

Item No. 7.1	Classification: Open	Date: 4 November 2014	Meeting Name: Planning Committee
Report title:	Development Management planning application: Application 14/AP/0833 for: Full Planning Permission Address: 237 WALWORTH ROAD, LONDON SE17 1RL Proposal: Erection of two buildings, one a 5 storey building plus lower ground floor and part basement plant room to provide student accommodation (143 bedspaces) (Sui generis) and the other a part 2, part 3, part 4 storey building together with a single storey extension to the flying freehold to provide 4 dwelling houses and 3 dwellings (Class C3), the provision of four disabled car parking spaces, cycle parking and associated landscaping works		
Ward(s) or groups affected:	East Walworth		
From:	HEAD OF DEVELOPMENT MANAGEMENT		
Application Start Date 25/04/2014		Application Expiry Date 25/07/2014	
Earliest Decision Date 05/06/2014			

RECOMMENDATION

- 1 That the planning committee resolves to grant planning permission subject to a satisfactory legal agreement and planning conditions.
- 2 In the event that the legal agreement is not entered into by 9 December, that the Head of Development Management is authorised to refuse planning permission, if appropriate, for the reasons set out in paragraph 106 of this report.

BACKGROUND INFORMATION

Site location and description

- 3 The site, measuring 0.304 hectares, is an irregular rectangular shaped backland site on the east side of Walworth Road. The sole access to the site is via a narrow passage between retail frontages at 235 and 239 Walworth Road. Beyond the passage the site is bounded on its north, east, south and south elevation by boundary walls varying in height between 2.5 – 4 metres. These walls separate the site from the adjoining Browning Estate to the east, a warehouse building (York House) to the north, and Manchester House to the south. There is no boundary wall to rear of 227-221 Walworth Road.
- 4 The site is vacant having recently been cleared of buildings that previously covered around 80% of the site. Those buildings were historically used for storage (Class B8) and other B class uses but were more recently occupied by a range of town centre uses including an unauthorized church, community use, hairdresser and retail units.
- 5 Whilst retail is the dominant land use to the west, the character to the east is

predominantly residential comprising a number of housing blocks over 4 storeys in height with large, mansard style roofs arranged around a central courtyard. The buildings typically have deck access and site within large plots that have substantial outdoor amenity space.

- 6 The site has an excellent public transport accessibility level (PTAL) of 6a.

Details of proposal

- 7 Full planning permission is sought to erect two new buildings that will provide student accommodation, new housing and associated landscaping, car parking cycle storage and refuse storage.

Student accommodation

- 8 A new 5 storey building will be erected to provide 130 student bed rooms (143 bedspaces). It is proposed as 'direct let' accommodation and so is not directly linked to a specific University or College - the rooms will be directly let to students.
- 9 The main entrance and reception is at ground floor level and provides access to an outdoor amenity space along the eastern boundary. The amenity space extends around the perimeter of the building providing an outdoor seating area, urban gym, orchard courtyard, sensory garden, terminating at a central courtyard. The main entrance to the student accommodation itself is from a separate entrance accessed from the central courtyard.
- 10 The student rooms vary in size but each will have an en-suite bathroom, a desk and storage space and kitchenette:

85 Studio rooms (17m² - 23 m²)
25 'Premium' rooms (20m² - 33 m²)
7 Accessible rooms (25 m² - 30 m²)
13 Twin rooms (37 m² - 39 m²)

Seven of the student rooms are proposed to be designed to be wheelchair accessible.

- 11 A large common room (122 m²) and communal lounge (30 m²) will be provided at lower ground level with four further common lounge areas being provided at first, second, third and fourth floor level. An educational study space is also proposed at upper ground floor level (91m²) that will provide space for workshops and classes such as yoga, self defence and nutrition. A laundry room (17 m²) will also be provided at lower ground floor level.
- 12 Dedicated refuse and cycle storage has been integrated within the proposed student building. The bin and bike store is accessible by a set of stairs and a platform lift from the central courtyard area.

Residential accommodation

- 13 Seven new self contained dwellings are proposed within this scheme. The proposed mix of dwellings is:

1 x 1 bed (market)
2 x 2 bed (shared ownership)
2 x 4 bed (social rent)
2 x 5 bed (social rent)

- 14 The one bed dwelling is proposed within the canopy structure (flying freehold) that sits above the main access passage to the site. The entrance to the dwelling is from the access passage.
- 15 The remaining dwellings are arranged in a short terrace that rises from two to four storeys. Access to these dwellings has been separated from the student accommodation and is via a gate that fronts the main access. Five of these dwellings have been designed to meet the South East London Housing Partnership Wheelchair Homes Design Guidelines and four will be provided with an on-site accessible parking space. All of these dwelling are proposed as affordable dwellings and will have dedicated cycle and refuse facilities.

Amendments

- 16 Alterations have been made to application since submission. The main changes and are:
 - The removal of a medical centre (Class D1) from the scheme - originally proposed at lower and upper ground floor levels.
 - The relocation of the main bin and bike store from the courtyard to the student block to replace the D1 space at the lower ground floor.
 - The provision of education/study space for students at upper ground floor level to replace the D1 space on the upper ground floor
 - An extension of the courtyard and relocation of main entrance to the courtyard to increase circulation space
 - Proposal for a traffic light control system for the main access

Planning history

- 17 14/AP/0830 Outline application for the erection of two buildings, one a part 5, part 6 storey building plus lower ground floor and part basement plant room and the other a part 2, part 3, part 4 storey building together with a single storey extension to the flying freehold to provide 68 residential units (comprising a mix of 19 x 1 bed, 42 x 2 bed, 3 x 3 bed, 2 x 4 bed and 2 x 5 bed) the provision of four disabled car parking spaces, cycle parking and associated landscaping works. The application is yet to be determined and is a concurrent alternative proposal).
- 18 14/EN/0296 Unauthorised change of use of the site to a car park (Enforcement Investigation). The case is under investigation.
- 19 13/PA/0024 Prior approval for the demolition of existing buildings to facilitate redevelopment of the site. Granted 25/09/2013.
- 20 10/AP/3592 Renewal of Planning Permission (reference 07-AP-2320) for the erection of a part 2, part 4 and part 5 storey building to accommodate 54 residential flats and 871.1sq.m of Class B1 (office/commercial) floorspace and remodelling of access from Walworth Road, plus associated works of demolition and construction. Granted 09/03/2011.
- 21 This planning permission expired on 08/3/2014. The applicant has also explained that physical constraints of that permission were such that that scheme was not deliverable owing to issues regarding land ownership, a covenant in place restricting built form and use of windows adjacent to Southey House and right of way and means of escape issues.
- 22 07/AP/2320 Planning permission granted for The erection of part 2, part 4 and part 5 storey buildings to accommodate 54 residential flats and 871.1sq.m of Class B1

(office/commercial) floorspace and remodelling of access from Walworth Road, plus associated works of demolition and construction. 25/01/2008.

Planning history of adjoining sites

229 Walworth Road

- 23 14/AP/2419 Full planning permission is sought for part demolition of a single storey rear extension and rebuilding works.
- 24 The proposed works will facilitate the creation of a means of escape for the ground floor retail occupiers of this building. At this time of writing, no decision has been made on this application.

KEY ISSUES FOR CONSIDERATION

Summary of main issues

- 25 The main issues to be considered in respect of this application are:
- a) Principle of the proposed development and conformity with strategic policies, including the need for student accommodation;
 - b) Affordable housing;
 - c) Design;
 - d) Quality of accommodation;
 - e) Impact of adjoining uses on the proposed development;
 - f) Impact upon the amenities of neighbouring residents and occupiers;
 - g) Transport including access;
 - h) Trees and landscaping;
 - i) Planning obligations (s106) and community infrastructure levy;
 - j) Sustainability;
 - k) Flood risk.

Planning policy

National Planning Policy Framework (NPPF)

- 26 Section 1 - Building a strong, competitive economy
Section 4 - Promoting sustainable transport
Section 6 - Delivering a wide choice of high quality homes
Section 7 - Requiring good design
Section 8 - Promoting healthy communities
Section 10 - Meeting the challenge of climate change, flooding and coastal change
Section 11 - Conserving and enhancing the natural environment

London Plan July 2011 consolidated with revised early minor alterations October 2013

- 27 Policy 3.1 Ensuring equal life chances for all
Policy 3.3 Increasing housing supply
Policy 3.8 Housing choice
Policy 3.9 Mixed and balanced communities
Policy 3.10 Definition of affordable housing
Policy 3.11 Affordable housing targets
Policy 3.12 Negotiating affordable housing on individual private residential
Policy 4.7 Retail and town centre development
Policy 4.10 New and emerging economic sectors
Policy 4.12 Improving opportunities for all
Policy 5.1 Climate change mitigation
Policy 5.2 Minimising carbon dioxide emissions

Policy 5.3	Sustainable design and construction
Policy 5.5	Decentralised energy networks
Policy 5.6	Decentralised energy in development proposals
Policy 5.7	Renewable energy
Policy 5.9	Overheating and cooling
Policy 5.15	Water use and supplies
Policy 5.10	Urban greening
Policy 5.11	Green roofs and development site environs
Policy 5.12	Flood risk management
Policy 5.13	Sustainable drainage
Policy 6.3	Assessing effects of development on transport capacity
Policy 6.13	Parking
Policy 6.9	Cycling
Policy 6.10	Walking
Policy 6.11	Smoothing traffic flow and tackling congestion
Policy 7.1	Building London's neighbourhoods and communities
Policy 7.2	An inclusive environment
Policy 7.3	Designing out crime
Policy 7.4	Local character
Policy 7.5	Public realm
Policy 7.6	Architecture
Policy 7.8	Heritage assets and archaeology
Policy 7.21	Trees and woodlands
Policy 7.13	Safety, security and resilience to emergency
Policy 7.14	Improving air quality
Policy 7.15	Reducing noise and enhancing soundscapes
Policy 8.3	Community infrastructure levy

Core Strategy 2011

- 28
- Strategic Policy 1 - Sustainable development
 - Strategic Policy 2 - Sustainable transport
 - Strategic Policy 3 - Shopping, leisure and entertainment
 - Strategic Policy 4 - Places for learning, enjoyment and healthy lifestyles
 - Strategic Policy 5 - Providing new homes
 - Strategic Policy 6 - Homes for people on different incomes
 - Strategic Policy 7 - Family homes
 - Strategic Policy 8 - Student homes
 - Strategic Policy 10 - Jobs and businesses
 - Strategic Policy 11 - Open spaces and wildlife
 - Strategic Policy 12 - Design and conservation
 - Strategic Policy 13 - High environmental standards
 - Strategic Policy 14 – Implementation and delivery

Southwark Plan 2007 (July) - saved policies

- 29
- The Council's cabinet on 19 March 2013, as required by para 215 of the NPPF, considered the issue of compliance of Southwark Planning Policy with the National Planning Policy Framework. All policies and proposals were reviewed and the Council satisfied itself that the policies and proposals in use were in conformity with the NPPF. The resolution was that with the exception of Policy 1.8 (location of retail outside town centres) in the Southwark Plan all Southwark Plan policies are saved. Therefore due weight should be given to relevant policies in existing plans in accordance to their degree of consistency with the NPPF.
- 30
- Saved Policy 1.1 - Access to employment opportunities
 - Saved Policy 2.5 - Planning obligations
 - Saved Policy 3.1 - Environmental effects
 - Saved Policy 3.2 - Protection of amenity

Saved Policy 3.3 - Sustainability assessment
Saved Policy 3.4 - Energy efficiency
Saved Policy 3.6 - Air quality
Saved Policy 3.7 - Waste reduction
Saved Policy 3.9 - Water
Saved Policy 3.11 - Efficient use of land
Saved Policy 3.12 - Quality in design
Saved Policy 3.13 - Urban design
Saved Policy 3.14 - Designing out crime
Saved Policy 3.28 - Biodiversity
Saved Policy 4.2 - Quality of accommodation
Saved Policy 4.4 - Affordable housing
Saved Policy 4.5 - Wheelchair affordable housing
Saved Policy 4.7 - Non self-contained housing for identified user groups
Saved Policy 5.2 - Transport impacts
Saved Policy 5.3 - Walking and cycling
Saved Policy 5.6 - Car parking
Saved Policy 5.7 - Parking standards for disabled people and the mobility impaired

Supplementary Planning Documents

Residential Design Standards SPD (2011)
Sustainable Design and Construction SPD (2009)
Sustainable Transport SPD (2010)
Section 106 Planning Obligations (2007) and (2014 draft)
Elephant and Castle Supplementary Planning Document and Opportunity Area
Planning Framework SPD (2012)
Affordable Housing SPD (2008) and (2011 draft)

- 31 The following policy designations apply to the site as identified by the Core Strategy (2011) Proposals Map:
- Urban Density Zone
 - Air Quality Management Area
 - The site has a Public Transport Accessibility rating of 6a
 - Walworth Village Archaeological Priority Zone
 - Elephant and Castle Major Town Centre
 - Elephant and Castle Opportunity Area

Principle of development

- 32 The NPPF promotes sustainable development which means improving the built and natural environment whilst creating jobs, improving the design and function of places and providing a wide choice of good quality homes.
- 33 The site is within a Major Town Centre and the Elephant and Castle Opportunity Area which is undergoing major transformation. It falls within the Walworth Road character area of the Opportunity Area which is characterised by numerous small scale shops alongside a number of larger retail stores. The vision for the area is for a high density, high quality, mixed use town centre that will provide new homes, an enhanced public transport interchange, employment, retail floor space and other social benefits. Redevelopment of this site therefore provides an opportunity to provide a high quality development that optimises the use of a brownfield site in a highly accessible location.
- 34 The lawful use of the site is not free of doubt but it is accepted that historically it was lawfully used for a mix of Class B uses. This proposal does not seek to re-provide B class uses and so it will result in the loss of employment land, the acceptability of which must be considered taking account of the development plan and other material

considerations.

Loss of land with an established B class land use

- 35 The loss of employment land is not normally permitted, except where;
- a) The applicant can demonstrate convincing attempts to dispose of the premises; either for continued B Class use, or for mixed uses, involving B Class, including redevelopment, over a period of 24 months, have been successful; or
 - b) The site or buildings would be unsuitable for re-use or redevelopment for B Class use or mixed uses including B Class use, having regard to physical or environmental constraints; or
 - c) The site is located within a town or local centre, in which case in accordance with saved policy 1.7, suitable Class A or other town centre uses will be permitted in place of Class B uses. Where an increase in floorspace is proposed, the additional floor space may be used for suitable mixed or residential use.

Marketing evidence

- 36 Marketing evidence has been submitted providing commentary on the viability of the site for continued B class and other commercial uses. The assessment reports that the site is not an established office location when compared to London Bridge and Waterloo and concludes that commercial users would not find the location desirable owing to the lack of a site frontage on Walworth Road and difficulties associated with its narrow access.
- 37 The council's Employment Land Review (2010) is a material consideration and forecasts the need to provide new office and business space outside of the SE1 area. The provision of new space is identified as a key policy objective in the Elephant and Castle Opportunity Area to stimulate growth and attract inward investment to facilitate the growth of small and medium sized enterprises.
- 38 The site now comprises cleared hard standing and in this respect is capable of being redeveloped to incorporate a mix of uses, involving B Class. However, the marketing analysis submitted provides sufficient reasoning to cast doubt on the potential viability of commercial uses at this location given its backland nature and access constraints. Based on this analysis the loss of an established employment use is considered acceptable.

Re-provision of space for Cooltan Arts

- 39 A provision within the legal agreement for two previous permissions required the owner of the site to offer Cooltan Arts, a mental health charity, floorspace of no less than 203 sq m² in the new development. Before relocation to a site nearby, Cooltan Arts occupied a part of the application site, although without the benefit of planning permission. The council supported the provision made for Cooltan Arts as they provide a valuable community service.
- 40 Several letters submitted in response to this application have cited concern that Cooltan Arts would not be offered space in the proposed scheme. The applicant has explained that they have consulted with Cooltan Arts who now have a requirement for 372m² over two/ three/ four floors with outside space. They have advised that they cannot accommodate their needs within this development without compromising the viability of affordable housing and have been assisting Cooltan Arts in their search for new space.

- 41 Officers have taken into account the representations received and reviewed the legal agreement. After careful consideration officers consider that there is no policy basis that requires the new owner to provide space for Cooltans in the new development. The provisions of the former legal agreement no longer apply as they relate to a planning permission that has since expired.

Student Housing

- 42 London Plan policy 4.10 requires boroughs to give strong support to London's higher and further education institutions, recognising their need for accommodation. Strategic policy 8 of the Core Strategy sets out the strategic approach to student housing in Southwark allowing their development within town centres and places with good access to public transport, provided they would not harm the local character of an area. The policy also emphasises that the provision of new student homes needs to be balanced against other types of housing, such as affordable and family housing and requires 35% of student housing to be provided as general needs affordable housing.
- 43 Saved policy 4.7 supports the implementation of the council's student housing policy by applying criteria that would apply to any assessment of non-self contained housing accommodation. In considering the appropriateness of a site it requires an assessment to be made of the need, and suitability of, the proposed accommodation for its intended users; that its provision would not result in a significant loss of amenity to neighbouring occupiers; adequate infrastructure is in the area to support any increase in residents; and that the scheme would provide a satisfactory standard of accommodation, including shared facilities.
- 44 The applicant has submitted a report which assesses the need for student accommodation in Walworth, Southwark and the London area. It explains that there are 32,347 full-time students living in the borough and that of these 868 (2.6%) live in direct let purpose built student accommodation which is much lower than the London average for equivalent accommodation. Whilst these figures do not account for students living in purpose built accommodation owned and operated by higher education institutions or those on nomination agreements, the site is identified as being highly accessible and within 35 minutes by public transport to over 10 higher education institutions. London Southbank University and University of the Arts London are identified as the closest institutions that may benefit from the accommodation notwithstanding the catchment of other institutions which are within a reasonable travelling distance to the site. Furthermore the rental levels proposed would be comparable with similar types of purpose built student accommodation in London.
- 45 Taking account of the development plan and other material considerations it is considered that the need for student accommodation has been adequately demonstrated.

Affordable Housing

- 46 The provision of student housing has to be balanced with the provision of other types of housing, particularly affordable and family homes. Strategic policy 8 of the Core Strategy seeks to address the balance by requiring 35% of student developments as affordable housing in line with Strategic policy 6. In the Elephant and Castle Opportunity Area a tenure split of 50% socially rented / 50% intermediate is required for the affordable units provided.
- 47 The draft Affordable Housing SPD (June 2011) explains that all student schemes providing 30 or more bedspaces will be required to provide affordable housing. It also

sets out the mechanism for calculating the level of affordable housing stating that each student bedroom, living/dining area, including common rooms will be counted as a habitable room. Guidance in the Southwark plan and Residential Design Standards SPD explains that rooms exceeding 27.5 sq metres can be counted as two habitable rooms. This can also apply to non-residential floorspace, including student accommodation for the purposes of calculating affordable housing. Therefore the sum of large communal living spaces within the scheme count towards the baseline when establishing the level of affordable housing that should be provided.

- 48 There are 130 bedrooms, 7 communal rooms and an education/study space which equates to 138 rooms ($130+7+1=138$). A further 2 habitable rooms can be added as market housing is proposed which counts towards baseline to establish the level of affordable housing that should be provided by this scheme. This equates to a total of 140 'rooms' ($130+7+1+2=140$). Taking account of large rooms there are a further 28 'rooms' that can be counted which equates to a total of 168 rooms ($130+7+1+2+28=168$). Based on this analysis, the requirement for 35% affordable housing equates to 59 habitable rooms ($168 \times 0.35 = 59$).
- 49 The applicant disputes the council's methodology to calculate the level of affordable housing. The main area of disagreement being that the council has counted large rooms above 27.5m^2 as more than one room and taken account of the common room and education space.
- 50 It is in accordance with guidance to count rooms above 27.5m^2 as more than one room for the purposes of affordable housing calculations. As such officers consider it is appropriate to continue to apply this guidance to this scheme. However consideration has also be given to the applicants representations and, where relevant, other material considerations. The conclusions of these discussions are set out in detail below which has resulted in a reduction of the number of rooms taken into account.
- 51 On balance, officers consider it would be reasonable, subject to a condition, not to take account of the education space for the purposes of calculating affordable housing. The space is not proposed as a living or communal area which are the spaces usually only taken into account. There are, however, instances where space with a function distinct from living space has been discounted in other consented student schemes. Consideration has therefore been given to the role of this space within the development. Subject to a condition, officers consider that it may be reasonable to restrict the use of this space for education/study purposes. A legal agreement is also recommended to ensure that in the event of sub-division in the future there would be a mechanism for claw-back if this space was to be used as communal living space or additional rooms. Discounting this room would reduce the number of rooms taken into account from 168 to 165 as this space counts for 3 rooms by virtue of its size. Based on this analysis, the requirement for 35% would then equate to 58 habitable rooms ($165 \times 0.35 = 58$).
- 52 Officers also consider it would be reasonable not to count eight (8) of the proposed 'student rooms' as two habitable rooms as there is no reasonable prospect that these rooms could be sub-divided. This is by virtue of their design and layout within the scheme which is considered a relevant material consideration. Discounting these rooms would reduce the number of rooms taking into account from 165 to 157 as each of these rooms would count as one and not two rooms. Based on this analysis, the requirement for 35% would equate to 55 habitable rooms (157×0.35).
- 53 The scheme will deliver 6 'affordable' dwellings comprising four social rent (2 x five bed and 2 x four bed) and two shared ownership units (2 x two bed). The shared ownership dwellings are proposed to be offered in accordance with affordability

thresholds set out in the draft Affordable Housing SPD. The dwellings houses are proposed as social rent wheelchair accessible and will provide large family homes all of which would have with gardens. This aspect of the scheme reflects local needs and priorities and therefore can be supported.

- 54 These dwellings will provide 36 habitable rooms to which a further 6 rooms can be added taking account of rooms over 27.5 sq m². The total number of affordable habitable rooms provided by this scheme is therefore 42 (36 + 6 = 42).
- 55 Based on the analysis above, there is a shortfall in the proposed level of affordable housing as the scheme will deliver 42 habitable rooms which equates to 27 % (42/157 x 100= 27%). However this does not take account of saved policy 4.4 which explains that one less affordable room can be provided for every affordable housing unit that complies with council's wheelchair design standard. Under this scenario 50 habitable rooms (55 – 5 = 50) would be an acceptable level taking account of the five wheelchair units proposed. However, even taking this into account, the scheme would fall short of a policy compliant level of affordable housing by a margin of 8 habitable rooms (50 – 42 =8).
- 56 The draft Affordable Housing SPD 2011 outlines a sequential approach to make sure as much affordable housing as possible is achieved. The sequential approach is set out below:
- All housing, including affordable housing should be located on the development site.
 - In exceptional circumstances the affordable housing may be provided off-site. In these circumstances that affordable housing should be provided on another site or sites in the local area of the proposed development.
 - In exceptional circumstances a contribution in lieu of on-site or off-site affordable housing may be permissible.
- 57 Officers accept that within the proposed configuration of buildings it would be problematic to incorporate more affordable housing on site owing to the layout of uses, which have been deliberately designed to separate the areas occupied by students and the residential dwellings. Incorporating affordable housing within the student housing block would be problematic taking account of the requirements of Registered Providers who generally require separate entrances, separate lifts and vertical separation between uses and affordable tenures. These are considered to be legitimate reasons why affordable could not be integrated within the main student block.
- 58 In these circumstances, a policy compliant mix and amount of dwellings may not be possible on site. As such, the council could consider a contribution in lieu of more on-site housing.

Off site

- 59 The SPD states that where the Council allows either an off-site or in lieu contribution provision, at least as much affordable housing must be provided as would have been provided if the minimum 35% affordable housing policy requirement were achieved on-site.
- 60 The applicant has explained that that at submission they considered the scheme to be policy compliant and that it would be challenging to find site in this area where there is extensive long term regeneration and the availability of sites. Officers accept that the availability of suitable sites is limited and recognise that the search for a site to meet the shortfall may unreasonably harm the deliverability of this scheme. Based on this

analysis, officers consider that there are legitimate reasons for why an in lieu payment may be acceptable.

In Lieu contributions

- 61 The SPD sets out a minimum of £100,000 per habitable room as in lieu payment for affordable housing. Based on a shortfall of 8 habitable rooms, this equates to an in lieu payment of £800,000 (8 x £100,000). The applicant has agreed to make this contribution which consequently would result in a policy compliant level of affordable housing.

Under these circumstances it is considered that the scheme would be policy compliant and that the affordable housing offer should be accepted.

Summary

- 62 Based on the analysis above, the principle of a mixed use development can be supported as it is consistent with strategic and local planning policies for Elephant and Castle Opportunity Area and Town Centre.

Environmental impact assessment

- 63 The development is capable of being considered a 10 (b) 'urban development project' under Schedule 2 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 as it proposes the demolition of buildings, construction works and change of land use in an urban area. The relevant threshold for urban development projects is 0.5 hectares and as such the size of the site, at 0.3 hectares, falls short this established threshold.

- 64 Notwithstanding this, consideration has been given to the characteristics of the project to determine whether it is likely to have significant environmental effects having regard to Schedule 3 of the EIA regulations. After careful consideration, as detailed in this report, it is considered that this development is not likely to result in significant environmental effects for the purposes of the EIA regulations by virtue of the nature of the project, its size or location and is not likely to have impacts that will be of more than local importance.

Design Issues

- 65 Strategic policy 12 of the Core strategy 'Design and conservation' states that 'Development will achieve the highest possible standards of design for buildings and public spaces to help create attractive and distinctive places which are safe, easy to get around and a pleasure to be in'. Saved policy 3.12 of the Southwark Plan asserts that developments 'should achieve a high quality of both architectural and urban design, enhancing the quality of the built environment in order to create attractive, high amenity environments people will choose to live in, work in and visit' and saved policy 13 requires the principles of good urban design to be taken into account in all developments. This includes height, scale and massing of buildings, consideration of the local context, its character and townscape as well as the local views and resultant streetscape.

- 66 Pre-application advice was provided to the applicant on a scheme of comparable scale, mass and footprint, but for a different land use. Notwithstanding the different land use, a fundamental rethink to the approach to layout, scale and design of this site was advised as it was considered that the proposal would create a long monolithic building that would be overly dominant and would not create or provide clearly distinguished and well functioning amenity and servicing spaces. This was suggested to ensure the redeveloped site would function well and add to the overall quality of the

area, not just for the short term but over the lifetime of the development.

Site layout

- 67 This proposal is arranged in two linear blocks. The main block comprises student accommodation and runs parallel with the eastern boundary. It rises to five storeys as a singular mass and includes an excavated lower ground floor, with an associated 1.5m deep well around the perimeter and a set-back top floor. The main block returns at its full height along the northern boundary where it abuts an adjacent site.
- 68 A stepped residential block is arranged along the northern edge of the site and provides a short terrace of housing each with front and rear gardens arranged along the party wall to the adjacent site. The residential block ranges from two to four storeys in height.
- 69 The proposed arrangement of blocks results in a predominantly hard landscaped courtyard where servicing and parking are proposed. A narrow strip of landscaped area along the eastern and southern edge is proposed that is bounded by a 4 metre high boundary wall which separates the site from the adjoining residential estate.
- 70 In accordance with saved policy 3.13 new development is required to provide a site layout that allows for vehicular servicing to take place alongside safe movement of pedestrians and cyclists. This is to ensure the development functions well and provides an inclusive environment for future users.
- 71 Access to the site is constrained by the nature of the entrance which is a narrow passage leading from Walworth Road. At, 3.6 metres wide, the main access cannot accommodate more than one vehicle at a time. The passage also serves as access to existing residential accommodation above ground floor retail units on Walworth Road. Emergency and fire access doors for 235 Walworth Road are along the north elevation of the passage which also serves as access to other retail units.
- 72 The access passage leads towards a gated courtyard which is proposed as a shared surface. Four accessible parking spaces are proposed within the courtyard that are linked with the affordable dwellings. Access to the affordable dwellings is via an entrance within the courtyard. The main entrance to the student accommodation is also through the courtyard where refuse and cycle storage can also be accessed.
- 73 Over the course of the application, officers raised concerns that the proposed layout was problematic taking account of the access constraints and the proposed mix of uses. The circulation space left within the courtyard was considered inadequate for the safe movement of vehicles, cycles and pedestrians as was the intensity of development taking account of the scale, footprint, layout and intensity of uses. It was considered that there was a reasonable expectation that there will be occasions when vehicles associated with the site will need to reverse back into the courtyard or reverse out onto Walworth Road. The arrangement proposed was considered problematic and revisions to the site layout encouraged.
- 74 The applicant has revised the scheme by removing the proposed medical centre and relocating the main refuse and cycle store to within the main student block. The revisions have created larger courtyard and more circulation space within the site providing areas of refuge for cyclists and pedestrians for the times when vehicles are accessing the site. This revision is considered adequate to create conditions that will allow for safe movement within the site for vehicles, cyclists and pedestrians. A traffic light system is also proposed that will control the movement of vehicles to and from the site and Walworth Road. The inclusion of this system is intended to help manage the movement of vehicles which further enhances the safety of movement within and

to and from the site.

- 75 Based on the revised layout it is considered that the concerns regarding safe movement have adequately been overcome. For these reasons the proposed layout is considered acceptable.

Scale, height and massing

- 76 The main student block is noticeably larger than most buildings in its immediate context and as a result its form dominates this site. At around 54m in length the main student block would be a substantial incursion into this townscape that will dominate the outlook of the neighbouring residential properties albeit without a street frontage given its' backland location.
- 77 On the western facade the proposal attempts to break up the singular mass of the main building into three bays which are defined by three full-height vertical glazed features. This coupled with the deliberately random arrangement of balconettes and windows gives this elevation a level of interest but doesn't fully mitigate its' overly dominant form which is particularly stark on the east elevation.
- 78 The terrace of houses is more subservient in scale and considered to respond sensitively to the local context. Its perpendicular alignment and stepped profile respects the urban form of the Walworth Road. The blank facades created at the junction of the student housing and affordable dwellings is unfortunate but could be mitigated by way of detailing that could be reserved by condition.

Detailed design and landscaping

- 79 A landscape strategy has been submitted as well as details on materials. Brick is the predominant cladding material for the main block and the terrace of houses with fibre-cement cladding to the top floor and window surrounds. Glazing is proposed to add interest on the bolt-on balconies and certain walls would be greened to add biodiversity. Officers consider that such matters could be reserved by condition should all other matters be acceptable.

Transport issues

- 80 The site has a Public Transport Accessibility Rating (PTAL) of 6a which equates to 'Excellent' in terms of access to public transport. It is proposed as 'car free'. The majority of trips to and from the site are predicted to be undertaken by foot, cycle or public transport which in accordance with saved policy 4.7 can be supported as there is adequate infrastructure to support the increase in the number of residents.

Servicing

- 81 The transport assessment identifies that a total of 153 bedrooms will be provided across the development which represents a significant level of occupation and related traffic for a constrained site. The only point of entry is the narrow passageway between 235 and 239 Walworth Road. The access fronts onto Walworth Road which is part of the bus priority network and well served by buses.
- 82 Vehicle tracking details have been provided which do not provide confidence that manoeuvres by vehicles entering and exiting this site are easy to perform. The length of the access and activity already associated with its use mean that the intensity of servicing associated with this site may be problematic. However these constraints would apply to any re-development at this site, which currently is vacant and identified as opportunity site within the Elephant and Castle Opportunity Area Framework.

- 83 The applicant has sought to address the site constraints by proposing a traffic light system. The traffic lights would be installed prior to any works in connection with this development as they recognise there is a significant risk that that vehicles may not be able to complete the entrance and exit of the site in one continuous movement. The traffic light system would control the movement of vehicles and ensure that vehicles attempting to enter the site would not have to reverse into Walworth Road or back along the access within the site which prior to the revisions proposed was an unacceptable risk to safety particularly if there were pedestrians or cyclists behind and to ensure there are not significant delays or impacts on the public highway. The proposed reconfiguration of the courtyard and traffic controls are considered adequate to overcome the concerns that servicing could not take place safely.
- 84 Notwithstanding the proposed mitigation in terms of vehicles moving to and from the site there are transport implications associated with the move in/ move out of future students and no clear plans on how the student traffic associated with move-in move out will be managed. The mass movement of students at the start and end of the academic year has the potential to impact on the surrounding highway network and would need to be carefully managed. There could be a mix of undergraduate and postgraduate students from different Higher Education Institutions with 40 and 52 week contracts respectively, which could result in a more dispersed process. Notwithstanding this, it is recommended that a detailed strategy should be secured by condition, setting out what measures would be put in place to manage the impact of student changeover to ensure adequate controls are in place manage associated transport impacts.

Construction Impacts

- 85 A preliminary assessment of construction traffic movements formed part of the submission which, given the access limitations, is not considered acceptable. A condition is recommended requiring details of a comprehensive construction management plan. These details in conjunction with the proposed traffic management system would need to be provided and approved by the local planning authority prior to any works in connection with the development.

Quality of accommodation

Student accommodation

- 86 Criteria (iv) of saved policy 4.7 of the Southwark Plan and the Residential Design Standards SPD require proposals for student accommodation to provide a satisfactory standard of accommodation.
- 87 There are no policy standards against which to assess the size of student rooms, notwithstanding this, consideration has been to the range and size that would be provided for future users and the communal spaces provided. Officers are satisfied that the quality of accommodation is generally of a good standard. Whilst the lower ground floor communal lounge is unlikely to be well lit by virtue of its relationship to the eastern boundary wall in what is a sunken courtyard area, there are other well lit communal spaces within the scheme which can be used by future students residing at this building.

Privacy and outlook

- 88 The scheme has been designed to minimise privacy impacts and will generally provide an acceptable standard of outlook for new occupiers. Privacy screening will be between the proposed dwellings house terraces which can be reserved by condition.

Residential accommodation

- 89 The proposed dwellings will exceed minimum standards and provide wheelchair accessible houses. Large family homes with outdoor amenity spaces will also be provided. This aspect of the scheme is in accordance with policy and can be supported.

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

Impact of students on the character of the area

- 90 Student accommodation would support the daytime economy and the town centre supporting mixed and balanced communities. A management plan has been put forward indicating a range of measures that be in place to manage the impact of the proposed student population. Further details would need to be provided including the move in and move out process for students, out of hours management, security and CCTV that would need to be secured by legal agreement over the lifetime of the development.

Plant, mechanical ventilation and noise associated with the proposed development

- 91 Plant including mechanical ventilation will be required to serve the scheme and has the potential to impact upon the amenity of nearby properties. Details can be reserved by condition to ensure to that noise generating sources from the development would not adversely impact upon existing and future residents.

Daylight, sunlight and overshadowing impacts

- 92 A Daylight and Sunlight Report was prepared by GVA Schatunowski Brooks which assessed the impact of the development against surrounding neighbouring properties. The analysis shows that a good standard of daylight will be maintained at surrounding properties although it is clear the development will result in some overshadowing. In any case the level of overshadowing identified is not considered to be harmful to the extent that would warrant the refusal of planning permission. Based on this analysis the impacts of this scheme are acceptable.

Impact of adjoining and nearby uses on occupiers and users of proposed development

Walworth Road

- 93 The dominant noise source affecting future occupiers of the development is likely to be road traffic noise generated from the flow of vehicles on Walworth Road. Subject to conditions reserving the details of glazing and ventilation for the new dwellings in respect of noise attenuation, particularly for the canopy structure it is expected that an acceptable standard can be achieved within the new habitable rooms. Mitigation of internal air quality may also be required by way of treatment to the facade to overcome odour impacts from nearby premises and local air quality impacts. This too should be controlled by condition.

Sustainable development implications

- 94 Policy 5.2 of the London Plan requires major developments to provide an assessment of their energy demands and to demonstrate that they have taken steps to apply the Mayor's energy hierarchy. Policies 5.5 and 5.6 require consideration of decentralised

energy networks and policy 5.7 requires the use of on-site renewable technologies, where feasible.

- 95 The development is reported to achieve a 42% reduction in carbon dioxide emissions using a combination of CHP, air sourced heat pumps and solar panels. This level of performance can be supported. Adequate provision will need to be made to ventilate the CHP plant which has not been incorporated within the design of this space. Details of their arrangement could be dealt with by condition.

BREEAM

- 96 An 'Excellent rating is proposed for the new student accommodation which is in accordance with policy.

Code for Sustainable Homes

- 97 A rating of 4 is proposed for the new dwellings consistent with policy.

Land contamination and groundwater assessment

- 98 An intrusive site investigation, prepared by RPS has shown that there elevated levels of contaminants within the site. Based on their analysis, a detailed quantitative risk assessment is recommended to be submitted prior to any development to determine the level of risk is posed by the contaminants on site. A remediation strategy detailing how the site would be brought to a condition suitable for the intended use is also recommended.

Flood Risk

- 99 The Environment Agency has no objection to the principle of this development subject to conditions relating to flood mitigation, ground water and land contamination.

Drainage

- 100 A drainage strategy has been submitted that seeks to reduce surface water run-off. It proposes green roofs, permeable paving and water butts within the development. Subject to further design details being submitted an acceptable level surface water run off and mitigation can be reserved by condition.

Planning obligations (S.106 undertaking or agreement)

- 101 Saved policy 2.5 'Planning obligations' of the Southwark Plan and policy 8.2 of the London Plan advises that Local Planning Authorities should seek to enter into planning obligations to avoid or mitigate the adverse impacts of developments which cannot otherwise be adequately addressed through conditions, to secure or contribute towards the infrastructure, environment or site management necessary to support the development, or to secure an appropriate mix of uses within the development. Further information is contained within the Council's Planning Obligations Supplementary Planning Document.

- 102 Heads of Terms based on the Councils Planning Obligations SPD have been a subject of negotiations during the course of the application. The following table sets out the contributions required based on the s106 SPD and accompanying toolkit compared to what the applicant has offered:

- 103
- | Topic Area | SPD Requirement | Applicant's Offer |
|--------------------|------------------------|--------------------------|
| Affordable housing | £800,000* | £800,000* |

Employment construction	£110,138	£110,138
Employment construction management fee	£8,335	£8,335
Public open space and sports development	£69,467	£69,467
Transport strategic	£383,864	£383,864
Transport site specific	£71,500	£71,500
Public realm	£107,250	£107,250
Health	£81,985	£81,985
Total	£1,632,539	£1,632,539
Admin fee (2%)	£16,650.78	£16,650.78
Total (including admin fee)	£1,649,189.78	£1,649,189.78

*This contribution has been listed but has not been included within the admin fee.

- 104 The proposed S106 contributions are in accordance with the S106 SPD and therefore acceptable.
- 105 In accordance with the recommendation, if the Section 106 Agreement is not signed by 9 December 2014 the Head of Development Management should be authorised to refuse permission, if appropriate, for the reason below:
- 106 'In the absence of a signed Section 106 Agreement, there is no mechanism in place to avoid or mitigate the impact of the proposed development on the delivery of affordable housing, employment, public open space, the transport network, the public realm, and health care services. The proposal would therefore be contrary to saved policy 2.5 of the Southwark Plan (2007), strategic policy 14 of the Core Strategy (2011) and Policy 8.2 of the London Plan (2011) and the draft Affordable Housing SPD (2011)'.

Other matters

Mayoral Community Infrastructure Levy (CIL)

- 107 S143 of the Localism Act 2011 states that any financial sum that an authority has received, will, or could receive in the payment of CIL as a material 'local financial consideration' in planning decisions. The requirement for Mayoral CIL is a material consideration. However, the weight to be attached to a local finance consideration remains a matter for the decision-maker. Mayoral CIL is to be used for strategic transport improvements in London, primarily Crossrail.
- 108 The scheme will result in a net increase of 5410m² of floor space (Gross Internal Area). Based on level of floorspace, the CIL liability is estimated to be £189,350.

Conclusion on planning issues

- 109 This National Planning Policy Framework advises that planning decisions should optimise the potential of sites to accommodate development, create and sustain an appropriate mix of uses. The application proposes a mixed used scheme on a brownfield site providing purpose built student accommodation and a range of residential dwellings. In terms of land use, the proposed mix is appropriate and can contribute towards the strategic objectives for the Elephant and Castle Opportunity Area.
- 110 The affordable housing offer comprises 6 on-site dwellings and an in lieu payment of £800,000 towards off-site delivery. Five of the dwellings are will be fully fitted wheelchair accessible homes and four large family sized homes. The quality of accommodation is acceptable as is the proposed level of affordable housing. This is a positive aspect of the scheme which can be supported.

- 111 The proposal will improve the function of the site by introducing a traffic light system to manage its constrained access. This is positive improvement that will have wider benefits for the local highway network and pedestrian and cycle safety. There is shortfall in planning contributions that is a key material consideration. But this must be balanced against the benefits of bringing this vacant site back into productive use and the benefits that would come from improvements to the access, the provision of large affordable family homes and purpose built student accommodation. Taking account the above, it is considered that the benefits of bringing this vacant site back into productive would outweigh the shortfall in the proposed level of planning contributions. It is therefore considered that that, in line with the NPPF, there is no substantive reason to withhold planning permission, subject to completion of a legal agreement and planning conditions.

Community impact statement

- 112 In line with the Council's Community Impact Statement the impact of this application has been assessed as part of the application process with regard to local people in respect of their age, disability, faith/religion, gender, race and ethnicity and sexual orientation. Consultation with the community has been undertaken as part of the application process.

a) The impact on local people is set out above.

Consultations

- 113 Details of consultation and any re-consultation undertaken in respect of this application are set out in Appendix 1.

Consultation replies

Details of consultation responses received are set out in Appendix 2.

- 114 Summary of consultation responses
2 letters of comment, 14 letters of objection
- 115 Comments
Concern that the agreement with the applicant which relates to the current applications does not meet the needs of Cooltan Arts sufficiently.
- 116 Letters of objection
Concern that the scheme would not provide mental health services and in particular re-provide space for Cooltan Arts

Statement of Community Involvement

- 117 A Statement of Community Involvement was submitted which detailed that the site has been put forward with two options for redevelopment:
- a) one for redevelopment incorporating 130 student bedrooms alongside 1,2 and 3 bed apartments and 4 and 5 bedroom wheelchair accessible houses; and
 - a) 130 student rooms including a student lounge, on site laundry plus six affordable homes comprising 4 and 5 bed wheelchair accessible houses with private gardens and 1 and 2 bed apartments.
- 118 Information about the scheme was provided in leaflets delivered by hand in the surrounding area and at a public exhibition held on October 24 2013. The exhibition

was attended by 24 people who commented that the scheme should provide affordable housing and questioned that impact the scheme would have on traffic and the type of people likely to live in the new homes.

- 119 The following groups were also contacted by the applicant about the proposal: Browning Estate Management Association, Drapers Resident Association, Manchester House Tenants and Residents Association, Penrose Estates, and Residents Association, Pembroke House Youth and Community Centre, Pullens Arts Business Association, Walworth Garden Farm and Ward Councillors for the East Walworth, Faraday and Newington Wards and Cooltan Arts.

Human rights implications

- 120 This planning application engages certain human rights under the Human Rights Act 2008 (the HRA). The HRA prohibits unlawful interference by public bodies with conventions rights. The term 'engage' simply means that human rights may be affected or relevant.
- 121 This application has the legitimate aim of providing a mixed use development. 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.

BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
Site history file: TP/1065-237 Application file: 14/AP/0833 Southwark Local Development Framework and Development Plan Documents	Chief executive's department 160 Tooley Street London SE1 2QH	Planning enquiries telephone: 020 7525 5403 Planning enquiries email: planning.enquiries@southwark.gov.uk Case officer telephone: 020 7525 5461 Council website: www.southwark.gov.uk

APPENDICES

No.	Title
Appendix 1	Consultation undertaken
Appendix 2	Consultation responses received
Appendix 3	Recommendation

AUDIT TRAIL

Lead Officer	Gary Rice Head of Development Management	
Report Author	Daniel Davies	
Version	Final	
Dated	13 October 2014	
Key Decision	No	
CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER		
Officer Title	Comments sought	Comments included
Strategic director, finance & corporate services	No	No
Strategic director, environment and leisure	Yes	Yes
Strategic director, housing and community services	Yes	Yes
Director of regeneration	No	No
Date final report sent to Constitutional Team		24 October 2014

Consultation undertaken

Site notice date: 13/05/2014

Press notice date: 01/05/2014

Case officer site visit date: n/a

Neighbour consultation letters sent: 12/05/2014

Internal services consulted:

Archaeology Officer
 Design and Conservation Team
 Environmental Protection Team [Noise / Air Quality / Land Contamination / Ventilation]
 Planning Policy
 Surface Water Flood Management Team
 Transport Planning Team
 Waste Management

Statutory and non-statutory organisations consulted:

Environment Agency
 London Ambulance Service NHS Trust
 London Fire & Emergency Planning Authority
 Thames Water - Development Planning
 Transport for London (referable & non-referable app notifications and pre-apps)

Neighbour and local groups consulted:

Flat 20 Coleridge House Browning Estate SE17 1DG	247-249 Walworth Road London SE17 1RL
Flat 21 Coleridge House Browning Estate SE17 1DG	187a Walworth Road London SE17 1RW
Flat 19 Coleridge House Browning Estate SE17 1DG	185 Walworth Road London SE17 1RW
Flat 2 Coleridge House Browning Estate SE17 1DG	239 Walworth Road London SE17 1RL
Flat 24 Coleridge House Browning Estate SE17 1DG	191-193 Walworth Road London SE17 1RW
Flat 3 Coleridge House Browning Estate SE17 1DG	2a Browning Street London SE17 1LN
Flat 22 Coleridge House Browning Estate SE17 1DG	1a Browning Street London SE17 1LN
Flat 23 Coleridge House Browning Estate SE17 1DG	187 Walworth Road London SE17 1RW
Flat 13 Coleridge House Browning Estate SE17 1DG	2 Browning Street London SE17 1LN
Flat 14 Coleridge House Browning Estate SE17 1DG	188 Walworth Road London SE17 1JJ
Flat 11 Coleridge House Browning Estate SE17 1DG	221 Walworth Road London SE17 1RL
Flat 12 Coleridge House Browning Estate SE17 1DG	201 Walworth Road London SE17 1RL
Flat 17 Coleridge House Browning Estate SE17 1DG	230 Walworth Road London SE17 1JE
Flat 18 Coleridge House Browning Estate SE17 1DG	216 Walworth Road London SE17 1JE
Flat 15 Coleridge House Browning Estate SE17 1DG	250 Walworth Road London SE17 1JE
Flat 16 Coleridge House Browning Estate SE17 1DG	205 Walworth Road London SE17 1RL
Flat 4 Coleridge House Browning Estate SE17 1DG	233 Walworth Road London SE17 1RL
Flat 14 Paxton House Browning Estate SE17 1DS	Flat 25a Southey House Browning Estate SE17 1DE
Flat 15 Paxton House Browning Estate SE17 1DS	Flat 11a Gower House Browning Estate SE17 1DU
Flat 12 Paxton House Browning Estate SE17 1DS	Flat 13a Cowper House Browning Estate SE17 1DD
Flat 13 Paxton House Browning Estate SE17 1DS	Flat 10a Southey House Browning Estate SE17 1DE
Flat 18 Paxton House Browning Estate SE17 1DS	196-202 Walworth Road London SE17 1JJ
Flat 19 Paxton House Browning Estate SE17 1DS	224-236 Walworth Road London SE17 1JE
Flat 16 Paxton House Browning Estate SE17 1DS	Flat 11a Coleridge House Browning Estate SE17 1DG
Flat 17 Paxton House Browning Estate SE17 1DS	182-184 Walworth Road London SE17 1JJ
Flat 7 Coleridge House Browning Estate SE17 1DG	207 Walworth Road London SE17 1RL
Flat 8 Coleridge House Browning Estate SE17 1DG	Flat 1 Ben Ezra Court SE17 1EH
Flat 5 Coleridge House Browning Estate SE17 1DG	Flat 2 Ben Ezra Court SE17 1EH
Flat 6 Coleridge House Browning Estate SE17 1DG	241 Walworth Road London SE17 1RL
Flat 10 Paxton House Browning Estate SE17 1DS	220-222 Walworth Road London SE17 1JE
Flat 11 Paxton House Browning Estate SE17 1DS	Flat 5 Ben Ezra Court SE17 1EH

Flat 9 Coleridge House Browning Estate SE17 1DG
Flat 1 Paxton House Browning Estate SE17 1DS
Flat 9 Southey House Browning Estate SE17 1DE
Flat 1 Shelley House Browning Estate SE17 1DF
Flat 7 Southey House Browning Estate SE17 1DE
Flat 8 Southey House Browning Estate SE17 1DE
Flat 12 Shelley House Browning Estate SE17 1DF
Flat 13 Shelley House Browning Estate SE17 1DF
Flat 10 Shelley House Browning Estate SE17 1DF
Flat 11 Shelley House Browning Estate SE17 1DF
Flat 36 Southey House Browning Estate SE17 1DE
Flat 37 Southey House Browning Estate SE17 1DE
Flat 34 Southey House Browning Estate SE17 1DE
Flat 35 Southey House Browning Estate SE17 1DE
Flat 5 Southey House Browning Estate SE17 1DE
Flat 6 Southey House Browning Estate SE17 1DE
Flat 38 Southey House Browning Estate SE17 1DE
Flat 4 Southey House Browning Estate SE17 1DE
Flat 14 Shelley House Browning Estate SE17 1DF
Flat 6 Shelley House Browning Estate SE17 1DF
Flat 7 Shelley House Browning Estate SE17 1DF
Flat 4 Shelley House Browning Estate SE17 1DF
Flat 5 Shelley House Browning Estate SE17 1DF
Flat 1 Coleridge House Browning Estate SE17 1DG
Flat 10 Coleridge House Browning Estate SE17 1DG
Flat 8 Shelley House Browning Estate SE17 1DF
Flat 9 Shelley House Browning Estate SE17 1DF
Flat 17 Shelley House Browning Estate SE17 1DF
Flat 18 Shelley House Browning Estate SE17 1DF
Flat 15 Shelley House Browning Estate SE17 1DF
Flat 16 Shelley House Browning Estate SE17 1DF
Flat 20 Shelley House Browning Estate SE17 1DF
Flat 3 Shelley House Browning Estate SE17 1DF
Flat 19 Shelley House Browning Estate SE17 1DF
Flat 2 Shelley House Browning Estate SE17 1DF
1 York Mansions Browning Street SE17 1LP
2 York Mansions Browning Street SE17 1LP
1c Browning Street London SE17 1LN
19a Browning Street London SE17 1LN
5 York Mansions Browning Street SE17 1LP
6 York Mansions Browning Street SE17 1LP
3 York Mansions Browning Street SE17 1LP
4 York Mansions Browning Street SE17 1LP
Flat 7 Gower House Browning Estate SE17 1DU
Flat 8 Gower House Browning Estate SE17 1DU
Flat 5 Gower House Browning Estate SE17 1DU
Flat 6 Gower House Browning Estate SE17 1DU
First Floor Flat 238 Walworth Road SE17 1JE
260a Walworth Road London SE17 1JE
Flat 9 Gower House Browning Estate SE17 1DU
First Floor And Second Floor Flat 216 Walworth Road SE17 1JE
7 York Mansions Browning Street SE17 1LP
Flat 2 220-222 Walworth Road SE17 1JE
1b Browning Street London SE17 1LN
49b Browning Street London SE17 1LU
Flat 1 220-222 Walworth Road SE17 1JE
Flat 16a Tennyson House Browning Estate SE17 1DB
Flat 40a Tennyson House Browning Estate SE17 1DB
19b Browning Street London SE17 1LN
York House Browning Street SE17 1LN
41a Browning Street London SE17 1LU
8 York Mansions Browning Street SE17 1LP
9 York Mansions Browning Street SE17 1LP
247a Walworth Road London SE17 1RL
247b Walworth Road London SE17 1RL
49a Browning Street London SE17 1LU
243a Walworth Road London SE17 1RL
Flat 6 Paxton House Browning Estate SE17 1DS
Flat 7 Paxton House Browning Estate SE17 1DS
Flat 4 Paxton House Browning Estate SE17 1DS
Flat 5 Paxton House Browning Estate SE17 1DS
Flat 1 Gower House Browning Estate SE17 1DU
Flat 10 Gower House Browning Estate SE17 1DU
Flat 8 Paxton House Browning Estate SE17 1DS
Flat 9 Paxton House Browning Estate SE17 1DS
Flat 21 Paxton House Browning Estate SE17 1DS
Flat 22 Paxton House Browning Estate SE17 1DS
Flat 2 Paxton House Browning Estate SE17 1DS
Flat 6 Ben Ezra Court SE17 1EH
Flat 3 Ben Ezra Court SE17 1EH
Flat 4 Ben Ezra Court SE17 1EH
245 Walworth Road London SE17 1RL
189 Walworth Road London SE17 1RW
213 Walworth Road London SE17 1RL
251 Walworth Road London SE17 1RL
12 Colworth Grove London SE17 1LR
192 Walworth Road London SE17 1JJ
231 Walworth Road London SE17 1RL
Flat 11 Manchester House SE17 2DW
Flat 12 Manchester House SE17 2DW
Flat 1 Manchester House SE17 2DW
Flat 10 Manchester House SE17 2DW
Flat 15 Manchester House SE17 2DW
Flat 16 Manchester House SE17 2DW
Flat 13 Manchester House SE17 2DW
Flat 14 Manchester House SE17 2DW
283 Walworth Road London SE17 2TG
287 Walworth Road London SE17 2TG
42 East Street London SE17 2DN
262 Walworth Road London SE17 2TE
1b East Street London SE17 2DJ
1c East Street London SE17 2DJ
81a East Street London SE17 2DH
1a East Street London SE17 2DJ
Flat 17 Manchester House SE17 2DW
Flat 4 Manchester House SE17 2DW
Flat 5 Manchester House SE17 2DW
Flat 25 Manchester House SE17 2DW
Flat 3 Manchester House SE17 2DW
Flat 8 Manchester House SE17 2DW
Flat 9 Manchester House SE17 2DW
Flat 6 Manchester House SE17 2DW
Flat 7 Manchester House SE17 2DW
Flat 2 Manchester House SE17 2DW
Flat 20 Manchester House SE17 2DW
Flat 18 Manchester House SE17 2DW
Flat 19 Manchester House SE17 2DW
Flat 23 Manchester House SE17 2DW
Flat 24 Manchester House SE17 2DW
Flat 21 Manchester House SE17 2DW
Flat 22 Manchester House SE17 2DW
269-271 Walworth Road London SE17 1RL
267 Walworth Road London SE17 1RL
273 Walworth Road London SE17 1RL
275 Walworth Road London SE17 1RL
Flat 3 251-253 Walworth Road SE17 1RL
248b Walworth Road London SE17 1JE
Flat 1 251-253 Walworth Road SE17 1RL
Flat 2 251-253 Walworth Road SE17 1RL
223 Walworth Road London SE17 1RL
229 Walworth Road London SE17 1RL
215 Walworth Road London SE17 1RL
219 Walworth Road London SE17 1RL
255 Walworth Road London SE17 1RL
235 Walworth Road London SE17 1RL
243 Walworth Road London SE17 1RL
217 Walworth Road London SE17 1RL
2 East Street London SE17 2DN
20 East Street London SE17 2DN
14 East Street London SE17 2DN
16 East Street London SE17 2DN
36 East Street London SE17 2DN
38 East Street London SE17 2DN
28 East Street London SE17 2DN
30 East Street London SE17 2DN
3 East Street London SE17 2DJ
35-37 East Street London SE17 2DJ
81 East Street London SE17 2DH
83 East Street London SE17 2DH
67 East Street London SE17 2DJ
7 East Street London SE17 2DJ
5 East Street London SE17 2DJ
65 East Street London SE17 2DJ
242 Walworth Road London SE17 1JE
2b Browning Street London SE17 1LN
P148 East Street Market SE17 2DN

Flat 20 Paxton House Browning Estate SE17 1DS
Flat 25 Paxton House Browning Estate SE17 1DS
Flat 3 Paxton House Browning Estate SE17 1DS
Flat 23 Paxton House Browning Estate SE17 1DS
Flat 24 Paxton House Browning Estate SE17 1DS

Flat 11 Gower House Browning Estate SE17 1DU
Flat 21 Gower House Browning Estate SE17 1DU
Flat 22 Gower House Browning Estate SE17 1DU
Flat 2 Gower House Browning Estate SE17 1DU
Flat 20 Gower House Browning Estate SE17 1DU
Flat 3 Gower House Browning Estate SE17 1DU
Flat 4 Gower House Browning Estate SE17 1DU
Flat 23 Gower House Browning Estate SE17 1DU
Flat 24 Gower House Browning Estate SE17 1DU
Flat 14 Gower House Browning Estate SE17 1DU
Flat 15 Gower House Browning Estate SE17 1DU
Flat 12 Gower House Browning Estate SE17 1DU
Flat 13 Gower House Browning Estate SE17 1DU
Flat 18 Gower House Browning Estate SE17 1DU
Flat 19 Gower House Browning Estate SE17 1DU
Flat 16 Gower House Browning Estate SE17 1DU
Flat 17 Gower House Browning Estate SE17 1DU
Flat 19 Tennyson House Browning Estate SE17 1DB
Flat 2 Tennyson House Browning Estate SE17 1DB
Flat 17 Tennyson House Browning Estate SE17 1DB
Flat 18 Tennyson House Browning Estate SE17 1DB
Flat 22 Tennyson House Browning Estate SE17 1DB
Flat 23 Tennyson House Browning Estate SE17 1DB
Flat 20 Tennyson House Browning Estate SE17 1DB
Flat 21 Tennyson House Browning Estate SE17 1DB
Flat 11 Tennyson House Browning Estate SE17 1DB
Flat 12 Tennyson House Browning Estate SE17 1DB
Flat 1 Tennyson House Browning Estate SE17 1DB
Flat 10 Tennyson House Browning Estate SE17 1DB
Flat 15 Tennyson House Browning Estate SE17 1DB
Flat 16 Tennyson House Browning Estate SE17 1DB
Flat 13 Tennyson House Browning Estate SE17 1DB
Flat 14 Tennyson House Browning Estate SE17 1DB
Flat 24 Tennyson House Browning Estate SE17 1DB
Flat 34 Tennyson House Browning Estate SE17 1DB
Flat 35 Tennyson House Browning Estate SE17 1DB
Flat 32 Tennyson House Browning Estate SE17 1DB
Flat 33 Tennyson House Browning Estate SE17 1DB
Flat 38 Tennyson House Browning Estate SE17 1DB
Flat 39 Tennyson House Browning Estate SE17 1DB
Flat 36 Tennyson House Browning Estate SE17 1DB
Flat 37 Tennyson House Browning Estate SE17 1DB
Flat 27 Tennyson House Browning Estate SE17 1DB
Flat 28 Tennyson House Browning Estate SE17 1DB
Flat 25 Tennyson House Browning Estate SE17 1DB
Flat 26 Tennyson House Browning Estate SE17 1DB
Flat 30 Tennyson House Browning Estate SE17 1DB
31 Tennyson House Browning Estate Browning Street SE17 1DB
Flat 29 Tennyson House Browning Estate SE17 1DB
Flat 3 Tennyson House Browning Estate SE17 1DB
47 Browning Street London SE17 1LU
37 Browning Street London SE17 1LN
39 Browning Street London SE17 1LN
Flat 10 Barrett House Browning Estate SE17 1DA
Flat 11 Barrett House Browning Estate SE17 1DA
51 Browning Street London SE17 1LU
Flat 1 Barrett House Browning Estate SE17 1DA
13 Browning Street London SE17 1LN
15 Browning Street London SE17 1LN
190 Walworth Road London SE17 1JJ
194 Walworth Road London SE17 1JJ
31 Browning Street London SE17 1LN
33 Browning Street London SE17 1LN
29 Browning Street London SE17 1LN
Flat 12 Barrett House Browning Estate SE17 1DA
Flat 4 Barrett House Browning Estate SE17 1DA
Flat 5 Barrett House Browning Estate SE17 1DA
Flat 20 Barrett House Browning Estate SE17 1DA
Flat 3 Barrett House Browning Estate SE17 1DA
Flat 8 Barrett House Browning Estate SE17 1DA
Flat 9 Barrett House Browning Estate SE17 1DA
Flat 6 Barrett House Browning Estate SE17 1DA

Second Floor Flat 238 Walworth Road SE17 1JE
259b Walworth Road London SE17 1RL
31 King And Queen Street London SE17 1DQ
11 Walworth Place London SE17 2TQ
Robert Browning Primary School King And Queen Street SE17 1DQ
The Gladstone 24-26 King And Queen Street SE17 1DQ
259a Walworth Road London SE17 1RL
248a Walworth Road London SE17 1JE
Store Pilton Place SE17 1DL
2d Browning Street London SE17 1LN
243b Walworth Road London SE17 1RL
Flat 18 Gray House Browning Estate SE17 1DT
Flat 19 Gray House Browning Estate SE17 1DT
Flat 16 Gray House Browning Estate SE17 1DT
Flat 17 Gray House Browning Estate SE17 1DT
Flat 20 Gray House Browning Estate SE17 1DT
Flat 21 Gray House Browning Estate SE17 1DT
Flat 19a Gray House Browning Estate SE17 1DT
Flat 2 Gray House Browning Estate SE17 1DT
Flat 10 Gray House Browning Estate SE17 1DT
Flat 11 Gray House Browning Estate SE17 1DT
18 East Street London SE17 2DN
Flat 1 Gray House Browning Estate SE17 1DT
Flat 14 Gray House Browning Estate SE17 1DT
Flat 15 Gray House Browning Estate SE17 1DT
Flat 12 Gray House Browning Estate SE17 1DT
Flat 13 Gray House Browning Estate SE17 1DT
Flat 22 Gray House Browning Estate SE17 1DT
Flat 7 Gray House Browning Estate SE17 1DT
Flat 8 Gray House Browning Estate SE17 1DT
Flat 5 Gray House Browning Estate SE17 1DT
Flat 6 Gray House Browning Estate SE17 1DT
Store Pilton Place Estate SE17 1DL
School House Robert Browning Primary School SE17 1DQ
Flat 8a Gray House Browning Estate SE17 1DT
Flat 9 Gray House Browning Estate SE17 1DT
Flat 25 Gray House Browning Estate SE17 1DT
Flat 26 Gray House Browning Estate SE17 1DT
Flat 23 Gray House Browning Estate SE17 1DT
Flat 24 Gray House Browning Estate SE17 1DT
Flat 3 Gray House Browning Estate SE17 1DT
Flat 4 Gray House Browning Estate SE17 1DT
Flat 27 Gray House Browning Estate SE17 1DT
Flat 28 Gray House Browning Estate SE17 1DT
43 Pilton Place London SE17 1DN
44 Pilton Place London SE17 1DN
41 Pilton Place London SE17 1DN
42 Pilton Place London SE17 1DN
72 Pilton Place London SE17 1DP
73 Pilton Place London SE17 1DP
45 Pilton Place London SE17 1DN
71 Pilton Place London SE17 1DP
35 Pilton Place London SE17 1DN
36 Pilton Place London SE17 1DN
33 Pilton Place London SE17 1DN
34 Pilton Place London SE17 1DN
39 Pilton Place London SE17 1DN
40 Pilton Place London SE17 1DN
37 Pilton Place London SE17 1DN
38 Pilton Place London SE17 1DN
74 Pilton Place London SE17 1DP
85 Pilton Place London SE17 1DP
86 Pilton Place London SE17 1DP
83 Pilton Place London SE17 1DP
84 Pilton Place London SE17 1DP
89 Pilton Place London SE17 1DP
90 Pilton Place London SE17 1DP
87 Pilton Place London SE17 1DP
88 Pilton Place London SE17 1DP
77 Pilton Place London SE17 1DP
78 Pilton Place London SE17 1DP
75 Pilton Place London SE17 1DP
76 Pilton Place London SE17 1DP
81 Pilton Place London SE17 1DP
82 Pilton Place London SE17 1DP
79 Pilton Place London SE17 1DP
80 Pilton Place London SE17 1DP

The Bell 51 East Street SE17 2DJ
 217a Walworth Road London SE17 1RL
 9b Manor Place London SE17 3BD
 Good Intent Public House 24-26 East Street SE17 2DN
 43b Browning Street London SE17 1LU
 17 Browning Street London SE17 1LN
 7 Occupation Road London SE17 3BE
 Walworth Police Station 12-28 Manor Place SE17 3BB
 25 Browning Street London SE17 1LN
 27 Browning Street London SE17 1LN
 21 Browning Street London SE17 1LN
 23 Browning Street London SE17 1LN
 217b Walworth Road London SE17 1JE
 Top Flat 7 Manor Place SE17 3BD
 Flat 213 Walworth Road SE17 1RL
 First Floor Flat 189 Walworth Road SE17 1RW
 First Floor Flat 2 Manor Place SE17 3BB
 Flat 2 12a Colworth Grove SE17 1LR
 Flat 2 277-279 Walworth Road SE17 2TG
 Flat 1 12a Colworth Grove SE17 1LR
 Flat 1 277-279 Walworth Road SE17 2TG
 Above 287 Walworth Road SE17 2TG
 Basement And Ground Floor Flat 7 Manor Place SE17 3BD
 212a Walworth Road London SE17 1JE
 262a Walworth Road London SE17 2TE
 Second Floor Flat 257 Walworth Road SE17 1RL
 First Floor Flat 187 Walworth Road SE17 1RW

 First Floor And Second Floor Flat 203 Walworth Road SE17 1RL
 First Floor And Second Floor Flat 214 Walworth Road SE17 1JE
 39-41 East Street London SE17 2DJ
 43-45 East Street London SE17 2DJ
 38 Bronti Close London SE17 2HD
 25-27 East Street London SE17 2DJ
 285 Walworth Road London SE17 2TG
 53-55 East Street London SE17 2DJ
 61-63 East Street London SE17 2DJ
 24 Bronti Close London SE17 2HD
 28 Bronti Close London SE17 2HD
 14 Bronti Close London SE17 2HD
 16 Bronti Close London SE17 2HD
 34 Bronti Close London SE17 2HD
 36 Bronti Close London SE17 2HD
 30 Bronti Close London SE17 2HD
 32 Bronti Close London SE17 2HD
 40 East Street London SE17 2DN
 1 Occupation Road London SE17 3BE
 5 Manor Place London SE17 3BD
 2 Manor Place London SE17 3BB
 Manor Place Surgery 1 Manor Place SE17 3BD
 1 Amelia Street London SE17 3PY
 Security House 2-6 Occupation Road SE17 3BE
 57-59 East Street London SE17 2DJ
 264-276 Walworth Road London SE17 2TE
 32-34 East Street London SE17 2DN
 22 East Street London SE17 2DN
 13 Manor Place London SE17 3BD
 3 Manor Place London SE17 3BD
 281 Walworth Road London SE17 2TG
 11 Manor Place London SE17 3BD
 Basement And Part Ground Floor 257 Walworth Road SE17 1RL
 Rear Of 257 Walworth Road SE17 1RL
 Rear Of 245 Walworth Road SE17 1RL
 256-260 Walworth Road London SE17 1JF
 Basement And Ground Floor 277-279 Walworth Road SE17 2TG
 First Floor And Second Floor 285 Walworth Road SE17 2TG
 Rear Of 262 Walworth Road SE17 2TE
 Part Ground Floor 263-265 Walworth Road SE17 1RL
 Ground Floor Rear 227 Walworth Road SE17 1RL
 Office No 4 Part First Floor 227 Walworth Road SE17 1RL
 Front And Part Rear First Floor 225 Walworth Road SE17 1RL

 Second Floor And Third Floor 225 Walworth Road SE17 1RL
 Rear Of 243 Walworth Road SE17 1RL
 Office Part First Floor 227 Walworth Road SE17 1RL

 96 Pilton Place London SE17 1DP
 110 Pilton Place London SE17 1DR
 121 Pilton Place London SE17 1DR
 97 Pilton Place London SE17 1DR
 119 Pilton Place London SE17 1DR
 120 Pilton Place London SE17 1DR
 46 Pilton Place London SE17 1DW
 47 Pilton Place London SE17 1DW
 98 Pilton Place London SE17 1DR
 99 Pilton Place London SE17 1DR
 113 Pilton Place London SE17 1DR
 114 Pilton Place London SE17 1DR
 111 Pilton Place London SE17 1DR
 112 Pilton Place London SE17 1DR
 117 Pilton Place London SE17 1DR
 118 Pilton Place London SE17 1DR
 115 Pilton Place London SE17 1DR
 116 Pilton Place London SE17 1DR
 Flat B 255 Walworth Road SE17 1RL
 Flat C 255 Walworth Road SE17 1RL
 Flat 5 Pearlec House SE17 2DL
 Flat A 255 Walworth Road SE17 1RL
 Flat 2 239 Walworth Road SE17 1RL
 Flat 3 239 Walworth Road SE17 1RL
 Flat 1 233 Walworth Road SE17 1RL
 Flat 1 239 Walworth Road SE17 1RL
 Basement And Ground Floors 214 Walworth Road SE17 1JE
 47 East Street London SE17 2DJ

 49 East Street London SE17 2DJ

 Flat 3 Pearlec House SE17 2DL
 Flat 4 Pearlec House SE17 2DL
 Flat 1 Pearlec House SE17 2DL
 Flat 2 Pearlec House SE17 2DL
 41b Browning Street London SE17 1LU
 Flat 3 204 Walworth Road SE17 1JE
 Flat 4 204 Walworth Road SE17 1JE
 Flat 1 204 Walworth Road SE17 1JE
 Flat 2 204 Walworth Road SE17 1JE
 Flat 7 204 Walworth Road SE17 1JE
 Flat 8 204 Walworth Road SE17 1JE
 Flat 5 204 Walworth Road SE17 1JE
 Flat 6 204 Walworth Road SE17 1JE
 Rios De Vida Church Unit A 237 Walworth Road SE17 1RL
 Unit B 237 Walworth Road SE17 1RL
 41c Browning Street London SE17 1LU
 Living Accommodation 51 East Street SE17 2DJ
 Unit C Ground Floor 237 Walworth Road SE17 1RL
 Second Floor 227 Walworth Road SE17 1RL
 Unit C First Floor 237 Walworth Road SE17 1RL
 Unit D 237 Walworth Road SE17 1RL
 2c Browning Street London SE17 1LN
 2 Laugan Walk London SE17 2EA
 3 Laugan Walk London SE17 2EA
 1 Laugan Walk London SE17 2EA
 4 Laugan Walk London SE17 2EA
 8 East Street London SE17 2DN
 Flat A 245 Walworth Road SE17 1RL
 4 East Street London SE17 2DN
 6 East Street London SE17 2DN
 9 Laugan Walk London SE17 2EA

 10 Laugan Walk London SE17 2EA
 Flat B 245 Walworth Road SE17 1RL
 7 Laugan Walk London SE17 2EA
 8 Laugan Walk London SE17 2EA

 5 Laugan Walk London SE17 2EA
 6 Laugan Walk London SE17 2EA
 Part Ground Floor 238 Walworth Road SE17 1JE
 First Floor Flat 241 Walworth Road SE17 1RL
 Rear Of 238 Walworth Road SE17 1JE
 Part Ground Floor And First Floor Rear Of 263-265 Walworth Road SE17 1RL
 Flat C 246 Walworth Road SE17 1JE
 234-236 Walworth Road London SE17 1JD
 Flat A 246 Walworth Road SE17 1JE

Shop 227 Walworth Road SE17 1RL
 Manor Place Depot 30-34 Penrose Street SE17 3DW
 55 Browning Street London SE17 1LU
 Flat 223 Walworth Road SE17 1RL
 Flat 215 Walworth Road SE17 1RL
 Ground Floor First Floor And Second Floor Flat 221 Walworth Road SE17 1RL
 Flat 219 Walworth Road SE17 1RL
 Second Floor Flat 241 Walworth Road SE17 1RL
 Third Floor Flat 187 Walworth Road SE17 1RW
 Second Floor Flat 187 Walworth Road SE17 1RW
 Second Floor Flat 189 Walworth Road SE17 1RW
 Flat 4 12a Colworth Grove SE17 1LR
 Flat 5 12a Colworth Grove SE17 1LR
 Flat 3 12a Colworth Grove SE17 1LR
 Flat 3 277-279 Walworth Road SE17 2TG
 First Floor And Second Floor Flat 210 Walworth Road SE17 1JE
 Fourth Floor Flat 258-260 Walworth Road SE17 1JE
 Flat 6 12a Colworth Grove SE17 1LR
 First Floor And Second Floor Flat 209 Walworth Road SE17 1RL
 Third Floor Flat 189 Walworth Road SE17 1RW
 Part First Floor South 224-236 Walworth Road SE17 1JE
 Second Floor 224-236 Walworth Road SE17 1JE
 Part First Floor 224-236 Walworth Road SE17 1JE
 Part Basement 225 Walworth Road SE17 1RL
 Ground Floor 225 Walworth Road SE17 1RL
 Part Third Floor South 224-236 Walworth Road SE17 1JE
 Part Fourth Floor South 224-236 Walworth Road SE17 1JE
 5 Browning Street London SE17 1LN
 Estate Workshop Tennyson House Browning Estate SE17 1DB
 Third Floor Flat 258-260 Walworth Road SE17 1JE
 9a Amelia Street London SE17 3PY
 70 Morecambe Street London SE17 1DX
 Rear Of 1 Occupation Road SE17 3BE
 Ground Floor 3 East Street SE17 2DJ

 1d East Street London SE17 2DJ
 5 Asolando Drive London SE17 1EJ
 6 Asolando Drive London SE17 1EJ
 3 Asolando Drive London SE17 1EJ
 4 Asolando Drive London SE17 1EJ
 186 Walworth Road London SE17 1JJ
 211 Walworth Road London SE17 1RL

 7 Asolando Drive London SE17 1EJ
 252 Walworth Road London SE17 1JE
 Flat 9 Ben Ezra Court SE17 1EH
 Flat 10 Ben Ezra Court SE17 1EH
 Flat 7 Ben Ezra Court SE17 1EH
 Flat 8 Ben Ezra Court SE17 1EH
 1 Asolando Drive London SE17 1EJ
 2 Asolando Drive London SE17 1EJ
 Flat 11 Ben Ezra Court SE17 1EH
 Flat 12 Ben Ezra Court SE17 1EH
 199 Walworth Road London SE17 1RL
 4 Browning Street London SE17 1LN
 10 York Mansions Browning Street SE17 1LP
 244-248 Walworth Road London SE17 1JE
 209 Walworth Road London SE17 1RL

 Flat B 246 Walworth Road SE17 1JE
 129 Pilton Place London SE17 1DJ
 130 Pilton Place London SE17 1DJ
 259 Walworth Road London SE17 1RZ
 128 Pilton Place London SE17 1DJ
 Flat 4 Ground Floor Rear 257 Walworth Road SE17 1RL

 203 Walworth Road London SE17 1RL
 Flat A 257 Walworth Road SE17 1RL
 Flat B 257 Walworth Road SE17 1RL
 Flat A 240 Walworth Road SE17 1JE
 Flat B 240 Walworth Road SE17 1JE
 1a York Mansions Browning Street SE17 1LP
 131 Pilton Place London SE17 1DJ
 142 Pilton Place London SE17 1DJ
 143 Pilton Place London SE17 1DJ
 140 Pilton Place London SE17 1DJ

 141 Pilton Place London SE17 1DJ
 146 Pilton Place London SE17 1DJ
 147 Pilton Place London SE17 1DJ

 144 Pilton Place London SE17 1DJ
 145 Pilton Place London SE17 1DJ
 134 Pilton Place London SE17 1DJ
 135 Pilton Place London SE17 1DJ
 132 Pilton Place London SE17 1DJ
 133 Pilton Place London SE17 1DJ
 138 Pilton Place London SE17 1DJ
 139 Pilton Place London SE17 1DJ
 136 Pilton Place London SE17 1DJ
 137 Pilton Place London SE17 1DJ
 Flat 4 3 Browning Street SE17 1LN
 Flat 5 East Street SE17 2DJ
 Flat 2 3 Browning Street SE17 1LN
 Flat 3 3 Browning Street SE17 1LN
 Part Third Floor North And Part Fourth Floor North 224-236 Walworth Road SE17 1JE
 Flat 1 252 Walworth Road SE17 1JE
 Flat 2 252 Walworth Road SE17 1JE
 248c Walworth Road London SE17 1JE
 45 Browning Street London SE17 1LU
 Living Accommodation Good Intent Public House SE17 2DN
 Flat 1 3 Browning Street SE17 1LN
 Living Accommodation 24 King And Queen Street SE17 1DQ
 Living Accommodation 267 Walworth Road SE17 1RL
 29-33 East Street London SE17 2DJ
 Flat 6 Herbert Morrison House SE17 1LN
 Ground Floor 3 Amelia Street SE17 3PY
 Flat 4 Herbert Morrison House SE17 1LN
 Flat 5 Herbert Morrison House SE17 1LN
 Middle Unit First Floor SE17 3PY
 Right Hand Unit First Floor SE17 3PY
 First Floor 3-9 Amelia Street SE17 3PY
 5-9 Amelia Street London SE17 3PY
 Herbert Morrison House 195 Walworth Road SE17 1RW
 First Floor 186 Walworth Road SE17 1JJ
 Second Floor 186 Walworth Road SE17 1JJ
 Flat 2 Herbert Morrison House SE17 1LN
 Flat 3 Herbert Morrison House SE17 1LN
 Flat 1 Herbert Morrison House SE17 1LN

Re-consultation: 22/08/2014

Consultation responses received

Internal services

Environmental Protection Team
Transport Planning
Flooding and Drainage Team

Statutory and non-statutory organisations

Transport for London (referable & non-referable app notifications and pre-apps)
Environment Agency
London Fire & Emergency Planning Authority
Thames Water - Development Planning

Neighbours and local groups

Walworth Society
Southwark Arts Forum
Email representations from staff and volunteers at Cooltan Arts

Details of consultation responses received

Internal services

Environmental Protection Team

Air quality – Proposed residential accommodation will be positioned near existing flues associated with establishments where food is cooked. Recommend condition requiring details of glazing treatment and ventilation to ensure good internal air quality to new residential units and internal noise.

Land Contamination – recommend a detailed quantitative risk assessment is recommended to be submitted prior to any development alongside a remediation strategy.

Ventilation Statement – See comments on air quality.

Acoustic report – Conditions are recommended concerning plant noise, internal noise levels and transmission of noise from the proposed D1 use and proposed residential accommodation.

Construction management –An environmental management plan providing details of the demolition and construction phase of the development is recommended to ensure works would minimise impacts on nearby residents.

Transport planning (support with comments)

The following concerns have been identified:

- The main access entrance to the site is very narrow and so there is a high potential for conflict between pedestrians, cyclists and vehicles on this narrow entrance given the proposed intensity of development.
- There is a concern that vehicles entering the site will not be able to do so when another vehicle is leaving. This will result in vehicles reversing onto Walworth Road

to allow a vehicle to exit, or, waiting on Walworth Road to allow a vehicle to leave. This is unacceptable and will significantly affect the safe operation of the street for other vehicles, cyclists and pedestrians and cause unnecessary delays to bus routes.

- The crossing of the pavement for access is considered a high risk for pedestrians and will create a detriment to pedestrian flows. This makes this development unacceptable.
- The Construction Management Plan (CMP) included with the application is too vague. It does not consider the safety implications of crossing the pavement, nor the likely impact on vehicles waiting to enter the site whilst another vehicle is exiting or on site, which will cause considerable impacts to the traffic and buses on Walworth Road. Further more it does not include an estimate of the number, size and timing of construction traffic.
- The CMP identifies the lay-by to the north of their entrance as a potential overspill area. This is not considered acceptable. The loading bay is in constant use by vehicles making deliveries to the shops. It would be a detriment to the area, increase congestion and will cause shops and business along that section of the street to encounter unacceptable impacts to their economic activity to use this lay-by for construction traffic.

Recommendations:

A traffic light management system has also been proposed to address the transport related concerns identified above. In the event of approval, these details should be secured by condition, approved and implemented prior to any works on site.

Car parking

- The application states the site will be car free and a legal agreement must be entered into before a decision is granted.

Servicing deliveries and refuse collection

- a full delivery and servicing plan is required

Flooding and Drainage Team

The drainage strategy prepared by RPS submitted shows the existing and proposed drainage system on the site and I am satisfied that there is sufficient representation of both of these from the reporting, drawings and calculations.

In the event of approval, the developer would need to indicate what areas are anticipated to flood and to what extent. We would need to be satisfied that the design has taken account of the potential for this flooding and that the flood risk impacts are reduced to the development. This could be achieved by providing a relatively steep cross-fall on the roads away from the buildings to keep water away from the thresholds and potentially by increasing the diameter of the manholes in this section of the network. If this cannot be achieved, we would look for flood resilience measures to be provided to the ground floor of the building.

The proposed drainage strategy includes provisions for green roofs, permeable paving and water butts. All of these are SuDS systems that would be welcomed by the flood and drainage team.

Statutory and non-statutory organisations

Transport for London (Support with comments)

The site is located on Walworth Road, which forms part of the Strategic Road Network (SRN). While the borough is the highway authority for this road, TfL have a duty under the Traffic Management Act 2004 to ensure that any development does not have an adverse impact upon the SRN.

This is a car-free scheme apart from the provision of four spaces for Blue Badge holders and is welcomed by TfL. The provision of Blue Badge parking should be secured by planning condition. TfL also requests that the applicant enters a legal agreement preventing residents from applying for local on-street parking permits.

72 cycle parking spaces will be provided for the student accommodation, 12 for the self-contained dwellings, 4 for the medical centre and 6 for visitors. This provision is considered to be in accordance with London Plan standards and cycle parking across the site should be secured by condition.

TfL also welcomes the provision of plans that set out construction logistics and the requirements for managing student arrivals and departures at the beginning and end of term. These plans should be finalised and approved by LB Southwark prior to works commencing on site and occupation of the premises respectively and should be secured by condition.

In accordance with London Plan policy 6.3, a full travel plan should be submitted for the student accommodation element of the scheme. This should be prepared in accordance with TfL's Travel Planning Guidance and should include objectives, targets for mode share and a package of measures that promote sustainable travel to and from the site. Information should also be provided on management, monitoring and finance. TfL requests that the travel plan is secured by appropriate legal agreement.

Subject to LB Southwark imposing the conditions and obligations requested above, TfL would not object to this application being approved

Environment Agency position (Support with comments)

No objection to the planning application as submitted, subject to the conditions in respect of ground water and land contamination and details setting out flood mitigation and surface water management measures. Without these conditions, the proposed development on this site poses an unacceptable risk to the environment and we would wish to object to the planning application.

Thames Water (Comments)

No impact piling shall take place until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement. Reason: The proposed works will be in close proximity to underground sewerage utility infrastructure. Piling has the potential to impact on local underground sewerage utility infrastructure. The applicant is advised to contact Thames Water Developer Services on 0845 850 2777 to discuss the details of the piling method statement.

Thames Water requests that the Applicant should incorporate within their proposal, protection to the property by installing for example, a non-return valve or other suitable device to avoid the risk of backflow at a later date, on the assumption that the sewerage network may surcharge to ground level during storm conditions.

Surface Water Drainage - With regard to surface water drainage it is the responsibility of a developer to make proper provision for drainage to ground, water courses or a suitable sewer. In respect of surface water it is recommended that the applicant should ensure that storm flows are attenuated or regulated into the receiving public network through on or off site storage. When it is proposed to connect to a combined public sewer, the site drainage should be separate and combined at the final manhole nearest the boundary. Connections are not permitted for the removal of groundwater. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. They can be contacted on 0845 850 2777. Reason - to ensure that the surface water discharge from the site shall not be detrimental to the existing sewerage system.

Where a developer proposes to discharge groundwater into a public sewer, a groundwater discharge permit will be required. Groundwater discharges typically result from construction site dewatering, deep excavations, basement infiltration, borehole installation, testing and site remediation. Groundwater permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 020 8507 4890 or by emailing wwqriskmanagement@thameswater.co.uk. Application forms should be completed on line via www.thameswater.co.uk/wastewaterquality. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991.

Water Comments - on the basis of information provided, Thames Water would advise that with regard to water infrastructure capacity, we would not have any objection to the above planning application.

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

London Fire and Emergency Planning Authority (Support with comments)

Thank you for your letter received by our office 15th May regarding ref; 14/AP/0833 - 237 Walworth Road SE17 , I can confirm no further action is required by our office and we are happy for the works to go ahead as planned.

Neighbours and local groups

Walworth Society, Local Group (Comments)

These comments come from the Walworth Society. The Walworth Society has more than 400 members in the Walworth area and aims to be a voice for people in Walworth, to preserve and protect its architectural heritage and to protect and help improve its green and open spaces.

These planning applications were discussed at our meeting of Thursday 5th June which was attended by more than 30 local residents. Initially we would like to express our concern about the statement of community involvement (http://planningonline.southwark.gov.uk/DocsOnline/Documents/351588_1.pdf) which states on page 9 that the Walworth Society was contacted by the applicants.

While we did come across the applicants when they attended an Elephant & Walworth Neighbourhood Forum meeting, we would suggest that Southwark Council is extremely cautious about claims concerning the degree of engagement which has occurred with

local community groups and the degree to which the applicant's thinking has evolved based upon that engagement. At the meeting that they attended (to which they had not been invited or expressed a desire to attend in advance), no substantive engagement took place and there was no follow up as to how their thinking had evolved in any way. After that meeting I suggested to the applicants that they might like to engage with Walworth Society members either with information about the development or attend a meeting to outline their plans. We have received no response from them or any contact since that time.

This issue is important as significant engagement with local groups is claimed.

The principal issue which was raised at our 5 June meeting was the degree to which Cooltan Arts would be accommodated within the latest planning application. We understand that in the s106 agreement for the lapsed planning application, Cooltan Arts would be accommodated in any new development. We remain concerned that the agreement with the applicant which relates to the current applications does not meet the needs of Cooltan Arts sufficiently. We would underscore the importance of Cooltan Arts as a local charity and organisation and the significance of the work they do on behalf of the community in Walworth and more widely across Southwark.

We would request that any agreement with the applicant seeks to meet the needs of Cooltan Arts as has always been envisaged in the development of this site.

Southwark Arts Forum (Comment)

I am writing regarding an obligation in the section 106 agreement which accompanied a planning application for land at 237 Walworth Road. Planning permission was granted in January 2008 – application reference number 07-AP-2320 – and the section 106 agreement was signed.

Section 6.1 of the agreement states the obligation of the developer to CoolTan Arts:

‘...The Developer covenants with the Council that within two months of the date of this Agreement it shall serve notice in writing on CoolTan Arts offering to enter into negotiations with CoolTan Arts for the letting of not less than 203 square metres of floor space (‘the Floor Space’) within the Development...’

The CEO of CoolTan Arts, Michelle Baharier, has had unsatisfactory communication with the Developer, who has offered a sum of money in order that CoolTan Arts not enforce the obligation. This offer was declined.

We ask that the planning application be monitored in order that a breach does not occur and that a purpose-built space be provided for CoolTan Arts, in accordance with the section 106 agreement.

Southwark Arts Forum is a leading cultural agency for the borough and Cooltan is one of our members.

Local volunteer (Staff) , Cooltan Arts (Objection) x 6

I am a participant at CoolTan Arts, a mental health charity in the Walworth Road, which has helped me to stay well and manage my mental health. I am driven to write this letter because CoolTan Arts was given a protected section 106 on its old site on Walworth Road SE171RL. The site was going to provide CA with a ground floor 2000 square meters and the possibility of another 1000, plus a garden and disabled parking. I am concerned that the new developer has not included CoolTan into its plans and I object to this.

CoolTan Arts works with 1743 people face-to-face and outreaches to 250,000 people annually in an area with one of the highest levels on mental ill health in Europe.

We want this planning to be stopped as it does not respect the urgent need for community mental health and well-being provision.

CoolTan provides training and experience for volunteers and participants to help them get back into work.

We object to this planning application being granted and believe that it contradicts key policies in Southwark's Development Plan such as:

- SP 9 Meeting community needs

All developments should, where appropriate, enable growth and development of education, community and welfare services in line with the community's needs.

- Community facility and health provision should be an integral part of master plans and larger developments.

There is an enormous need in Southwark for mental health services and CoolTan Arts helps to relieve that pressure on already-stretched services.

If this application is to be decided by councilors, please take this as notice that I would like to speak at the meeting of the committee at which this application is expected to be decided. Please let us know as soon as possible the date of the meeting.

Volunteer Coordinator, Cooltan arts (Objection) x 8

As a staff member at CoolTan Arts (CA), arts and mental health charity in the Walworth Road, I am compelled to write this letter. In January 2007 a written and signed section 106 protection was attached to an original Southwark Planning Department application submitted by Walworth Road, LTD for 237 Walworth Road, SE17 1RL (Ref #: 07/AP/2320). The Section 106 protection order was signed by all parties and obligated the developer to provide for sale to CoolTan Arts a ground floor 2000 square meter office and studio space with the understanding of a possible further 1000 square meters, a garden with 3 disabled parking places.

Seven years later in March/April 2014 Goldcrest, the new developers, put in an application under cover of two separate, but similar Southwark Planning applications. They are well aware of CoolTan Arts agreement and needs as Michelle Baharier CEO, has met and spoken to them. They bought the site knowing full well that CoolTan Arts has a Section 106 protection, which they seem to be ignoring.

I am concerned that the new developer has not included CoolTan Arts into its plans, and outright object to this. CoolTan Arts was originally located at 237 Walworth Road, which is the primary reason for the original Section 106 agreement was made. CoolTan Arts works with 1743 people face-to-face and outreaches to 250,000 people annually, and provides training and experience for people with mental distress, volunteers and participants to help them get back into work.

Currently CoolTan Arts has a limited 3 year lease across the road from the site at 224-236 Walworth Road. It is unsuitable as it is not on the ground floor and we do not have our own entrance. It is imperative we move back to our 'spiritual home' at 237 Walworth Rd, with our right to buy outright, with car parking and garden space in our 'spiritual' home.

I respectfully demand this planning to be stopped as it does not respect the urgent need for community mental health and well-being provision in this area of Walworth Road.

I object to this woeful planning application being granted and believe that it contradicts key policies in Southwark's Development Plan such as:

- SP 9 Meeting community needs
"All developments should, where appropriate, enable growth and development of education, community and welfare services in line with the community's needs".
- *"Community facility and health provision should be an integral part of master plans and larger developments."*

Southwark has the largest mental health population in Western Europe and the greatest need for excellent services. CoolTan Arts helps to relieve that pressure on already-stretched services costs.

Furthermore, this application for 68 student units is in an area where we have high student accommodation already owned by Goldcrest, where his B1 units in fact remain empty. A former factory the site at 237 is an industrial site that was a place for employment and work. With massive redevelopment of housing units, it is an unsuitable space for accommodation due to having only a one way entrance meaning people could be at risk of death if a fire or ambulance service were ever needed.

If this application is to be decided by councillors, please take this as notice that I would like to speak at the meeting of the committee at which this application is expected to be decided. Please let us know as soon as possible the date of the meeting.