of the proposed development in terms of land use
 - Development viability
 - Environmental impact assessment
 - Quality of accommodation
 - Impact on neighbours
 - Design
 - Landscaping and trees
 - Green infrastructure, ecology and biodiversity
 - Transport and highways
 - Environmental matters
 - Energy and sustainability
 - Planning obligations
 - Community engagement and consultation responses and
 - Community impacts, equalities and human rights.
42. These matters are discussed in detail in the 'Assessment' section of this report.

Legal context

43. 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 2021 and the Southwark Plan 2022. Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires decision-makers determining planning applications to pay special regard to the desirability of preserving listed buildings and their setting or any features of special architectural or historic interest which they possess.
44. 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

45. The statutory development plan for the borough comprises the London Plan 2021 and the Southwark Plan 2022. The National Planning Policy Framework 2023 is a material consideration but not part of the statutory development plan. A list of policies which are relevant to this application is provided at Appendix 2. Any policies which are particularly relevant to the consideration of this application are highlighted in the report.

Assessment

Consultation responses from members of the public and local groups

46. Consultation with members of the public was first conducted in March 2022. Letters were sent to local residents when the application was received, the application was advertised in the local press and site notices were displayed. Comments were received from 120 respondents. The table below summarises the number of representations received during this period:

<u>Original round of consultation: Summary table</u>		
Total number of responses: 120		
The split of views between the 120 responses was:		
In objection: 117	Neutral: 0	In support: 3

47. As mentioned in the paragraph above, a number of amendments were made to the application over the course of the determination process. To ensure the public was made aware of the changes, re-consultation was conducted in October 2022. The table below summarises the number of representations received in response to the re-consultation:

<u>Re-consultation: Summary table</u>		
Total number of responses: 17		
The split of views between the 17 respondents was:		
In objection: 17	Neutral: 0	In support: 0

Reasons for objection

48. The following paragraphs summarise the material planning considerations raised in objection from the consultation and re-consultation. The issues

raised are dealt with in the main assessment part of this report. Some objections raised by the public consultation process do not constitute material planning considerations (such as loss of view); therefore, these are not captured in the following summary paragraphs, nor are they discussed in later parts of this report.

Amenity Impacts

- 49.
- Loss of daylight/sunlight to neighbouring properties
 - Overlooking from the roof terrace
 - Increased noise locally once the development is operational, in particular from the roof terrace
 - Potential overshadowing of Pullens Gardens.

Land uses

- 50.
- There are more appropriate uses for the site, such as housing
 - There is no need/demand for student housing in this location
 - There is already too much student housing in this location
 - There is no need for replacement commercial floorspace.

Design and heritage

- 51.
- Development is too tall
 - Development is too big
 - Poor architectural/design quality
 - Harm to the Pullens Gardens Conservation Area
 - Harm to the Grade II listed Manor Place Baths
 - Will create inconsistent building lines
 - Lack of activity from the ground floor frontage
 - Development does not enhance the Low Line.

Quality and management of student accommodation

- 52.
- Poor quality of accommodation for students in terms of space and light

Transport and highways

- 53.
- Loss of parking
 - Additional traffic

Construction Phase

- 54.
- Increase noise and traffic during construction
 - Loss of available on street parking during construction

Social impacts

- 55.
- Lack of affordable housing

- Lack of affordable student housing
- Harm from the transient nature of the student population
- Anti-social behaviour
- Lack of consultation by the developer.

Environmental impacts

- 56.
- Lack of public realm
 - Lack of public greenery or landscaping

Reasons in support

57. Listed below are the material planning considerations raised in support of the planning application by the consultation and re-consultation:

Land use

- 58.
- More student housing is needed.

Design and heritage

- 59.
- The height of development is in keeping with nearby blocks
 - The design is an improvement to the existing building on site

Environmental impact assessment

60. Environmental Impact Assessment (EIA) is a process reserved for the types of development that by virtue of their scale or nature have the potential to generate significant environmental effects.
61. The council was not requested to issue a screening opinion as to whether the proposed development, due to its proposed size and scale, would necessitate an Environmental Impact Assessment.
62. The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 set out the circumstances in which development must be underpinned by an EIA. Schedule 1 of the Regulations sets out a range of development, predominantly involving industrial operations, for which an EIA is mandatory. Schedule 2 lists a range of development types for which an EIA might be required due to the potential for significant environmental impacts to arise. Schedule 3 sets out that the significance of any impact should include consideration of the characteristics of the development, the environmental sensitivity of the location and the nature of the development.
63. The range of developments covered by Schedule 2 includes 'Urban development projects' where:
- The area of the development exceeds 1 hectare and the proposal is not dwellinghouse development; or

- The site area exceeds 5 hectares.
64. The application site is 0.09 hectares and as such the proposal does not exceed the Schedule 2 threshold. An EIA is not required in respect of the proposed development.

Principle of the proposed development in terms of land use

Existing use

65. The application site is 0.09 hectares in total area and comprises a two storey industrial style 'shed' providing 735 sq. m. (GIA) of commercial floorspace that falls within flexible Use Class E and is used as offices.

Proposal

66. The proposal is for the redevelopment of the site, comprising demolition of the existing building and the construction of an 8 storey building providing 744 sq. m. of flexible Use Class E commercial floorspace at basement and ground floors and 146 student accommodation rooms on the upper floors.

Relevant policy designations

Central Activities Zone (CAZ)

67. The site is within the Central Activities Zone (CAZ). London Plan Policies SD4 "The Central Activates Zone" and SD5 o "Offices, other strategic functions and residential development in the CAZ" outline the strategic functions of the CAZ, of which higher education is one, stating that its unique mix of uses should be promoted and enhanced. Policy SD6 "Town centres and high streets" of the London Plan recognises that the vitality and viability of London's varied town centres should be promoted and enhanced.
68. Policy P30 "Office and business development" of the Southwark Plan 2022 seeks to retain or increase the amount of employment floorspace within the Central Activities Zone.

Elephant and Castle Opportunity Area

69. The site is within the Elephant and Castle Opportunity Area. The London Plan sets out an indicative capacity of 5,000 homes and 10,000 jobs for this Opportunity Area over the twenty years to 2041. Furthermore, Strategic Target ST1 "Southwark's Development Targets" of the Southwark Plan 2022 seeks the delivery of 10,000 jobs in the Elephant and Castle Opportunity Area.

Elephant and Castle Major Town Centre

70. The site is also within the Elephant and Castle major town centre, where London Plan Policy SD6 “town centres and high streets” encourages development to, amongst other things:
- Promote the vitality and viability of town centres, including by bringing forward mixed-use or housing-led intensification
 - Optimise residential growth potential
 - Accommodate a diverse range of housing, including student housing and
 - Enhance the vitality of the area through the provision of vibrant and well-managed daytime, evening and night-time activities.

Elephant and Castle Area Vision

71. The site is located within AV.09, the Elephant and Castle Area Vision, in the Southwark Plan 2022. It states that Elephant and Castle has the potential to provide significant amounts of new offices, shops, leisure and cultural uses, university facilities, parks, homes and a community health hub.

Conclusion on policy designations

72. The principle of redeveloping the application site for a mixed use development with the re-provision of flexible Use Class E (commercial) floorspace at basement and ground floor levels and the provision of student accommodation is acceptable, as it would support the role and functioning of the Elephant and Castle Major Town Centre as well as being consistent with the policies for the Opportunity Area.

Student accommodation

Policy background

73. Student housing is classified as non-self-contained accommodation and a ‘Sui Generis’ use in the use classes order. Student accommodation is also considered as ‘housing’ for monitoring purposes through the council’s and GLA’s monitoring reports.
74. Policy H15 “Purpose-built student accommodation” of the London Plan sets an overall strategic requirement for Purpose Built Student Accommodation (PBSA) of 3,500 bed spaces to be provided annually. The supporting text to Policy H15 is clear that PBSA contributes to meeting London’s overall housing need and is not in addition to this need.
75. Part A of Policy H15 states that boroughs should seek to ensure the local and strategic need for PBSA is addressed, provided that:
- The development contributes to a mixed and inclusive neighbourhood
 - It is secured for occupation by students

- The majority of bedrooms and all affordable student accommodation is, through a nominations agreement, secured for occupation by students of one or more higher education providers
 - The maximum level of accommodation is secured as affordable student accommodation and
 - The accommodation provides adequate functional living space and layout.
76. Part B of Policy H15 encourages boroughs, student accommodation providers and higher education providers 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
77. Paragraph 4.15.3 of Policy H15 states that:
- “To demonstrate that there is a need for a new PBSA development and ensure the accommodation will be supporting London’s higher education providers, the student accommodation must either be operated directly by a higher education provider or the development must have an agreement in place from initial occupation with one or more higher education providers, to provide housing for its students, and to commit to having such an agreement for as long as the development is used for student accommodation. This agreement is known as a nominations agreement. A majority of the bedrooms in the development must be covered by these agreements”.*
78. Where this is not achieved, paragraph 4.15.5 states that the accommodation will be treated neither as PBSA nor as meeting a need for PBSA. Instead, the development proposal will *“normally be considered large-scale purpose-built shared living and be assessed by the requirements of Policy H16 Large-scale purpose-built shared living”*.
79. At local level, the Southwark Plan aims to deliver at least 40,035 homes between 2019 and 2036, equating to 2,355 new homes per annum. Policy ST2 of the Plan states that new development will be focussed in locations including Elephant and Castle Opportunity Area, where the aim will be to balance the delivery of as many homes as possible against creating jobs, protecting industrial and office locations, sustaining vibrant town centres, and protecting open space and heritage.
80. Policy P5 “Student homes” of the Southwark Plan requires PBSA proposals where all the bedspaces would be ‘direct-lets’ to meet the following:
- As a first priority deliver the maximum amount of PBSA alongside a minimum of 35% of the habitable rooms as conventional affordable housing (subject to viability);
 - In addition to this provide 27% of student rooms let at a rent that is affordable to students as defined by the Mayor of London.
81. When assessing the principle of a student housing scheme, the policies outlined above require consideration of:

- the principle of introducing a housing use to this site
 - the local and strategic need for student housing
 - whether the student housing would contribute to a mixed and inclusive neighbourhood
 - securing the accommodation for student occupation
 - whether a nominations agreement has been secured;
 - securing the maximum level of affordable housing subject to viability and,
 - whether adequate and functional accommodation and layouts would be provided.
82. The following paragraphs of this report assesses the proposed development against these considerations.

Assessment

83. There is a demand for more student accommodation across London, which needs to be balanced with ensuring Southwark has enough sites for other types of homes, including affordable and family housing.
84. There are several Higher Education Institutions (HEIs) in the borough. These include London South Bank University (LSBU), Kings College London (KCL), University of the Arts (UAL) and London School of Economics (LSE). There are also some smaller campuses.
85. The evidence base underpinning the Southwark Plan 2022 included 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:
- major HEIs within Southwark provide a total of 23,500 course places
 - over 21,000 students aged 20 or above live in the borough during term time
 - at least 50% of these students live in private rented accommodation, while 15% live with their parents and,
 - there are some 7,800 bed spaces in PBSA in the borough.
86. The applicant has submitted a student needs assessment in support of this application, prepared by Cushman & Wakefield (dated 2022). Whilst there is no policy requirement for a needs assessment, it is acknowledged that the assessment notes the following key points:

Demand:

- The number of full-time students in the UK Higher Education (HE) system has increased from 1.5m in 2008/09 to 1.9m in 2019/2020, a compound annual growth rate of 2.1% and the number of non-EU students has risen from 8% in 1999/00 to 19% in 2019/20

- UCL is the fastest-growing institution in the UK, increasing student numbers by just over 9,000 students in five years and has the largest postgraduate population in the UK
- In 2019/20 LSE had a full-time student population of 11,665 having grown by 15% over the past five years
- KCL has grown its international student cohort by 75% over the past 5 years
- LSBU has grown student numbers by 61% from 2014/15 to 2019/20.

Supply:

- The PBSA market comprises of 91,836 beds across 23 boroughs for 2021.22 academic year. The market comprises 43% university owned beds, 22% partnership beds and 35% beds offered on a direct let basis. There were 2,497 new beds for the 2021/22 academic year. Southwark itself is home to 7,829 bed spaces; 9% of the total supply in London.

Development pipeline:

- The London development pipeline currently stands at 16,693 bed spaces, with 39% having planning approval. There are 6,574 planned in Southwark, Lewisham and Wandsworth.

Proximity to HEIs:

- The application site is within walking distance of five key university campuses and commutable distance of a further 30 institutions via public transport (within 45 minutes).

87. The student needs assessment concludes that the London market remains structurally undersupplied with PBSA evidenced by above average rental increases over a number of years and even with the development pipeline, the student to bed ratio is set to remain above average. It also notes that London is likely to continue to attract a large international student population, there is a UK demographic growth and the current economic environment has potential to push more students into higher education. There are 2,161 poor quality beds currently operating in the market.
88. In summary, while the proposed accommodation would add to a number of pre-existing direct-let student housing developments in the borough, it would nevertheless contribute towards the borough's housing stock, for which there is an identified need.
89. Situated within the CAZ and a major town centre, the site benefits from excellent accessibility to public transport (as reflected in its PTAL rating of 6B), services and established higher educational facilities. The area surrounding the application site is characterised by a mix of uses, with commercial and residential uses predominating. The proposed student-housing led scheme would sustain a mixed and inclusive community through the introduction of an alternative residential product and demographic.
90. The proposed development would be managed by an independent provider. As such, responsibility would rest with the provider to ensure the

units are let to students on courses with HEIs. Student-exclusive use would be secured by way of an obligation in the Section 106 Agreement.

Summary on the principle of student housing

91. In conclusion, the principle of student housing on site is considered appropriate as it would meet a demonstrable need and achieving compliance with the requirements of London Plan Policy H15 “Purpose-built student accommodation” and Southwark Plan Policy P5 “Student homes”.

Use Class E floorspace and Low Line promotion

Policy background

92. Policy P30 “Office and business development” of the Southwark Plan states that in the Central Activities Zone, town centres and opportunity areas, development must retain or increase the amount of employment floorspace on site and promote the successful integration of homes and employment space in areas that will accommodate mixed use development.
93. Policies P34 “Railway arches” and P52 “Low line routes” of the Southwark Plan requires development within railway arches to promote the delivery of Low Line walking routes by providing active frontages and commercial or community activities.

Assessment

94. The application site currently comprises 735 sq. m. (GIA) of commercial floorspace in Use Class E which is of low quality. The proposed development would provide 744 sq. m. commercial floorspace across basement and ground floors. As such, the development would retain and slightly increase the amount of employment floorspace on site in accordance with policy requirements.
95. The proposed development would support the implementation of the Low Line with active frontages to the railway viaduct and the creation of a pedestrian route adjacent to the railway viaduct. Currently, the building on site with fencing restricts access to the Low Line and this would be removed.

Summary on the principle of flexible retail/service/dining use

96. In summary, the proposals for commercial Class E floorspace are considered appropriate and acceptable in this location, contributing towards the vitality and economy of the major town Centre, Opportunity Area and Central Activities Zone.

Conclusion on uses

97. The proposed land uses are appropriate in policy terms for the application site within the CAZ, Elephant and Castle opportunity area and town centre. The introduction of student housing is considered to be a benefit of the scheme, facilitating the growth of Elephant and Castle's education offer and bringing economic and housing delivery benefits. The proposed commercial element would be an improvement upon the existing commercial provision and is in accordance with policy requirements. The proposal also contributes to the Low Line.

Development viability

Policy background

98. Southwark's development viability SPD requires a Financial Viability Appraisal (FVA) to be submitted for all planning applications which trigger a requirement to provide affordable housing. Southwark's Development Viability SPD pre dates the current London Plan and Southwark Plan policies for student housing. Nonetheless the FVA should also identify the maximum level of affordable student housing that can be sustained as required by Policy P5 "Student Homes".
99. The SPD, in requiring an in lieu payment of £100,000 per habitable room of conventional affordable housing, effectively establishes the minimum payment-in-lieu a scheme should deliver. However, the policy expectation, as per Southwark Plan Policy P5, is for development proposals to deliver the *maximum* viable amount. It should also be noted that the SPD does not provide an in lieu figure for affordable student housing, as the SPD was drafted before the current London Plan policy was adopted.
100. Earlier parts of this report have explained the rationale for this proposal to deliver no on-site affordable student housing, and to instead deliver a 100% direct-let scheme with a payment-in-lieu towards off-site affordable housing. For the proposed development, a 35% provision equates to 51.1 habitable rooms, resulting in a minimum expected contribution of £5,110,000 as an in-lieu payment to the Council to use for providing affordable housing.
101. The applicant has submitted a Financial Viability Assessment (FVA) in accordance with the Affordable Housing SPD and Southwark Plan Policy P5 "Student homes" to allow an assessment of the maximum level of affordable housing that could be supported by the development.

Assessment

Findings of the viability review process

102. The inputs within the final iteration of the applicant's FVA and the Council's third party review by BPS are set out in the table below:

103.	Input	Montagu (Applicant)	Evans	BPS (Southwark)
	Private PBSA Values	£38,758,747		£44,925,023
	Commercial Values	£2,603,877		£2,668,330
	Build Costs	£21,750,000		£19,435,000
	Benchmark Land Value	£3,000,000		£1,410,000
	Surplus	£2,159,642		£13,397,306

104. The applicant's FVA concludes that the maximum affordable housing contribution that can be viably sustained is £2,159,642.

105. The values estimated by the applicant's assessor differ from the finding of BPS' viability review. BPS' review indicates that the scheme could viably support a 35% equivalent affordable housing officer generating a surplus of £13,397,306.

106. A 35% affordable housing contribution would come to £5,110,000 as a financial payment (35% of 146 habitable rooms at £100,000 per habitable room). The applicant has offered a payment-in-lieu contribution of £5,110,000 in order to comply with policy, despite this exceeding what their FVA concluded would be viable.

107. An early stage review, which would be triggered if the development is not implemented within two years, and a Late Stage Review, which would identify the actual total costs incurred by the applicant in building the scheme, would be secured via Section 106 agreement. This would enable a proportion of any surplus profit that might be generated to be captured and could result in an increased payment of £7,400,000 based on an equivalent of 40% affordable housing, which is the fast track threshold in the Southwark Plan. This approach is consistent with that taken for the Rockingham Street (22/AP/1068) and the King's Place/Harper Road (23/AP/0479) applications for student housing which were approved by the planning committee in 2023.

Allocation of the payment-in-lieu

108. The payment-in-lieu financial contribution would be allocated to Southwark construction for the delivery of new council homes.

Conclusion on viability

109. A payment-in-lieu of £5,110,000, the financial equivalent of 35% by habitable room, has been agreed. With an Early Stage Review and a Late Stage Review to be imposed through the Section 106 agreement, the maximum viable amount of affordable housing has been secured, and therefore the requirements of London Plan Policy H15(A) have been met, having regard to the expectations of the more up to date Southwark Plan and considering all policy.

Quality of residential accommodation

110. The Soutwark Plan does not prescribe any specific standards for quality of student accommodation, however a good quality of accommodation is expected.

Spatial arrangement

111. There are 146 student bedrooms proposed, comprising 106 studios, 8 wheelchair accessible studios and 32 cluster rooms. The cluster rooms are formed of either 2 bedrooms, 3 bedrooms or 8 bedrooms. The studios all have private kitchen facilities, whilst the cluster rooms share kitchen facilities. The studios and 8 bedroom cluster units all have private en-suites, whilst the 2 bedroom and 3 bedroom cluster units have shared bathrooms.
112. The standard studios are 16.7 square metres in total area and the wheelchair accessible studios are 27 square metres in total area. The cluster bedrooms range in size from 9 sq. m. to 13.2 square metres with shared areas of 8 square metres for the 2 bedroom units, 12.3 square metres for the 3 bedroom units and 41 square metres for the 8 bedroom units. As such, the proposals provide sufficient private and sociable living spaces. The proposed layouts include furnishings to illustrate how beds, dining and seating space could be accommodated within each of the units in a way that would not be cramped or impractical for use.

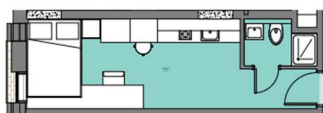


Figure 11 (above): Standard studio unit



Figure 13 (above): Standard 8 bedroom cluster room

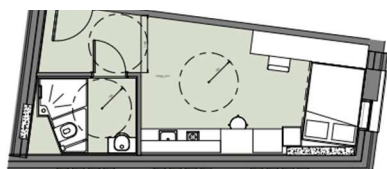


Figure 14 (above): Accessible studio unit

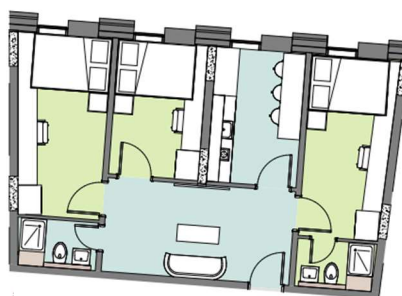


Figure 12 (left bedroom cluster unit

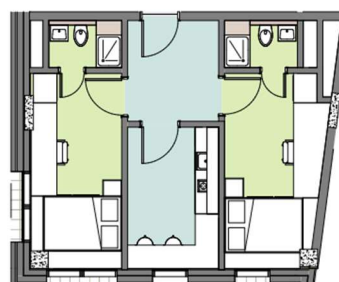


Figure 15 (above): 2 bedroom cluster unit

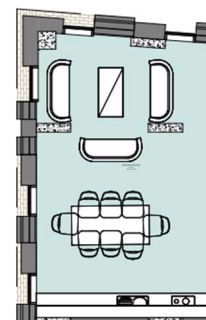


Figure 16 (above, shared space for 8 bed cluster

113. The proposal achieves floor to ceiling heights ranging from 2.550 metres to 2.625 metres, therefore meeting the requirements of Policy P15

“Residential design” of the Southwark Plan 2022 in that they would all exceed 2.5 metres.

Environmental comfort

114. A Noise Assessment accompanies the application, which outlines that the application site is at ‘low risk’ from environmental noise and therefore standard double glazing and openable windows are appropriate at the site. Each student room has an openable window.
115. The environmental protection team are satisfied that an acceptable internal noise level would be secured for the student occupiers, subject to conditions. Appropriate conditions regarding internal noise levels, horizontal sound transmission, vertical sound transmission and plant noise levels have been recommended. Further conditions have been recommended regarding the noise levels from the commercial uses at basement and ground floor levels.

Outlook, sense of openness and privacy

116. Outlook, sense of openness and privacy are all important considerations for student housing proposals. All rooms would benefit from good outlook and levels of privacy with windows on all elevations, except abutting the site boundary to the south. A lightwell area is proposed to the south to provide a further sense of openness and opportunities for outlook.

Daylight

117. As all student rooms have openable windows it is anticipated that appropriate levels to natural daylight and sunlight would be achieved. Similarly, the communal spaces within the building have vertical openable windows.

Wheelchair rooms

118. The proposed development would provide 8 ‘wheelchair accessible’ i.e. fully fitted-out and readily usable by a wheelchair user at the point of completion [M4(3)(2)(b) equivalent].
119. This equates to 5.48% of bedspaces, which meets the minimum requirement of Southwark Plan Policy P5. The wheelchair user accommodation would be secured through the Section 106 Agreement.

Communal facilities

120. In addition to the private and shared spaces within the units themselves, internal communal amenity spaces are proposed. These would be distributed throughout the building to offer a range of different spaces for communal amenity and include:

- 88 square metre social lounge at ground floor
- 34 square metre arts and performance room at first floor
- 41.5 square metre wellness suite at second floor
- 41.5 square metre study rooms at third and fourth floors
- 41.4 square metre bookable room (free to access) / private dining room at fifth floor.

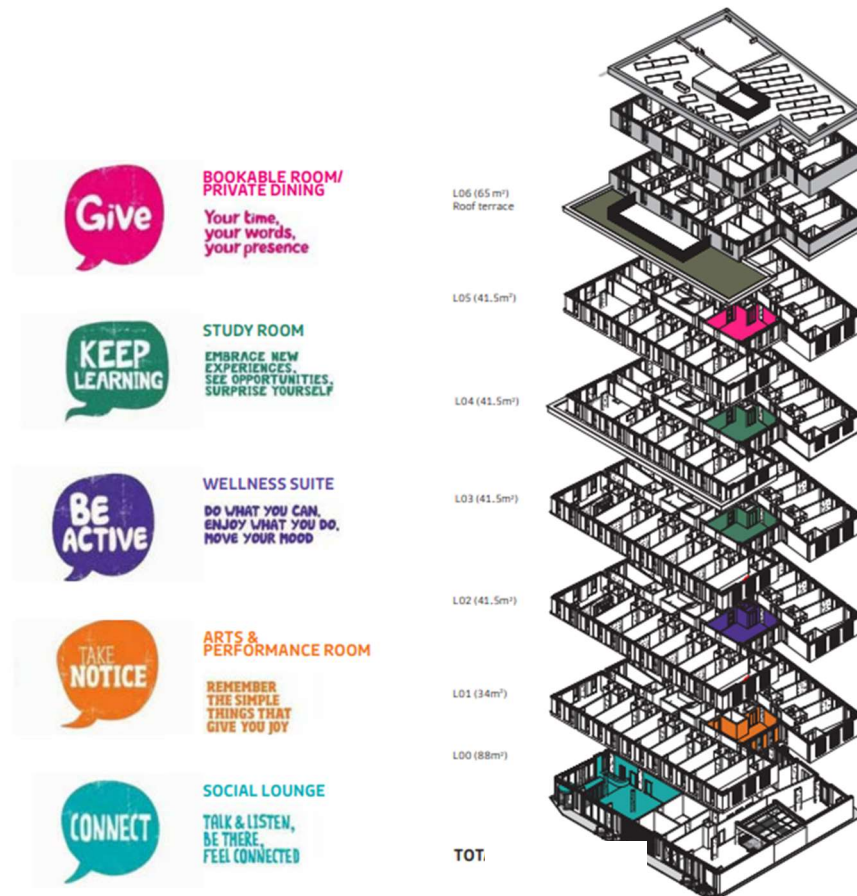


Image 17 (above): Floorplans of the building where communal amenity facilities would be provided.

121. In total, these communal amenity spaces would be 288 square metres, which equates to 1.97 square metres per student. This would provide good internal amenity of different uses for students throughout the building.

Access to outdoor space

122. The proposed development would provide a roof terrace of 65 square metres at sixth floor and would provide outdoor space for future occupiers.

Conclusion on quality of residential accommodation

123. In conclusion, the proposal would achieve high quality living accommodation for students. A range of room sizes and shared facilities is proposed, achieving good internal natural light and outlook. There has been clear consideration of accessibility, and outdoor amenity space would also

be provided. The development would provide good functional living spaces and layout for future student occupiers.

Impact on neighbours

124. The importance of protecting neighbouring amenity is set out in Southwark Plan Policy P56 “Protection of amenity”, which states “development should not be permitted when it causes an unacceptable loss of amenity to present or future occupiers or users”.
The 2015 Technical Update to the Residential Design Standards SPD 2011 expands on policy and sets out guidance for protecting amenity in relation to privacy, daylight and sunlight.

Daylight and sunlight

125. The NPPF sets out guidance with regards to daylight/sunlight impact and states “when considering applications for housing, authorities should take a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site”. London Plan Policy D6 “Housing quality and standards” sets out the policy position regarding this matter and states “the design of development should provide sufficient daylight and sunlight to new and surrounding houses that is appropriate for its context”.
126. The BRE Guidance sets out the rationale for testing the daylight impacts of new development through various tests. The first and most readily adopted test prescribed by the BRE Guidelines is the Vertical Sky Component assessment (VSC). This test considers the potential for daylight by calculating the angle of vertical sky at the centre of each of the windows serving the residential buildings which look towards the site. The target figure for VSC recommended by the BRE is 27%, which is considered to be a good level of daylight and the level recommended for habitable rooms with windows on principal elevations. The BRE have determined that the daylight can be reduced by approximately 20% (0.8) of the original value before the loss is noticeable.
127. The second method is the No Sky Line (NSL) or Daylight Distribution (DD) method, which assesses the proportion of the room where the sky is visible, and plots the change in the No Sky Line between the existing and proposed situation. It advises that if there is a reduction of more than 20% in the area of sky visibility, daylight may be affected.

Properties assessed for daylight impacts

128. This planning application was accompanied by a daylight and sunlight assessment undertaken in accordance with the BRE guidelines. The document assesses the extent to which the proposed development would affect the dwellings in the following buildings:
- 68-82 Amelia Street
 - 52-66 Amelia Street

- 81 Crampton Street
 - 83 Crampton Street
 - 22 Amelia Street
 - 140 Manor Place
 - 188 Crampton Street
 - 1-12 George Elliot Street
129. The above properties were tested for VSC and NSL impacts.
130. Provided below is a map of the residential buildings (in beige) showing their relationship to the application site (in dark grey):



Image 18 (above): Plan of the site with the surrounding existing sensitive residential buildings shown in beige.

VSC and NSL impacts for sensitive surrounding residential properties

131. The below summarises the VSC and NSL (also known as ‘daylight distribution’) impacts to surrounding properties as a result of the proposed development being built-out in the present day context.

68-82 Amelia Street

Property	Number of windows that would experience a VSC reduction (as a percentage of the baseline VSC value)			
	No loss or a loss of up to 19.9%	20%-29.9% (minor adverse impact)	30%-39.9% (moderate adverse impact)	40% + (substantial adverse impact)
68-82 Amelia Street				
Total no. habitable windows tested: 14				
<ul style="list-style-type: none"> Of the 14 windows tested, all windows would comply with BRE guidelines in terms of VSC. 				
Property	No. windows that would experience a reduction in NSL (as a percentage of the baseline NSL value)			
	No loss or a loss of up to 19.9%	20%-29.9% (minor adverse impact)	30%-39.9% (moderate adverse impact)	40% + (substantial adverse impact)
68-82 Amelia Street				
Total no. habitable rooms tested: 8				
Proposed vs existing	8	0	0	0

132. 68-82 Amelia Street is located to the north west of the application site, fronting onto Pullens Gardens. It comprises 4 storey Victorian tenement blocks. 14 windows and 8 habitable rooms have been assessed within 68-62 Amelia Street. All of the windows comply with BRE guidelines in terms of VSC and all of the rooms comply with BRE guidelines in terms of NSL as a result of the proposed development. As such, the occupiers' amenity would not be harmed.

52-66 Amelia Street

Property	Number of windows that would experience a VSC reduction (as a percentage of the baseline VSC value)			
	No loss or a loss of up to 19.9%	20%-29.9% (minor adverse impact)	30%-39.9% (moderate adverse impact)	40% + (substantial adverse impact)
52-66 Amelia Street				
Total no. habitable windows tested: 14				
<ul style="list-style-type: none"> Of the 14 windows tested, all windows would comply with BRE guidelines in terms of VSC. 				
Property	No. windows that would experience a reduction in NSL (as a percentage of the baseline NSL value)			
	No loss or a loss of up to 19.9%	20%-29.9% (minor adverse impact)	30%-39.9% (moderate adverse impact)	40% + (substantial adverse impact)
52-66 Amelia Street				
Total no. habitable rooms tested: 8				
Proposed vs existing	8	0	0	0

133. 52-66 Amelia Street is located to the north west of the application site, fronting onto Pullens Gardens. It comprises 4 storey Victorian tenement blocks. 14 windows and 8 habitable rooms have been assessed within 52-66 Amelia Street. All of the windows comply with BRE guidelines in terms of VSC and all of the rooms comply with BRE guidelines in terms of NSL as a result of the proposed development. As such, the occupiers' amenity would not be harmed.

81 Crampton Street

Property	Number of windows that would experience a VSC reduction (as a percentage of the baseline VSC value)			
	No loss or a loss of up to 19.9%	20%-29.9% (minor adverse impact)	30%-39.9% (moderate adverse impact)	40% + (substantial adverse impact)

81 Crampton Street				
Total no. habitable windows tested: 12				
<ul style="list-style-type: none"> • Of the 12 windows tested, 10 would comply with BRE guidelines in terms of VSC. • For the <u>2</u> that would not, the distribution of percentage reductions is: 				
Proposed vs existing	10	2	0	0
Property	No. windows that would experience a reduction in NSL (as a percentage of the baseline NSL value)			
	No loss or a loss of up to 19.9%	20%-29.9% (minor adverse impact)	30%-39.9% (moderate adverse impact)	40% + (substantial adverse impact)
81 Crampton Street				
Total no. habitable rooms tested: 11				
Proposed vs existing	11	0	0	0

134. 81 Crampton Street is located to the north of the application site, across Amelia Street and comprises a five storey residential block. 12 windows and 11 habitable rooms have been assessed within 81 Crampton Street. The results find that all windows, with the exception of 2 windows comply with BRE guidelines. These are two windows at first floor.

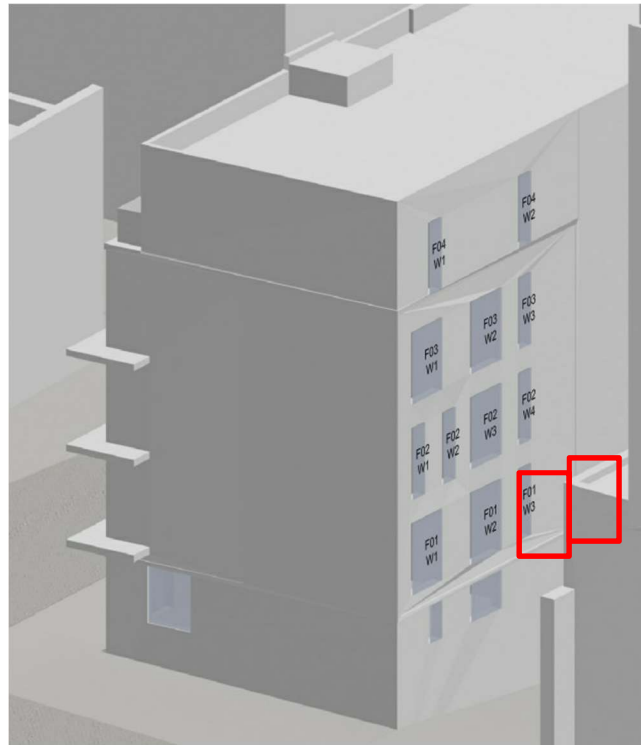


Image 19 (above): Model showing the two affected windows in terms of VSC in red

135. The 2 windows that fail to meet BRE guidelines would experience VSCs at 0.77 and 0.79 of their current value which are not significantly beyond BRE guidelines of 0.8 whereby there would not be a significant adverse impact on levels received.
136. Furthermore, these rooms, as with all other rooms within the building, would comply with BRE guidelines in terms of NSL.

83 Crampton Street

Property	Number of windows that would experience a VSC reduction (as a percentage of the baseline VSC value)			
	No loss or a loss of up to 19.9%	20%-29.9% (minor adverse impact)	30%-39.9% (moderate adverse impact)	40% + (substantial adverse impact)
83 Crampton Street				
Total no. habitable windows tested: 20				
<ul style="list-style-type: none"> • Of the 20 windows tested, 18 would comply with BRE guidelines in terms of VSC. • For the <u>2</u> that would not, the distribution of percentage reductions is: 				

Proposed vs existing	18	0	2	0
Property	No. windows that would experience a reduction in NSL (as a percentage of the baseline NSL value)			
	No loss or a loss of up to 19.9%	20%-29.9% (minor adverse impact)	30%-39.9% (moderate adverse impact)	40% + (substantial adverse impact)
83 Crampton Street				
Total no. habitable rooms tested: 19				
Proposed vs existing	16	0	2	1

137. 83 Crampton Street is located to the north of the application site, also adjacent to the railway line, and comprises a 7 storey block with double-height commercial uses at ground floor and residential dwellings above. 20 windows and 19 habitable rooms have been assessed within 83 Crampton Street. The results find that 18 windows comply with BRE guidelines in terms of VSC and 16 habitable rooms comply with BRE guidelines in terms of NSL.



Image 20 (above): Model showing the affected windows in terms of VSC in red and affected windows in terms of NSL in blue

138. The 2 windows that fail to meet BRE guidelines in terms of VSC would result in VSC values at 0.63 and 0.64 of their former value. Notwithstanding this, the VSC values of the windows would be 24.1% and 24.5% which are not significantly below BRE guidelines of 27%. This is because the windows in the existing setting both have high VSC values of 38.3%. Both of these windows serve rooms which would not comply with BRE guidelines in terms of NSL with VSC values at 0.62 and 0.48 of their former value. It is assumed that these rooms are bedrooms and are therefore less sensitive to reductions in daylight than living rooms. One further room fails to meet BRE guidelines in terms of NSL at 0.6 of the former NSL value. The remaining 18 windows and 16 associated habitable rooms do comply with BRE guidelines in that there would not be a significant adverse impact. Given that the VSC values of the affected windows would be above 24%, which can be considered appropriate for such location, on balance it is considered that the impacts would not be significantly harmful.

22 Amelia Street

Property	Number of windows that would experience a VSC reduction (as a percentage of the baseline VSC value)			
	No loss or a loss of up to 19.9%	20%-29.9% (minor adverse impact)	30%-39.9% (moderate adverse impact)	40% + (substantial adverse impact)
22 Amelia Street				
Total no. habitable windows tested: 51				
Proposed vs existing	48	3	0	0
Property	No. windows that would experience a reduction in NSL (as a percentage of the baseline NSL value)			
	No loss or a loss of up to 19.9%	20%-29.9% (minor adverse impact)	30%-39.9% (moderate adverse impact)	40% + (substantial adverse impact)
22 Amelia Street				
Total no. habitable rooms tested: 34				
Proposed vs existing	34	0	0	0

139. 22 Amelia street is to the north east of the application site, beyond the railway line and across Robert Dashwood Way. It comprises a 10-storey building with double-height commercial uses at ground floor and the final two storeys being set back. 51 windows and 34 habitable rooms have been assessed within 22 Amelia Street. The results find that 48 windows would comply with BRE guidelines in terms of VSC and all rooms would comply with BRE guidelines in terms of NSL.

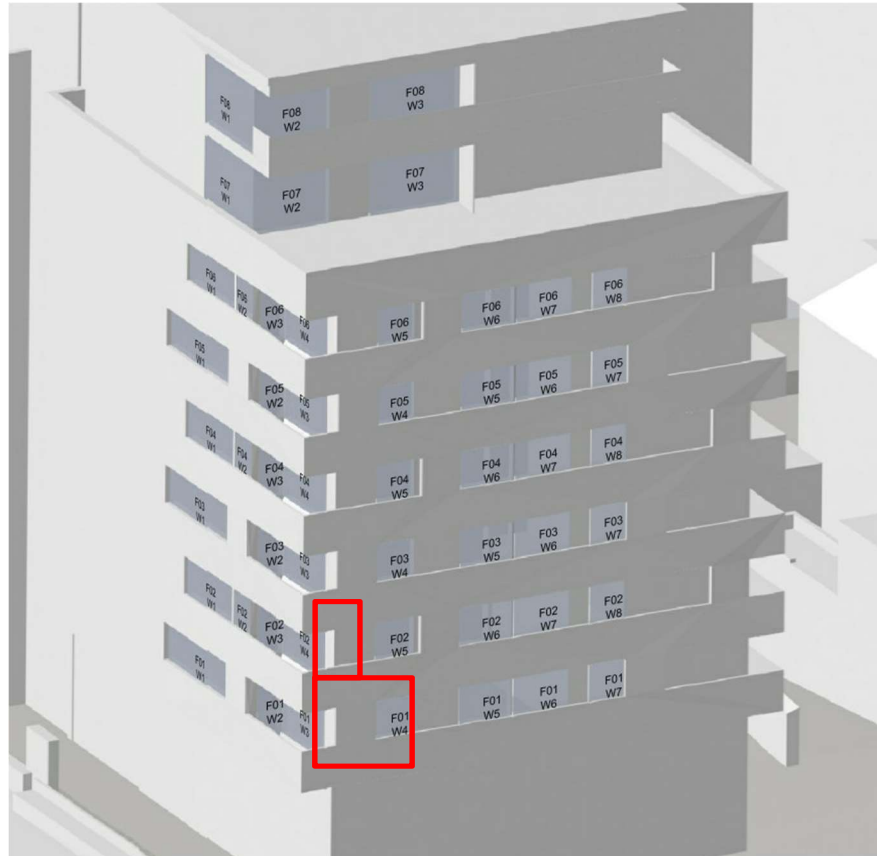


Image 21 (above): Model showing the affected windows in terms of VSC in red

140. The windows that fail to meet BRE guidelines in terms of VSC are 2 windows at first floor and one window at second floor. These windows would be at 0.75, 0.74 and 0.79 of their former VSC value as a result of the proposed development which are marginally below BRE guidance of 0.8 not resulting in an adverse impact on levels received. Furthermore, all of the rooms would comply with BRE guidelines in terms of NSL.

140 Manor Place

Property	Number of windows that would experience a VSC reduction (as a percentage of the baseline VSC value)			
	No loss or a loss of up to 19.9%	20%-29.9% (minor adverse)	30%-39.9% (moderate adverse)	40% + (substantial adverse impact)

		impact)	impact)	
140 Manor Place				
Total no. habitable windows tested: 18				
<ul style="list-style-type: none"> Of the 18 windows tested, all windows would comply with BRE guidelines in terms of VSC. 				
Property	No. windows that would experience a reduction in NSL (as a percentage of the baseline NSL value)			
	No loss or a loss of up to 19.9%	20%-29.9% (minor adverse impact)	30%-39.9% (moderate adverse impact)	40% + (substantial adverse impact)
140 Manor Place				
Total no. habitable rooms tested: 12				
Proposed vs existing	12	0	0	0

141. 140 Manor Place is located to the south west of the application site and comprises three storey residential dwellings. 18 windows and 12 habitable rooms have been assessed within 140 Manor Place. All of the windows comply with BRE guidelines in terms of VSC and all of the rooms comply with BRE guidelines in terms of NSL as a result of the proposed development. As such, the occupiers' amenity would not be harmed.

188 Crampton Street

Property	Number of windows that would experience a VSC reduction (as a percentage of the baseline VSC value)			
	No loss or a loss of up to 19.9%	20%-29.9% (minor adverse impact)	30%-39.9% (moderate adverse impact)	40% + (substantial adverse impact)
188 Crampton Street				
Total no. habitable windows tested: 5				
<ul style="list-style-type: none"> Of the five windows tested, all windows would comply with BRE guidelines in terms of VSC. 				
Property	No. windows that would experience a reduction in NSL (as a percentage of the baseline NSL			

	value)			
	No loss or a loss of up to 19.9%	20%-29.9% (minor adverse impact)	30%-39.9% (moderate adverse impact)	40% + (substantial adverse impact)
188 Crampton Street				
Total no. habitable rooms tested: 5				
Proposed vs existing	5	0	0	0

142. 188 Crampton Street is located to the west of the application site, to the south of Pullens Gardens, and comprises a 3 storey residential block attached to 1-12 George Elliot House. 5 windows and 5 habitable rooms have been assessed within 188 Crampton Street. All of the windows comply with BRE guidelines in terms of VSC and all of the rooms comply with BRE guidelines in terms of NSL as a result of the proposed development. As such, the occupiers' amenity would not be harmed.

1-12 George Elliot House

Property	Number of windows that would experience a VSC reduction (as a percentage of the baseline VSC value)			
	No loss or a loss of up to 19.9%	20%-29.9% (minor adverse impact)	30%-39.9% (moderate adverse impact)	40% + (substantial adverse impact)
1-12 George Elliott House				
Total no. habitable windows tested: 33				
<ul style="list-style-type: none"> Of the 33 windows tested, 18 windows would comply with BRE guidelines in terms of VSC. For the <u>15</u> that would not, the distribution of percentage reductions is: 				
Proposed vs existing	18	10	4	1
Property	No. windows that would experience a reduction in NSL (as a percentage of the baseline NSL value)			
	No loss or	20%-29.9%	30%-39.9%	40% +

	a loss of up to 19.9%	(minor adverse impact)	(moderate adverse impact)	(substantial adverse impact)
1-12 George Elliot House				
Total no. habitable rooms tested: 19				
Proposed vs existing	17	2	0	0

143. 1-12 George Elliot House is located to the west of the application site, to the south of Pullens Gardens, and comprises a 3 storey residential block. It has frontages on Crampton Street and Pullens Gardens. 33 windows and 19 habitable rooms have been assessed. The results find that 14 windows fail to meet BRE guidelines in terms of VSC as a result of the proposed development and 2 rooms fail in terms of NSL.

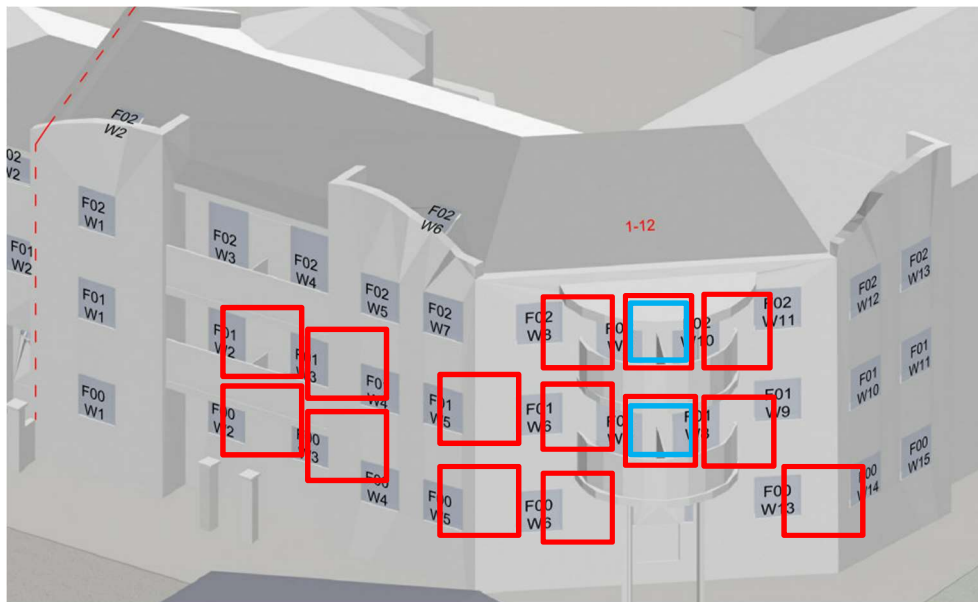


Image 22 (above): Model showing the affected windows in terms of VSC in red and affected windows in terms of NSL in blue

144. The 14 windows that fail to meet BRE guidance would experience VSC values at 0.61 to 0.79 of their former values which are reductions which would be noticeable for the occupiers. The majority of rooms served by these windows comply with BRE guidance in terms of NSL, given that there are additional windows serving the rooms, meaning the daylight levels received would not cause any significant adverse impacts. Only 2 rooms which are served by windows that fail to meet BRE guidance on VSC also fail to meet BRE guidance on NSL. Both of the rooms would have VSC values at 0.77 of their former value which is not significantly beyond BRE guidance of 0.8 where the guidance says there would not be a noticeable reduction. It is acknowledged that the losses are generally due to the design of 1-12 George Elliott House itself with substantial balconies and

overhangs.

Sunlight

145. The applicant's daylight and sunlight report has assessed the impact of the proposed development on the sunlight received at all windows facing within 90 degrees of due south. The BRE guidance states that nearby windows must be assessed using the three-stage process set out below to determine if, as a result of the development, the sunlight levels would reduce to an extent that the room may feel colder and less pleasant.
146. The first stage is to determine if the window would experience:
- a reduction in sunlight to less than 25% Annual Probable Sunlight Hours (APSH) or
 - a reduction in sunlight to less than 5% Winter Probable Sunlight Hours (WPSH) or
 - both of the above.
147. If one of the above criteria is triggered, the next stage is to determine if:
- The window's resulting APSH is less than 0.8 times its former value; or
 - The window's resulting WPSH is less than 0.8 times its former value; or
 - Both of the above.
148. Where one of the criteria in Stage 2 is met, the final stage is to determine if the overall loss of sunlight across the whole year would reduce by more than 4% of APSH.
149. Five of the properties assessed for daylight impacts have also been assessed for sunlight impacts. The table below summarises these:

Property	No. windows that would experience a reduction in sunlight hours			
	No. of windows tested	No. of windows that pass	No. of windows that fail winter	No. of windows that fail annual
68-82 Amelia Street				
Proposed vs existing	8	8	0	0
52-66 Amelia Street				
Proposed vs existing	8	8	0	0

83 Crampton Street				
Proposed vs existing	19	17	2	1
22 Amelia Street				
Proposed vs existing	34	34	0	0
140 Manor Place				
Proposed vs existing	15	15	0	0

150. The results show that 97% of the 5 neighbouring properties comply with BRE guidance in terms of annual and winter APSH.
151. At 83 Crampton Street, there are two windows at first floor which would experience a reduction in APSH in excess of the BRE guidance with one window experiencing a loss both in terms of annual and winter hours. These are windows which already receive low levels of sunlight as measured by APSH in the existing environment and are assumed to be bedrooms. While acknowledging that there would be an appreciable change to APSH for the occupiers, on balance the impacts would not be harmful to residential amenity given that the impacts are only to two windows. One of the windows would not experience a noticeable impact in terms of WSPH.

Conclusion on daylight and sunlight

152. In total, the development would result in 15 minor, 6 moderate and 1 substantial adverse reduction in VSC for surrounding properties. With respect to NSL, there would be a total of 2 minor, 2 moderate and 1 substantial reduction for surrounding properties. These exceedances of the BRE guidance, and the negative impact they would have on neighbour amenity, should be given some weight in determining the application.
153. However, when interpreting the daylight losses, regard must be had to the underdeveloped nature of the site, as well as its location within a comparatively more densely-developed environment. Some of the most impacted properties have design features that significantly limit the existing internal light levels, as a result of which any meaningful development on neighbouring land would generate sizeable percentage losses. The majority of reductions are not significantly beyond BRE guidance.
154. Sunlight exceedances would be experienced by 2 windows within 83 Crampton Street. All of these windows face south in the direction of the application site. As such, they are reliant on the openness and low density existing development on the land to achieve these baseline APSH levels.

In turn, this makes the windows more susceptible to change.

155. Given the location within the CAZ and Elephant and Castle Opportunity Area, where more intensive development is expected and where the BRE guidelines should be applied flexibly following the design-led approach to density promoted by the London Plan, the impacts are on balance acceptable. As noted above, the BRE guidelines are not mandatory and the advice within the guide should not be seen as an instrument of planning policy. Some of the impacts would go beyond the recommended guidelines but these are not of such significance that it would warrant a reason for refusal of an otherwise acceptable development.

Overshadowing

156. No private external amenity areas have been identified that would be significantly overshadowed by the proposed development.

Privacy

157. Some representations from members of the public have objected to the proposal on the grounds that it would infringe on the privacy of surrounding existing properties.
158. With regard specifically to preventing harmful overlooking of dwellings, the 2015 Technical Update to the Residential Design Standards SPD 2011 requires developments to achieve:
- A distance of 12 metres between windows on a highway-fronting elevation and those opposite at existing buildings; and
 - A distance of 21 metres between windows on a rear elevation and those opposite at existing buildings.
159. The plan below shows the façade-to-façade distances between the proposed development and the surrounding existing buildings:

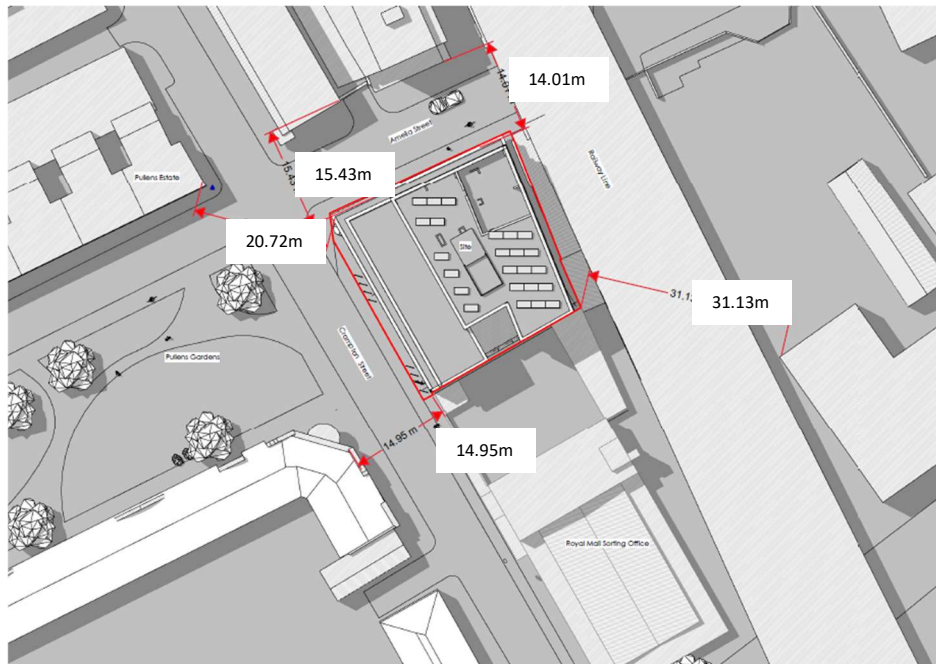


Image 23 (above): Plan of the proposal in context, showing the separation distances to the surrounding buildings

160. All the ‘across street’ distances between the development and habitable residential rooms opposite would exceed 12 metres. The closest distances between the proposed development and neighbouring residential buildings are 14 metres (to 83 Crampton Street) and 15.4 metres (to 81 Crampton Street). As the 12 metre ‘across street’ guideline of the Residential Design Standards would be achieved, no privacy infringement issues are raised.

Outlook and sense of enclosure

161. The site is within the Major Town Centre, which is characterised by a dense urban grain including a number of existing and consented tall buildings. Although the townscape to west of the site is lower-rise with more sparsely laid out buildings, forming the Pullens Gardens Conservation Area, the site being adjacent to the railway line clearly forms part of the more high-rise urban environment. The proposal would be of high quality materials and similar in height and scale to neighbouring properties. It is not considered that any of the surrounding dwellings that look towards the site would experience a harmfully diminished quality of outlook or sense of openness as a result of the proposed development.

Management and maintenance of the student housing

162. The council’s 2015 technical update to the residential design standards 2011 requires student housing proposal to be accompanied by details of the long-term management and maintenance arrangements of the student accommodation, including details of security. This is in the interests of ensuring that, once operational, the development:

- Does not generate adverse neighbour amenity or local environmental impacts;
 - Is managed and maintained to ensure the continued quality of the accommodation, communal facilities and services; and
 - Will positively integrate into the surrounding communities.
163. A management plan has been submitted in support of the planning application, which sets out how the proposed development will be managed and maintained. With regard to the management of the scheme, the plan is a framework setting out the following provisions:

Management team:

- on site management, maintenance and housekeeping will be provided
- students will have access to the management team 24 hours a day
- the welcome point provides visible staff presence
- external areas will be kept clean, tidy and landscaped.

Waste and recycling management:

- collections will take place from the rear service road
- a dedicated cleaning team would be active and a full preventative pest control regime will be installed.

Access:

- no vehicular parking or access will be allowed to or around the site – car parking enforcement will take place
- students will be asked to keep noise to a minimum when entering and existing the building and this will be set out in the tenancy agreement.

Security:

- 24 hour CCTV and a secure door entry system will be provided
- out of hours emergency management will be available.

Open days / intake days:

- measures are proposed to ensure a smooth transition of visitors and students including: additional staff to manage visitors, providing specific time slots for arrival and check-in and timeframes of unloading.

Neighbourhood and community:

- the management team will actively seek to engage with local tenants and residents associations and community organisations, including monthly meetings to discuss and address any concerns
- academic institutions will also be invited.

164. A final Student Management Plan is to be secured via Section 106 agreement.

Noise and vibration

Plant noise

165. Plant rooms would be located at ground and seventh floors.
166. A condition has been recommended requiring the plant not to exceed the background sound level (LA90 15min) at the nearest noise sensitive premises, and for the specific plant sound level to be 10 dB(A) or more below the representative background sound level in that location, all to be calculated fully in accordance with the relevant Building Standard. The condition is sufficient to ensure that the proposed plant will not have an unacceptably adverse impact on existing neighbouring residents or the users of the building.

Public noise nuisance

167. In terms of public noise nuisance from the development for surrounding residents, an initial student management plan has been submitted with the application which details how the probable provider so as to limit sources of human noise disturbance to neighbours. A condition has been recommended for a detailed management plan to be submitted prior to occupation.
168. The proposal includes a roof terrace at sixth floor which is set back from the building edge. To ensure that there would not be an adverse noise impact to neighbours as a result, a condition has been recommended that the roof terrace shall not be used, other than for means of escape, between the hours of 22:00 and 07:00.
169. The proposal includes commercial floorspace at basement and ground floors. A condition has been recommended restricting the use of the Use Class E premises to only between 07:00 and 23:00 on any day. Servicing shall also be restricted to Monday to Saturday 08:00 to 20:00 and Sundays 10:00 – 15:00.

Vibration

170. A vibration assessment has been submitted identifying that the levels recorded do not require mitigation. A condition has been recommended for the development to be designed to ensure that habitable rooms in the student accommodation are not exposed to vibration dose values in excess of 0.13 m/s during the hours of 23:00 to 07:00.

Odour

171. The application is not accompanied by any extraction details, however a flexible Class E use is proposed at basement at ground floors. A condition has been recommended to restrict restaurant and café uses [Use Class E (b)] from the site to ensure that there are no odour or ventilation impacts.

Design

172. Paragraph 56 of the NPPF stresses the importance of good design, considering it to be a key aspect of sustainable development. Chapter 12 of the NPPF “Achieving Well Designed Places” is the key national policy for design. In particular para 134 requires development to reflect local and national design policies, guidance and SPDs. It sets out that outstanding or innovative design should be given significant weight in decision making, and requires development that is not well designed to be refused.
173. Chapter 3 of the London Plan deals with design related matters. Policy D3 “Optimising site capacity through design-led approach” promotes a design-led approach to making the best use of land. Policies D4 “Delivering good design” and D8 “Public realm” build on this, setting out the design principles for ensuring new development makes a positive contribution in terms of architecture, public realm, streetscape and cityscape. Policy HC1 advises that development affecting heritage assets and their settings should conserve their significance by being sympathetic in their form, scale, materials and architectural detail.
174. The importance of good design is further reinforced by Policies P13 “Design of Places” and P14 “Design Quality” of the Southwark Plan. These policies require all new developments to:
- Be of appropriate height, scale and mass
 - Respond to and enhance local distinctiveness and architectural character
 - Conserve and enhance the significance of the local historic environment
 - Take account of and improve existing patterns of development and movement, permeability and street widths
 - Ensure that buildings, public spaces and routes are positioned according to their function, importance and use
 - Improve opportunities for sustainable modes of travel by enhancing connections, routes and green infrastructure and
 - Be attractive, safe and fully accessible and inclusive for all.

Demolition

175. The application site is to the west of the Walworth Road, immediately beyond the railway viaduct, occupying the corner plot at the junction of Amelia Street with Crampton Street. It is presently occupied by a two storey industrial-style ‘shed’, comprising brickwork and ribbed metal-cladding with a slack-pitched metal roof. The building is aligned with Amelia Street, but is sat back behind a large parking apron, broadly covering two-thirds of the plot. The site is enclosed by a tall palisade fence. The site layout and architecture are typical of the late 1980s, providing low-cost accommodation for office/ workshop/ distribution activities. The building is of no architectural merit or townscape merit, and is therefore not considered a non-designated heritage asset. The demolition and replacement with a

building of improved architectural and urban design quality is therefore supported.

Layout

176. The proposed development includes a replacement single building with a larger footprint, infilling the parking apron, albeit the new building does not cover the full plot. The new footprint extends northwards, infilling the parking apron and bringing the building forward onto Amelia Street, where it sits close to the back edge of the pavement, extending the pavement to 2.2m. This generally aligns with the abutment of the railway bridge crossing the street, maintaining a clear sight line along this section of street, as well as broadly aligning with the public park's northern boundary, opposite.
177. The replacement building is set on much the same line as the existing building onto Crampton Street, positioned some 1.6m behind the back edge of the pavement. This maintains its alignment with the neighbouring post office depot building to the south and Flamingo Court to the north, providing a consistent building edge to the wider street scene. The removal of the existing boundary fence allows the 1.6m apron strip to be used as additional public realm, which presently has a modest footway of 1.9m.
178. At the rear, the new building is pulled slightly inwards to provide a consistent 1.9m gap to its boundary with the railway viaduct, providing sufficient space for a rear passageway and servicing route. This contributes to the Low Line route in the future if linked to the redevelopment of the adjacent post office site, as previously consented. The replacement building abuts the existing substation and boundary wall with the post office site, retaining the current arrangement.
179. The layout activates both main frontages with student accommodation and commercial uses, with the student entrance and reception/ lounge positioned around the building's prominent corner on the junction of Crampton/ Amelia Street, flanked by the commercial activities on each side. The commercial units run through to the rear of the building to animate the railway viaduct in accordance with the aims of the Low Line.
180. Overall, the positioning and layout of the building are welcome, reflecting the general building alignments within the adjoining streets and providing good activation and informal surveillance of the existing and new public realm, including the potential Low-line route to the rear.

Scale, height and massing

181. The massing of the development is relatively straight-forward presenting a broadly cuboid form towards the adjacent streets and railway line. The volume is cut into along part of its eastern flank to create a lightwell that opens towards the adjoining post office site. The lightwell rises above ground floor, providing daylight into a commercial unit at ground floor and to its internal stairwell that runs to basement level.

182. The volume is further articulated by horizontal setbacks that initially step the building back on its north and west elevations over 4th and 5th floor levels, and again on the west elevation over 6th and 7th floor levels. The setbacks create a distinct shoulder line to the building above the 3rd floor when viewed within Crampton Street and Amelia Street, and then look to diminish the visual impact of the upper most storeys when viewed from Pullens Gardens.
183. Regarding the overall height, at 25.7m, including the lift overrun, the building falls well below the threshold of 30m for a tall building, although compared to the more domestic scale to its west, it is nonetheless a notably taller building. At eight storeys it is similar in height to recent developments that immediately align both sides of the railway viaduct, including the neighbouring rear block of Flamingo Court (22.6m). It would also reflect the approved maximum height of the neighbouring post office depot redevelopment, although the planning permission has not been implemented.
184. Importantly, the setbacks sufficiently push the tallest volume of the proposed built form to the rear of the site, diminishing its visual impact when seen along Crampton Street and from within Pullens Gardens. The 6th and 7th floors will be evident in more immediate views in Amelia Street, including at its junction with Crampton Street, although in this instance its impact is localised by the railway viaduct and is seen amongst the other taller buildings adjacent to the viaduct, including Flamingo Court and Robert Dashwood Way.
185. A key feature of the massing is the proposed shoulder height of four storeys (ground and three upper floors), which is sufficiently well defined by the 1.5m setback at 4th and 5th floor levels. This height broadly aligns with the shoulder height of Flamingo Court's front block, which is part four and part five storeys onto Crampton Street, and with the parapet line of the Victorian tenement buildings that face onto Pullens Gardens. This, together with the proposed building line, would bring a consistent scale to this section of Crampton Street and partly on the return into Amelia Street.
186. The proposed shoulder height of four storeys (ground and three upper floors), which is sufficiently well defined by the 1.5m setback at 4th and 5th floor levels. At 13.2m above grade, this height broadly aligns with the shoulder height of Flamingo Court's front block, which is part four/ five storeys (12m/ 15m) onto Crampton Street, and with the parapet line of the Victorian tenement buildings that face onto Pullens Gardens (north side). This, together with the proposed building line, would bring a consistent scale to this section of Crampton Street and partly on the return into Amelia Street.
187. The upper floors of the proposed building would be visible although the articulated massing and the provision of parapet upstands would help ease the visual impacts to a sufficient extent. As stated above, the 4th and 5th floors would be set back together by 1.5m behind the building's street facade and would be partly obscured by the parapet upstand above the 3rd

floor. As such, this upper volume would appear sufficiently recessive and secondary to the main volume. Above this, the massing would step back again over the 6th and 7th floor levels, with the uppermost volume recessed 9m behind the front façade line. The deep setback, combined with the parapet upstand and perimeter planting would combine to obscure the 6th floor in nearby and middle distance views when seen from within Pullens Gardens, only becoming marginally visible in the longer distance view from Penton Place at the park's western end. The 7th floor would be more obvious when seen in middle and long distance views, but would read as distinctly recessive. The material treatment of the two uppermost floors would further lessen the visual impact, allowing the uppermost volume to read as a lightweight top to the building. However, the uppermost volume would be much more evident onto Amelia Street, where the 6th and 7th floors are brought forward onto the same façade line as the 4th and 5th floors below and therefore positioned .5m rearward of the building's shoulder. In these immediate views, the massing is moderately bulky, but the switch in material treatment would allow the uppermost volume to read more as a distinctive penthouse element, reducing its impact.

188. Overall, the new building is large, but is sufficiently well articulated not to appear especially bulky or overbearing and should sit reasonably comfortably within the context of the nearby low-rise Victorian and modern residential estates to the west and that of the railway viaduct and taller modern blocks to the east.

Architecture

189. The elevational designs are for a robust brickwork building including a punched-hole aesthetic to the main body of the building with a more open curtain walling finish to the ground floor for greater transparency and visual engagement at street level. The facades are designed to work with the proposed massing and bring a sense of base, middle and top to the building, with the setback 6th and 7th floors finished in a contrasting metalwork cladding, suggesting more of a penthouse roof addition.
190. The ground floor features large openings framed by brickwork piers that bring the building down to grade. The openings provide wide glazed entrances and frontages to the student reception area and communal lounge and to the commercial units, which will animate the building frontages onto Crampton Street and Amelia Street. The student entrance includes a revolving door onto Crampton Street and a separate passing door onto Amelia Street.
191. A condition has been recommended for details of the appearance of the brickwork piers and curtain wall glazing to be submitted to ensure a high design quality. A further condition has been recommended requiring the submission of a signage strategy for the student accommodation and commercial units, promoting the incorporation of appropriately discreet signs within the glazed shopfronts, rather than cluttering the outer brickwork frame.

192. On the upper floors, the brickwork is articulated with a regular grid of large punched-hole openings with a vertical bias. Each opening is partly infilled to one side by a recessed textured brick panel, with a tall window remaining. The outer framework of piers organise the gridded openings into a series of bays that are three windows wide, which brings a calm, ordered appearance to the facades and a rhythm to the street frontages that suggests a finer plot width to the development. This visual ordering draws on the façade treatment of the Pullens Estate, which similarly groups its windows and doors into threes. The outcome is a well-proportioned and engaging façade design. A condition has been recommended requiring details of reveals, headers, cills and the textured brickwork to be submitted. Much the same elevational treatment is carried through to the setback 4th and 5th floors, although the design for recessed infill panels is simplified to a simple brickwork finish rather than textured. Though plainer in appearance, the design works well to bring a modest contrast and visual hierarchy within the elevations, and as such is welcome.
193. The building is constructed with a reinforced concrete frame with an outer leaf of full brickwork. The brickwork itself is illustrated as a yellow multi-stock in an English garden bond, although the material palette refers to handmade clay buff brick and a stretcher bond. The proposed use of brick is welcome, however a condition has been recommended for details to be submitted to ensure an attractive, contextual finish.
194. The parapet finishes are similarly simple in appearance, with a contrasting metal capping to the parapet walls, although the finish would benefit from a review to bring more visual interest or weight to the design. A condition has been recommended for details of the parapet and the treatment of the window infills on the south flank of the building where they overlook the adjacent post office site, which are unclear in the submission.
195. The uppermost floors are finished in metal-cladding with a standing-seam finish with large punched-hole openings, using ppc-coated aluminium or steel. The openings are ordered and vertically proportioned, generally reflecting the student rooms below, with the designs bringing a lightweight, penthouse character to the architecture that works well as a conclusion to the building. Again, details are to be secured by condition. Its appearance is further softened by the tall perimeter planting that obscures the setback roof terrace. The lift overrun is minimal and positioned not to be seen, as are the low-lying rooftop pv panels, which is welcome. A condition has been recommended for detailed plans of the roof finish to be submitted in order to ensure that any cluttering of the roof profile when seen from the public realm is avoided.
196. In terms of functional quality, the architecture is of a sufficiently high standard. The ground and basement floors feature tall ceiling heights of 3.7m which should provide a high standard of accommodation for the commercial uses, whilst the student rooms on the upper floors have ceiling heights of 2.6m.

Heritage impacts

197. The application site does not contain a listed building or structure and is not within a conservation area. The nearest statutory listed building is the Grade II former late Victorian bathhouse/ later Council depot facility in Manor Street, located some 90m to the south. The other significant heritage asset is the Pullens Estate Conservation Area, which sits to the immediate west and northwest of the site and is based around the surviving streets of late Victorian tenement buildings and workshops. The conservation area includes Pullens Gardens, immediately opposite the site, which was set out following the earlier clearance of part of the estate. The surviving properties are also classified as locally listed buildings.
198. In terms of the heritage impacts, there is a degree of inter-visibility between the listed Manor Street complex and the development site, with the Grade II listed buildings closing the vista along Crampton Street. The building complex is notable for its mix of Arts and Crafts and Flemish architecture and in this street view for its engaging silhouette, with its chimney, clock tower and roof lantern. The development scheme would maintain the current building's position onto Crampton Street, although at a greater scale. At four main storeys the new development would present a comfortable shoulder height onto Crampton Street that would frame the streetscene, with the vista of the listed building and its engaging roofline unaffected. Its ordered elevations and buff brickwork would not appear unduly eye-catching or disruptive in the foreground. The development's upper floors would be visible, but would be sufficiently recessed not to unduly impinge on the view. As such, the setting of the listed building would be preserved.
199. The development would be more evident in the setting of the adjacent Pullens Estate and the settings of the local listed tenement buildings within Amelia Street and Crampton Street. However, as set out earlier, its height and massing is reasonably well articulated, easing its townscape fit and helps to bring a coherent form to the adjacent streets and frame Pullen Gardens. The four-storey shoulder height responds to the parapet heights of the tenement buildings, whilst the elevational designs echo the rhythm of bays and material palette of the late Victorian architecture.
200. The significance of the conservation area is the special architectural and historic interest of the Pullens Estate as a good example of late Victorian speculative development that combines tenement housing and industrial workshops, and targeted housing for the working classes for commercial reasons rather than philanthropic. A significant part of the estate survives, with its distinctive character and appearance of four storey terraced tenement blocks and two storey mews-style workshops, laid out in a series of coherent residential streets and industrial yards, with shops at yard entrances. The architecture is a blend of utilitarian design and modest decoration, using moulded brickwork and terracotta, which gives the estate a strong, overall consistency.

201. Its significance as a conservation area draws little from its surrounding mainly post-war setting, beyond its relatively moderate scale and benign appearance. Whilst no specific vistas are identified within the appraisal, the general townscape formed within the estate and along its edges are important. The development would not be visible from within Iliffe Yard, but would be seen along Crampton Street and Amelia Street. As stated earlier, along Crampton Street, the development would be seen opposite the park, helping to frame the central space. The upper floors would be glimpsed, but would be sufficiently set back not to unduly impact on the townscape view or setting of the estate. Looking east along Amelia Street, the new building would be visible in the backdrop to the park (albeit partly screened by its tree cover) and flanking onto Amelia Street, diagonally opposite the tenement buildings. Nonetheless, its four storey shoulder height would be glimpsed relating to the parapet height of the tenement buildings, whilst its restrained design would appear sufficiently polite within the townscape. Overall, the development would preserve the settings of the Pullens Gardens Conservation Area and the tenement buildings as Non Designated Heritage Assets.

Designing-out crime

202. Policy D11 “Safety, security and resilience to emergency” of the London Plan and Policy P16 of the Southwark Plan require development proposals to reduce opportunities for crime and create and maintain safe internal and external environments.
203. The Metropolitan Police's Secure by Design (SBD) Officer has assessed the proposal and notes that it is suitable to achieve SBD certification. To ensure certification is ultimately achieved, the imposition of a two-part ‘Secured by Design’ condition is recommended.

Conclusion on design

204. The proposals are for the redevelopment of an underutilised site on the edge of the Pullens Estate conservation area, west of the railway viaduct and the Walworth Road, and is for replacement commercial offices and new student housing. The current building is a 1980s low-grade industrial workshop and is of no particular design merit. Its demolition is not resisted. The replacement building is relatively large, compared to the more domestic context to the west, but is of similar height to other recently built or consented mixed-use schemes built that run along both sides of the railway viaduct. Its massing is not too bulky and is sufficiently well articulated, presenting a comfortable shoulder height towards the Pullen Estate and the small public park.
205. The new building maintains the current building line onto Crampton Street as the main road and, whilst slightly tight onto Amelia Street, aligns with the viaduct’s pedestrian underpass. It also makes adequate allowance for the extension of the Low-line project at its rear. Its ground floor layout provides good activation and animation of its frontages, ensuring good urban design.

206. The elevational language is contemporary, but is calm and well ordered; of a sufficiently high quality; and is sufficiently sympathetic to the adjacent historic context. The building's scale and architecture does not unduly impose on the vista along Crampton Street of the Grade II listed former washhouse complex in Manor Place or alter its setting and, although more evident in local views within the Pullen Estate conservation area, remains sufficiently neutral within its setting, preserving its character and appearance. Subject to conditions ensuring the scheme's detailed design and material quality, no objection is raised on design grounds.

Landscaping and trees

207. London Plan Policy G7 "Trees and woodlands" and Southwark Plan Policy P61 recognise the importance of retaining and planting new trees wherever possible within new developments. London Plan Policy G5 "Urban greening" requires major development proposals to contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage.

Landscaping

208. Soft landscaping is proposed in the form of an intensive green roof and box planting. The site is currently bound by a tall metal palisade fence. The proposed development would remove this and create a more welcoming and open public realm surrounding the site, with wider pavements area of a permeable finish.
209. A condition has been recommended for full details of the hard and soft landscaping scheme to be submitted.

Trees

210. There are presently no trees on the site. The application does not propose to introduce any new trees, given the lack of space available within the relatively modest site boundary for accommodating specimens that could grow to a reasonable degree of maturity. The on-site greening and is considered adequate such that the non-provision of new tree planting is acceptable.

Conclusion on landscaping and trees

211. The scheme would deliver improved public realm, enlarging the surrounding footway and unlocking part of the Low Line walking route. This is considered appropriate given the existing environment on site.

Green infrastructure, ecology and biodiversity

212. Policy G5 "Urban greening" of the London Plan states that urban greening

should be a fundamental element of site and building design. It requires major developments that are predominantly residential to achieve an Urban Greening Factor (UGF) score of 0.4 and those that are predominantly commercial to achieve a score of 0.3.

213. The protection and enhancement of opportunities for biodiversity is a material planning consideration. London Plan Policy G6 “Biodiversity and access to nature” requires development proposals to manage impacts on biodiversity and secure net biodiversity gain. This should be informed by the best available ecological information and addressed from the start of the development process. Southwark Plan Policy P60 “Biodiversity” seeks to enhance populations of protected species and increase biodiversity net gains by requiring developments to include features such as green and brown roofs, green walls, soft landscaping and nest boxes.

Urban greening

214. The proposal would achieve a UGF score of 0.383 through a combination of:
- intensive green roof
 - permeable paving
 - hedging
215. The score of 0.383 is slightly below 0.4 for a residential scheme but above 0.3 for a commercial scheme. This level of urban greening is considered appropriate given the constraints of the site, and the lack of any greening on the site as present. A condition has been recommended for full details of a hard and soft landscaping scheme and details of the biodiversity roof to be submitted.

Ecology

216. The applicant’s Preliminary Ecological Appraisal notes that the site currently has low ecological value, with only hardstanding and built form. The appraisal concludes that no impacts to designated habitats or priority habitats will occur as a consequence of the proposed redevelopment.
217. In seeking to improve the ecological value of the site, in addition to the greening proposed, conditions have been recommended for details of 24 Swift bricks and 6 bat tubes to be submitted.

Biodiversity

218. The applicant’s Biodiversity Net Gain Assessment found the site to have a baseline score of 0.00. The site’s score would rise to 0.06 habitat units, exceeding the target score of 0.0374.

Conclusion on urban greening, ecology and biodiversity

219. The council's ecologist and urban forester have reviewed the application information and deemed the proposal to be satisfactory, following changes to the scheme which increased the UGF from 0.17 to 0.383.

Archaeology

220. The site is located within the Walworth Village Archaeological Priority Area (APA). The adaptation of the area in this part of Walworth is based upon the historical suggestion that the parish church was originally located in the area of Manor Place and later, presumably in the 13th century is relocated to Newington. The applicants have submitted a desk-based assessment that summarises the potential of the site and discusses the likely survival of ground surfaces that indicate an archaeological potential.
221. Conditions have been recommended for a programme of archaeological evaluation works, a programme of mitigation works and details of the scope and arrangement of the basement and foundation design to be submitted. In addition, a financial contribution towards archaeological monitoring shall be secured within the Section 106 legal agreement.

Transport and highways

Trip generation

222. Policy T4 "Assessing and mitigating transport impacts" of the London Plan requires development proposals to ensure the impacts on the capacity of the transport network are fully assessed and that any adverse impacts are mitigated. Policies P45 "Healthy developments", P49 "Public transport" and P50 "Highways impacts" of the Southwark Plan require developments to minimise the demand for private car journeys and demonstrate the public transport network has sufficient capacity to support any increase in the number of journeys by the users of the development.
223. The proposal would be car free, which along with the various public transport options in the area, cycle links and cycle parking, means the trips associated with the proposed student accommodation and retail use would predominantly be by sustainable travel modes including on public transport, by bicycle and on foot. It is predicted that the proposed development would generate public transport trips as follows:
- 16 two-way trips in the AM peak hour
 - 19 two-way in the PM peak hour and
 - 197 two-way trips across the day.
224. The majority of movements are likely to be via sustainable modes of transport, being public transport, walking or cycling. Initiatives are proposed in the travel plan; these include the appointment of a dedicated student travel plan co-ordinator, students to be issued with a travel information pack upon occupation and encouraged to use sustainable modes of transport.

225. A final travel plan and transport methods survey is to be secured by condition to ensure the measures outlined in the draft document are implemented and promoted.

Student move-ins and move-outs

226. Students moving in and out of accommodation can generate a significant demand for loading space nearby. To ensure these impacts are minimised, the procedure for managing student arrival and departure periods at the start and end of term will be set out within the final student management plan to be secured by a Section 106 obligation.

Servicing and deliveries

227. London Plan Policy T7 deals with servicing and delivery arrangements during construction and end use. With respect to end use, the policy requires provision of adequate space for servicing, storage and deliveries to be made off-street, with on-street loading bays only used where this is not possible.

Servicing/delivery trip generation

228. The applicant's transport assessment predicts on a daily basis approximately 3 deliveries to the student housing and 1-2 to the flexible commercial unit. As a result of the existing vehicle crossover being reinstated as kerb line, the length of double yellow line at the front of the site would be increased. These numbers would neither place undue strain on the highway network nor impact upon the amenity of nearby residential occupiers.

Servicing/delivery facilities

229. Servicing would be undertaken on-street, with delivery vehicles utilising the extended double yellow line (35 metres) along the northern frontage of the site on Amelia Street. The most direct route to the application site is via Amelia Street from Walworth Road, and there is also potential to egress through Crampton Street and Manor Place to Walworth Road to avoid reversing.



Image 24 (above): Recommended vehicle route plan

Servicing/delivery hours

230. Servicing hours to all of the uses, including students moving in and out, would be restricted by condition, as follows:
- 08:00 to 20:00 on Monday to Saturdays
 - 10:00 to 15:00 on Sundays
 - Not at all on Bank Holidays

Conclusion on servicing/deliveries

231. The proposed servicing arrangements, with appropriate routing of inbound and outbound vehicles, as well as limitations on delivery hours, are not considered to have any adverse impact on the local highway.
232. The submission and approval of a standalone Final Delivery and Servicing Management Plan (DSP) is to be required by condition. This should be based on the principles established by the outline version submitted with the application, and the operation of the building thereafter will need to be in accordance with the approved Final DSP.

Refuse storage arrangements

233. Dedicated separate refuse storage is proposed at ground floor level. This includes 7 x 1100L Eurobins for the commercial premises and 9 x 1100L Eurobins for the student accommodation. The commercial refuse storage would open onto the railway line route and the student refuse storage would open onto Amelia Street.

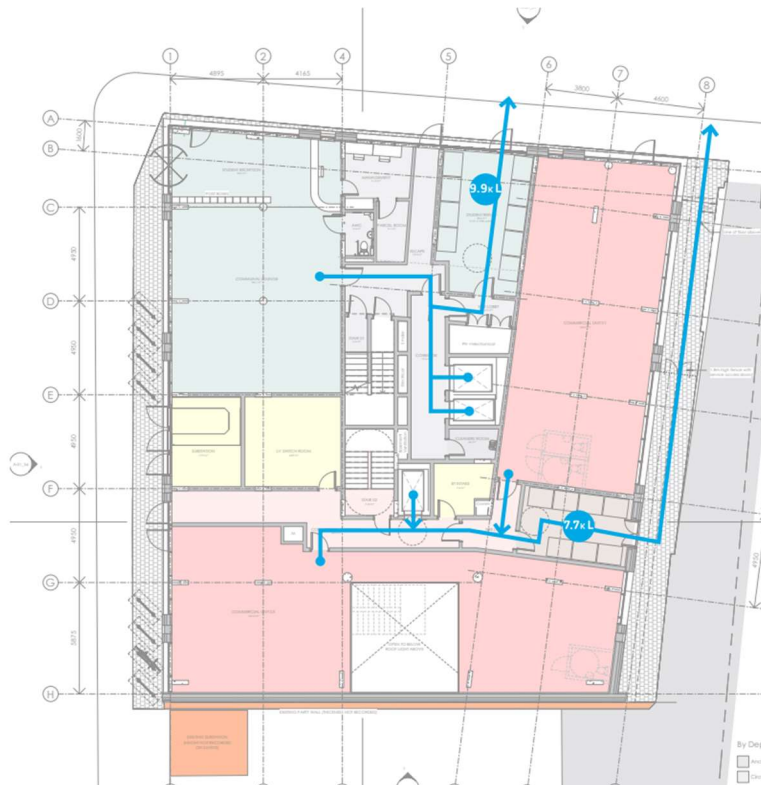


Image 25 (above): Ground floor plan with student refuse and commercial refuse

234. The Final Delivery and Servicing Plan, to be required by condition, will secure the finalised refuse details including the collection arrangements.

Car parking

235. Policy T6 “Car Parking” of the London Plan requires developments in locations with existing and future high public transport accessibility to be car-free.
236. Southwark Plan Policy P54 “Car Parking” echoes the London Plan, promoting car-free development in zones with good public transport accessibility. It requires car-free non-residential proposals in CAZ locations, and for any disabled parking to be provided on-site and supported by EVCPs.

Provision

237. The proposed development does not include the provision of any car parking on site.
238. The Southwark Plan requires a maximum of one car parking space per wheelchair accessible unit (which for this application would equate to a maximum of 8), depending on:
- The anticipated demand for parking spaces
 - The tenure of the development
 - The quality and accessibility of the local public transport network and

- The access to local amenities.
239. The application site is located within close proximity of amenities and access to public transport and research by the applicant has shown that there is little or no evidenced demand for wheelchair accessible car parking associated with student accommodation. The lack of any wheelchair accessible car parking is considered to be appropriate on balance.
240. The Controlled Parking Zone (CPZ) in place in this location provides adequate daytime parking control against on-street parking. Through an obligation in the Section 106 Agreement, all residents of the proposed development would be exempted from applying for parking permits.

Cycle parking

241. London Plan Policy T5 “Cycling” sets minimum cycle parking standards for different uses. Southwark Plan Policy P53 “Cycling” sets out a higher requirement than the London Plan standards.

Long-stay cycle parking provision

242. The proposal would provide 126 cycle parking spaces for the student accommodation at basement level, exceeding minimum policy requirements. This would comprise 110 two tier cycle spaces, 10 Sheffield stands and 6 larger adapted bike spaces. A separate cycle storage area for the commercial element of the proposed development would provide 13 spaces comprising 10 two tier spaces, 2 Sheffield stands and one larger adapted bike space. A condition has been recommended for details of the cycle storage to be submitted prior to commencement to ensure appropriate access.

Short-stay cycle parking provision

243. With regard to the proposed short-stay provision, 8 Sheffield stands are proposed on Crampton Street. The amount exceeds policy requirements and the storage would be in an appropriate location.

Highways works

244. The applicant will enter into a Section 278 agreement for the following highways works:
- Repave the footways including new kerbing fronting the development on Amelia Street and Crampton Street using materials in accordance with Southwark’s Streetscape Design Manual (Yorkstone slabs and 300mm wide granite kerbs).
 - Reinstate redundant vehicle crossover on Amelia Street as footway.
 - Provide access arrangements such as a dropped kerb construction to accommodate refuse collection on Amelia Street.
 - Upgrade street lighting fronting the development to current LBS standards.

- Offer for adoption as publicly maintained the strip of land between existing public highway and proposed building line.
- Repair any damage to the highway due to construction activities for the Development including construction work and the movement of construction vehicles.

Environmental matters

Construction management

245. Some public representations have raised concerns that construction activities will generate noise, dust, traffic and associated pollution. In order to ensure that increases in traffic, noise and dust associated with the demolition and construction phases of the development are minimised, a condition has been recommended for a Construction Environmental Management Plan to be submitted prior to the start of any works, including demolition.

Flood risk, resilience and safety

246. The site is in Flood Zones 2 and 3 and is located within an area benefitting from flood defences. The site is classified as being at an 'extreme low residual risk of tidal flooding' and that whilst groundwater flooding could potentially impact the site, mitigation within the basement design has deemed the associated risk as 'low'. Other potential sources of flooding are deemed to be 'negligible to low'.
247. Compliance with the Flood Risk Assessment will be secured by way of a condition.

Sustainable urban drainage

248. The applicant's Drainage Strategy, which is contained within the applicant's Flood Risk Assessment, proposes that the surface water runoff would be attenuated to 6.0 l/s and discharged to the existing Thames Water combined sewer along Crampton Street. The Council's Flood Risk Management Team are satisfied with the strategy, though recommend a condition for full details of the proposed surface water drainage system to be submitted.

Land contamination

249. The application is accompanied by a Phase 1 Desk Study Report, which the council's environmental protection team has assessed and deemed acceptable. A condition is recommended requiring a Phase 2 intrusive investigation to be conducted and the results submitted to the Council for approval, with further remediation measures to apply if contamination is found to be present.

Basement-related impacts

250. A Basement Impact Assessment (BIA) was submitted with the application. It determines that the potential damage to surrounding structures within the zone of influence has been assessed as Category 0 for the Network Rail viaduct and Royal Mail single-storey masonry structure, meaning negligible damage. The potential damage to the lean-to structures has also been assessed as Category 1, meaning fine cracks that can easily be treated during normal decoration. The ground movements have been assessed at the boundary wall location, and the adjacent highways, and the proposed basement installation is anticipated to have a negligible impact. The assessment concludes that there is negligible risk of groundwater flooding and surface water flooding as a result of the basement development.

Air quality

251. An Air Quality Assessment was submitted with the application, which considers the air quality impacts arising from the proposed development. It identifies the baseline pollutant concentrations on site as being below air quality objectives and finds that the proposed development would be Air Quality Neutral. Notwithstanding this, during the construction phase there may be 'medium risk' but with appropriate mitigation proposed the residual effects would not be significant. Compliance with the Air Quality Assessment will be secured by way of a condition.

Light pollution

252. A condition has been recommended that if any external lighting is proposed, it must comply with the Institute of Lighting Professionals (ILP) Guidance Note 1 for the reduction of obtrusive light (2021) and details must be submitted and approved.

Fire safety

253. Policy D12 "Fire safety" of the London Plan expects all development proposals to achieve the highest standards of fire safety and to this end requires applications to be supported by an independent Fire Strategy, produced by a third party suitably qualified assessor.
254. A Fire Strategy was submitted with the application; this has been amended throughout the course of the application. Changes were made to the scheme following consultee comments from the Health and Safety Executive (HSE) raising concerns and additional information was submitted by the applicant. HSE confirmed that they are satisfied with the fire safety design.
255. The submitted information assesses the scheme for compliance against the relevant parts of Policy D12. Among other things, the fire strategy confirms that:

- a 'stay-put' evacuation strategy will be in place
 - appropriate means of escape are designed in
 - access for fire appliances will be from both Amelia Street and Crampton Street
 - a residential firefighting shaft will be provided comprising a firefighting shaft and lift
 - the ground floor commercial unit will have hose-laying distances within 45m of the fire access points
 - the basement commercial unit exceeds the 45m hose laying distance so a dry falling main will be provided
 - a dry rising / falling fire main will be provided within each of the firefighting cores
 - an existing fire hydrant is located on Amelia Street within 90m of the site and firefighting vehicles can park within 18m
 - dry fire mains will be provided within the residential staircores
256. The relevant fire risk minimisation policies of the London Plan are deemed to have been satisfied.

Energy and sustainability

257. In the context of energy and sustainability policy, student housing is treated as a non-residential use.
258. Chapter 9 of the London Plan deals with all aspects of sustainable infrastructure and identifies the reduction of carbon emissions as a key priority. Policy SI2 "Minimising greenhouse gas emissions" requires all developments to be net zero carbon with a minimum on-site reduction of 35% against the Part L 2021 baseline for both commercial and residential uses. Non-residential development should achieve a 15% reduction in emissions through energy efficiency measures. Where developments are unable to meet net zero carbon targets any shortfall between the minimum 35% and zero carbon must be mitigated by way of a payment towards the carbon offset fund. The energy strategy for new developments must follow the London Plan hierarchy (comprising 'be lean', 'be clean', 'be green' and 'be seen') and this must be demonstrated through the submission of an Energy Strategy with applications, as well as post construction monitoring for a period of five years.
259. Southwark Plan Policies P69 "Sustainability Standards" and P70 "Energy" reflect the approach of the London Plan by seeking to ensure that non-residential developments achieve a BREEAM rating of 'Excellent' and include measures to reduce the effects of overheating using the cooling hierarchy. The policies pursue the 'lean, green, clean and seen' principles of the London Plan and requires non-residential buildings to be zero carbon with an on-site reduction of at least 40% against the Part L 2021 baseline. Any shortfall must be addressed by way of a financial contribution towards the carbon offset fund.

Energy and carbon emission reduction

Be Lean

260. In terms of meeting the 'be lean' tier of the hierarchy, a range of passive and active measures are proposed. The passive measures include:
- appropriate building fabric insulation
 - construction details to reduce cold bridging
 - air permeability to reduce heat loss in the winter
 - 'g-value' of residential and commercial glazing set at 0.4
 - use of gas boilers (with a standard efficiency of 91%) with minimal pipe lengths to reduce loss
 - mechanical ventilation heat recovery unit for kitchens, lounges, communal areas and commercial floorspace
 - bedrooms to have a communal supply and extract air handling unit incorporating heat recovery
 - communal corridors to be naturally ventilated via actuated smoke vents
 - the use of energy efficient LED lighting
 - smart control systems / metering for the student accommodation.
261. These 'demand reduction' measures will achieve a 4.5% reduction in carbon emissions.

Be Clean

262. Given that the application site is not within close proximity of a communal heat network, it is proposed that site heating and hot water systems would be installed and would be futureproofed to connect to any future district heating system.
263. As no immediate connection to a district heating network is proposed, no carbon savings are reported from the 'be clean' stage of the energy hierarchy.

Be Green

264. With respect to the 'be green' tier of the hierarchy, the following technologies are proposed:
- air source heat pumps (a mix of low and high temperature models) to supply heat and hot water; and
 - photovoltaic panels (16.7 kWp) with an area of 18 square metres to supply direct current electricity.
265. On a site-wide basis, carbon emissions would be reduced by 58.3% through these 'be green' measures. The applicant has demonstrated that opportunities for renewable energy by producing, storing and using renewable energy on-site have been maximised.

Be Seen

266. Introduced as part of the London Plan 2021, 'be seen' requires developments to predict, monitor, verify and improve their energy performance during end-use operation.
267. The applicant's energy statement states that a suitable metering strategy will be implemented to record energy consumption. 'Be seen' energy monitoring would be secured via Section 106 agreement.

Total energy savings

268. Southwark council's carbon offset cost is £95 for every tonne of carbon dioxide emitted per year over a period of 30 years. This is the equivalent of £2,850 per tonne of annual residual carbon dioxide emissions.
269. The proposal would reduce on-site regulated carbon dioxide emissions by 62.8% over a notional building minimally compliant with the Building Regulations Part L 2013, which is above the 40% on-site target. The performance is summarised in the below table:

Development CO2 Emissions from each stage of the Energy Hierarchy			
	Total Regulated Emissions	CO2 Savings	Percentage saving
With Be Lean applied	254 tonnes CO2	7.2 tonnes CO2	4.5%
With Be Clean applied	254 tonnes CO2	0	0
With Be Green applied	102 tonnes CO2	92.4 tonnes CO2	58.3%
Cumulative saving		99.6 tonnes CO2	<u>62.8%</u>
Shortfall on carbon zero	1,770 tonnes CO2		

270. The energy savings, as detailed above, which take into account the decarbonisation of the electricity grid, demonstrate the good environmental and sustainability credentials of the proposed development. The total per annum shortfall in savings relative to carbon zero would, at a rate of £95/tonne for 30 years, generate an offset contribution of £168,147.

Whole life cycle

271. London Plan Policy SI2 requires all major development proposals to be supported by a whole life cycle carbon assessment. This assesses the embodied and operational emissions associated with redevelopment.

272. 'Embodied carbon' is the term used to describe the carbon emissions associated with:
- Extraction and manufacturing of materials and products
 - In-use maintenance and replacement
 - End of life demolition, disassembly and disposal and
 - The transportation relating to all three.
273. 'Operational carbon' is the carbon dioxide associated with the in-use operation of the building. This usually includes carbon emissions associated with heating, hot water, cooling, ventilation and lighting systems, as well as those associated with cooking, equipment and lifts.
274. Driven by the aim of achieving net carbon zero for new development by closing the implementation gap, whole life cycle carbon assessments are monitored at the pre-application, submission and post-construction stages. Policy P70 of the Southwark Plan reinforces the need to calculate whole life cycle carbon emissions through a nationally recognised assessment and demonstrate actions taken to reduce life cycle carbon emissions
275. The submitted whole life carbon assessment for the planning application considers the operational carbon and embodied carbon of the proposal throughout its life from construction, use and deconstruction. The assessment finds that the development's operational and embodied load would be:
- 563.9kgCO₂e/m² for Modules A1-A5 (covering the product sourcing and construction stages); and
 - 138KgCO₂e/m² for modules B-C (covering the in-use and end-of-life stages), excluding operational energy and water.
276. The benchmark set by the GLA for Modules A1-A5 is 850kgCO₂e/m², with an aspirational benchmark of 500 kgCO₂e/m² GIA. The benchmark for Modules B-C is 350kgCO₂e/m², with an aspirational benchmark of 300kgCO₂e/m². As such, the whole life cycle performance for Modules A1-A5 and Modules B-C is compliant.

Circular economy

277. Southwark Plan Policy P62 "Reducing Waste" states that a circular economy statement should accompany planning applications referable to the Mayor. Circular economy principles include conserving resource, increasing efficiency, sourcing sustainably, designing to eliminate waste and managing waste sustainably at the highest value. London Plan Policies GG5 "Growing a Good Economy", D3 "Growth Locations in the Wider South East and Beyond" and SI7 "Reducing Waste" and all mention circular economy principles and the benefits of transitioning to a circular economy as part of the aim for London to be a zero-carbon city by 2050.

278. A detailed circular economy statement was submitted with the application, which sets out strategic approaches, specific commitments and the overall implementation approach.
279. The broad strategic approaches for the development include adopting lean design principles, minimising waste, specifying materials responsibly and sustainably, and designing for longevity, adaptability and flexibility. Ways this will be achieved include:
- lightweight design to reduce quantity of materials used
 - water and electricity consumption to be monitored on site throughout works
 - materials to be locally / responsibly sourced where possible
 - flexible structure to allow internal re-arrangements to suit future changing needs
 - pre-demolition audit to be undertaken, targeting 90% of waste diversion from landfill
 - construction waste target of <8.5 tonnes/100 square metres of GIA
 - excavation waste removed by expert contractor and
 - appropriate refuse storage to enable recycling and best practice waste management.
280. The application has addressed the requirements of London Plan Policy SI7 “Reducing Waste and Supporting the Circular Economy”, Southwark Plan Policy P62 “Reducing Waste”, and has referenced the GLA’s guidance in producing the circular economy Statement.

Overheating and cooling

281. London Plan Policy SI4 “Managing Heat Risk” details that major development proposals should demonstrate how they will reduce the potential for internal overheating and reliance on air conditioning systems in accordance with the cooling hierarchy. Policy P69 “Sustainability Standards” of the Southwark Plan states that development must reduce the risk of overheating, taking into account climate change predictions over the lifetime of the development, in accordance with the cooling hierarchy.
282. The six-step hierarchy that should be followed when developing a cooling strategy for new buildings is as follows:
- minimise internal heat generation through energy efficient design then
 - reduce the amount of heat entering the building through the orientation shading, albedo, fenestration, insulation and green roofs and walls; then
 - manage the heat within the building through exposed internal thermal mass and high ceilings; then
 - use passive ventilation; then
 - use mechanical ventilation; then
 - use active cooling systems (ensuring they are the lowest carbon options).

283. The student rooms would have side hung opening windows to allow natural ventilation and the communal corridors would be naturally ventilated via actuated smoke vents at each end of the corridor. Ventilation would also the student rooms would also be through a communal supply and an extract air handling unit, with the kitchen and lounge areas served by a local hybrid mechanical ventilation heat recovery unit.

Minimise internal heat generation

284. Internal heat generation is to be minimised through measures including low minimising cold bridging and heat loss from heating and hot water systems, no boilers in occupied spaces, low energy lighting and energy efficient appliances.

Reduce heat entering the building

285. The heat entering the proposed development is to be reduced by a combination of measures including improved fabric 'U' values, improved air tightness, optimisation of glazing g-value, optimisation of glazing areas and the use of internal blinds.

Manage the heat within the building

286. The floor-to-ceiling heights have been maximised and ceiling voids are as small as possible to maintain these heights.

Use passive ventilation

287. All student rooms would have openable windows for passive ventilation.

Use mechanical ventilation

288. Mechanical ventilation to the student rooms to provide fresh air and extract moisture/pollution in accordance with Building Regulations Part F is proposed via a communal supply and extract air handling unit incorporating heat recovery. The kitchen and lounge areas would be provided with a local hybrid mechanical ventilation heat recovery unit that includes cooling.

289. Overheating can be prevented through a combination of passive and mechanical ventilation.

Use active cooling systems (low carbon)

290. Active cooling is proposed only for the commercial units and communal lounges.

BREEAM

291. Policy P69 "Sustainability standards" of the Southwark Plan states that non-residential development must achieve a BREEAM rating of 'Excellent'. The

applicant's BREEAM indicates 'Excellent' can be achieved, and a planning condition is recommended to secure this.

Water efficiency

292. The proposed development aims to minimise water consumption such that the BREEAM excellent standard for the 'Wat 01' water category would be achieved, as required by London Plan Policy SI5. This would be achieved through the specification of features such as:
- aerated shower heads and taps
 - dual flush toilets
 - low water consumption appliances

Socio-economic impacts

293. London Plan Policy E11 "Skills and Opportunities for All" requires development proposals to support employment, skills development, apprenticeships, and other education and training opportunities in both the construction and end-use phases. This requirement is also covered by Southwark Plan Policy P28 "Access to Employment and Training", with the methodology for securing these opportunities prescribed by the Council's Section 106 Planning Obligations and Community Infrastructure Levy SPD (2015 with 2020 Update).
294. In accordance with the policy framework, there would be a requirement for this development to deliver training and employment during the construction phase only. 10 jobs lasting a minimum of 26 weeks for unemployed Southwark Residents and 10 Southwark residents trained in pre or post-employment short courses would be required. These would all need to be filled by the applicant in accordance with a Construction Phase Employment, Skills And Business Plan. These obligations will be secured through the Section 106 Agreement.

Planning obligations

295. London Plan Policy DF1 "Delivery of the plan and planning obligations" and Southwark Plan Policy IP3 "Community Infrastructure Levy and Section 106 planning obligations" advise that planning obligations can be secured to overcome the negative impacts of a generally acceptable proposal. These policies are reinforced by the Section 106 Planning Obligations and CIL SPD, which sets out in detail the type of development that qualifies for planning obligations. The NPPF echoes the Community Infrastructure Levy Regulation 122 which requires obligations to be:
- necessary to make the development acceptable in planning terms;
 - directly related to the development; and
 - fairly and reasonably related in scale and kind to the development

296. In accordance with the Section 106 Planning Obligations and CIL SPD, the following contributions have been agreed with the applicant in order to mitigate the impacts of the development:

<u>Obligation</u>	<u>Mitigation / Terms</u>
Viability and affordable housing	
AFFORDABLE HOUSING PAYMENT IN-LIEU	<p>Applicant is to pay a minimum of £5,110,000 (subject to BCIS All in Tender Price Index) in lieu of providing on-site affordable housing, equivalent to the maximum viable amount (as agreed between the applicant's viability consultants, GLA Viability officers and the Council's independent assessor).</p> <p>The total sum is to be paid in three tranches linked to stages of construction, as follows:</p> <ul style="list-style-type: none"> • Instalment 1: 25% prior to implementation • Instalment 2: 50% prior to completion and • Instalment 3: 25% prior to first occupation <p>The staging set out above is in accordance with section 6.3.12 of the council's draft affordable housing SPD 2011.</p> <p>Applicant's position: Agreed</p>
AFFORDABLE HOUSING EARLY STAGE REVIEW	<p>Early Stage Review to be required if the planning permission has not been implemented within two years of the decision date.</p>
AFFORDABLE HOUSING LATE STAGE REVIEW	<p>Late stage review to be required at first full year of occupation.</p> <p>In the event that an additional in-lieu affordable housing payment is required following the identification of a profit surplus through the Late Stage Review process, occupation of more than 75% of the student accommodation in the third academic year shall be prohibited unless and until said monies (index-linked) have been paid in full to the Council.</p>

	<p>The late stage review cap shall be the financial equivalent of 40% affordable housing (£7,300,000).</p>
	<p>Applicant's position: Agreed</p>
Local economy: Employment and training	
<p>CONSTRUCTION PHASE JOBS/ CONTRIBUTIONS</p>	<p>Development to:</p> <ul style="list-style-type: none"> • Deliver 10 sustained jobs to unemployed Southwark residents and, • Deliver 10 short courses. <p>Or make the pro-rata Employment and Training Contribution which, at maximum, would be £44,500 This breaks down as:</p> <ul style="list-style-type: none"> • £43,000 against sustained jobs and • £1,500 against short courses.
	<p>Applicant's position: Agreed</p>
Operation and management of student accommodation	
<p>STUDENT MANAGEMENT PLAN</p>	<p>Prior to occupation of the development, a final student management plan is to be submitted to and approved by the council. The final student management plan shall be based on the principles established by the application-stage student management plan and shall include details of:</p> <ul style="list-style-type: none"> • the day to day operation of the student housing to ensure noise and disturbance is minimised during the day- and night-time (including codes of behaviour / conduct and other protocols for managing breaches of acceptable behaviour). • the logistics and coordination of the move-in and move-out arrangements to minimise disruption to the public highway (and shall include specified management measures in respect of both the move-in and move-out period, not just the former, including coordination of arrangements with other student residences in the area so as to avoid overload at peak times). • deliveries and servicing management.

	<ul style="list-style-type: none"> • security and surveillance measures and • strategies for establishing and managing relationships and lines of communication with local residents and other potentially affected parties. <p>The approved final student management plan (as amended from time to time) shall be complied with throughout the lifetime of the development.</p>
	Applicant's position: Agreed
USE OF PREMISES	<p>The development is:</p> <ul style="list-style-type: none"> • not to be used and occupied for anything other than its authorised purpose as accommodation available for letting as student accommodation to students. • to be used at all times as a single planning unit, with no part of it to be rented, sold, sub-let, licensed or otherwise disposed of in any form as a separate planning unit; and • with respect to all parts of the basement and ground floor of the building, prohibited from being used in the future for sleeping accommodation <p>The student accommodation may be let to part time and full time students from UK registered educational institutions during the holiday period.</p>
	Applicant's position: Agreed
Archaeology	
MONITORING AND SUPERVISION CONTRIBUTION	<p>On signing of the Section 106 Agreement, a sum of £3,389 is to be paid by towards monitoring and providing technical archaeological support during the works on and in the vicinity of the site.</p>
	Applicant's position: Agreed
Transport impacts mitigation	
	Prior to occupation, a delivery and servicing monitoring plan is to be submitted to and

DELIVERY AND SERVICING MONITORING PLAN	<p>approved by the council. The delivery and servicing monitoring plan shall set out the method for monitoring and recording the number of servicing and delivery trips to and from the development.</p> <p>Applicant's position: Agreed</p>
Highway impacts mitigation	
SCOPE OF S278 WORKS	<p>Prior to implementation, with the exception of any site clearance/demolition and archaeological investigative works, the developer is to submit the Section 278 Highway Works Specification, detailed design and estimated costs to the Council (specifically the Local Planning Authority, who shall liaise with the Highways Authority) and receive its approval in writing.</p> <p>This specification, detailed design and estimated costs shall comprise the following works, and all shall be constructed in accordance with SSDM standards:</p> <ul style="list-style-type: none"> • Repave the footways including new kerbing fronting the development on Amelia Street and Crampton Street using materials in accordance with Southwark's Streetscape Design Manual (Yorkstone slabs and 300mm wide granite kerbs). • Reinstate redundant vehicle crossover on Amelia Street as footway. • Provide access arrangements such as a dropped kerb construction to accommodate refuse collection on Amelia Street. • Upgrade street lighting fronting the development to current LBS standards. • Offer for adoption as publicly maintained the strip of land between existing public highway and proposed building line. • Repair any damage to the highway due to construction activities for the Development including construction work and the movement of construction vehicles.

	Applicant's position: Agreed
PARKING PERMIT ELIGIBILITY EXCLUSION	All future occupiers shall be prohibited from being eligible for CPZ parking permits.
	Applicant's Position: Agreed
Energy and sustainability	
FUTURE- PROOFED CONNECTION TO DISTRICT CHP	Prior to occupation, a CHP Energy Strategy must be approved setting out how the development will be designed and built so that all parts of it will be capable of connecting to any future District CHP.
	Applicant's position: Agreed
CARBON OFFSET PAYMENT	The development as built is to achieve the carbon reduction set out in the submitted Application Stage Energy Strategy. Prior to implementation, with the exception of any site clearance/demolition and archaeological investigative works, the developer shall pay an off-site contribution of £168,147 (index linked).
	Applicant's position: Agreed
BE SEEN MONITORING	Within 8 weeks of the grant of the planning permission, the owner shall submit to the GLA and the council accurate and verified estimates of the 'Be Seen' energy performance indicators. Prior to occupation of the development the owner shall provide to the GLA and the Council updated accurate and verified estimates of the 'Be Seen' energy performance indicators. On the first anniversary of occupation or following the end of the Defects Liability Period (whichever is the later) and at least for the following four years after that date, the Owner shall submit to the GLA accurate and verified annual in-use energy performance data for all relevant indicators.

	In the event that the 'in-use stage' evidence shows that the 'as-built stage' performance estimates have not been or are not being met, the owner shall identify the causes of underperformance and the potential mitigation measures. The owner shall submit a Be Seen Mitigation Measures Plan comprising of measures that are reasonably practicable to implement, along with a proposed timescale for implementation. The measures shall be implemented in accordance with the approved Be Seen Mitigation Measures Plan.
	Applicant's position: Agreed
Administration	
Monitoring	Payment to cover the costs of monitoring these necessary planning obligations (with the exception of those that have monitoring contributions already factored-in), calculated as 2% of total sum.
	Applicant's position: Agreed

297. In the event that a satisfactory legal agreement has not been entered into by 16 July 2024, it is recommended that the director of planning and growth refuses planning permission, if appropriate, for the following reason:

“The proposal, by failing to provide for appropriate planning obligations secured through the completion of a S106 agreement, fails to ensure adequate provision of mitigation against the adverse impacts of the development through projects or contributions, contrary to: Policy DF 1 ('Planning Obligations') of the London Plan 2021; Policy IP3 ('Community Infrastructure Levy (CIL) and Section 106 Planning Obligations') of the Southwark Plan; and the Southwark 'Section 106 Planning Obligations and Community Infrastructure Levy SPD' 2015”.

Mayoral and Borough Community Infrastructure Levies

298. 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 Borough CIL is therefore a material consideration. However, the weight attached is determined by the decision maker. The Mayoral CIL is required to contribute towards strategic transport investments in London as

a whole, while the Borough CIL will provide for infrastructure that supports growth in Southwark.

299. The site is located within Southwark CIL Zone 2, and MCIL2 Band 2 Zone. Based on the GIA measurements obtained from the proposed floor plans the gross amount of CIL is £592,237.54 and MCIL is £277,672. It should be noted that this is an estimate, and the floor areas will be checked when related CIL Assumption of Liability is submitted after planning approval has been secured.

Community involvement and engagement

300. This application was accompanied by a statement of community involvement, confirming the public consultation that was undertaken by the applicant during the pre-application phase. The table below summarises this consultation:

<u>Consultation Undertaken by Applicant: Summary Table</u>	
<u>Date</u>	<u>Form of consultation</u>
14 December 2021	<ul style="list-style-type: none"> The applicant emailed Newington Ward councillors informing them of the proposals and inviting them to a meeting with the project team. A website went live detailing the proposals. A virtual exhibition was open from 14 December to 22 December to engage with local residents, inform them of the plans and receive feedback – 136 views were recorded on the website and 14 feedback responses were provided.
15 December 2021	<ul style="list-style-type: none"> Newsletters were distributed to approximately 980 households and businesses in the local area.
11 January 2021	<ul style="list-style-type: none"> A meeting was held at the request of the Chair of the Walworth Society.

301. Included within the statement of community involvement are the consultation materials that were circulated as part of the pre-application engagement exercise. A summary of each topic raised by the community feedback is also provided, along with details of how the applicant responded.
302. The pre-application consultation undertaken by the applicant was an adequate effort to engage with those affected by the proposals. Due to

Covid-19 restrictions that were in place at the time of consultation, face to face meetings were not deemed to be suitable in line with national guidance. The virtual engagement as detailed in the table above, is considered to be an acceptable engagement method.

303. The council, as part of its statutory requirements, sent letters to surrounding residents, issued a press notice publicising the planning application and displayed notices in the vicinity of the site. Re-consultation letters were issued to all those who commented as part of the original round of consultation. Details of the consultation undertaken by the council are set out in the appendices. The responses received are summarised earlier in this report.

Consultation responses from external consultees

Network Rail

- 304.
- No objection.
 - Request that the applicant engages Network Rail's Asset Protection and Optimisation team.
 - Officer **response:** Noted.

Environment Agency

- 305.
- No objection/comments.
 - **Officer response:** Noted.

Health and Safety Executive (Fire Risk Unit)

- 306.
- As the basement is ancillary accommodation and includes plant rooms (which constitute places of special fire hazard) it should not connect with the single staircase. Design changes necessary to provide alternative access to the basement will affect land use planning considerations such as layout and appearance of the development.
 - The ground floor drawing shows that the single staircase serving residential floors connects with the bin store, a room labelled 'PH + Mechanical' and a cleaners' room. Where a staircase forms part of the only escape route from flats it should not connect with ancillary accommodation of higher fire risk. Indeed, due to the fire risk associated with waste, refuse stores should only be approached from outside.
 - The basement drawing shows that the lifts serving the residential floors descend to the basement levels. A lift should not be continued down to serve any basement storey if it is in a building, or part of a building, served by only one escape stair.
 - Drawings of floors 01 to 07 show rooms on each storey labelled 'PH + Mechanical'. Ancillary accommodation should not connect with any part of the only escape route from one or more dwelling(s) on the same storey as the ancillary accommodation.
 - Drawings of floors 01 to 07 show windows of communal lounges and flats in close proximity, and at angles of 90 degrees or less, to escape

route windows. This proximity and angle may allow the spread of fire to the escape routes

- **Officer response:** These comments were sent to the applicant and the proposals were amended in response. HSE are now satisfied with the fire safety design, to the extent that it affects land use planning.

Metropolitan Police

- 307.
- The proposal is suitable to achieve Secured by Design (SBD) accreditation.
 - Request conditions for details of SBD measures to be submitted and for a prior to occupation inspection to take place.
 - **Officer response:** The suggested conditions have been included on the draft decision notice.

Community impact and equalities assessment

308. 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.

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

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

311. The council has given due regard to the above needs and rights where relevant or engaged throughout the course of determining this application. The positive impacts have been identified throughout this report. They include:
- Accessible accommodation: 5% of the studios would be wheelchair accessible, as would all of the ancillary and common spaces within the student housing scheme.
312. Officers are satisfied that equality implications have been carefully considered throughout the planning process and that Members have sufficient information available to them to have due regard to the equality impacts of the proposal as required by Section 149 of the Equality Act 2010 in determining whether planning permission should be granted.

Human rights implications

313. This planning application engages certain human rights under the Human Rights Act 1998 (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.
314. This application has the legitimate aim of redeveloping the site for a new 24-storey building with rooftop plant, containing a student accommodation and flexible commercial uses, together with public realm improvements and other associated works. 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.

<u>Positive and proactive engagement: summary table</u>	
Was the pre-application service used for this application?	YES
If the pre-application service was used for this application, was the advice given followed?	YES
Was the application validated promptly?	YES
If necessary/appropriate, did the case officer seek amendments to the scheme to improve its prospects of achieving approval?	YES

Conclusion

315. The proposed development is for the redevelopment of 31 Amelia Street to re-provide commercial floorspace at basement and ground floors and provide 146 student accommodation rooms on the upper floors.
316. The proposed building has been designed to appropriately respond to the local context so as to preserve the settings of local heritage assets and not

cause any adverse impacts on neighbouring occupiers. A financial contribution payment-in-lieu of £5,110,000 towards affordable housing has been agreed.

317. Subject to conditions and completion of a Section 106 legal agreement it is recommended that the application is approved.

BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
Application file: 22/AP/0850 Southwark Local Development Framework and Development Plan Documents	Planning Division, Cooperate Services, Finance & Governance 160 Tooley Street, London, SE1 2QH	Planning enquiries telephone: 020 7525 5403 Planning enquiries email: planning.enquiries@southwark.gov.uk Case officer telephone: 07514 539 532 Council website: www.southwark.gov.uk

APPENDICES

No.	Title
Appendix 1	Recommendation (draft decision notice)
Appendix 2	Relevant planning policy
Appendix 3	Planning history of the site and nearby sites
Appendix 4	Consultation undertaken
Appendix 5	Consultation responses received

AUDIT TRAIL

Lead Officer	Stephen Platts, Director of Planning and Growth	
Report Author	Abbie McGovern, Team Leader	
Version	Final	
Dated	15 January 2024	
Key Decision?	No	
CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER		
Officer Title	Comments sought	Comments included
Strategic Director of Finance	No	No
Strategic Director of Environment, Neighbourhoods and Growth	No	No
Strategic Director of Housing	No	No
Date final report sent to Constitutional Team		6 February 2024

APPENDIX 1

Recommendation (draft decision notice)

This document shows the case officer's recommended decision for the application referred to below.

This document is not a decision notice for this application.

Applicant	H Cheun Imperial South Limited	Reg. Number	22/AP/0850
Application Type	Major application		
Recommendation		Case Number	1060-99

Draft of Decision Notice

for the following development:

Demolition of existing building on the site and erection of a mixed-use development comprising 744 sq. m. commercial floorspace (Class E) and student accommodation (146 rooms)

31 Amelia Street London Southwark SE17 3PY

In accordance with application received on 4 March 2022 and Applicant's Drawing Nos.:

Location Plan 3811-FBA-XX-XX-DR-A-01001 LOCATION PLAN received 07/03/2022

Plans - Proposed 3811-FBA-XX-00-DR-A-01660 LEVEL 06 PLAN P2 received 19/10/2022

Plans - Proposed 3811-FBA-XX-00-DR-A-01400 LEVEL 04 PLAN P2 received 19/10/2022

Plans - Proposed 3811-FBA-XX-00-DR-A-01500 LEVEL 05 PLAN P2 received 19/10/2022

Plans - Proposed 3811-FBA-XX-02-DR-A-01200 LEVEL 02 PLAN P2 received 19/10/2022

Plans - Proposed 3811-FBA-XX-00-DR-A-013000 LEVEL 03 PLAN P2 received 19/10/2022

Plans - Proposed 3811-FBA-XX-00-DR-A-01700 LEVEL 07 PLAN P2 received 19/10/2022

Plans - Proposed 3811-FBA-XX-00-DR-A-01X01 ROOM LAYOUTS P2 received 19/10/2022

Plans - Proposed 3811-FBA-XX-00-DR-A-01800 LEVEL ROOF PLAN P2 received 19/10/2022

Plans - Proposed 3811-FBA-XX-00-DR-A-01X01 BASEMENT LEVEL PLAN P2 received 19/10/2022

Plans - Proposed 3811-FBA-XX-01-DR-A-01100 LEVEL 01 PLAN P2 received 19/10/2022

Plans - Proposed 3811-FBA-XX-00-DR-A-01000 LEVEL 00 PLAN P2 received 19/10/2022

Elevations - Proposed 3811-FBA-XX-XX-DR-A-01_51 NORTH ELEVATION received 07/03/2022

Elevations - Proposed 3811-FBA-XX-XX-DR-A-01_52 EAST ELEVATION received 07/03/2022

Elevations - Proposed 3811-FBA-XX-XX-DR-A-01_53 SOUTH ELEVATION received 07/03/2022

Elevations - Proposed 3811-FBA-XX-XX-DR-A-01_54 WEST ELEVATION received 07/03/2022

Plans - Proposed 3811-FBA-XX-XX-DR-A-01002 PROPOSED SITE PLAN received 07/03/2022

Sections 3811-FBA-XX-XX-DR-A-01_01 SECTION 01 received 07/03/2022

Sections 3811-FBA-XX-XX-DR-A-01_02 SECTION 02 received 07/03/2022

Time limit for implementing this permission and the approved plans

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

Reason:

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

Permission is subject to the following Pre-Commencements Conditions

3. No development shall take place, including any works of demolition, until a written CEMP has been submitted to and approved in writing by the Local Planning Authority. The CEMP shall oblige the applicant, developer and contractors to commit to current best practice with regard to construction site management and to use all best endeavours to minimise off-site impacts, and will include the following information:

- A detailed specification of demolition and construction works at each phase of development including consideration of all environmental impacts and the identified remedial measures;

- Site perimeter continuous automated noise, dust and vibration monitoring;

- Engineering measures to eliminate or mitigate identified environmental impacts e.g. hoarding height and density, acoustic screening, sound insulation, dust control measures, emission reduction measures, location of specific activities on site, etc.;
- Arrangements for a direct and responsive site management contact for nearby occupiers during demolition and/or construction (signage on hoardings, newsletters, residents liaison meetings, etc.)
- A commitment to adopt and implement of the ICE Demolition Protocol and Considerate Contractor Scheme; Site traffic - Routing of in-bound and outbound site traffic, one-way site traffic arrangements on site, location of lay off areas, etc.;
- Site waste Management - Accurate waste stream identification, separation, storage, registered waste carriers for transportation and disposal at appropriate destinations.
- A commitment that all NRMM equipment (37 kW and 560 kW) shall be registered on the NRMM register and meets the standard as stipulated by the Mayor of London

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

Reason:

To ensure that occupiers of neighbouring premises and the wider environment do not suffer a loss of amenity by reason of pollution and nuisance, in accordance with the Policy P56 (Protection of amenity) of the Southwark Plan 2022 and the National Planning Policy Framework 2023.

4. Prior to the commencement of development hereby permitted, a drainage strategy detailing any on and or off site drainage works shall be submitted to and approved in writing by the Local Planning Authority. No discharge of foul or surface water from the site shall be accepted into the public systems until drainage works referred to in the strategy have been completed and the development shall not be carried out otherwise than in accordance with any such approval given.

Reason:

The development may lead to sewage flooding and to ensure that sufficient capacity is made available to cope with the new development and in order to avoid adverse environmental impact upon the community in accordance with Policy SI 13 (Sustainable drainage) of the London Plan 2021, Policies P67 (Reducing water use) and P68 (Reducing flood risk) of the Southwark Plan 2022 and the National Planning Policy Framework 2023.

5. Before any work (excluding demolition to slab level and site investigation works) hereby permitted begins, the applicant shall secure the implementation of a programme of archaeological evaluation works in accordance with a written scheme of investigation which shall be submitted to and approved in writing by the Local Planning Authority.

Reason:

In order that the applicants supply the necessary archaeological information to ensure suitable mitigation measures and/or foundation design proposals be presented in accordance with Policy P23 (Archaeology) of the Southwark Plan 2022 and the National Planning Policy Framework 2023.

6. Before any work (excluding demolition to basement level, archaeological evaluation and site investigation works) hereby permitted begins, the applicant shall submit a detailed scheme showing the complete scope and arrangement of the basement and foundation design, and all associated subterranean groundworks, including the construction methods.

The submitted documents should show how archaeological remains will be protected by a suitable mitigation strategy. The detailed scheme will need to be approved in writing by the Local Planning Authority and the development shall only be carried out in accordance with the approval given.

Reason:

In order that all below ground impacts of the proposed development are known and an appropriate protection and mitigation strategy is achieved to preserve archaeological remains by record and/or in situ in accordance with Policy P23 (Archaeology) of the Southwark Plan 2022 and the National Planning Policy Framework 2023.

7. Before any work (excluding demolition to slab level and archaeological evaluation) hereby permitted begins, the applicant shall secure the implementation of a programme of archaeological mitigation works in accordance with a written scheme of investigation, which shall be submitted to and approved in writing by the Local Planning Authority.

Reason:

In order that the details of the programme of works for the archaeological mitigation are suitable with regard to the impacts of the proposed development and the nature and extent of archaeological remains on site in accordance with Policy P23

(Archaeology) of the Southwark Plan 2022 and the National Planning Policy Framework 2023.

8. Prior to commencement of the development hereby permitted, details (1:50 scale drawings) of the facilities to be provided for the secure and covered storage of cycles shall be submitted to and approved in writing by the Local Planning Authority. This shall include details of how cycles would be accessed within the designated storage area.

Thereafter the cycle parking facilities provided shall be retained and the space used for no other purpose, and the development shall not be carried out otherwise in accordance with any such approval given.

Reason:

In order to ensure that satisfactory safe and secure cycle parking facilities are provided and retained in order to encourage the use of cycling as an alternative means of transport to the development and to reduce reliance on the use of the private car in accordance with Policy T5 (Cycling) of the London Plan 2021, Policy P53 (Cycling) of the Southwark Plan 2022 and the National Planning Policy Framework 2023.

9. The commercial floorspace hereby permitted shall not be used as a restaurant or café [Use Class E(b)].

Reason:

To ensure that the proposed development would not result in an odour, fume or noise nuisance and not detract from the appearance of the building in the interests of amenity in accordance with Policies P64 (Contaminated land and hazardous substances), P65 (Improving air quality) and P56 (Protection of amenity) of the Southwark Plan 2022.

Permission is subject to the following Grade Conditions

10. Before any above grade work hereby authorised begins, detailed drawings of the following elements shall be submitted to and approved in writing by the Local Planning Authority:
 - Brickwork piers and curtain wall glazing (including deep reveals and brick slot patterning of the piers)
 - Openings (including reveals, headers and cills)
 - Textured brickwork

- Parapet finishes are similarly simple in appearance
- Treatment of the window infills

Reason:

In order to achieve a high quality design in accordance with Policies P13 (Design of places) and P14 (Design quality) of the Southwark Plan 2022, Policy D4 (Delivering good design) of the London Plan 2021 and the National Planning Policy Framework 2023.

11. Before any above grade work hereby authorised begins details of roof finishes (including PVs, lift overrun and plant) shall be submitted to and approved in writing by the Local Planning Authority.

Reason:

In order to ensure that there would be no roof clutter and achieve a high quality design in accordance with Policies P13 (Design of places) and P14 (Design quality) of the Southwark Plan 2022, Policy D4 (Delivering good design) of the London Plan 2021 and the National Planning Policy Framework 2023.

12. Before any above grade work hereby authorised begins a signage strategy for the student residence and commercial units shall be submitted to and approved in writing by the Local Planning Authority.

Reason:

In order to achieve a high quality design in accordance with Policies P13 (Design of places) and P14 (Design quality) of the Southwark Plan 2022, Policy D4 (Delivering good design) of the London Plan 2021 and the National Planning Policy Framework 2023.

13. Before any above grade work hereby authorised begins samples of all external facing materials and full-scale (1:1) mock-ups of the façades to be used in the carrying out of this permission shall remain on site for inspection for the duration of the building's construction and be presented on site to the Local Planning Authority and approved in writing. The development shall not be carried out otherwise than in accordance with any such approval given. The façades to be mocked up should be agreed with the Local Planning Authority.

Reason:

In order that the Local Planning Authority may be satisfied that these samples will make an acceptable contextual response in terms of materials to be used, and achieve a quality of design and detailing, are suitable in context and consistent with the consented scheme in accordance with Policy D4 (Delivering good design) of the London Plan 2021, Policies P13 (Design of places) and P14 (Design quality) of the Southwark Plan 2022 and the National Planning Policy Framework 2023.

14. Before any above grade work hereby authorised begins, detailed drawings of a hard and soft landscaping scheme showing the treatment of all parts of the site not covered by buildings shall be submitted to and approved in writing by the Local Planning Authority. The site shall be landscaped strictly in accordance with the approved details in the first planting season after completion of the development. Details shall include:

- a scaled plan showing all existing vegetation and landscape features to be retained with proposed trees, hedging, perennial and other plants;
- proposed access, or pathway layouts, materials and edge details;
- location, type and materials to be used for hard landscaping including specifications, where applicable for:
 - a) permeable paving
 - b) tree pit design
 - c) underground modular systems
 - d) sustainable urban drainage integration
 - e) use within tree Root Protection Areas (RPAs);
- typical cross sections;
- types and dimensions of all boundary treatments.

There shall be no excavation or raising or lowering of levels within the prescribed root protection area of retained trees unless agreed in writing by the Local Planning Authority.

The landscaping shall not be carried out otherwise than in accordance with any such approval given and shall be retained for the duration of the use. Any trees, shrubs, grass or other planting that is found to be dead, dying, severely damaged or diseased within five years of the completion of the building works OR five years of the carrying out of the landscaping scheme (whichever is later), shall be replaced in the next planting season by specimens of the equivalent stem girth and species in the first suitable planting season.

Unless required by a separate landscape management condition, all soft landscaping shall have a written five-year maintenance programme following planting. Works shall comply to BS: 4428 Code of practice for general landscaping operations, BS: 5837 (2012) Trees in relation to demolition, design and construction; BS3998: (2010) Tree work - recommendations, BS 7370-4:1993 Grounds maintenance Recommendations for maintenance of soft landscape (other than amenity turf); EAS 03:2022 (EN) - Tree Planting Standard.

Reason:

So that the Council may be satisfied with the details of the landscaping scheme, in accordance with Policies SI 4 (Managing heat risk), SI 13 (Sustainable drainage), G1 (Green infrastructure, G5 (Urban greening) and G7 (Trees and woodlands) of the London Plan 2021, Policies P13 (Design of places), P14 (Design quality), P56 (Protection of amenity), P57 (Open space), P60 (Biodiversity) and P61 (Trees) of the Southwark Plan 2022 and the National Planning Policy Framework 2023.

15. a) The development hereby permitted shall incorporate security measures to minimise the risk of crime and to meet the specific security needs of the development in accordance with the principles and objectives of Secured by Design. Prior to above grade work details of these measures shall be submitted to and approved in writing by the Local Planning Authority and shall be implemented in accordance with the approved details prior to occupation.
- b) Prior to occupation a satisfactory Secured by Design inspection must take place. The resulting Secured by Design certificate shall be submitted to and approved by the Local Planning Authority.

Reason:

In pursuance of the Local Planning Authority's duty under section 17 of the Crime and Disorder Act 1998 to consider crime and disorder implications in exercising its planning functions and to improve community safety and crime prevention, in accordance with Chapter 8 (Promoting healthy and safe communities) of Policy D11 (Safety, security and resilience to emergency) of the London Plan 2021, Policies P13 (Design of places), P14 (Design quality) and P16 (Designing out crime) of the Southwark Plan 2022 and the National Planning Policy Framework 2023.

16. Before any above grade work hereby authorised begins, details of the biodiversity roofs shall be submitted to and approved in writing by the Local Planning Authority. The biodiversity roofs shall be:
- biodiversity based with extensive substrate base (depth 80-150mm);
 - laid out in accordance with agreed plans; and

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

The biodiversity roofs shall not be used as an amenity or sitting out space of any kind whatsoever and shall only be used in the case of essential maintenance or repair, or escape in case of emergency. The biodiversity roofs shall be carried out strictly in accordance with the details so approved and shall be maintained as such thereafter.

Reason:

To ensure the development provides the maximum possible provision towards creation of habitats and valuable areas for biodiversity in accordance with Policies SI 4 (Managing heat risk), SI 13 (Sustainable drainage), G1 (Green infrastructure) and G5 (Urban greening) of the London Plan 2021, Policies P59 (Green infrastructure) and P60 (Biodiversity) of the Southwark Plan 2022 and the National Planning Policy Framework 2023.

Permission is subject to the following Pre-Occupation Conditions

17. Before the first occupation of the building hereby permitted, a Delivery and Servicing Management Plan detailing how all elements of the site are to be serviced, shall be submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the approval given and shall remain for as long as the development is occupied.

Reason:

To ensure compliance with Policy T7 (Deliveries, servicing and construction) of the London Plan 2021, Policy P50 (Highways impacts) of the Southwark Plan 2022 and the National Planning Policy Framework 2023.

18. Prior to the commencement of the use hereby permitted, details of Swift nesting bricks and bat tubes shall be submitted to and approved in writing by the Local Planning Authority.

No less than 24 Swift bricks and 6 bat tubes shall be provided and the details shall include the exact location, specification and design of the habitats.

The bricks and tubes shall be installed prior to the first occupation of the building to which they form part or the first use of the space in which they are contained. The

Swift nesting bricks and bat tubes shall be installed strictly in accordance with the details so approved, shall be maintained as such thereafter.

Reason:

To ensure the development provides the maximum possible provision towards creation of habitats and valuable areas for biodiversity in accordance with Policy G6 (Biodiversity and access to nature) of the London Plan 2021 and Policies P59 (Green infrastructure) and P60 (Biodiversity) of the Southwark Plan 2022 and the National Planning Policy Framework 2023.

19. a) Before the first occupation of the building hereby permitted commences, the applicant shall submit in writing and obtain the written approval of the Local Planning Authority to a Travel Plan setting out the proposed measures to be taken to encourage the use of modes of transport other than the car by all users of the building, including staff and visitors.

b) At the start of the second year of operation of the approved Travel Plan, a detailed survey showing the methods of transport used by all those users of the building to and from the site and how this compares with the proposed measures and any additional measures to be taken to encourage the use of public transport, walking and cycling to the site shall be submitted to and approved in writing by the Local Planning Authority and the development shall not be carried out otherwise in accordance with any such approval given.

Reason:

In order that the use of non-car based travel is encouraged in accordance with Policy T2 (Healthy streets) of the London Plan 2021, Policies P50 (Highways impacts), P51 (Walking) and P54 (Car parking) of the Southwark Plan 2022 and the National Planning Policy Framework 2023.

Permission is subject to the following Compliance Conditions

20. The habitable rooms within the development sharing a party ceiling/floor element with commercial premises shall be designed and constructed to provide reasonable resistance to the transmission of sound sufficient to ensure that noise due to the commercial premises does not exceed NR20 when measured as an Laeq across any 5 minute period.

Reason:

To ensure that the occupiers and users of the proposed development do not suffer a loss of amenity by reason of noise nuisance and other excess noise from activities

within the commercial premises in accordance with the Southwark Plan 2022 Policy P56 (Protection of amenity); Policy P66 (Reducing noise pollution and enhancing soundscapes), and the National Planning Policy Framework 2023.

21. The development must be designed to ensure that habitable rooms in the residential element of the development are not exposed to vibration dose values in excess of 0.13 m/s during the night-time period of 23.00 - 07.00hrs.

Reason:

To ensure that the occupiers and users of the proposed development do not suffer a loss of amenity by reason of excess vibration from transportation sources in accordance with the Southwark Plan 2022 Policy P56 (Protection of amenity), and the National Planning Policy Framework 2023.

22. The Rated sound level from any plant, together with any associated ducting shall not exceed the Background sound level (LA90 15min) at the nearest noise sensitive premises. Furthermore, the plant Specific sound level shall be 10dB(A) or more below the background sound level in this location. For the purposes of this condition the Background, Rating and Specific sound levels shall be calculated in full accordance with the methodology of BS4142:2014 +A1:2019

Reason:

To ensure that occupiers of neighbouring premises do not suffer a loss of amenity by reason of noise nuisance or the local environment from noise creep due to plant and machinery in accordance with the Southwark Plan 2022 Policy P56 (Protection of amenity); Policy P66 (Reducing noise pollution and enhancing soundscapes), and the National Planning Policy Framework 2023.

23. The dwellings hereby permitted shall be designed to ensure that the following internal noise levels are not exceeded due to environmental noise:

Bedrooms - 35dB Laeq T†, 30 dB L Aeq T*, 45dB LAFmax T *

Living and Dining rooms- 35dB Laeq T †

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

† - Daytime - 16 hours between 07:00-23:00

Reason:

To ensure that the occupiers and users of the development do not suffer a loss of amenity by reason of excess noise from environmental and transportation in accordance with the Southwark Plan 2022 Policy P56 (Protection of amenity); Policy P66 (Reducing noise pollution and enhancing soundscapes), and the National Planning Policy Framework 2023.

24. The external terrace amenity areas shall not be used, other than for means of escape, outside the hours of 07:00 - 22:00.

Reason:

To ensure that occupiers of neighbouring premises do not suffer a loss of amenity by reason of noise nuisance in accordance with the Southwark Plan 2022 Policy P56 (Protection of amenity); Policy P66 (Reducing noise pollution and enhancing soundscapes), and the National Planning Policy Framework 2023.

25. The commercial E class use hereby permitted shall not be carried on outside of the hours of 07:00 to 23:00 on any day.

Reason:

To safeguard the amenity of neighbouring residential properties in accordance with the Southwark Plan 2022 Policy P56 (Protection of amenity); Policy P66 (Reducing noise pollution and enhancing soundscapes), and the National Planning Policy Framework 2023.

26. Servicing and delivery, including students moving in and out, shall only take place between the following hours:
- 08:00 to 20:00 on Monday to Saturdays;
 - 10:00 to 15:00 on Sundays;
 - Not at all on Bank Holidays.

Reason:

To ensure that the proposed development would not adversely impact on highways or the amenity of neighbours in accordance with Policies P50 (Highways impacts) and P56 (Protection of amenity) of the Southwark Plan 2022 and the National Planning Policy Framework 2023.

Permission is subject to the following Special Conditions

27. a) Prior to commencement of any works (except demolition) hereby approved a Phase 2 Intrusive site investigation and associated risk assessment, fully characterising the nature and extent of any contamination of soils and ground water on the site, shall be submitted to and approved in writing by the Local Planning Authority.

b) In the event that contamination is found that presents a risk to future users or controlled users or other receptors, a detailed remediation and/or mitigation strategy shall be prepared and submitted to the Local Planning Authority for approval in writing. The strategy shall detail all proposed actions to be taken to bring the site to a condition suitable for the intended use together with any monitoring or maintenance requirements. The scheme shall also ensure that as a minimum, the site should not be capable of being determined as contaminated land under Part IIA of the Environmental Protection Act 1990 in relation to the intended use of the site after remediation. The approved remediation (if one is required) shall be carried out and implemented as part of the development.

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

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

Reason:

To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out in accordance with Policies P56 (Protection of amenity) and P64 (Contaminated land and hazardous substances) of the Southwark Plan 2022 and the National Planning Policy Framework 2023.

28. Within one year of the completion of the archaeological work on site, an assessment report detailing the proposals for the off-site analyses and post-excavation works, including publication of the site and preparation for deposition of the archive, shall be submitted to and approved in writing by the Local Planning Authority, and the works detailed in the assessment report shall not be carried out otherwise than in accordance with any such approval given. The assessment report shall provide

evidence of the applicant's commitment to finance and resource these works to their completion.

Reason:

In order that the archaeological interest of the site is secured with regard to the details of the post-excavation works, publication and archiving to ensure the preservation of archaeological remains by record in accordance with Policy P23 (Archaeology) of the Southwark Plan 2022 and the National Planning Policy Framework 2023.

29. Any external lighting system installed at the development shall comply with the Institute of Lighting Professionals (ILP) Guidance Note 1 for the reduction of obtrusive light (2020).

Prior to the installation of any external lighting, details of the lighting (including: design; power and position of luminaries; light intensity contours) shall be submitted to and approved by the Local Planning Authority in writing. The development shall not be carried out otherwise than in accordance with any such approval given.

Reason:

In order that the Council may be satisfied as to the details of the development in the interest of the visual amenity of the area, the amenity and privacy of adjoining occupiers, and their protection from light nuisance, in accordance with the Southwark Plan 2022 Policy P16 (Designing out crime); Policy P56 (Protection of amenity), and the National Planning Policy Framework 2023.

30. (a) Before any fit out works to the commercial premises hereby authorised begins, an independently verified BREEAM report (detailing performance in each category, overall score, BREEAM rating and a BREEAM certificate of building performance) to achieve a minimum 'Excellent' rating shall be submitted to and approved in writing by the Local Planning Authority and the development shall not be carried out otherwise than in accordance with any such approval given;

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

Reason:

To ensure the proposal complies with Policy SI 2 (Minimising greenhouse gas emissions) of the London Plan 2021 and Policies P69 (Sustainability standards) and P70 (Energy) of the Southwark Plan 2022 and the National Planning Policy Framework 2021.

Relevant planning policy

National Planning Policy Framework (the framework)

The revised National Planning Policy Framework ('NPPF') was published on 19 December 2023 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 224 states that the policies in the Framework are material considerations which should be taken into account in dealing with applications.

The relevant chapters from the Framework are:

- Chapter 2 Achieving sustainable development
- Chapter 8 Promoting healthy and safe communities
- Chapter 9 Promoting sustainable transport
- Chapter 11 Making effective use of land
- Chapter 12 Achieving well-designed places
- Chapter 14 Meeting the challenge of climate change, flooding and coastal change
- Chapter 15 Conserving and enhancing the natural environment
- Chapter 16 Conserving and enhancing the historic environment

The London Plan 2021

On 2 March 2021, the Mayor of London published the London Plan 2021. The spatial development strategy sets a strategic framework for planning in Greater London and forms part of the statutory Development Plan for Greater London. The relevant policies are:

- Policy SD1 Opportunity Areas
- Policy SD4 The Central Activities Zone (CAZ)
- Policy SD5 Offices, other strategic functions and residential development in the CAZ
- Policy SD6 Town centres and high streets
- Policy SD7 Town centres: development principles and Development Plan Documents
- Policy SD8 Town centre network
- Policy SD9 Town centres: Local partnerships and implementation
- Policy D1 London's form, character and capacity for growth
- Policy D4 Delivering good design
- Policy D5 Inclusive design
- Policy D9 Tall buildings

- Policy D10 Basement development
- Policy D12 Fire safety
- Policy D14 Noise
- Policy H4 Delivering affordable housing
- Policy H15 Purpose-built student accommodation
- Policy E1 Offices
- Policy E9 Retail, markets and hot food takeaways
- Policy HC1 Heritage conservation and growth
- Policy HC3 Strategic and Local Views
- Policy HC4 London View Management Framework
- Policy G1 Green infrastructure
- Policy G5 Urban greening
- Policy G6 Biodiversity and access to nature
- Policy G7 Trees and woodlands
- Policy SI 1 Improving air quality
- Policy SI 2 Minimising greenhouse gas emissions
- Policy SI 3 Energy infrastructure
- Policy SI 4 Managing heat risk
- Policy SI 5 Water infrastructure
- Policy SI 7 Reducing waste and supporting the circular economy
- Policy SI 12 Flood risk management
- Policy SI 13 Sustainable drainage
- Policy T1 Strategic approach to transport
- Policy T2 Healthy streets
- Policy T3 Transport capacity, connectivity and safeguarding
- Policy T4 Assessing and mitigating transport impacts
- Policy T5 Cycling
- Policy T6 Car parking
- Policy T7 Deliveries, servicing and construction

The Southwark Plan 2022

The Southwark Plan 2022 was adopted on 23 February 2022. The plan provides strategic policies, development management policies, area visions and site allocations which set out the strategy for managing growth and development across the borough from 2019 to 2036. The relevant policies are:

- Policy P5 Student homes
- Policy P8 Wheelchair accessible and adaptable housing
- Policy P13 Design of places
- Policy P14 Design quality
- Policy P16 Designing out crime
- Policy P17 Tall buildings
- Policy P18 Efficient use of land
- Policy P19 Listed buildings and structures
- Policy P20 Conservation areas

- Policy P21 Conservation of the historic environment and natural heritage
- Policy P23 Archaeology
- Policy P28 Access to employment and training
- Policy P30 Office and business development
- Policy P34 Railway arches
- Policy P35 Town and local centres
- Policy P49 Public transport
- Policy P50 Highways impacts
- Policy P51 Walking
- Policy P52 Low Line routes
- Policy P53 Cycling
- Policy P54 Car parking
- Policy P56 Protection of amenity
- Policy P59 Green infrastructure
- Policy P60 Biodiversity
- Policy P61 Trees
- Policy P62 Reducing waste
- Policy P64 Contaminated land and hazardous substances
- Policy P65 Improving air quality
- Policy P66 Reducing noise pollution and enhancing soundscapes
- Policy P67 Reducing water use
- Policy P68 Reducing flood risk
- Policy P69 Sustainability standards
- Policy P70 Energy

Planning history of the site and nearby sites

Reference and Proposal	Status
12/AP/3457 Installation of two windows to the first floor rear (southern) elevation of the building.	GRANTED- Minor Application 08/04/2013
04/AP/2072 Retention of non-illuminated fascia sign over central doors, a vertical banner sign between ground and first floor level and three signs at ground floor level on front elevation of building.	GRANTED- Advertisement Consent 24/01/2005

Consultation undertaken

Site notice date: 31/03/2022

Press notice date: 24/03/2022

Case officer site visit date: 31/03/2022

Neighbour consultation letters sent: 21/10/2022

Internal services consulted:

LBS Community Infrastructure Levy Team

LBS Transport Policy

LBS Archaeology

LBS Design & Conservation Team [Formal]

LBS Ecology

LBS Environmental Protection

LBS Highways Development & Management

LBS Flood Risk Management & Urban Drain

LBS Waste Management

LBS Urban Forester

Statutory and non-statutory organisations:

Network Rail

Environment Agency

Metropolitan Police Service (Designing Out Crime)

Neighbour and local groups consulted:

54 Amelia Street London Southwark

25B Manor Place London Southwark

Unit 14 83 Crampton Street London	19A Iliffe Yard London Southwark
18A Iliffe Yard London Southwark	78 Amelia Street London Southwark
Kennington And Walworth Delivery Centre 111-123 Crampton Street London	Unit 13 83 Crampton Street London
Flat 204 22 Amelia Street London	9 Flamingo Court 81 Crampton Street London
19 Iliffe Yard London Southwark	803 83 Crampton Street London
150 Manor Place London Southwark	Flat 711 22 Amelia Street London
142 Manor Place London Southwark	64 Iliffe Street London Southwark
First Floor 3-9 Amelia Street London	Flat 411 22 Amelia Street London
Flat 30 Manor Place London	10 Iliffe Yard London Southwark
10A Iliffe Yard London Southwark	96 Iliffe Street London Southwark
Flat 702 22 Amelia Street London	81 Iliffe Street London Southwark
100 Amelia Street London Southwark	Railway Arch 185 30 Manor Place London
9A Amelia Street London Southwark	18 Iliffe Yard London Southwark
610 83 Crampton Street London	416 83 Crampton Street London
152 Amelia Street London Southwark	Flat 10 140 Manor Place London
160 Amelia Street London Southwark	Flat 1 George Elliot House Thrush Street
Unit A And B 22 Amelia Street London	Flat 201 22 Amelia Street London
1 Thrush Street London Southwark	1 Occupation Road London Southwark
Flat 6 George Elliot House Thrush Street	17 Manor Place London Southwark
515 83 Crampton Street London	9B Manor Place London Southwark
418 83 Crampton Street London	Unit 11 Flamingo Court 81 Crampton Street
706 83 Crampton Street London	Concierge Office 22 Amelia Street London
Walworth Police Station 12-28 Manor Place London	25A Manor Place London Southwark
Top Flat 7 Manor Place London	186 Crampton Street London Southwark
158 Amelia Street London Southwark	108 Amelia Street London Southwark
Railway Arch 183 30 Manor Place London	Unit E 22 Amelia Street London
162 Amelia Street London Southwark	Flat 813 22 Amelia Street London
186A Crampton Street London Southwark	Flat 801 22 Amelia Street London

Flat 816 22 Amelia Street London	85 Iliffe Street London Southwark
Flat 111 22 Amelia Street London	55 Iliffe Street London Southwark
Flat 102 22 Amelia Street London	704 83 Crampton Street London
Unit B 22 Amelia Street London	415 83 Crampton Street London
Flat 810 22 Amelia Street London	405 83 Crampton Street London
Flat 804 22 Amelia Street London	Flat 3 140 Manor Place London
Flat 108 22 Amelia Street London	307 83 Crampton Street London
Flat 807 22 Amelia Street London	Flat 25 140 Manor Place London
Flat 105 22 Amelia Street London	18 Flamingo Court 81 Crampton Street London
Railway Arch 184 30 Manor Place London	612 83 Crampton Street London
9A Manor Place London Southwark	208 83 Crampton Street London
Flat 806 22 Amelia Street London	513 83 Crampton Street London
Flat 706 22 Amelia Street London	Flat 13 140 Manor Place London
82 Amelia Street London Southwark	3 Thrush Street London Southwark
118 Amelia Street London Southwark	7 Iliffe Yard London Southwark
156 Amelia Street London Southwark	16A Iliffe Yard London Southwark
Flat 609 22 Amelia Street London	609 83 Crampton Street London
604 83 Crampton Street London	811 83 Crampton Street London
Flat 809 22 Amelia Street London	93 Iliffe Street London Southwark
Flat 707 22 Amelia Street London	73 Iliffe Street London Southwark
Flat 521 22 Amelia Street London	70 Iliffe Street London Southwark
Flat 503 22 Amelia Street London	60 Iliffe Street London Southwark
Flat 406 22 Amelia Street London	53 Iliffe Street London Southwark
11A Iliffe Yard London Southwark	56 Iliffe Street London Southwark
16 Iliffe Yard London Southwark	50 Iliffe Street London Southwark
11 Iliffe Yard London Southwark	15 Iliffe Yard London Southwark
9 Iliffe Yard London Southwark	Flat 12 George Elliot House Thrush Street
6A Iliffe Yard London Southwark	Flat 7 George Elliot House Thrush Street
71 Iliffe Street London Southwark	

Flat 10 George Elliot House Thrush Street	Flat 709 22 Amelia Street London
Flat 617 22 Amelia Street London	Flat 610 22 Amelia Street London
Unit 5 83 Crampton Street London	Flat 605 22 Amelia Street London
80 Amelia Street London Southwark	503 83 Crampton Street London
Flat 2 George Elliot House Thrush Street	417 83 Crampton Street London
20 Iliffe Yard London Southwark	Flat 32 140 Manor Place London
Flat 612 22 Amelia Street London	Flat 14 1 Angel Lane London
Flat 606 22 Amelia Street London	Flat 6 1 Angel Lane London
Flat 504 22 Amelia Street London	Flat 4 1 Angel Lane London
Flat 402 22 Amelia Street London	Flat 2 1 Angel Lane London
Flat 321 22 Amelia Street London	2 Thrush Street London Southwark
Flat 216 22 Amelia Street London	Flat 107 22 Amelia Street London
Flat 618 22 Amelia Street London	805 83 Crampton Street London
Unit 11 83 Crampton Street London	19 Manor Place London Southwark
Unit 17 83 Crampton Street London	140 Manor Place London Southwark
619 83 Crampton Street London	Flat 604 22 Amelia Street London
154 Amelia Street London Southwark	Flat 512 22 Amelia Street London
90 Amelia Street London Southwark	Flat 508 22 Amelia Street London
88 Amelia Street London Southwark	Flat 505 22 Amelia Street London
66 Amelia Street London Southwark	219 83 Crampton Street London
11 Manor Place London Southwark	Flat 221 22 Amelia Street London
75 Iliffe Street London Southwark	Flat 203 22 Amelia Street London
58 Iliffe Street London Southwark	410 83 Crampton Street London
49 Iliffe Street London Southwark	63 Iliffe Street London Southwark
29A Amelia Street London Southwark	Flat 27 140 Manor Place London
Flat 4 George Elliot House Thrush Street	Room 117 140 Manor Place London
14A-15A Iliffe Yard London Southwark	90 Iliffe Street London Southwark
Flat 31 140 Manor Place London	83 Iliffe Street London Southwark
Flat 20 140 Manor Place London	72 Amelia Street London Southwark

64 Amelia Street London Southwark	6 Flamingo Court 81 Crampton Street London
8 Thrush Street London Southwark	
140 Amelia Street London Southwark	809 83 Crampton Street London
14 Iliffe Yard London Southwark	806 83 Crampton Street London
Flat 615 22 Amelia Street London	804 83 Crampton Street London
Flat 414 22 Amelia Street London	718 83 Crampton Street London
Flat 405 22 Amelia Street London	615 83 Crampton Street London
Flat 705 22 Amelia Street London	611 83 Crampton Street London
Flat 5 140 Manor Place London	518 83 Crampton Street London
Flat 33 140 Manor Place London	501 83 Crampton Street London
711 83 Crampton Street London	409 83 Crampton Street London
419 83 Crampton Street London	304 83 Crampton Street London
314 83 Crampton Street London	Unit 16 83 Crampton Street London
311 83 Crampton Street London	716 83 Crampton Street London
Flat 415 22 Amelia Street London	206 83 Crampton Street London
Flat 212 22 Amelia Street London	144 Amelia Street London Southwark
Flat 113 22 Amelia Street London	128 Amelia Street London Southwark
Flat 110 22 Amelia Street London	120 Amelia Street London Southwark
Flat 109 22 Amelia Street London	Flat 603 22 Amelia Street London
Unit F 22 Amelia Street London	Flat 522 22 Amelia Street London
402 83 Crampton Street London	Flat 417 22 Amelia Street London
312 83 Crampton Street London	Flat 408 22 Amelia Street London
220 83 Crampton Street London	Flat 210 22 Amelia Street London
207 83 Crampton Street London	Flat 114 22 Amelia Street London
201 83 Crampton Street London	Flat 621 22 Amelia Street London
Unit 9 83 Crampton Street London	Flat 18 140 Manor Place London
Unit 4 83 Crampton Street London	808 83 Crampton Street London
7 Flamingo Court 81 Crampton Street London	317 83 Crampton Street London
	308 83 Crampton Street London

Unit 8 83 Crampton Street London	404 83 Crampton Street London
10 Flamingo Court 81 Crampton Street London	215 83 Crampton Street London
601 83 Crampton Street London	Tenants Hall Crampton Street London
508 83 Crampton Street London	Unit 3 83 Crampton Street London
86 Amelia Street London Southwark	11 Flamingo Court 81 Crampton Street London
62 Amelia Street London Southwark	812 83 Crampton Street London
130 Amelia Street London Southwark	807 83 Crampton Street London
126 Amelia Street London Southwark	703 83 Crampton Street London
92 Iliffe Street London Southwark	614 83 Crampton Street London
89 Iliffe Street London Southwark	411 83 Crampton Street London
86 Iliffe Street London Southwark	13A Iliffe Yard London Southwark
74 Iliffe Street London Southwark	Flat 6 140 Manor Place London
17 Iliffe Yard London Southwark	Flat 28 140 Manor Place London
2 Manor Place London Southwark	Flat 2 140 Manor Place London
146 Manor Place London Southwark	2 Flamingo Court 81 Crampton Street London
Ground Floor 3 Amelia Street London	216 83 Crampton Street London
Flat 704 22 Amelia Street London	56 Amelia Street London Southwark
Flat 602 22 Amelia Street London	136 Amelia Street London Southwark
Flat 514 22 Amelia Street London	88 Iliffe Street London Southwark
Flat 421 22 Amelia Street London	79 Iliffe Street London Southwark
Flat 418 22 Amelia Street London	59 Iliffe Street London Southwark
Flat 403 22 Amelia Street London	52 Iliffe Street London Southwark
Flat 305 22 Amelia Street London	4 Thrush Street London Southwark
Flat 302 22 Amelia Street London	Right Hand Unit First Floor 3-9 Amelia Street
Flat 209 22 Amelia Street London	Flat 29 140 Manor Place London
Flat 115 22 Amelia Street London	Flat 19 140 Manor Place London
Flat 104 22 Amelia Street London	Flat 803 22 Amelia Street London
Flat 103 22 Amelia Street London	

Flat 715 22 Amelia Street London	134 Amelia Street London Southwark
Flat 713 22 Amelia Street London	114 Amelia Street London Southwark
Flat 703 22 Amelia Street London	Flat 510 22 Amelia Street London
Flat 601 22 Amelia Street London	Flat 306 22 Amelia Street London
Flat 409 22 Amelia Street London	502 83 Crampton Street London
Flat 211 22 Amelia Street London	413 83 Crampton Street London
Flat 116 22 Amelia Street London	5 Flamingo Court 81 Crampton Street London
Unit D 22 Amelia Street London	203 83 Crampton Street London
313 83 Crampton Street London	106 83 Crampton Street London
309 83 Crampton Street London	103 83 Crampton Street London
301 83 Crampton Street London	517 83 Crampton Street London
15 Flamingo Court 81 Crampton Street London	514 83 Crampton Street London
713 83 Crampton Street London	511 83 Crampton Street London
504 83 Crampton Street London	505 83 Crampton Street London
420 83 Crampton Street London	96 Amelia Street London Southwark
414 83 Crampton Street London	70 Amelia Street London Southwark
412 83 Crampton Street London	124 Amelia Street London Southwark
Flat 15 1 Angel Lane London	104 Amelia Street London Southwark
Flat 202 22 Amelia Street London	13 Manor Place London Southwark
66 Iliffe Street London Southwark	68 Iliffe Street London Southwark
Flat 317 22 Amelia Street London	67 Iliffe Street London Southwark
First Floor Flat 2 Manor Place London	65 Iliffe Street London Southwark
110 Amelia Street London Southwark	61 Iliffe Street London Southwark
80 Iliffe Street London Southwark	30 Manor Place London Southwark
77 Iliffe Street London Southwark	Flat 8 George Elliot House Thrush Street
98 Amelia Street London Southwark	9 Thrush Street London Southwark
11 Thrush Street London Southwark	Railway Arch 182 30 Manor Place London
5 Thrush Street London Southwark	Flat 11 140 Manor Place London

Flat 815 22 Amelia Street London	Flat 714 22 Amelia Street London
Flat 812 22 Amelia Street London	714 83 Crampton Street London
Flat 805 22 Amelia Street London	702 83 Crampton Street London
Flat 620 22 Amelia Street London	616 83 Crampton Street London
Flat 419 22 Amelia Street London	94 Amelia Street London Southwark
Flat 322 22 Amelia Street London	76 Amelia Street London Southwark
Flat 316 22 Amelia Street London	74 Amelia Street London Southwark
Flat 118 22 Amelia Street London	146 Amelia Street London Southwark
318 83 Crampton Street London	122 Amelia Street London Southwark
202 83 Crampton Street London	21 Manor Place London Southwark
104 83 Crampton Street London	82 Iliffe Street London Southwark
101 83 Crampton Street London	76 Iliffe Street London Southwark
620 83 Crampton Street London	72 Iliffe Street London Southwark
608 83 Crampton Street London	Flat 11 George Elliot House Thrush Street
605 83 Crampton Street London	13 Thrush Street London Southwark
603 83 Crampton Street London	12 Thrush Street London Southwark
602 83 Crampton Street London	1 Amelia Street London Southwark
520 83 Crampton Street London	148 Manor Place London Southwark
516 83 Crampton Street London	Flat 8 140 Manor Place London
Flat 26 140 Manor Place London	Flat 422 22 Amelia Street London
Flat 23 140 Manor Place London	Flat 410 22 Amelia Street London
Flat 1 140 Manor Place London	Flat 404 22 Amelia Street London
Flat 12 1 Angel Lane London	Flat 310 22 Amelia Street London
Flat 1 1 Angel Lane London	Flat 308 22 Amelia Street London
58 Amelia Street London Southwark	Flat 217 22 Amelia Street London
Flat 501 22 Amelia Street London	Flat 205 22 Amelia Street London
Flat 312 22 Amelia Street London	319 83 Crampton Street London
Flat 219 22 Amelia Street London	315 83 Crampton Street London
Flat 120 22 Amelia Street London	217 83 Crampton Street London

214 83 Crampton Street London	Flat 213 22 Amelia Street London
212 83 Crampton Street London	Flat 117 22 Amelia Street London
Unit 12 83 Crampton Street London	407 83 Crampton Street London
Unit 7 83 Crampton Street London	403 83 Crampton Street London
17 Flamingo Court 81 Crampton Street London	Unit 2 83 Crampton Street London
4 Flamingo Court 81 Crampton Street London	13 Flamingo Court 81 Crampton Street London
705 83 Crampton Street London	613 83 Crampton Street London
701 83 Crampton Street London	150 Amelia Street London Southwark
618 83 Crampton Street London	142 Amelia Street London Southwark
606 83 Crampton Street London	116 Amelia Street London Southwark
519 83 Crampton Street London	106 Amelia Street London Southwark
512 83 Crampton Street London	95 Iliffe Street London Southwark
Flat 15 140 Manor Place London	94 Iliffe Street London Southwark
Flat 7 1 Angel Lane London	91 Iliffe Street London Southwark
Flat 3 1 Angel Lane London	78 Iliffe Street London Southwark
18 Amelia Street London Southwark	62 Iliffe Street London Southwark
Flat 407 22 Amelia Street London	57 Iliffe Street London Southwark
209 83 Crampton Street London	54 Iliffe Street London Southwark
1 Flamingo Court 81 Crampton Street London	51 Iliffe Street London Southwark
Flat 420 22 Amelia Street London	Flat 14 140 Manor Place London
Flat 309 22 Amelia Street London	Flat 811 22 Amelia Street London
25 Manor Place London Southwark	Flat 619 22 Amelia Street London
84 Amelia Street London Southwark	Flat 616 22 Amelia Street London
Flat 519 22 Amelia Street London	Flat 613 22 Amelia Street London
Flat 507 22 Amelia Street London	Flat 607 22 Amelia Street London
Flat 318 22 Amelia Street London	Flat 515 22 Amelia Street London
Flat 9 140 Manor Place London	Flat 413 22 Amelia Street London
	Flat 401 22 Amelia Street London

Flat 304 22 Amelia Street London
Flat 220 22 Amelia Street London
Flat 119 22 Amelia Street London
Flat 112 22 Amelia Street London
Unit G 22 Amelia Street London
306 83 Crampton Street London
218 83 Crampton Street London
211 83 Crampton Street London
204 83 Crampton Street London
102 83 Crampton Street London
Unit 1 83 Crampton Street London
12 Flamingo Court 81 Crampton Street
London
3 Flamingo Court 81 Crampton Street
London
810 83 Crampton Street London
801 83 Crampton Street London
707 83 Crampton Street London
510 83 Crampton Street London
509 83 Crampton Street London
408 83 Crampton Street London
Flat 11 1 Angel Lane London
Flat 10 1 Angel Lane London
Flat 9 1 Angel Lane London
Flat 8 1 Angel Lane London
Flat 5 1 Angel Lane London
Flat 502 22 Amelia Street London
Flat 311 22 Amelia Street London
Flat 218 22 Amelia Street London
Flat 106 22 Amelia Street London
87 Iliffe Street London Southwark
Flat 5 George Elliot House Thrush Street
52 Amelia Street London Southwark
17A Iliffe Yard London Southwark
5-9 Amelia Street London Southwark
Flat 513 22 Amelia Street London
Flat 24 140 Manor Place London
Flat 16 140 Manor Place London
Flat 222 22 Amelia Street London
320 83 Crampton Street London
148 Amelia Street London Southwark
68 Amelia Street London Southwark
60 Amelia Street London Southwark
132 Amelia Street London Southwark
102 Amelia Street London Southwark
5 Manor Place London Southwark
8 Iliffe Yard London Southwark
188 Crampton Street London Southwark
10 Thrush Street London Southwark
6 Thrush Street London Southwark
144 Manor Place London Southwark
Flat 12 140 Manor Place London
Flat 7 140 Manor Place London
Flat 4 140 Manor Place London
Flat 814 22 Amelia Street London
Flat 808 22 Amelia Street London
Flat 802 22 Amelia Street London
Flat 710 22 Amelia Street London
Flat 622 22 Amelia Street London

Flat 614 22 Amelia Street London	Flat 30 140 Manor Place London
Flat 608 22 Amelia Street London	Flat 303 22 Amelia Street London
Flat 517 22 Amelia Street London	Flat 207 22 Amelia Street London
Flat 511 22 Amelia Street London	Flat 22 140 Manor Place London
Flat 506 22 Amelia Street London	Flat 611 22 Amelia Street London
Flat 412 22 Amelia Street London	Flat 708 22 Amelia Street London
Flat 307 22 Amelia Street London	Railway Arches 178 To 181 Amelia Street London
Flat 301 22 Amelia Street London	Flat 21 140 Manor Place London
Flat 215 22 Amelia Street London	708 83 Crampton Street London
Flat 208 22 Amelia Street London	802 83 Crampton Street London
Flat 206 22 Amelia Street London	717 83 Crampton Street London
Flat 121 22 Amelia Street London	406 83 Crampton Street London
310 83 Crampton Street London	16 Flamingo Court 81 Crampton Street London
205 83 Crampton Street London	8 Flamingo Court 81 Crampton Street London
105 83 Crampton Street London	305 83 Crampton Street London
Unit 15 83 Crampton Street London	302 83 Crampton Street London
Unit 10 83 Crampton Street London	213 83 Crampton Street London
Unit 6 83 Crampton Street London	210 83 Crampton Street London
14 Flamingo Court 81 Crampton Street London	607 83 Crampton Street London
709 83 Crampton Street London	Basement And Ground Floor Flat 7 Manor Place London
Flat 13 1 Angel Lane London	138 Amelia Street London Southwark
Flat 518 22 Amelia Street London	112 Amelia Street London Southwark
401 83 Crampton Street London	84 Iliffe Street London Southwark
19 Flamingo Court 81 Crampton Street London	69 Iliffe Street London Southwark
92 Amelia Street London Southwark	Flat 9 George Elliot House Thrush Street
Middle Unit First Floor 3-9 Amelia Street	Flat 3 George Elliot House Thrush Street
Flat 516 22 Amelia Street London	7 Thrush Street London Southwark
Flat 315 22 Amelia Street London	

Flat 17 140 Manor Place London
Flat 716 22 Amelia Street London
Flat 712 22 Amelia Street London
Flat 701 22 Amelia Street London
Flat 520 22 Amelia Street London
Flat 509 22 Amelia Street London
Flat 416 22 Amelia Street London
Flat 320 22 Amelia Street London
Flat 319 22 Amelia Street London
Flat 314 22 Amelia Street London
Flat 313 22 Amelia Street London
Flat 214 22 Amelia Street London

Flat 122 22 Amelia Street London
Flat 101 22 Amelia Street London
Unit C 22 Amelia Street London
316 83 Crampton Street London
303 83 Crampton Street London
715 83 Crampton Street London
712 83 Crampton Street London
710 83 Crampton Street London
617 83 Crampton Street London
507 83 Crampton Street London
506 83 Crampton Street London

Consultation responses received

Internal services

LBS Community Infrastructure Levy Team

LBS Archaeology

LBS Design & Conservation Team [Formal]

LBS Ecology

LBS Environmental Protection

LBS Highways Development & Management

LBS Flood Risk Management & Urban Drain

LBS Urban Forester

LBS Transport Policy

Statutory and non-statutory organisations

Network Rail

Metropolitan Police Service (Designing Out Crime)

Neighbour and local groups consulted:

10B Urlwin Street, Camberwell Camberwell
LONDON

31 Sutherland Walk London

11 Thrush Street London SE17 3AQ

118 Benhill Road London Southwark

75 Iliffe Street London SE17 3LL

72 Amelia Street Pullens Buildings London

Flat 1 Arnold House Doddington grove
London

60 Penton Place London

1 Hillside Gardens London N6 5SU

Flat 8, Duke of Clarence Court 154 Manor
Place London

2 Iliffeyard London Se173qa

152 crampton street london SE17 3AE

Unit 8, Clements Yard Iliffe Street London

8 ILIFFE STREET ELEPHANT AND
CASTLE LONDON

100 Crampton street London SE17 3AE
95 Iliffe Street London SE17 3ll
35 Pullens Buildings, Peacock Street
London Se17 3lf
101 Mina Road London SE17 2QS
9b Charleston Street London SE17 1NG
20 Faunce Street London SE17 3TR
92 Amelia Street London se17 3ar
8 iliffe street elephant and castle london
Flat 16 Pullens Buildings Penton Place
London
Flat 5, 3 Angel Lane Southwark London
93 Illife St London SE173LL
206 Amelia Street London SE173AS
4 Pullens Buildings Peacock Street London
38 peacock street pullens buildings london
Flat 306 83 Crampton Street London
308 83 Crampton Street London
42 Camberwell Grove London SE5 8RE
Flat 5 London SE172GD
100 Alberta Street London SE17 3RT
33 Chapter Road, Walworth Walworth
London
44 Iliffe Street London SE17 3LJ
152 Amelia Street London SE17 3AS
128 Crampton Street London SE17 3AE
26 percival house Winchester So22 5sz
Flat 23 Boundary House Bethwin Road
London
61 Iliffe Street LONDON SE17 3LL
Flat A, 71 Larcom Street London
Flat 83, Comber House Camberwell,
London SE5 0LL
82 iliffe street London se17 3LL
19 Fielding Street London SE17 3HE
95 Iliffe Street London Se173ll
77 Iliffe St London SE17 3LL
171 Brook Drive London SE11 4TG
22 Williamson Court Borrett Close London
Flat 3 Pearlec House Walworth Place
London
220 83 Crampton Street London
Flat 417 22 Amelia Street London
712 83 Crampton Street London
78B Henshaw St London SE17 1PD
77 Iliffe St Walworth London
Flat 5, Skyline Court, 9 Grange Yard
London SE1 3AN
4 Pullens Buildings, Peacock Street London
60 Penton Place London SE17 3JS
11 Peacock Street London Southwark
47 Peacock Street London sE17 3LF
128 Crampton Street LONDON SE17 3AE
224 Amelia St London SE17 3AS
60 penton place London Se17 3js
8 Gransden Road London W12 9SA
3 Iliffe Street Walworth London
22a Iliffe Yard London SE173QA
23A Iliffe Yard London SE17 3QA
Flat 31, Pullens Buildings Penton Place
London
64 Amelia street London SE173AR

21 Pullens Buildings, Peacock Street
Peacock Street London

142 amelia street pullens buildings London

84 Penton Place London SE17 3JS

47 Iliffe Street London

34 Kemerton Road London se5 9ar

69 Iliffe st London se17 3ll

Flat 308 83 Crampton Street London

172 Amelia Street London SE17 3AS

92 Amelia Street London SE17 3AR

60 Amelia Street London SE17 3AR

11 Thrush Street London SE17 3AQ

Flat 220 83 Crampton Street London

166 Crampton street London

53 Ambergate Street London SE17 3RZ

Flat 28, Pullens Buildings Penton Place
London

Flat 710 83 Crampton Street London

84 Penton Place Walworth London

94 iliffe st LONDON SE17 3LL

24 Pullens Buildings Peacock Street London

88 Amelia St Kennington London

Flat 810 83 Crampton Street London

38 pullens buildings peacock street london

56 Iliffe Street London SE17 3LL

Flat 405 83 Crampton Street London

158 Crampton Street London SE17 3AE

37 Evelina Mansions, New Church Road
London SE5 7JW

86 Crampton Street London SE17 3AE

23a Iliffe Yard London SE17 3QA

78 Penton Place London SE17 3JS

11 Peacock St London SE17 3LF

Flat 16 Pullens Buildings Penton Place
London

Flat 705 22 Amelia Street London

71 Iliffe Street London SE17 3LL

76 Amelia St London SE17 3AR

108 Amelia Street London SE17 3AR

142 Amelia Street London SE17 3AR

76 Amelia Street Amelia Street London

31 Iliffe Street Walworth London

7 Peacock Street Pullens Estate London

Flat 8, 1 Angel Lane 1 Angel Lane London

Flat 110, 22 Amelia Street London SE17
3BY

17 Pullens Buildings Penton London

123 Manor Place LONDON London SE17
3JP

Flat 405 83 Crampton St London

11 thrush street London Se17 3AQ

138 Amelia Street London SE17 3AR

53 Wesley Close London SE17 3AU

162 Crampton Street London SE17 3AE

Flat 10, 1 Angel Lane London SE173FA

28 Sutherland Square London SE17 3EQ

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