

Planning Statement **Avonmouth House**

Relating to site at
6 Avonmouth Street, London, SE1 6NX

November 2021



hghconsulting.com

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1.0 Introduction

- 1.1 This Town Planning Statement is submitted in support of an application for full planning permission on behalf of Tribe Avonmouth House Limited ('the Applicant'), hereafter referred to as 'Tribe' for proposed development at Avonmouth House, 6 Avonmouth Street, London, SE1 6NX ('the site').
- 1.2 The proposals are described in greater detail in Section 4 of this Statement. In summary, planning permission is sought for the following ('the proposed development'):

"Demolition of existing building and structures and erection of a part 2, part 7, part 14, part 16 storey plus basement mixed-use development comprising 1733sqm (GIA) of space for Class E employment use and/or community health hub and/or Class F1(a) education use and 233 purpose-built student residential rooms with associated amenity space and public realm works, car and cycle parking, and ancillary infrastructure."

- 1.3 This Statement provides a planning assessment of the proposed development against all relevant planning policies and other material considerations in accordance with section 38(6) of the Planning and Compulsory Purchase Act 2004.
- 1.4 The proposals have also been assessed against the statutory duties found in section 66(1) and section 71(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 and the relevant sections of the National Planning Policy Framework.
- 1.5 London's higher education providers make a "significant" contribution to its economy and labour market, and it is important that their attractiveness and potential growth are not compromised by inadequate provision for new student accommodation, as recognised by the Mayor of London¹. The housing need of students in London, whether in purpose-built student accommodation or shared conventional housing, is an element of the overall housing need for London determined in the 2017 London SHMA². Tribe was established in 2020 to provide high quality and good value student accommodation across London. Tribe has a rapidly growing portfolio of student accommodation, operating in Peckham, New Cross, the Old Kent Road and Walthamstow.
- 1.6 The site is currently being used as a corporate meeting/event/training venue having been acquired by 'etc.venues Ltd' in 1992. However, over the past five years, etc. venues has focussed on developing its larger landmark sites, such as County Hall, where economies of scale and operations are greater. Etc. venues is committed to retaining a strong presence in Southwark and has recently signed a 10 year lease extension at nearby Prospero House on Borough High Street, which will be able to support former Avonmouth House clients as well as all five existing employees at the site. As a result, Avonmouth House is surplus to requirements and will cease trading when the existing occupier moves off-site, thus providing a major opportunity for redevelopment. Further details regarding etc. venues' business consolidation strategy are contained within the letter by etc. venues supporting the planning application.
- 1.7 The site is in a highly accessible location and within 5 minutes' walk of two University campuses, the University of the Arts and London South Bank. The site is also located within the Central Activities Zone and the Elephant and Castle Opportunity Area, which is undergoing major and rapid

¹ London Plan 2021, paragraph 4.15.1

² London Plan 2021, paragraph 4.15.1

transformation, with a number of tall buildings either recently completed, under construction or consented.

- 1.8 The Elephant and Castle Supplementary Planning Document (SPD) and Opportunity Area Planning Framework (OAPF) (2012) identifies the site, located within the “Enterprise Quarter” of the Elephant and Castle Opportunity Area, as an opportunity site for development. Student housing proposals will be supported within the Enterprise Quarter, in accordance with SPD 8.
- 1.9 Within the emerging New Southwark Plan, the site, and neighbouring buildings at 63-85 Newington Causeway are allocated for mixed-use redevelopment, that “could” include taller buildings (site ref: NSP43: 63-85 Newington Causeway).
- 1.10 The existing two storey building on the site was constructed in the late 1980s, replacing a warehouse building occupied by Atlas Paper Works, who specialised in the manufacture of stationery until it closed in the early 1980s. The existing building is of utilitarian design; it is visually impermeable and illegible and is not of heritage significance. The ground floor plane is of poor quality with extensive dead frontage providing an unattractive backdrop to Newington Gardens, a non-designated heritage asset.
- 1.11 The site therefore represents an excellent opportunity for a major mixed-use development which will deliver high quality student housing alongside flexible Class E floorspace, which could include a community health hub, and/or Class F1(a) education use in this highly accessible, inner London location.
- 1.12 The proposed development, designed by Stitch Architects, is of the highest quality and would deliver an exemplary design solution for this site. The architecture is expressed as a group of elements of differing heights which relate to different orientations. At ground floor the scheme would provide a new high quality façade with active frontage reconnecting the building to the surrounding area. Consistent with applicable adopted and emerging policies and guidance on tall buildings, the proposed development is elegantly proportioned and contributes positively to the townscape, both at the level of the streetscape and on the skyline. It will form part of the emerging cluster at Elephant and Castle and will represent an appropriate transition between the tallest elements located on Newington Causeway including Two Fifty One, 89 and 87 Newington Causeway, and the lower scale further north on Newington Causeway and to the south and east of the site. Its height will contribute to this emerging cluster that defines the gateway into the central area of Elephant and Castle.
- 1.13 The application scheme has evolved through pre-application consultation with the London Borough of Southwark (‘Southwark’), the Greater London Authority (‘GLA’) and Transport for London (‘TfL’). Pre-application discussions have also taken place with local stakeholders including local residents, neighbouring landowners and businesses, ward councillors and relevant local community groups. Due to Covid-19, a digital public consultation was held in the form of an online interactive consultation website as well as virtual meetings during the pre-application period.
- 1.14 The scale of development proposed by this application does not reach the minimum thresholds for Environmental Impact Assessment (EIA) Screening under the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. The location and nature of the proposed development does not give rise to significant environmental impacts in an urban setting sufficient to

warrant a requirement for an EIA; therefore, the proposed development does not constitute a scheme requiring an EIA.

- 1.15 The application is referable to the Mayor of London under Category 1C of the Schedule to the Town and Country Planning (Mayor of London) Order 2008.
- 1.16 A list of the documents submitted with the application is enclosed at **Appendix 1**.
- 1.17 Overall, the proposed development has the potential to deliver significant public benefits and policy objectives related to delivery of specialist housing, employment growth and jobs, high quality architecture, place-shaping, and sustainability. Accordingly, planning permission should be granted without delay.

2.0 Site and Surrounding Context

- 2.1 The site is located within the Chaucer ward within the London Borough of Southwark. The site is accessed from the southern and western side of Avonmouth Street, approximately 50 metres from the Newington Causeway (A3) junction.
- 2.2 The site measures 0.12 hectare and comprises a two storey building constructed in the late 1980s and an area of hard surfaced vehicular access. It is currently occupied by etc. venues and comprises a mix of uses including corporate training and conference facilities, meeting rooms, lecture theatres, offices, and associated catering facilities.
- 2.3 The site is adjoined to the west by Coburg House (63-67 Newington Causeway), a seven storey commercial building fronting Newington Causeway; and Balppa House (57-61 Newington Causeway), a five storey mixed-use building on the corner of Newington Causeway and Avonmouth Street. Coburg House has a private right of way on the existing northeast area of the site, which would remain post-development.
- 2.4 Adjoining the site to the north is a group of mainly 20th century, four storey commercial buildings with some residential above that front onto Newington Causeway. Included within this group is the three storey Southwark Playhouse (77-85 Newington Causeway) and the only surviving 19th century locally listed building at 73-75 Newington Causeway. Opposite to the east is Newington Gardens, a non-designated heritage asset. To the south of the site is the large Rockingham Estate formed of 19 predominantly five storey residential blocks set around quadrangles and areas of open amenity space.
- 2.5 There are no listed buildings on the site. The site is not located within a conservation area but is located within the setting of heritage assets whose settings may be affected, such as the Grade II Listed Inner London Session Court approximately 50m to the northeast of the site, and the Trinity Square Conservation Area, approximately 250m northeast of the site. The site is also within the setting of non-designated heritage assets, including the locally listed building at 73-75 Newington Causeway and Newington Gardens.
- 2.6 The site is well located for quick and convenient access to various modes of transport, including on foot, by bicycle and public transport. The site's public transport accessibility level (PTAL) is classified as "excellent" with a rating of 6b on a scale where 1a is poor and 6b is excellent. Of note, high frequency bus services are available from the bus stops located immediately adjacent to the Avonmouth Street/Newington Causeway junction. These stops are known as the Inner London Crown Court stops and are served by the 35, 133, 343 and C10 services as well as the N133 and N343 night bus services. Elephant and Castle Underground Station is located approximately 400 metres walk to the southwest of the site. It is located on the Bank branch of the northern line with a typical off-peak frequency of 20 trains per hour in each direction. It is also the terminus of the Bakerloo line with approximately 14 trains arriving and departing per hour. Elephant and Castle National Rail Station is located approximately 650 metres to the southwest of the site. It provides services to London Blackfriars, Kentish Town, St Albans City, Sevenoaks and Sutton amongst others.
- 2.7 There are a wide range of amenities within walking distance of the site and the two nearest university campuses, University of the Arts and London South Bank, are within 0.3 miles (5 minute walk) and 0.2 miles (3 minute walk) respectively.
- 2.8 The site is located in Flood Zone 3 within an area that benefits from flood defences.

- 2.9 Most of the site comprises the building of 6 Avonmouth Street itself, but there is a single tree (category 'C') within a raised planter within the boundaries of the site. Of the off-site trees, one small tree is growing within a raised planter adjacent to the boundary of the site to the northwest and the others are growing on the north-eastern side of Avonmouth Street. There are no arboricultural features within the site. The key arboricultural features of the immediate area are the hybrid black poplar (category 'B') and the London plan (category 'A'), both of which are large and highly visible trees in the street scene and make a significant contribution to the character and appearance of the locality. The large London plane trees growing within Newington Gardens to the southeast of the site are also key arboricultural features of the locality.

Surrounding Area

- 2.10 The area surrounding the site is mixed in character, comprising largely commercial, retail and leisure uses to the west and residential use to the south and east, which form the Rockingham Estate.
- 2.11 As noted in Section 1, the site is within an area experiencing rapid regeneration and transformation in townscape terms, reflective of its opportunity area status. Within the immediate vicinity of the site, between Southwark Playhouse and the railway viaduct, is the recently constructed 25 storey mixed-use hotel and residential scheme by SPPARC Architecture known as 'The Kite' (87 Newington Causeway). Further to the west of the railway viaduct is The Pioneer Building, a 20 storey apartment building at 89 Newington Causeway. Two Fifty One London (formerly Eileen House) stands at 41 storeys high and is located opposite 80-94 Newington Causeway.
- 2.12 Planning permission has been granted for a 12 storey building designed by Collado Collins Architects at 5-9 Rockingham Street. Other sites identified for large scale future redevelopment within the immediate area include the Salvation Army Headquarters and Skipton House, both on Newington Causeway to the southwest of the railway viaduct; and the 'Newington Triangle' (also referred to as 'Borough Triangle') site bounded by Borough Road, Newington Causeway and the railway viaduct. Formerly owned by Peabody Estate, the Newington Triangle site has recently been acquired by Berkeley Homes and currently houses the temporary food market, Mercato Metropolitano, although it is allocated for mixed-use development with an indicative capacity of 438 homes that could include taller buildings.

Site Designations

- 2.13 The site has the following designations as shown on the adopted Southwark Policies Map (last updated in 2016):
- Major Town Centre – Elephant and Castle;
 - Opportunity Area – Elephant and Castle;
 - Central Activities Zone;
 - Archaeological Priority Zone; and
 - Air Quality Management Zone.
- 2.14 Within the emerging New Southwark Plan, the site is subject to the following designations:
- Part of Site Allocation NSP43: 63 – 85 Newington Causeway;
 - Major Town Centre – Elephant and Castle;
 - Strategic Cultural Area – Elephant and Castle Strategic Cultural Quarter;

- Opportunity Area – Elephant and Castle;
- Central Activities Zone;
- Archaeological Priority Area; and
- Air Quality Management Area.

Emerging Site Allocation ‘NSP43: 63 – 85 Newington Causeway’

2.15 The site and the neighbouring sites to the west form part of emerging site allocation ‘NSP43’ which measures 3,784sqm according to the allocation. A copy of the draft allocation is enclosed as **Appendix 2**. The allocation stipulates that the existing uses on the site comprise the following:

- Southwark Playhouse (Sui Generis) – 816sqm
- Office (E(g)(i)) – 4,168sqm
- Light industrial uses (E(c)(i)) – 827sqm
- Job Centre (E(c)(i)) – 546sqm

2.16 The site allocation says the following regarding redevelopment proposals across the allocation as a whole:

Redevelopment of the site must:

- *Provide at least the amount of employment floorspace (E(g), B class)³ currently on the site or provide at least 50% of the development as employment floorspace, whichever is greater; and*
- *Retain the existing theatre use or provide an alternative cultural use (D2); and*
- *Provide active frontages including ground floor retail, community or leisure uses (as defined in the glossary) on Newington Causeway.*

Redevelopment of the site should:

- *Provide new homes (C3).*

Redevelopment of the site may:

- *Provide a new community health hub (E(e)).*

2.17 The indicative residential capacity across the site allocation is 93 homes.

2.18 The “design and accessibility guidance” for the site contained within the emerging allocation is as follows:

“Redevelopment should deliver a more complementary and harmonious mix of uses alongside the retained Southwark Playhouse theatre, subject to need, that emphasises its cultural significance, attracts more visitors to the area and creates active frontages on Newington Causeway. Redevelopment should enhance accessibility to public transport, walking and cycle routes.

³ MM132 in the Schedule of Proposed Main Modifications to the New Southwark Plan (document ref: EIP219)

Southwark needs to accommodate significant growth for offices and other workspaces which are growing in demand contributing to the central London economy and status as a world city. Sites that are within the Central Activities Zone are most in demand for delivery of offices and will be required to contribute to this growth by providing an increase in the amount of employment floorspace.”

- 2.19 In terms of the approach to tall buildings, the allocation states that “*comprehensive mixed-use redevelopment of the site could include taller buildings subject to consideration of impacts on existing character, heritage and townscape.*”

Elephant and Castle Supplementary Planning Document (SPD) and Opportunity Area Planning Framework (OAPF) (March 2012)

- 2.20 The Elephant and Castle SPD and OAPF sets out the vision for the 122-hectare opportunity area, within which the application site is located. Although the SPD was adopted almost 10 years ago, it remains a material consideration in the determination of planning applications and provides contextual information which has shaped the regeneration of the area since its adoption.
- 2.21 The site and Nos. 57-87 Newington Causeway are identified as a “potential development site” within the Enterprise Quarter defined character area of the opportunity area.
- 2.22 In terms of existing land uses, the site, and the area immediately to the north and west are identified as being “predominantly commercial”⁴. However, adjoining the site to the east is an area identified as being “predominantly institutional/cultural/leisure”, which includes the Court building, and to the south is an area containing “predominantly residential with supporting community uses”. It is clear, therefore, that the site is in a diverse area comprising a broad range of land uses, typical of a town centre location.

⁴ Elephant and Castle SPD and OAPF (2012), Figure 5: Indicative land uses in the opportunity area

3.0 Planning History

3.1 The site's planning history has been obtained from Southwark's online planning register and is tabled below.

Application reference	Description of Development	Date received	Decision
89/AP/0133	Change of use from office B1 to educational D1 at 6 Avonmouth Street SE1	10 January 1989	Granted
04/AP/1181	Retention of external refurbishment works to include new planters, resurface existing driveway, installation of new railings to semi-enclosed area and installation of a double set of doors to entrance	2 July 2004	Granted
04/AP/1607	Relocation of existing free standing advertisement sign, to be positioned within a proposed planter	1 September 2004	Granted

4.0 Proposed Development

- 4.1 The application scheme involves the demolition of the existing late 1980s two storey building to provide a single building of stepped heights ranging from 2 to 16 storeys plus a double basement. The development provides 233 purpose-built student rooms comprising 217 en-suite rooms, 4 studios, and 12 (5%) accessible studios arranged over levels 2 to 15 for London South Bank University or one of the University of London's Southwark-based member institutions. In line with the London Plan and New Southwark Plan, the accommodation would be secured via a Nomination Rights Agreement and 35% would be affordable student accommodation.
- 4.2 Flexible Class E/F1(a) floorspace is proposed at basement (-1), ground and first floor, totalling 1,733sqm (GIA), 10% of which would be affordable. The floorspace has been designed with maximum flexibility from the outset in order to appeal to a range of potential end users. Indicative layouts on pages 34 and 35 of the DAS demonstrate how the floorspace could be configured over the three floors to accommodate various options, including a community health hub.
- 4.3 Public realm improvements form part of the proposals, including new landscaping and widening of the footways around the site to create an attractive and welcoming pedestrian experience. Beyond the application site boundary, there is the potential to significantly upgrade the public realm for the mutual benefit of local residents and future occupiers of the development, including the provision of a "pocket park", which is shown illustratively within the Landscape Statement. This does not form part of the planning application, but the Applicant is committed to delivering these aspirational public realm improvements to the wider area should Southwark be amenable.
- 4.4 A total of 165sqm external amenity space for the future student residents is provided by way of a landscaped roof terrace at seventh floor. The space has been designed to incorporate areas for lounging, eating, sitting, and working, and the landscape features include raised planters with integrated seating and multi-stem trees. Extensive urban greening is proposed on roof terraces at levels two, seven, fourteen and sixteen, including green roofs in combination with solar panels.
- 4.5 The existing access off Avonmouth Street will be retained but improved with the provision of a Copenhagen crossing along the frontage, thus creating a nicer and safer pedestrian environment along Avonmouth Street compared with the existing situation.
- 4.6 The proposals seek to reduce car dependency and will be "car-free", providing only one disabled car parking space on-site which will be utilised when allocated to a student/staff member with a blue badge. Separate cycle stores for each use are proposed in accordance with the London Plan minimum cycle parking standards. A total of 210 spaces are provided overall, comprising 176 long stay spaces for student users within the second basement level, 24 long stay spaces for the commercial use at ground floor, and 10 short stay/visitor parking spaces within the public realm at street level.
- 4.7 Deliveries and servicing by larger vehicles (including refuse vehicles) is proposed to take place on Avonmouth Street as per the current situation, whilst deliveries by smaller vehicles (such as those used by couriers etc.) can be undertaken within the site.

- 4.8 Further details of the proposal are contained in the Design and Access Statement ('DAS') and drawings, produced by Stitch Architects, and the other technical reports submitted with the application as listed in Appendix 1.
- 4.9 The proposed development represents a significant opportunity to create a mixed-use development incorporating high quality purpose-built student accommodation and flexible Class E/F1(a) floorspace within an inner London Opportunity Area.
- 4.10 In summary, the proposed development would deliver the following key benefits:
- i. First class, flexible Class E/F1(a) floorspace, including 10% affordable workspace, fronting Avonmouth Street and Tiverton Street with views across Newington Gardens;
 - ii. 233 high quality purpose-built student rooms, including 35% affordable and 5% wheelchair accessible rooms, supporting the Borough's higher education establishments and contributing towards the Mayor's target of 3,500 new purpose-built student bedrooms per annum;
 - iii. An indirect contribution of 93 homes towards Southwark's and the GLA's housing targets (based on the London Plan ratio of 2:5:1⁵), which in turn, would free up conventional housing thus reducing pressure on the local private rental housing market;
 - iv. Active frontages and enhanced public realm on Avonmouth Street and Tiverton Street that would create an attractive, safe and high quality environment for people and students to work, live and visit, better revealing local distinctiveness and providing a strong sense of place;
 - v. Exemplary new architecture that is sympathetic to the local character and history while optimising the site's potential, providing benefits in townscape and streetscape terms;
 - vi. New jobs once the building is operational/completed, as well as indirect employment in the construction and supply chain;
 - vii. Fiscal benefits through increased spending power in the area from the future student residents; CIL payments; section 106 contributions; and annual business rates;
 - viii. A highly sustainable, zero carbon development, including BREEAM 'Excellent' rated employment floorspace;
 - ix. Introduction of urban greening to improve the biodiversity of the area;
 - x. The potential for public realm improvements to the wider area including a newly created "pocket park" and associated highway improvements.
- 4.11 As set out within this Statement, the proposals accord with the aims and objectives of national, regional, and local planning policy, and would deliver significant public benefits.

⁵ Refer to paragraph 7.29 of this Statement

5.0 Consultation and Community Engagement

- 5.1 Paragraph 39 of the National Planning Policy Framework (NPPF) confirms that *“early engagement has significant potential to improve the efficiency and effectiveness of the planning application system for all parties. Good quality preapplication discussion enables better coordination between public and private resources and improved outcomes for the community.”*

- 5.2 In addition, paragraph 41 of the NPPF states:

“The more issues that can be resolved at pre-application stage, including the need to deliver improvements in infrastructure and affordable housing, the greater the benefits. For their role in the planning system to be effective and positive, statutory planning consultees will need to take the same early, pro-active approach, and provide advice in a timely manner throughout the development process. This assists local planning authorities in issuing timely decisions, helping to ensure that applicants do not experience unnecessary delays and costs.”

Pre-application discussions with the Greater London Authority and Transport for London

- 5.3 A pre-application meeting with the GLA planning and design officers and TfL was held on 6th July 2021. Officers welcomed the principle and general form of the proposed scheme, although at the time of writing the written pre-application response has not been received.

Pre-application discussions with the London Borough of Southwark

- 5.4 The proposed development has evolved through pre-application engagement with Southwark. Discussions have taken place between officers and the design team in respect of topics relating to design, land use, transport and highways, and heritage and townscape. A formal pre-application meeting was held on 17th August 2021 and at the time of writing the written pre-application response has not been received.

Engagement with Tibbalds

- 5.5 LB Southwark has appointed a team led by Tibbalds to develop an urban design framework and associated “assessment tool” to enable future development scenarios for a number of sites in and around Newington Causeway to be assessed in terms of their environmental and townscape impacts. The sites include Newington Triangle, Quadrilateral, Salvation Army and the various sites comprising emerging allocation NSP43, including Coburg House and Avonmouth House.
- 5.6 We understand that, whilst preparing the assessment, Tibbalds consulted with several landowners. This included the planning agents representing other landowners within the block that contains the Application Site, but not the owners of the Application Site itself (who were thought to be acquiescent in the plans of the other parties). Subsequently, a meeting was held on 6th October 2021 which involved Tibbalds, members of LB Southwark’s regeneration and planning team and the current Applicants. The purpose of this meeting was for Tibbalds to present and explain their work.
- 5.7 The framework is not a publicly available document and does not have any planning policy status, for example, as supplementary planning guidance, and should therefore attract very little weight. The Applicant has nonetheless welcomed the pre-application engagement with Tibbalds and has responded to the framework accordingly within the planning application material.

- 5.8 The central image on page 21 of the DAS is an overlay of the Stitch Masterplan onto Tibbalds' urban design analysis which demonstrates how the proposed development at Avonmouth House considers the key urban design principles in the framework, including those specific to emerging site allocation NSP43 as follows:
- Enhance existing link from Newington Causeway to Newington Gardens through creation of active pedestrian and visual links along Avonmouth Street
 - Enhance pedestrian connections towards Low Line along Tiverton Street
 - Consider the setting of Listed building: Inner London Crown Court
 - Create a strong new frontage with emphasis on the corner in response to the immediate relationship with Newington Gardens
 - Provide accessible residential amenity space
 - Activate frontages onto Newington Causeway creating a positive frontage
 - Respond to proposals on NSP41 Newington Triangle by establishing a coherent cluster of tall buildings responding to context
 - Consider 'low line'
 - Consider impacts on and connections to Newington Gardens to the east.
- 5.9 Whilst the proposals are taller than envisaged within the framework, they do follow the same rationale and design rationale, whereby the massing steps up away from Borough Road towards the tallest building in the North Southwark Cluster – 251 Newington Causeway at 41 storeys high. The diagrammatic sections on page 21 of the DAS demonstrate this. The HTVA also makes reference to the Tibbalds study on page 15 and concludes that both in the present semi-sensitive context and in the future context of a fully built out regeneration site, the development is of an appropriate scale and height such that it contributes positively to the townscape, and in particular, achieves an appropriate relationship with Newington Gardens, the listed Court House and the Rockingham Estate, and adds qualitatively to the architecture of the area.
- 5.10 Notwithstanding this, there are limitations with the Tibbalds framework which include:
- The study is self-avowedly high level, and not intended to be prescriptive. That is one of the main reasons why it has not been published yet, nor given any formal status.
 - The authors of the study assumed that the whole allocation is in single ownership. This is unrealistic because it does not reflect the complex multi-ownership position and it has therefore been undertaken as an academic study and in a "vacuum". The Council have not indicated that they intend to use CPO powers and the emerging site allocation does not indicate that the site needs to come forward comprehensively.
 - In view of the assumptions made regarding site ownership, the study does not consider massing options and associated environmental and townscape impacts for Avonmouth House and the various other land parcels within the site allocation in isolation. As such, it does not consider how the individual sites can be optimised without prejudicing the future redevelopment of neighbouring sites.
 - The exercise has no regard to development viability and other material factors and is a purely architectural and townscape-led study.

Non-Statutory Consultation

- 5.11 As well as the key statutory consultees noted above, consultation has taken place with non-statutory bodies, including locally elected political representatives, local community groups, residents and businesses around the site, and neighbouring landowners. Constructive one-to-one meetings have taken place with the following key stakeholders:
- Councillor Helen Dennis – Chaucer ward councillor and Cabinet Member for Climate Emergency and Sustainable Development
 - Blyford Investment Co. Limited – representing 75-85 Newington Causeway
 - Berkeley Homes (Capital) PLC – representing the Newington Triangle site
 - RDI REIT – representing Coburg House, 63-67 Newington Causeway
 - Neobrand Ltd – representing Balppa House, 57-61 Newington Causeway

Digital Consultation

- 5.12 Due to the Covid-19 pandemic, consultation has been undertaken via digital means in order to obtain feedback ahead of the submission of the planning application. A project website was launched by the Applicant on 6th September 2021 with virtual exhibition boards showing the detailed proposals for the site. In addition, two webinars were arranged via Zoom, held on Thursday 9th and Thursday 16th September, both of which consisted of a formal presentation of the proposals by the project team followed by a question-and-answer session. Members of the project team, including the Applicant, architect, and planning consultant, were on hand to discuss the proposals with attendees.
- 5.13 In order to publicise the website and webinar events, individual letters were sent to 557 local residents and businesses around the site on 20th August 2021. A copy of the letter that was sent is provided within the Statement of Community Involvement ('SCI'). Separate invitations to view the website were also sent to the three Chaucer ward councillors. It is intended that the website will continue to run throughout the application determination period to give local people and interested parties the opportunity to view the proposals.
- 5.14 The website included feedback forms allowing the community the opportunity to submit their comments on the proposals. At the time of writing, the project website has been visited by 102 users. Two people attended the online webinars, and two feedback forms were received via the website (copies of which are contained within the SCI). The feedback received during the webinars was positive overall, with participants acknowledging that the scheme would contribute to the ongoing regeneration of this part of Elephant and Castle. Further details of the feedback received via the website and webinars, and through one-to-one meetings with key stakeholders, is contained within the Statement of Community Involvement.
- 5.15 The Applicant has reflected on the points raised during the pre-application consultation process and sought to address them, where possible, in the application. The Applicant will continue to communicate regularly and openly with all stakeholders throughout the planning process and, should permission be granted, throughout the construction phase of the development.

6.0 Planning Policy Framework

6.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the statutory development plan unless material considerations indicate otherwise.

6.2 Planning policy operates at national, regional, and local levels. At a national level, Central Government adopted the National Planning Policy Framework (NPPF) in March 2012, and subsequently revised it in July 2018, February 2019, and July 2021. The statutory development plan for the site comprises, at a regional level, the London Plan (April 2021), and at the local level, the Southwark Core Strategy (April 2011) and Saved Southwark Plan Policies (2007, saved in April 2013).

The National Planning Policy Framework (July 2021)

6.3 The NPPF sets out the Government's economic, environmental, and social planning policies. Taken together, these policies articulate the Government's vision of sustainable development, which should be interpreted and applied at the borough level to meet local aspirations.

6.4 At paragraph 11, the NPPF states that plans and decisions should apply a **presumption in favour of sustainable development**. For decision-taking this means:

- Approving development proposals that accord with an up-to-date development plan without delay; or
- Where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:
 - i. The application of policies in the Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or
 - ii. Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole.

Planning Practice Guidance (March 2014 and updated on a continuous basis)

6.5 In March 2014, the Department for Communities and Local Government (DCLG) launched the web-based Planning Practice Guidance (PPG) resource. This aims to provide guidance which is useable in an up-to-date and accessible manner.

6.6 With regard to decision taking, the PPG is a material consideration in the determination of planning applications.

The London Plan (April 2021)

6.7 The London Plan is the overall strategic plan for Greater London, setting out an integrated economic, environmental, transport and social framework for the development of London over the next 20–25 years. The London Plan forms the London-wide policy context within which the boroughs set their local planning agendas. The London Plan was adopted in April 2021 and forms part of the statutory development plan.

6.8 The following GLA Supplementary Planning Guidance (SPG) documents are also material considerations:

- Affordable Housing and Viability (August 2017)
- Housing (March 2016)
- Accessible London: Achieving an Inclusive Environment (October 2014)
- The control of dust and emissions during construction and demolition (July 2014)
- Character and Context (June 2014)
- Use of planning obligations in the funding of Crossrail, and the Mayoral Community Infrastructure Levy (April 2013)
- London Planning Statement (May 2014)
- Sustainable Design and Construction (April 2014)
- Planning for Equality and Diversity in London (October 2007)

Adopted Southwark Core Strategy (April 2011) and Saved Southwark Plan Policies (2007, saved in April 2013)

- 6.9 This application has been drafted on the basis that the emerging New Southwark Plan ('NSP') carries material weight in the decision-making process⁶. The NSP is expected to replace the adopted Core Strategy and the saved policies of the Southwark Plan (as well as various AAPs listed below) later in 2021. It is likely that at the point of determination of this application, the NSP will be adopted and form the statutory development plan. Nonetheless, policies within the Core Strategy and saved policies of the Southwark Plan are referred to in this Statement where considered relevant.

Emerging New Southwark Plan

- 6.10 Southwark is in the process of preparing a new Local Plan. In accordance with paragraph 48 of the NPPF, Local Planning Authorities may give weight to relevant policies in emerging plans according to:
- a) *the stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given);*
 - b) *the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and*
 - c) *the degree of consistency of the relevant policies in the emerging plan to this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given).*
- 6.11 The NSP is at an advanced stage in the plan-making process. The NSP was submitted to the Secretary of State in January 2020 and the Examination in Public ('EiP') took place between February and April 2021. Consultation on the "main modifications", which comprise the changes to policies the Inspectors' consider are needed to ensure the Plan is sound, took place between 6 August and 24 September 2021. The Inspectors' report is due in Autumn 2021, with Cabinet and Council Assembly consideration for adoption expected at the end of 2021. It is anticipated that the NSP will be adopted later in 2021 and will replace the saved policies of the Southwark Plan (2007), the Core Strategy

⁶ Committee Report Ref: 20/AP/3250, paragraphs 40 and 56-60

(2011), the Aylesbury Area Action Plan (2010), the Peckham and Nunhead Area Action Plan (2014), and the Canada Water Area Action Plan (2015).

- 6.12 Accordingly, it is a material consideration in the determination of this application and is referred to throughout the remainder of this Statement.

London Borough of Southwark Supplementary Planning Documents

- 6.13 The following adopted and emerging Supplementary Planning Documents may also be material considerations:

Adopted:

- Elephant and Castle SPD/OAPF (adopted 2012)
- Affordable Housing SPD (adopted 2008, draft update consulted on in 2011)
- Development Viability SPD (adopted 2016)
- Design and Access Statements SPD (2007)
- Section 106 and CIL SPD (adopted 2015 and amended in November 2020)
- Sustainability Assessments SPD (2009)
- Sustainable Design and Construction SPD (2009)

Emerging:

- Draft Heritage SPD (December 2020)

7.0 Planning Assessment

7.1 This section provides an assessment of the proposals against the planning policy framework identified in Section 6 in relation to the following principal topics:

- Land Use – Principle of flexible employment/community health hub/education floorspace (Class E/F1(a))
- Land Use – Principle of purpose-built student accommodation
- Demand for purpose-built student accommodation
- Urban Design
- Townscape, Views and Heritage
- Delivery of affordable student housing
- Standard of student accommodation
- Energy and Sustainability
- Daylight and Sunlight
- Transport and Servicing
- Public Realm, Urban Greening and Trees

Land Use – Principle of flexible employment/community health hub/education floorspace (Class E/F1(a))

7.2 The NPPF sets out the Government’s commitment to securing economic growth and advises that plans should proactively meet the development needs of businesses and support an economy fit for the twenty first century. Paragraph 81 of the NPPF states that “significant weight” should be given to supporting economic growth and productivity, taking into account local business needs and opportunities for development.

7.3 Policy AV.09 ‘Elephant and Castle Area Vision’ within the emerging NSP states that development in Elephant and Castle should, amongst other things,

- *Support the area’s function as a major town centre for all Southwark residents and a central London location that attracts global business, research, teaching, shopping, flexible business spaces and cultural facilities; and*
- *Harness the expertise and infrastructure from the universities to develop a strong, dynamic and specialised local economy that will attract new specialised services and research.*

7.4 NSP Policy P29 ‘Office and business development’ says:

“1. In the Central Activities Zone, town centres, opportunity areas and individual development plots within site allocations where employment re-provision is required, development must:

- 1. Retain or increase the amount of employment floorspace on site (GIA) of E(g), B2, B8 class use or sui generis employment generating uses); and*
- 2. Promote the successful integration of homes and employment space in physical layout and servicing in areas that will accommodate mixed use development. This will include a range of employment spaces including freight, logistics, light industry, co-working, maker spaces and offices; and*

3. *Provide a marketing strategy for the use and occupation of the employment space to be delivered to demonstrate how it will meet current market demand.*

...

Employment uses required by this policy (Use Class E(g)) will be secured through the implementation of conditions and/or planning obligations which will restrict change of use within Use Class E."

- 7.5 NSP Policy P30 'Affordable workspace' requires developments proposing 500sqm GIA or more employment floorspace to deliver at least 10% of the proposed gross employment floorspace as affordable workspace on site at Discounted Market Rents and secure the affordable workspace for at least 30 years. Part 4 of the policy says that affordable workspace will be secured as employment uses through the implementation of planning obligations which will restrict change of use within Use Class E.
- 7.6 The emerging site allocation NSP43 states that redevelopment of the allocated site:
 - *"must provide at least the amount of employment floorspace (E(g), B class) currently on site or provide at least 50% of the development as employment floorspace, whichever is greater";* and
 - *"may provide a new community health hub."*
- 7.7 As per the NSP, Southwark has a strategic target of 58,000 new jobs between 2019 and 2036, of which 10,000 are expected within the Elephant and Castle Opportunity Area, and 460,000sqm office floorspace within the same period, of which around 80% will be delivered in the Central Activities Zone (CAZ).
- 7.8 Within the Enterprise Quarter character area of the Elephant and Castle Opportunity Area, business space use should be retained unless replaced by an alternative town centre use and the provision of health facilities will be supported, as per SPD 49 'Land uses'. The provision of health facilities is also supported within the Enterprise Quarter, as elaborated on at paragraph 5.8.11 of the supporting text as follows:

"NHS Southwark have identified a potential need for health facilities in the Enterprise Quarter. Flexibility should be incorporated into proposals to enable such space to be provided, should the need arise."
- 7.9 SPD 4 'Jobs and business' supports the provision of new business space and specifies that it "must" be designed flexibly to accommodate a range of unit sizes to help meet the needs of the local office market and SME businesses.
- 7.10 NSP Policy P26 'Education places' supports the development of educational facilities where proposals provide pre-school, school, higher and further education places to meet identified needs and where there are sports, arts, leisure, cultural or community facilities that are shared with local residents and all members of the community.

Assessment

- 7.11 Site allocation NSP43 assumes the site's existing use is "Office (E)(g)(ii)", whereas the site's planning history confirms that planning permission was granted in 1989 for use of the site for

education purposes (Class D1, now F1). Since then, and for at least the last 10 year continuous period, etc. venues have used the site in a variety of ways, not limited to training activities, but also including conferencing, meeting rooms, offices, kitchen, and dining facilities, with the training activity comprising only one component of the overall use. Whilst the planning permission in 1989 was for education type uses, this has not been the primary use for at least the last 10 years. Accordingly, the site's lawful use is sui generis.

- 7.12 Notwithstanding this, the emerging site allocation requires redevelopment of the site to provide “at least 50% of the development as employment floorspace”. The allocation adds that “sites that are within the Central Activities Zone are most in demand for delivery of offices and will be required to contribute to this growth by providing an increase in the amount of employment floorspace.”
- 7.13 The site allocation was drafted at a time when demand for good quality office accommodation in inner London was stable. However, the last two years have seen an ultra-low take-up in the local and wider area. The Employment Land Report (ELR) by Union Street Partners provides an overview of current market trends within the office market and an analysis of the supply and demand for office floorspace in the local and wider area around Southwark and Borough. This evidences a significant supply of office floorspace available now and a healthy pipeline for the future. For example, there is currently 1.4 million sqft of available office floorspace, the highest level for eight years, and a further 643,205 sqft of new space to be delivered over the next two years.
- 7.14 In terms of demand, the market analysis confirms that demand for offices in the core South Bank office market is returning after a turbulent 20 months, however, the second and tertiary markets (such as Elephant and Castle) are still slow, and it is questionable whether these markets will return to that of pre-Covid. There is limited occupational demand in the office market in Elephant and Castle as demonstrated by the lack of recent occupational transactions in the area. The ELR considers the “micro location” of Avonmouth House to be undesirable for offices and a likely deterrent to many potential occupiers. This is particularly the case now as occupiers are becoming more selective.
- 7.15 Looking ahead at the development pipeline, there are several development sites in and around Elephant and Castle which will be providing office floorspace (through new build or refurbishment) and these are in superior locations to Avonmouth House. The ELR therefore concludes that the provision of c 47,000 sqft of employment floorspace at the site (i.e., 50% of the floorspace in the proposed development), as sought by the emerging site allocation, would be unrealistic, unviable and at odds with the market based on current and predicted future trends post-Covid, which clearly can't have been considered when the draft site allocation was drafted. To blindly pursue an out-of-date policy position is not good planning and does not meet the objectives set out in the NPPF at paragraph 82(d), which outlines the need for planning policies to “be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances”, the thrust of which is evident in the recent significant changes to the Use Classes Order.
- 7.16 The proposed development does not provide 50% of the floorspace as employment floorspace as sought by Southwark within emerging site allocation NSP43. Nevertheless, the development would result in an uplift of 426sqm (GIA) high quality, sustainable, flexible employment floorspace that would contribute to the vitality and mix of uses within Elephant and Castle, supporting its function as a major town centre, in accordance with emerging NSP Policy P29. In percentage terms, 24.5% of the overall

floorspace proposed would be employment-generating floorspace, excluding the student accommodation which also generates jobs and contributes towards economic growth. The proposals therefore meet the holistic planning policy objectives of Policy P29.

7.17 A minimum of 10% of the Class E floorspace would be affordable as sought by emerging Policy P30.

7.18 The breakdown of existing and proposed employment floorspace is as follows:

	Existing (GIA) (sqm)	Proposed (GIA) (sqm)
Basement -2	1,307	139.5
Basement -1		604
Ground floor		351.7
First floor		637.8
Total		1,733

7.24 The floorspace has been designed with maximum flexibility from the outset in order to appeal to a range of potential end users. Indicative layouts on pages 34 and 35 of the DAS demonstrate how the space could be configured over the three floors to accommodate various options, including a community health hub.

7.25 The majority of the Class E/F1(a) floorspace is located at ground and first floor levels, providing activation and animation to create a street presence. Conversely, as much plant and refuse storage as possible is located within the basement to maximise activity at ground floor.

7.26 Each commercial floor has generous floor to ceiling heights to ensure a well-lit set of spaces. The basement commercial level contains large lightwells located around the perimeter of the building to allow natural light to penetrate into the space, while the ground and first floors have large windows to maximise light spill into the building and to capitalise on the views out across Newington Gardens. Interior views of the employment space proposed are contained on pages 32 and 33 of the DAS.

7.27 The proposals would not only create additional high quality floorspace to support more jobs but would also enhance the efficiency of the site by increasing the intensity of jobs that can be accommodated. Based on the HCA's Employment Densities Guide 3rd Edition (2015), the Class E floorspace proposed could generate up to 144 full-time jobs at the site for Southwark residents, assuming that all of it is used as offices⁷. The HCA Employment Densities Guide does not include health care or education uses, though the employment generation would be lower in a health care/education use. In reality, it is highly unlikely that a community health centre would require 1,733 sqm of floorspace, therefore, if there was take up of this use, it would likely only be in part.

7.28 The increase in jobs would support economic growth within the Elephant and Castle Major Town Centre and would contribute towards meeting Southwark's ambitious targets for employment growth across the Borough, namely 58,000 new jobs between 2019 and 2036, of which 10,000 are expected within the Elephant and Castle Opportunity Area.

7.29 In summary, the proposals do not provide 50% of the total floorspace as employment floorspace as stipulated in the emerging site allocation NSP43, however, the proposed development would meet

⁷ B1a Offices, Professional Services employment density = 12 jobs per sqm (1,733sqm/12 = 144)

an identified need (as set out in the report by Knight Frank) by providing 1,733sqm (GIA) of dedicated employment-generating floorspace, including 10% affordable workspace, equating to 24.5% of the total floorspace proposed and an uplift of 426sqm compared with the existing floorspace. As well as the quantitative benefits, the proposed employment floorspace is superior in design quality and sustainability terms and will meet the demands of modern-day flexible working practices. There is potential for 144 new full-time jobs to be generated by the proposal contributing towards the target of 10,000 new jobs within the Elephant and Castle Opportunity Area up to 2036. The inherently flexible design of the proposed employment floorspace allows for the provision of a community health hub to be delivered on the site, as sought by the site allocation. Alongside this, the proposal would deliver active ground floor frontages onto Avonmouth Street and Tiverton Street to enliven the streetscape which is somewhat compromised by the expansive area of dead frontage presently on the site, in accordance with the requirements of NSP43, as well as policies contained within the NPPF, Policies AV.09, 29 and 30 within the draft New Southwark Plan, and guidance set out within the Elephant and Castle SPD and OAPF.

Land Use – Principle of purpose-built student accommodation

7.30 London Plan Policy H15 'Purpose-built student accommodation' (PBSA) notes that:

- A Boroughs should seek to ensure that local and strategic need for purpose-built student accommodation is addressed, provided that:*
- 1) at the neighbourhood level, the development contributes to a mixed and inclusive neighbourhood*
 - 2) the use of the accommodation is secured for students*
 - 3) the majority of the bedrooms in the development including all of the affordable student accommodation bedrooms are secured through a nomination agreement for occupation by students of one or more higher education provider*
 - 4) the maximum level of accommodation is secured as affordable student accommodation as defined through the London Plan and associated guidance:*
 - a) to follow the Fast Track Route, at least 35 per cent of the accommodation must be secured as affordable student accommodation or 50 per cent where the development is on public land or industrial land appropriate for residential uses in accordance with Policy E7 Industrial intensification, co-location and substitution*
 - b) where the requirements of 4a above are not met, applications must follow the Viability Tested Route set out in Policy H5 Threshold approach to applications, Part E*
 - c) the affordable student accommodation bedrooms should be allocated by the higher education provider(s) that operates the accommodation, or has the nomination right to it, to students it considers most in need of the accommodation.*
 - 5) the accommodation provides adequate functional living space and layout.*

B Boroughs, student accommodation providers and higher education providers are encouraged to develop student accommodation in locations well connected to local services by walking, cycling and public transport, as part of mixed-use regeneration and redevelopment schemes.

- 7.31 The overall strategic requirement for PBSA in London has been established through the work of the Mayor's Academic Forum, and a requirement for 3,500 PBSA bed spaces to be provided annually over the Plan period has been identified⁸.
- 7.32 The supporting text (paragraph 4.15.1) to Policy H15 is explicit that the completion of new PBSA contributes to meeting London's overall housing need and is not in addition to this need. For the purposes of calculating the contribution made by PBSA to meeting a borough's housing target, a conversion factor of 2.5:1 should be applied⁹ (with two and a half bedrooms / studios being counted as a single home). The delivery of student accommodation contributes to overall housing delivery based on the amount of general housing that is (theoretically) freed up from students residing in other forms of accommodation.
- 7.33 According to London Plan Policy E8 'Sector growth opportunities and clusters' (Part E), London's higher and further education providers and their development across all parts of London should be promoted. Furthermore, their integration into regeneration and development opportunities to support social mobility and the growth of emerging sectors should be encouraged.
- 7.34 At the local level, Core Strategy Policy 8 'Student homes' allows development of student homes within the town centres and places with good access to public transport services, providing that these do not harm the local character.
- 7.35 Southwark's draft NSP contains a specific policy for PBSA development. Policy P5 'Student homes' says:
- "Development of purpose-built student housing must:*
- 1. Provide 5% of student rooms as easily adaptable for occupation by wheelchair users; and*
 - 2. When providing direct lets at market rent, provide the maximum amount, with a minimum of 35% as conventional affordable housing by habitable room subject to viability, as per policy P4, as a first priority. In addition to this, 27% of student rooms must be let at a rent that is affordable to students as defined by the Mayor of London; or*
 - 3. When providing student rooms for nominated further and higher education institutions at affordable student rent as defined by the Mayor of London, provide the maximum amount of affordable student rooms with a minimum of 35% affordable student rooms."*
- 7.36 Southwark's "vision" for the Elephant and Castle Opportunity Area as set out within the Core Strategy¹⁰ and Elephant and Castle SPD and OAPF¹¹ highlights that *"London South Bank University and London University of the Arts will develop further as important centres of learning."*
- 7.37 SPD 8 'Higher education and student housing' within the Elephant and Castle SPD and OAPF states:

⁸ London Plan Policy H15 'Purpose-built student accommodation', paragraph 4.15.2 of the supporting text

⁹ London Plan Policy H1 'Increasing housing supply', paragraph 4.1.9 of the supporting text

¹⁰ Paragraph 4.26

¹¹ Paragraph 3.1.4

- *“Proposals for provision of space used for higher education will be supported*
- *Proposals for student housing will be supported in line with policy 8 of the Core Strategy.”*

- 7.38 More specifically, within the Enterprise Quarter of the Opportunity Area, student housing proposals will be supported in accordance with SPD 8, according to SDP 49 (which provides guidance on land uses within the Enterprise Quarter character area).
- 7.39 The supporting text at paragraphs 4.3.8 – 4.3.11 of the SPD stipulates that the two universities in the Opportunity Area, London South Bank University (LSBU) and the London College of Communication (LCC) (which is a constituent college of the University of the Arts) are *“an important presence in the area, providing first class teaching and research facilities and making a strong contribution to its economic life.”*
- 7.40 Paragraph 4.3.10 emphasises the demand for student housing, saying:
- “In addition to teaching and research accommodation, both universities have a need for more student housing and we will work closely with both to ensure that their requirements for student housing are met. Enabling LCC and LSBU to improve their facilities and the student experience they offer will benefit both institutions and in doing so, will contribute to the regeneration of the opportunity area...”*
- 7.41 Paragraph 4.3.11 goes on to say:
- “Provision of student homes can contribute towards providing housing choice in the opportunity area. To help achieve mixed communities, in line with Core Strategy policy 8, development should not result in an over-concentration of student homes in particular areas. Core Strategy policy 8 also states that new student housing developments should provide an element of affordable housing...”*

Assessment

- 7.42 This section first examines the planning policy position in respect of student housing and second the student demand within Southwark, directing consideration to the local context.

Land Use – Principles

- 7.43 The site comprises brownfield land, which forms part of a designated “potential development site” and an emerging allocation for complete redevelopment within the NSP.
- 7.44 Located within a Major Town Centre, the Enterprise Quarter of an Opportunity Area and the CAZ, the site benefits from excellent accessibility to public transport, general amenities and services, and established higher educational facilities. Within a few minutes’ walk of the site are two university campuses (London South Bank University and University of the Arts) as well as a wide range of leisure and recreation activities for students, including Newington Gardens open space directly opposite the site. The site’s location is, therefore, suitable and appropriate for student housing, as acknowledged within the Elephant and Castle SPD and OAPF.
- 7.45 Not only is the site within an Opportunity Area identified as being appropriate for student housing proposals in general terms, but it is also located within one distinct part, the Enterprise Quarter, in which student housing proposals “will be supported”¹².

¹² Elephant and Castle SPD and OAPF (2012), SPD 29: Land uses

- 7.46 Although the site is located very close to two university campuses, there is not a large concentration of student accommodation already in the area, so the provision of PBSA would contribute towards a mixed and inclusive neighbourhood, as per London Plan Policy H15.
- 7.47 Student housing is considered non self-contained accommodation and a 'sui generis' use in the Use Classes Order. Student housing is, however, considered as housing for monitoring purposes within Southwark Council's and the GLA's monitoring reports.
- 7.48 The emerging site allocation in the NSP stipulates that redevelopment of the site (referring to the wider allocated site comprising 63-85 Newington Causeway) should provide new homes, and the indicative residential capacity is **93 homes**. The provision of 233 student bed spaces would contribute the equivalent of **93 homes** towards Southwark's housing targets based on the London Plan ratio of 2:5:1, thus the delivery of student housing at the site would not compromise Southwark's ability to meet its strategic housing target of 2,355 new homes per annum over the forthcoming plan period (2019-2036). It would also reduce pressure on the local private rented market by releasing 93 single dwellings back to the private rented sector.
- 7.49 Furthermore, the provision of this equivalent number of general needs housing would meet the residential capacity for the wider site allocation. Notwithstanding, it should be noted that the indicative residential capacity of 93 homes applies to the whole of the allocation and not the subject site in isolation. It is more likely than not that additional new homes will come forward in future on other parts of the allocation contributing to and likely far exceeding the indicative housing capacity of 93 homes. A masterplan has been prepared by Stitch Architects (which forms part of the DAS) demonstrating how the remainder of the allocation could come forward in the future, ensuring optimisation of the site allocation and delivering its specific requirements.
- 7.50 The PBSA would contribute towards the London Plan target of 3,500 purpose-built student bedspaces to be provided annually across London, as well as assisting Southwark and London as a whole in meeting its need for general housing and purpose-built student housing.

Demand for purpose-built student accommodation

- 7.51 The demand for student housing in the local context is a material consideration having regard to the PPG, which states (Paragraph: 004 Reference ID: 67-004-20190722):
- "Strategic policy-making authorities need to plan for sufficient student accommodation whether it consists of communal halls of residence or self-contained dwellings, and whether or not it is on campus. Encouraging more dedicated student accommodation may provide low cost housing that takes pressure off the private rented sector and increases the overall housing stock. Strategic policy-making authorities are encouraged to consider options which would support both the needs of the student population as well as local residents before imposing caps or restrictions on students living outside university-provided accommodation. Local Planning Authorities will also need to engage with universities and other higher educational establishments to ensure they understand their student accommodation requirements in their area."*
- 7.52 The demand has therefore been examined and is set out below.
- 7.53 Southwark is home to three of London's largest and most successful universities – The University of the Arts, King's College London and London South Bank University – in addition to a host of smaller

satellite campuses, comprising over 30,000 higher education students in total. Both the University of London (UoL) and London South Bank University (LSBU) have expressed their support for the proposed student accommodation.

- 7.54 The University of London (UoL) is a federation of 17 independent member institutions of outstanding global reputation ranging from larger universities such as UCL or King's College London to smaller specialised institutions such as the Royal Academy of Music. Between the member institutions, three of which are Southwark-based – UCL, Kings College and LSE – UoL has over 120,000 students studying over 3,700 courses. The letter from UoL accompanying the application contains further details regarding their need for student housing. The proposed development would be affiliated with a Higher Education Institution, most likely UoL, and all occupiers of the student accommodation within the proposed development would be students registered as attending UoL.
- 7.55 The NSP evidence base includes a background paper on student housing (dated December 2019). It refers to the Council's Strategic Housing Market Assessment (SHMA) Update 2019 which found that over 21,000 students aged 20 or above live in the Borough during term time, and 23,500 places at Higher Education Institutions in Southwark. At least 50% of these students live in private rented accommodation, and 15% live with their parents. There are some 7,800 bed spaces in PBSA and independent halls of residence in the Borough for London South Bank University, King's College, University of the Arts. The evidence-based paper sets out the student schemes in the Borough at that time, however, there are now ten live or recently approved planning applications that include PBSA – the Spa Road scheme, the Alscot Road scheme, the Canada Water Masterplan, Capital House, Eagle Wharf, 313-349 Ilderton Road, and 6 Paris Gardens, all of which have been granted planning permission; 671-679 Old Kent Road, which has a resolution to grant; 272 St James's Road allowed at appeal; and one live applications at 89-111 Borough High Street. If the live scheme is approved, this would total 3,540 student rooms, with no figure put to the Canada Water outline scheme given the inherent flexibility within the masterplan. This represents a substantial deficit in the supply of student housing relative to the number of students living and studying in Southwark.
- 7.56 A student demand assessment and market analysis has been undertaken by Knight Frank as part of the application. This evidences a significant need for good quality student accommodation within London as a whole. There are an estimated 94,764 PBSA bed spaces across London, which represents only 28% of the total full-time students. This means that 72% of full-time students in London are required to find accommodation within private rented HMOs or by living with parents/other family members, exacerbating the pressures faced by the private rental housing market.
- 7.57 According to Knight Frank's study, the universities within a 30-minute travel time of the site provide accommodation for approximately 14,139 students, which represents only 11.8% of the total full-time student population within a 30-minute travel time (119,861 students). There are currently a further 64 additional PBSA schemes within a 30-minute travel time of Avonmouth House, providing approximately 20,458 bed spaces on a direct let basis. In total, there are 34,597 PBSA bed spaces within a 30-minute travel time and 94,764 across the whole of London, which represents 28.9% of total full-time students respectively.
- 7.58 Analysis of completions data for PBSA indicates that the average yearly delivery of PBSA beds totals approximately 2,100 bed spaces in the period 2016 to 2020. Over the last three years, just 4,880

bed spaces have been delivered in London, 47% of the 3,500 bed spaces per annum target set by the Mayor in the London Plan.

- 7.59 The study also analyses the development pipeline of PBSA in London. The supply of PBSA bed spaces under construction across London looks set to meet the strategic requirement of 3,500 bed spaces per annum (as required by the London Plan) only once over the next three years.
- 7.60 In conclusion, there are currently 3.5 students per available purpose-built student bed space across London and similarly 3.5 students per student bed space within a 30-minute travel time of Avonmouth House. Full time student numbers within a 30-minute travel time are projected to rise by 20% (4,785 students per annum) to 2024/25, whilst the development pipeline of PBSA over the same period will not meet this increase in demand, thus the pressure on the local private rented market will continue to rise.
- 7.61 The proposal will, therefore, provide high quality PBSA within the short term to address an identified need in an area in which student housing is supported in principle, in accordance with national planning guidance, London Plan Policies H15 and E8, Southwark Core Strategy, NSP Policy P5, and guidance contained within the Elephant and Castle SPD and OAPF, which is a strong material consideration.

Urban Design

- 7.62 The Government attaches great importance to the design of the built environment in the NPPF with Chapter 12 referring to achieving well design places. This was also a principal topic within 'The Planning for the Future' White Paper published in August 2020.
- 7.63 Paragraph 134 of the NPPF states that significant weight should be given to:
- a) development which reflects local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes; and/or
 - b) outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.
- 7.64 The NPPG states that new or changing places should have the following qualities commonly exhibited by successful, well-designed places:
- Be functional;
 - Support mixed uses and tenures;
 - Include successfully public spaces;
 - Be adaptable and resilient;
 - Have a distinctive character;
 - Be attractive; and

- Encourage ease of movement.

- 7.65 At the regional level, London Plan Policy D1 ‘London’s form, character and capacity for growth’ (Part B) requires that all development must make the best use of land by following a design-led approach that optimises site capacity.
- 7.66 Policies D1-D3 of the London Plan relate to design and layout of development and set out a range of urban design principles, including the quality of the public realm, the provision of convenient, legible movement routes, and the importance of designing out crime by maximising the provision of active frontages.
- 7.67 At the local level, Strategic Policy 12 of the Southwark Core Strategy states that all development in the borough will be expected to *“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 ‘Quality in design’ 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. Saved Policy 3.13 of the Southwark Plan asserts that the principles of good urban design must be taken into account in all developments. This includes height, scale and massing of buildings, consideration of the local context, its character and townscape as well as the local views and resultant streetscape.
- 7.68 NSP Policies P12 ‘Design of places’ and P13 ‘Design quality’ identify a set of principles that all development must comply with, including ensuring the urban grain and site layout take account of and improve existing patterns of development and movement and ensuring a high quality public realm that encourages walking and cycling and is legible and attractive.
- 7.69 In accordance with Policy P13, development must provide:
1. High standards of design including building fabric, function and composition; and
 2. Innovative design solutions that are specific to the site’s historic context, topography and constraints; and
 3. Adequate daylight, sunlight, outlook, and a comfortable microclimate including good acoustic design for new and existing residents; and
 4. Respond positively to the context using durable, quality materials; and
 5. Buildings and spaces which are constructed and designed sustainably to adapt to the impacts of climate change; and
 6. Buildings and spaces that utilise active design principles that are fitting to the location, context, scale and type of development; and
 7. Active frontages and entrances that promote activity and successfully engage with the public realm in appropriate locations; and
 8. Adequate servicing within the footprint of the building and site for each land use; and
 9. Accessible and inclusive design for all; and

10. A positive pedestrian experience; and

11. Basements that do not have adverse archaeological, amenity or environmental impacts.

7.70 Policy P17 within the emerging New Southwark Plan 'Efficient use of land' states that development will be permitted that:

1. Optimises the efficient use of land; and
2. Does not unreasonably compromise development potential or legitimate activities on neighbouring sites; and
3. Provides adequate servicing facilities, circulation spaces and access to, from and through the site.

7.71 Further guidance on design matters is contained within the Elephant and Castle SPD and OAPF. SPD 16 'Built form' says that non-residential frontages should:

- Provide a strong identifiable street address
- Floor-to-ceiling heights at ground level should be generously proportioned
- Incorporate generous window sizes or areas of glazing
- Retain features which reinforce character and contribute positively to the host building and wider context
- Contribute to a consistent building line
- Ensure that signage design responds to the scale of the street.

7.72 Within the Enterprise Quarter specifically, the integration of public art into the public realm as part of development proposals or within streets and spaces is supported, as is the provision of active frontages to ensure that spaces are overlooked for safety.

Assessment

7.73 The Applicant and project team have sought to develop a scheme which demonstrates the highest quality architecture and responds to the site's context. This section provides an assessment of design matters in the context of relevant policies. A comprehensive commentary on the design approach is provided within the DAS prepared by Stitch and the HTVA by Citydesigner. The architectural quality of the scheme is also depicted in the illustrative verified views in chapter 7 of the HTVA.

7.74 In line with the NPPF, the London Plan and the New Southwark Plan, sustainability lies at the heart of the proposals. Following the energy hierarchy, the "fabric first" approach is implemented, which includes well insulated walls, very airtight construction and accredited thermal bridging details, and high-performance double glazing. The proposed development will be zero carbon overall and achieve a 60% improvement over the building regulation gas boiler baseline, which meets the London Plan target for on-site carbon savings. The employment/education/health floorspace space will achieve BREEAM 'Excellent' rating.

7.75 As explained in Section 1, the existing building is unattractive, outdated, and illegible in design terms. It contributes nothing to the streetscape owing to the large expanse of dead frontage and it provides

an unattractive backdrop to Newington Gardens. The proposals would markedly improve how the building relates to the ground plane and this has been a key design consideration at all stages of design development; for example, large windows at ground and first floor will replace the areas of dead frontage to bring a distinctive character and animation to the street scene.

- 7.76 The design has evolved to generate a form that respects the neighbouring scale and character of the Rockingham Estate as well as create a slender taller form that transitions between the taller buildings on Newington Causeway and the lower scale hinterland of Newington Gardens and the Grade II Listed Sessions Court. The tallest elements of the scheme have been carefully positioned so as to minimise their impact on neighbouring properties. The Daylight and Sunlight Report concludes that the retained levels of amenity to neighbouring properties will be good and the effects on Newington Gardens will be de minimis.
- 7.77 The existing context offers a plethora of architectural styles, which contribute to an eclectic mixed character. The proposals use high quality materials, carefully selected to articulate the different forms of the building. For example, the uppermost two storeys and lowest two floors, which express the employment space and entrances, are proposed in a deep aubergine red brick cladding whereas the middle height section is in a white brick. Secondary detailing in the form of spandrels, lintels and string courses adds richness to the façade and the proportioning of the different elements. The proposed building's stepped profile and articulated upper parapet mean that an overtly horizontal silhouette is avoided and a harmony with the treescape of Newington Gardens is thus achieved. Townscape views in the HTVA illustrate how well attuned the form of the development is to both the Rockingham Estate and Newington Gardens. The approach to the design is imaginative and uses innovative and modern building techniques which results in an exemplar building of the highest standard in accordance with NPPF Paragraph 134, London Plan Policies D1-D3, and NSP Policies P12 and P13.
- 7.78 The scheme has been designed to minimise mechanical plant at roof level; instead, the majority of plant is located in the basement which frees up space on the upper floors for amenity and opportunities for urban greening. The seventh-floor amenity space provides direct access onto a landscaped communal terrace providing 165sqm of dedicated external amenity space for the student occupiers. As demonstrated in the Wind Microclimate Assessment, the wind conditions on the proposed external roof terrace and around the proposed development will be suitable for pedestrian activities.
- 7.79 Opportunities to incorporate public art into the design of the scheme are being explored with the aim of commissioning local artists and creatives to design an installation that reflects the character of the area on the northwest elevation facing onto Newington Causeway. Further details are contained on page 56 of the DAS.
- 7.80 The height and massing of the proposals has been thoroughly tested in townscape views, as described in the section below. In both the present and future context of a fully built-out wider regeneration site, as envisaged by site allocation NSP43, the proposed development is of an appropriate scale and height such that it contributes positively to the townscape and in particular, creates an appropriate relationship with Newington Gardens, the statutorily listed Court and the Rockingham Estate.

- 7.81 The proposed development is in accordance with paragraph 130 of the NPPF insofar as it would function well and add to the quality of the area over the lifetime of the development; it would be visually attractive as a result of good architecture and would be sympathetic to the local character and history; it would contribute to the streetscape and sense of place; it would optimise the development potential of the site; and would create a safe and inclusive space for all users and help raise the general design standard in this part of Southwark.
- 7.82 It has been demonstrated that the proposed development accords with the relevant planning policies in respect of urban design at all levels. It would optimise the efficient use of land without compromising the development potential of neighbouring sites and would result in a building of the highest design quality, where sustainability forms an integral part.

Townscape, Heritage and Views

- 7.83 The site is not located within a conservation area and does not contain any listed buildings. However, the site is located within the setting of heritage assets whose settings may be affected, such as the Grade II Listed Inner London Session Court approximately 50m to the northeast of the site, and the Trinity Square Conservation Area, approximately 250m northeast of the site. The site is also within the setting of non-designated heritage assets on Newington Causeway and the non-designated heritage asset, Newington Gardens. It is therefore necessary to assess the potential townscape impact of the proposed development in heritage terms.
- 7.84 Section 66(1) of the Planning (Listed Buildings and Conservation Area) Act 1990 requires that when considering whether to grant planning permission for development which affects a listed building or its setting, the decision maker shall have special regard to the desirability of preserving the building or its setting, or any features of special architectural or historic interest which it possesses.
- 7.85 Section 72(1) of Planning (Listed Building and Conservation Areas) Act 1990 requires the determining authority to pay special attention to the desirability of preserving or enhancing the character and appearance of a conservation area when determining applications.
- 7.86 The Government has attached great importance to conserving and enhancing the historic environment in the NPPF. The NPPF advises that decisions on applications with implications on designated heritage assets should be made on the basis of the significance of the asset, and the harm (substantial or less than substantial) that the proposal would cause to the significance of the heritage asset.
- 7.87 Under paragraph 194 of the NPPF, in determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting.
- 7.88 Paragraph 195 sets out that local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal taking account of the available evidence and any necessary expertise and that such an assessment should be taken into account when considering the impact of a proposal on a heritage asset.

- 7.89 Paragraph 202 states that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.
- 7.90 The PPG (paragraph 20) acknowledges that the public benefits which flow from a development can be anything that delivers economic, social or environmental progress. The benefits should flow from the proposals and be of a nature and scale to be of benefit to the public interest at large and should not just be a private benefit. However, benefits do not have to be visible or accessible to the public in order to constitute public benefits. It also acknowledges that public benefits can include heritage benefits such as sustaining or enhancing the significance of a heritage asset and the contribution of its setting.
- 7.91 Policy D8 'Public realm' of the London Plan states that development proposals should address visual impacts, including an analysis through long-range, mid-range and immediate views from the surrounding streets; architectural quality and materiality of an exemplary standard and consider nearby heritage assets and their settings.
- 7.92 London Plan Policy D9 'Tall buildings' sets out that development plans should define what is considered a tall building for specific localities, which should not be less than 6 storeys, or 18 metres measured from ground to the floor level of the uppermost storey. Under the policy, boroughs are required to determine where tall buildings may be appropriate, and any such locations should be identified on maps in development plans. Development proposals for tall buildings are required to address the criteria set out in Part C of the policy, paraphrased as follows:
- 1) visual impacts, including:
 - a) long-range, mid-range and immediate views
 - b) reinforce the spatial hierarchy and aid legibility and wayfinding
 - c) architectural quality and materials should be of an exemplary standard
 - d) proposals should avoid harm to the significance of London's heritage assets and their settings
 - 2) functional impacts, including:
 - a) the internal and external design, the building's materials and its emergency exit routes must ensure the safety of all occupants
 - b) buildings should be serviced, maintained, and managed in a manner that will preserve their safety and quality
 - c) entrances, access routes, and ground floor uses should be designed for peak time use to avoid unacceptable overcrowding
 - d) it must be demonstrated that the capacity of the area and its transport network can accommodate the quantum of development in terms of access to facilities, services, walking and cycling networks, and public transport for people living or working in the building
 - e) jobs, services, facilities, and economic activity that will be provided by the development and the regeneration potential this might provide should inform the design so it maximises the

benefits these could bring to the area, and maximises the role of the development as a catalysis for further change in the area

3) environmental impacts

- a) wind, daylight, sunlight penetration and temperature conditions around the building(s) must not compromise comfort and the enjoyment of open spaces
- b) air movement affected by the building(s) should support the effective dispersion of pollutants, but not adversely affect street-level conditions
- c) noise created by air movements around the building(s), servicing, machinery, or building uses, should not detract from the enjoyment of open spaces around the building

4) cumulative impacts

- a) the cumulative visual, functional, and environmental impacts of proposed, consented and planned tall buildings in an area must be considered when assessing tall building proposals and when developing plans for an area. Mitigation measures should be identified and designed into the building as integral features from the outset to avoid retrofitting.

7.93 Part D of Policy D9 says that publicly accessible areas should be incorporated into tall buildings where appropriate, particularly more prominent tall buildings where they should normally be located at the top of the building to afford wider views across London.

7.94 At a local level, Saved Policy 3.20 of the Southwark Plan states that planning permission may be granted for buildings that are significantly taller than their surroundings or have a significant impact on the skyline, on sites which have excellent accessibility to public transport facilities and area located in the Central Activities Zone (particularly in Opportunity Areas) outside viewing corridors. The policy sets out design requirements for tall buildings, which are reproduced in the emerging policy on tall building (Policy P16) in the NSP.

7.95 Policy P16 'Tall buildings' in the NSP identifies locations in which tall buildings are expected and design criteria with which they are expected to comply, as follows:

1. *The areas where we expect tall buildings are shown on the adopted Policies Map and on Figure 4. These are typically within our Major Town Centres, Opportunity Area Cores, Action Area Cores and the Central Activities Zone. Individual sites where taller buildings may be appropriate have been identified in the site allocations. Some of these site allocations have identified possible locations for tall buildings in Peckham and Camberwell town centres taking account of conservation areas and other heritage assets.*
2. *Tall buildings must:*
 1. *Be located at a point of landmark significance; and*
 2. *Have a height that is proportionate to the significance of the proposed location and the size of the site; and*
 3. *Make a positive contribution to the London skyline and landscape, taking into account the cumulative effect of existing tall buildings and emerging proposals for tall buildings; and*

4. *Not cause a harmful impact on strategic views, as set out in the London View Management Framework, or to our Borough views; and*
 5. *Respond positively to local character and townscape; and*
 6. *Provide a functional public space that is appropriate to the height and size of the proposed building; and*
 7. *Provide a new publicly accessible space at or near to the top of the building and communal facilities for users and residents where appropriate.*
3. *The design of tall buildings will be required to:*
1. *Be of exemplary architectural design and residential quality; and*
 2. *Conserve and enhance the significance of designated heritage assets and make a positive contribution to wider townscape character. Where proposals will affect the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting) clear and convincing justification in the form of public benefits will be required; and*
 3. *Avoid harmful and uncomfortable environmental impacts including wind shear, overshadowing, and solar glare; and*
 4. *Maximise energy efficiency and prioritise the use of sustainable materials; and*
 5. *Have a positive relationship with the public realm, provide opportunities for new street trees, and design lower floors to successfully relate to and create a positive pedestrian experience; and provide widened footways and routes to accommodate increased footfall.*

7.96 Guidance on tall buildings within the Elephant and Castle Opportunity Area is outlined in SPD 17 'Building Heights' within the Elephant and Castle SPD and OAPF. It provides that the tallest elements of development will generally be in "gateway locations" as shown on Figures 14 and 15 within the SPD (reproduced in **Appendix 3**).

Assessment

- 7.97 A thorough assessment of the townscape, heritage and visual effects of the proposed development has been undertaken by Citydesigner.
- 7.98 Citydesigner has worked collaboratively with the architects and design team through the design development process with the intention of achieving a high quality of design in order to maximise the beneficial effects of the proposed development on heritage assets, townscape and views. Computer models were used during the design process to test how different iterations of the design would affect views, and this information was then used to make early assessments of the effects and inform modifications to the design.
- 7.99 The site is located within the Elephant and Castle Opportunity Area, a Major Town Centre and the CAZ. It is within an area identified as being appropriate for tall buildings on Figure 4 'Tall buildings map' within the draft NSP. The Elephant and Castle Opportunity Area is set to see considerable redevelopment, including numerous proposals for tall buildings. As explained in Sections 1 and 2, Elephant and Castle Town Centre is experiencing rapid regeneration and has already seen a huge

amount of development, including the recently constructed 25 storey 'Kite' building at 87 Newington Causeway, adjacent to site allocation NSP43.

- 7.100 With reference to Figures 14 and 15 within the Elephant and Castle SPD and OAPF, the site lies outside and to the west of the identified "gateway locations to the town centre", which is where the "tallest elements of development" are expected. However, both the 25 storey 'Kite' building at 87 Newington Causeway and the approved part 14 storey development at Harper Road¹³ notably fall outside of these "gateway locations". Given that the site is located between the 14-storey development at Harper Road to the east, and the existing cluster of tall buildings to the west, the proposed development would not compete with the existing tall buildings cluster in the central area of Elephant and Castle, but instead it would provide an appropriate transition in height along Newington Causeway and would help to define the gateways into the central area as sought by the SPD.
- 7.101 The site allocation (NSP43) itself acknowledges that redevelopment of the site could incorporate tall buildings:
- "Comprehensive mixed-use redevelopment of the site could include taller buildings subject to consideration of impacts on existing character, heritage and townscape."*
- 7.102 The proposed development covers one part of the wider area allocated for redevelopment in the absence of a sitewide masterplan. As set out within Citydesigner's HTVA, the site forms a "spit" of land, in other words, a peninsular, which extends southward from the main area of land covered by the site allocation. Its particular circumstances therefore lend itself to be the first parcel of land to come forward within the wider allocation since it can be developed without fettering the wider site. Indeed, it has the potential to kick-start the regeneration of the wider site, which is in multiple ownerships as is often the case with large site allocations comprising an ensemble of buildings and land.
- 7.103 To demonstrate in theoretical terms how the proposed development will not prejudice the future redevelopment of the neighbouring sites covered by NSP43, Stitch has prepared an illustrative masterplan, contained on pages 16 – 21 of the DAS.
- 7.104 In terms of comprehensiveness, the Applicant and design team have met with all the other landowners within NSP43 to discuss the proposals and ensure that they do not compromise their respective sites, both in their current format and in future when they are redeveloped, as envisaged by the site allocation. There was unanimous positive feedback to the proposals and no objections raised by adjoining landowners, which reasserts the position that the proposed development can come forward independently and in advance of the wider sites that together constitute NSP43 without fettering the requirements and objectives of the allocation, having regard to impacts on existing character, heritage, and townscape.
- 7.105 The HTVA assesses the proposals and their relationships with the existing character, urban grain, scale, and hierarchy of existing buildings. A significant number of views (13 verified views) have been assessed as part of the HTVA. The selected views are the principal views which are likely to be affected the development and represent a general spread of views which illustrate the urban

¹³ Land at 19, 21 and 23 Harper Road, 325 Borough High Street, 1-5 and 7-11 Newington Causeway (LPA ref: 18/AP/0657)

relationships likely to arise between the development and the surrounding townscape, heritage assets and local urban vistas.

- 7.106 The HTVA describes the site's context as having some degree of sensitivity, but this is limited to the locally listed Newington Gardens to the southeast and the Grade II Listed London Sessions Court to the northeast. Other listed buildings and conservation areas are either remote, shielded by dense development or simply unlikely to be affected given the height of the proposed scheme. The latter condition applies, for instance, to the Trinity Square Conservation Area and its listed buildings, where there will be no effect because the proposal is out of view. Nos. 73-75 Newington Causeway, and part of the site allocation, is locally listed. The remaining context is either due for radical change or of a robust character such as the Rockingham Estate.
- 7.107 The development's visibility in relation to the Grade II Listed Sessions Court is mitigated by the quality of the silhouette and duality of materials. In each of the three views illustrating this relationship, none are overbearing nor interfere with the reading of the listed building's symmetry, so whilst the front façade can be seen in an acute view, it does not harm the heritage significance.
- 7.108 The HTVA concludes that both the present semi-sensitive context and in the future context of a fully built-out regeneration site, the proposed development is of an appropriate scale and height such that it contributes positively to the townscape and adds to the architectural quality of the area overall.
- 7.109 The design would also comply with London Plan Policy D9 and NSP Policy P16 on tall buildings, insofar as its quality architecture and materiality will ensure longevity in quality of appearance; the stepped form and proportions would relate well to the massing, form and character of the emerging cluster of taller buildings to the west and southwest and also to the surrounding mid-rise buildings; special attention has been paid to the crown of the building, which will assist in legibility and wayfinding to Newington Gardens; and the ground floor activities would create a street presence and enhance the permeability of the wider Newington Gardens, Rockingham Estate and Newington Causeway area. As demonstrated within the DAS, consideration has been given to the proposal's form and materiality to ensure that it respects and positively relates to the nearby heritage assets including the Grade II listed Inner London Sessions Court and the non-designated heritage asset of Newington Gardens.
- 7.110 In terms of its functionality, the proposal would be well maintained for its lifetime (as set out within the Student Housing Management Plan by Tribe); it would provide clear and safe entrances and access routes; it has been flexibly designed to adapt to changing market conditions ensuring it maximises economic and regeneration benefits for the area; and it has been demonstrated through the accompany Transport Assessment that the transport network can accommodate the quantum of development proposed.
- 7.111 The environmental impacts of the proposed development, including wind, daylight and sunlight, air quality, and noise, have been assessed and it has been demonstrated that there are no adverse impacts that would affect the enjoyment of open spaces around the proposed building. The cumulative wind impacts have also been assessed and mitigation measures have been incorporated into the landscaping proposals.
- 7.112 Overall, the proposed massing and height is acceptable given the site's location within the Elephant and Castle Opportunity Area, Major Town Centre and CAZ; the excellent public transport accessibility

in the immediate area; the need to make effective use of land to meet London's development requirements; and the exemplary standards of design proposed. As a taller building, it accords with the approach to tall buildings outlined in the emerging allocation NSP43, of which the site forms a part, as there would be no harm to the existing character, heritage, and townscape.

- 7.113 The proposed development will not result in any harm to the significance of designated heritage assets or undesignated heritage assets. We therefore conclude that no heritage or conservation harm would be caused as a result of the proposal.
- 7.114 The proposed development is therefore consistent with legislation, the policies and guidance on design set out in the NPPF and PPG; London Plan policies; and adopted and emerging local policies and SPDs.

Delivery of affordable housing

- 7.115 Under Policy H15 of the London Plan and the Mayor's Affordable Housing and Viability SPD, a minimum of 35% of PBSA must be secured as on-site affordable student accommodation, as defined through the Mayor's Academic Forum, in order to follow the Fast Track Route. Policy H15 does not require the provision of any conventional affordable housing in PBSA schemes and notably discourages boroughs from seeking on-site provision of, or a contribution towards, conventional affordable housing for PBSA.
- 7.116 Southwark Core Strategy Policy 8 and Saved Policy 4.4 of the Southwark Plan seek at least 35% of all new housing as affordable. It should be noted, however, that both policies are out of date and not in accordance with the London Plan, therefore, consideration has been directed towards policies contained within the current London Plan and emerging NSP (below), which override Core Strategy Policy 8 and Saved Policy 4.4 of the Southwark Plan.
- 7.117 Southwark's draft policy on student homes (Policy P5) in the emerging NSP¹⁴ seeks the provision of 35% affordable student accommodation, but not conventional affordable housing, for nomination schemes, such as that being proposed in this application. The full policy wording states:

Development of purpose-built student housing must:

1. *Provide 5% of student rooms as easily adaptable for occupation by wheelchair users; and*
2. *When providing direct lets at market rent, provide the maximum amount, with a minimum of 35% as conventional affordable housing by habitable room subject to viability, as per policy P4, as a first priority. In addition to this, 27% of student rooms must be let at a rent that is affordable to students as defined by the Mayor of London; or*
3. *When providing student rooms for nominated further and higher education institutions at affordable student rent as defined by the Mayor of London, provide the maximum amount of affordable student rooms with a minimum of 35% affordable student rooms.*

- 7.118 Of note, the Inspectors' post-hearings letter (paragraph 5.5) comments as follows:

¹⁴ Main Modifications Document No: EIP219, Ref: MM30 (CPC096)

"In order to find Policy P5 sound, the requirement for the proportion of student rooms to be easily adaptable for occupation by wheelchair users should be reduced from 10% to 5%. Additionally, in order to be in general conformity with the London Plan and otherwise justified, criterion 3 of Policy P5, requiring 35% affordable housing on purpose built student accommodation whose occupation is nominated or provided by universities, should be deleted. We are not proposing that criterion 2 (which would require 35% affordable housing, in addition to 27% affordable student room lets) on speculative purpose built student accommodation at market rents requires modification."

Assessment

- 7.119 The proposed scheme provides 35% affordable student accommodation in accordance with the GLA affordability criteria for students affiliated with the University of London.
- 7.120 Notwithstanding the fact that the proposed development will be covered by a Nomination Rights Agreement and therefore doesn't trigger the requirement for conventional affordable under Policy P5, a Financial Viability Assessment (FVA) has been undertaken by James R Brown & Co Ltd on behalf of the Applicant to establish the extent to which the scheme can viably sustain any additional affordable housing accounting for the proposed affordable student accommodation provision (35%). This concludes that the proposed scheme cannot viably sustain any conventional affordable housing provision (by way of commuted sum or other) in addition to the proposed affordable student accommodation provision (35%).
- 7.121 Furthermore, from a practical perspective, it is not appropriate to mix conventional affordable housing with student housing, particularly on an already small and constrained site such as this. The inclusion of conventional affordable housing would require an additional core to independently service and access the affordable units, separate to the secure entrance serving the student accommodation. This would result in gross inefficiencies across the site, which in turn would fetter the viability and deliverability of the scheme and result in poor quality student homes.
- 7.122 In conclusion, the delivery of a policy compliant level of affordable student accommodation on site for either LSBU or UoL meets the requirements of London Plan Policy H15, draft NSP Policy P5, and the Mayor's Affordable Housing and Viability SPD.

Standard of student accommodation

- 7.123 London Plan Policy H15 requires PBSA to provide adequate functional living space and layout. Draft NSP Policy P5 requires 5% of student rooms to be easily adaptable for occupation by wheelchair users.

Assessment

- 7.124 The student rooms themselves comprise a range of room types to suit varying needs including en-suite bedrooms, accessible en-suite bedrooms, studio rooms and accessible studio rooms. In accordance with emerging NSP Policy P5, a total of 5% of all of the en-suite bedrooms are designed to accommodate wheelchair users meeting the requirements of Building Regulations M4(3) 'wheelchair user dwellings'. Shared kitchens have been designed to ensure sufficient circulation and space for wheelchair users and all amenity spaces have level access.

- 7.125 There are no specific housing standards for PBSA and given the different needs and management of student housing compared with conventional housing, it is not appropriate to apply residential design standards to student housing. However, the proposed accommodation is designed to a very high standard and provides functional and high quality living space, for example:
- All bedrooms and studios will have integrated storage and will be provided with an en-suite shower room;
 - Windows are generously sized and have an openable ventilation shutter;
 - Shared kitchen dining facilities are located within each cluster flat;
 - Kitchens will be large enough to provide seating for all residents and will be accessible for wheelchair users; and
 - The accommodation will be well lit and have good levels of outlook and privacy.
- 7.126 A Student Housing Management Plan prepared by Tribe accompanies the planning application. This deals with all matters relating to the operation of the student accommodation, including management of the student halls and amenity spaces, maintenance and housekeeping issues, servicing and deliveries, safety and security, and community liaison. A commitment to an ongoing student management plan would be secured by way of a planning obligation to ensure that the accommodation is maintained to a high standard during its lifespan. Accordingly, the proposed development complies with London Plan Policy H15 and emerging NSP Policy P5.

Energy and Sustainability

- 7.127 At the heart of the NPPF is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking.
- 7.128 Paragraph 157 of the NPPF says that in determining planning applications, local planning authorities should expect new development to:
- a) Comply with the development plan policies on local requirements for decentralised energy supply unless it can be demonstrated by the applicant, having regard to the type of development involved and its design, that this is not feasible or viable; and
 - b) Take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption.
- 7.129 Part A of London Plan Policy SI 2 'Minimising greenhouse gas emissions' states that major development should be net zero-carbon. Greenhouse gas emissions should be reduced, and annual and peak energy demands minimised in accordance with the following energy hierarchy:
- 1) Be lean: use less energy and manage demand during operation;
 - 2) Be clean: exploit local energy resources and supply energy efficiently and cleanly; and
 - 3) Be green: maximise opportunities for renewable energy on site.
- 7.130 Part C of the policy sets the following targets for major developments:

- Net zero carbon with at least 35% reduction in carbon emissions beyond Part L of the 2013 Building Regulations
 - Residential development should achieve 10%, and non-residential development should achieve 15% reduction through energy efficiency measures
- 7.131 London Plan Policy SI 3 ‘Energy infrastructure’ advises that developers should engage at an early stage with relevant energy companies to establish the future energy and infrastructure requirements arising from large-scale development proposals.
- 7.132 Policy SI 4 ‘Managing heat risk’ of the London Plan seeks to minimise adverse impacts on the urban heat island through design, layout, orientation, materials, and the incorporation of green infrastructure of new development proposals.
- 7.133 In terms of sustainability, London Plan Policy D3 ‘Optimising site capacity through the design-led approach’ stipulates that development proposals should aim for high sustainability standards and consider the principles of the circular economy.
- 7.134 Draft NSP Policy P68 ‘Sustainability standards’ requires all non-residential development and non-self-contained residential development over 500sqm to achieve a BREEAM rating of ‘Excellent’. To reduce the risk of overheating, the cooling hierarchy should be followed in order of priority as follows:
1. Reduce the amount of heat entering a building through the orientation, shading, albedo, fenestration, insulation and green roofs and walls; then
 2. Minimise internal heat generation through energy efficient design; then
 3. Manage the heat within the building through exposed internal thermal mass and high ceilings; then
 4. Passive ventilation; then
 5. Mechanical ventilation; then
 6. Active cooling systems (ensuring they are the lowest carbon options).
- 7.135 Draft NSP Policy 69 ‘Energy’ requires all major development to be net zero-carbon. Major residential development must reduce carbon emissions on-site (100% on 2013 Building Regulations) and major non-residential developments must reduce carbon emissions on-site by a minimum of 40% on 2013 Building Regulations. Any shortfall in either of the above must be secured off-site through planning obligations or as a financial contribution. In addition, development proposals referable to the Mayor must calculate whole life cycle carbon emissions through a nationally recognised assessment and demonstrate actions taken to reduce life cycle carbon emissions.

Assessment

- 7.136 Sustainability and energy matters are dealt with in the following reports prepared by JAW Sustainability submitted with the application:
- Energy Strategy (including Carbon Emissions Reporting)
 - Sustainability Statement (including BREEAM Pre-Assessment)
 - Circular Economy Statement

- Overheating Assessment
- Life Cycle Carbon Assessment

- 7.137 As required by the London Plan and New Southwark Plan, the development follows the energy hierarchy, incorporating passive design measures, energy efficient equipment and renewable energy. The development employs an efficient building fabric, including well insulated walls and highly efficient glazing and efficient systems. At the 'be lean' stage, this results in a 13.5% saving for the development as a whole. Although this falls marginally below the London Plan target of 15% for this stage, all reasonable measures have been taken to maximise be lean savings. Justification for why the 15% is not achievable is outlined within the Energy Strategy. At the 'be green' stage, PV panels and an air source heat pump for heating and hot water are proposed to maximise carbon savings for the site. Overall, the development achieves a 60.1% improvement over the building regulation gas boiler baseline, which meets the London Plan target for on-site carbon savings. To achieve net zero-carbon, an offset payment is proposed equivalent to £252,732.
- 7.138 The glazing strategy design has carefully considered orientation and window size in order to maximise daylight while controlling excessive solar gains. Glazing will incorporate low emissivity coatings to limit overheating without compromising light transmittance. Further details are contained within the Overheating Assessment.
- 7.139 In terms of sustainability, the employment floorspace within the development will aim to achieve BREEAM 'excellent' standard.
- 7.140 A Circular Economy Statement and Life Cycle Carbon Assessment have been produced in line with the London Plan, outlining strategies to reduce the carbon impact of the development, and assessing the impact of the development. For example, materials with a high recycled content will be specified where possible to reduce the embodied carbon of the development.

Daylight and Sunlight

- 7.141 At a national level, the Building Research Establishment ('BRE') Report 'Site Layout Planning for Daylight and Sunlight 2011' is most widely accepted by planning authorities as the means by which to judge the acceptability of a scheme in terms of the impact that a new development will have on the light to neighbouring properties. The tests within the document are given as guidance and are not mandatory, as recognised within the BRE guide itself.
- 7.142 The BRE daylight and sunlight guidance was established in relation to a suburban environment. As such, the default nationwide BRE numerical criteria are based on 25-degree development angles, which are frequently inappropriate and indeed unachievable, in urban areas. It is therefore important to apply the guidance flexibly and consider the retained levels of amenity and whether they are commensurate with those for an urban location such as where the site is located.
- 7.143 The BRE guide advises that daylight and sunlight levels should be assessed for the main habitable rooms of neighbouring residential properties. Habitable rooms in residential properties are defined as kitchens, living rooms and dining rooms.
- 7.144 London Plan Policy D6(D) 'Housing quality and standards' states that the design of developments should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for

its context, whilst avoiding overheating, minimising overshadowing, and maximising the usability of outside amenity space.

- 7.145 Draft NSP Policy P13(3) 'Design quality' requires new development to provide adequate daylight, sunlight, outlook, and a comfortable microclimate including good acoustic design for new and existing residents.

Assessment

- 7.146 A Daylight and Sunlight Assessment has been undertaken by Point 2 Surveyors which assesses the effects that the proposed development would have on the daylight and sunlight amenity to the properties surrounding the site. It also considers the provision of daylight amenity within the proposed student accommodation. In relation to overshadowing, it assesses the effects that the proposal will have on Newington Gardens to the east of the site.
- 7.147 The following properties surrounding the site form part of the scope for assessment based on their proximity to the development site and the fact that they contain residential accommodation:
- Telford House
 - Stephenson House
 - 57-61 Newington Causeway (Balppa House)
 - 2 Avonmouth Street
- 7.148 The results show that in relation to the daylight and sunlight effects on neighbouring residential properties, while there will inevitably be some noticeable reduction as the existing site is underdeveloped currently, the effects are acceptable overall. Retained levels of amenity are generally good and compare favourably with those appropriate for the urban location.
- 7.149 Within the proposed scheme itself, daylight amenity will be very good, and the level of compliance with BRE targets is excellent for a high density scheme such as this.
- 7.150 In relation to overshadowing, Newington Gardens will retain excellent levels of sunlight amenity following the construction of the development.
- 7.151 Overall, therefore, the effects of the proposed development in relation to daylight, sunlight and overshadowing are acceptable in accordance with the national BRE guidance, Policy D6 of the London Plan and Policy P13 of the draft NSP.

Transport and Servicing

- 7.152 Chapter 9 of the NPPF sets out the Government's policies on transport, the overall aim of which is to promote solutions that support a reduction in greenhouse gas emissions and reduce congestion, contributing to wider sustainability and health objectives.
- 7.153 Paragraph 112 of the NPPF confirms that applications should:
- a) give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public

transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;

- b) address the needs of people with disabilities and reduced mobility in relation to all modes of transport;
- c) create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards;
- d) allow for the efficient delivery of goods, and access by service and emergency vehicles; and
- e) be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.

7.154 London Plan Policy T1 ‘Strategic approach to transport’ sets out (in Part A) that development proposals should facilitate the delivery of the Mayor’s strategic target of 80% of all trips in London to be made by foot, cycle or public transport by 2041. Part B of the policy says: *“All development should make the most effective use of land, reflecting its connectivity and accessibility by existing and future public transport, walking and cycling routes, and ensure that any impacts on London’s transport networks and supporting infrastructure are mitigated.”*

7.155 London Plan Policy T4 ‘Assessing and mitigating transport impacts’ (Part B) requires Transport assessments to accompany development proposals where required in accordance with national or local guidance, focussing on the “Healthy Streets Approach” within, and in the vicinity of, new development. The policy advises that Travel Plans, Parking Design and Management Plans, Construction Logistics Plans and Delivery and Servicing Plans are also required having regard to TfL guidance.

7.156 London Plan Policy T5 ‘Cycling’ requires the provision of appropriate levels of cycle parking in accordance with the minimum standards set out in Table 10.2 and Figure 10.3, which should be designed and laid out in accordance with the guidance contained in the London Cycle Design Standards. Policy T6 ‘Car parking’ stipulates that car-free development (i.e., limited to disabled persons parking only) should be the starting point for all development proposals in places that are (or are planned to be) well-connected by public transport.

7.157 NSP Policies P48 and P49 relate to public transport and highways impacts. New developments are required to demonstrate that the public transport network and road network has sufficient capacity to support any increase in the number of journeys by users of the proposed development, taking into account the cumulative impact of local existing and permitted development. Delivery and servicing within large development sites is expected to be incorporated on site and not on the public highway. Policies P52, P53 and P54 within the NSP provide car parking and cycle parking standards for new development.

Assessment

7.158 In respect of transport, servicing and highways matters, the following reports have been prepared by Ardent Consulting Engineers and submitted in support of the proposed development:

- Healthy Streets Transport Assessment

- Framework Travel Plan
- Student Management Plan (Transport)
- Outline Construction Logistics Plan
- Car Park Management Plan
- Delivery and Servicing Management Plan

- 7.159 The Transport Assessment (TA) has been prepared in line with TfL’s “Healthy Streets for London” assessment criteria and following liaison with LBS, TfL and the GLA.
- 7.160 The existing access off Avonmouth Street will be retained but improved with the provision of a Copenhagen style crossing along the frontage, thus creating a nicer and safer pedestrian environment along Avonmouth Street compared with the existing situation. The access will continue to serve the rear of 63-67 Newington Causeway as it does currently.
- 7.161 The proposed development is “car-free”, which is appropriate given the immediate proximity to bus and rail services on Newington Causeway as well as cycle and pedestrian routes and the extremely high PTAL rating (6b). One disabled car parking space is provided on-site which will be utilised when allocated to a student/staff member with a blue badge.
- 7.162 The proposed design has sought to prioritise pedestrian and cycle movement over vehicles by being a car-free development and by setting back the building to allow for a wider footway to be provided on the site frontage.
- 7.163 Separate cycle stores for each use are proposed in accordance with the London Plan minimum cycle parking standards and the guidance set out within the London Cycle Design Guidance, resulting in 210 spaces overall (200 long stay and 10 short stay/visitor spaces).
- 7.164 Deliveries and servicing by larger vehicles (including refuse vehicles) is proposed to take place on Avonmouth Street as per the current situation, whilst deliveries by smaller vehicles (such as those used by couriers etc.) can be undertaken within the site. Given the quiet nature of Avonmouth Street, this approach is appropriate and consistent with the existing situation. In the event of no take-up of the on-site disabled car parking space, the space could be made available for smaller deliveries (as demonstrated by swept path analysis within the TA). This is appropriate given the high turnover of residents and the fact that the requirement for the use of the disabled bay could change frequently and indeed on a semester-to-semester basis. This arrangement was agreed recently with Southwark for a similar scheme at Old Kent Road (ref: 20/AP/2701). Servicing activity, including unloading, in the location of the disabled bay would only be permitted in the event of the bay not being allocated to a blue badge holder resident/member of staff, and this would be managed and enforced via the Student Management Plan secured within the s106 Legal Agreement.
- 7.165 Overall, the trip generation predicted as a result of the proposed development is extremely low and is not expected to have a significant effect on any transport mode.
- 7.166 In summary, the Transport Assessment and related highways reports have demonstrated that the proposed development is acceptable in highways and transport terms and complies with the NPPF, London Plan Policies T1-T6 and NSP Policies P48 and P49.

Public Realm, Urban Greening and Trees

- 7.167 Paragraph 131 of the NPPF explains that trees make an important contribution to the character and quality of urban environments and can also help mitigate and adapt to climate change. Newly planted trees should be properly maintained and existing trees retained where possible.
- 7.168 London Plan Policy G5 'Urban greening' requires major development proposals to contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high quality landscaping (including trees), green roofs, green walls, and nature-based sustainable drainage. Part B of the policy stipulates that boroughs should develop an Urban Greening Factor (UGF) to identify the appropriate amount of urban greening required in new developments, but in the interim, the Mayor recommends a target score of 0.40 for developments that are predominantly residential and a target score of 0.3 for predominantly commercial development.
- 7.169 London Plan Policy G7 'Trees and woodlands' stipulates that development proposals should ensure that, wherever possible, existing trees of value are retained. It goes on to say that the planting of additional trees should generally be included in new developments.
- 7.170 London Plan Policy D8 'Public realm' encourages the creation of new public realm where appropriate. The public realm should be well-designed, safe, accessible, inclusive and reflective of local character, as well as ensuring appropriate landscaping treatments are used.
- 7.171 NSP Policy 60 'Trees' states that development involving trees as part of landscaping and public realm schemes will reflect the surrounding character of the area and should be adaptable to climate change while supporting native species.
- 7.172 NSP Policy P12 'Design of places' outlines that development should ensure high quality public realm that encourages walking and cycling and eases the movement of pedestrians, cyclists, wheelchair users and pushchairs.
- 7.173 SPD 15 'Public realm' within the Elephant and Castle SPD and OAPF says *"we will work with TfL, developers and the community to transform the quality of the public realm in the opportunity area..."*. More specifically, within the Enterprise Quarter, SPD 52 'Natural Environment' street tree planting should be enhanced to soften the public realm and enhance green links and help wayfinding. The indicative proposals for the Enterprise Quarter character area (as shown on Figure 40 within the SPD, reproduced in **Appendix 4**) include a "green route" along Tiverton Street and part of Avonmouth Street terminating at Newington Gardens.

Assessment

- 7.174 An Arboriculture Survey, Impact Assessment and Method Statement have been undertaken by PJC Consultancy. The proposed layout has been overlaid with the tree constraints plan in order to identify the impacts to the trees to inform this impact assessment and this information has formed the basis of the tree retention plan and the tree protection plan.
- 7.175 A total of 6 trees have been surveyed, one of which is located within the site boundary. The single on-site tree, which is a category 'C' individual, is required to be removed to enable the development. This tree is growing in a small, raised planter and is of only 5m in height and therefore its removal would have a negligible impact on the character and appearance of the locality.

- 7.176 The proposals include significant street tree planting which will mitigate the loss of this tree and make a positive contribution to the species and age range diversity and the canopy cover of the trees in the locality.
- 7.177 The proposed site layout involves construction of the building within a small section of the root protection area of off-site London plane T2. Also, the hard surfacing within the root protection area of the off-site snake-bark maple T6 is to be replaced. Subject to the specific and generic tree protection measures outlined within the Arboriculture Method Statement being followed, the proposals are considered to represent a negligible impact to the health and longevity of the off-site trees. Also, the proposed landscaping scheme which comprises off-site street tree planting, will make a significant positive contribution to the landscape setting of the site.
- 7.178 A Landscape Statement has been prepared by Turkington Martin Landscape Architects which outlines the landscaping and “urban greening” opportunities that arise and how these have been maximised across the various levels of the development.
- 7.179 At street level, new planting is proposed, and the width of footway increased to create an attractive and welcoming pedestrian experience around the site. Moving up the building, extensive urban greening is proposed on roof terraces at levels two, seven, fourteen and sixteen, including green roofs in combination with solar panels. At seventh floor an accessible roof terrace is proposed capitalising on the views out across Newington Gardens, providing an external amenity space for the future student residents to socialise in. The space has been designed to incorporate areas for lounging, eating, sitting, and working, and the landscape features include raised planters with integrated seating and multi-stem trees.
- 7.180 The planting proposals feature shrub and evergreen planting to provide form and structure, whilst grasses and herbaceous plants will provide seasonal bursts of colour and interest as well as improve ecology and biodiversity.
- 7.181 As well as the landscaping proposals within the application site boundary, there is the potential to significantly upgrade the public realm around the site for the mutual benefit of local residents and future occupiers of the development, as well as to deliver on Southwark’s ambition for a “green link” along Tiverton Street as it wraps around the site, as set out within the Elephant and Castle SPD and OAPF. A conceptual diagram showing the potential for what could be achieved should Southwark be amenable to the public realm enhancements illustratively shown within the vicinity of the site is included on page 9 of the Landscape Statement. This includes a new “pocket park”, new street tree planting, and new paving to align with the entrance to Newington Gardens. The Applicant is committed to delivering the pocket park and public realm works illustratively shown within the Landscape Statement.
- 7.182 The proposed development has sought to maximise the amount of greening proposed and will thus achieve an urban greening score of 0.40 based on the GLA calculator, in compliance with London Plan Policy G5.
- 7.183 In summary, the proposed development will have extensive urban greening and accords with the aspirations of the NPPF, London Plan G5, G7 and G8, Policies P12 and P60 within the New Southwark Plan, and the guidance set out within the Elephant and Castle SPD and OAPF.

8.0 Other Technical Considerations

Ecology

- 8.1 London Plan Policy G6 'Biodiversity and access to nature' states that *"development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain"*.
- 8.2 NSP Policy P59 'Biodiversity' states that development proposals should include features such as green roofs, green walls, and landscaping.
- 8.3 A Preliminary Ecological Appraisal has been undertaken by The Ecology Partnership, which concludes that the redevelopment of the site would not result in any indirect ecological impacts that would be considered significant. Due to a lack of suitable habitat present at the site, no further surveys have been recommended for bats, reptiles, or other protected species. With the implementation of the recommended enhancements, a net gain in biodiversity can be achieved post-development, in compliance with London Plan Policy G6 and NSP Policy P59.

Archaeology

- 8.4 London Plan Policy HC1 'Heritage conservation and growth' states that proposals should identify assets of archaeological significance.
- 8.5 In accordance with Policy HC1, an Archaeological Desk-Based Assessment has been undertaken by RPS. This concludes that whilst the site is located within an Archaeological Priority Zone ('APZ') for 'North Southwark and Roman Roads', this APZ is the largest in Southwark and covers a broad area including the historic core of Southwark, the entire river frontage and the Roman radial roads leading to the historic core. The APZ therefore covers a vast area intended to capture various areas of archaeological interest, much of which does not apply to the site itself. The assessment confirms that a moderate archaeological potential would be identified at the site for the Roman period as well as for the Medieval land division and agricultural activity. However, modern development impacts are likely to have been severe at the site, due to extensive industrial development in the mid-19th century, bomb damage during World War Two, and subsequent phases of clearance, demolition, and redevelopment to the present day, thereby reducing the site's archaeological potential.
- 8.6 Overall, given the likely extent of past ground disturbance, the site is considered to retain only a limited archaeological potential for remains of up to a local significance only. Whilst the site's location within a locally defined APZ is acknowledged, it is considered unlikely that the proposed development would have either a significant or widespread archaeological impact. On this basis, no further archaeological work is recommended to support the planning application.

Ground Investigation and Basement Impact Assessment

- 8.7 NPPF paragraph 183(a) outlines that sites need to be suitable for their proposed use, taking into account ground conditions and any risks from land instability and contamination.
- 8.8 NSP Policy P13 'Design quality' states that basements that do not have adverse archaeological, amenity or environmental impacts will be acceptable.
- 8.9 A Desk Study and Basement Impact Assessment has been undertaken by Jomas Associates in support of the application. The assessment concludes that the creation of a double basement as

proposed will not adversely impact the site or its immediate environs, providing measures are taken to protect surrounding land and properties during construction.

- 8.10 The proposed development is not expected to cause significant problems to the subterranean drainage, however, it is recommended that an intrusive ground investigation is undertaken to confirm the ground conditions and groundwater levels (if any) beneath the site prior to development commencing, as well to inform foundation design. Due to the potential presence of asbestos containing materials, an asbestos survey should also be undertaken, with any asbestos containing materials found and removed under suitably controlled conditions. There should be no risk to end users from asbestos if the potential asbestos containing materials are removed by suitably qualified and experienced specialists under controlled conditions.
- 8.11 Accordingly, the proposed development complies with the NPPF and London Plan Policy P13.

Fire Risk

- 8.12 London Plan Policy D12 'Fire safety' states that proposals must identify suitable positioned, unobstructed outside space, incorporate appropriate features which reduce the risks associated with fires, be constructed in a way to minimise fire, and provide suitable means of escape.
- 8.13 For the purposes of national 'planning gateway one', the proposed development is a "relevant building" (being a building of 18m or more in height, or 7 or more storeys). Accordingly, and to comply with national requirements and London Plan Policy D12, a Fire Statement for the proposed development has been prepared by Clarke Banks. This outlines in detail the measures taken to ensure that the development will meet the relevant British Standards and London Plan Policy D12, including the proposed arrangements for emergency fire service access, the siting of fire appliances, suitability of water supply for the scale of development proposed. The proposal includes separate fire lifts and evacuation lifts and will be covered by an automatic fire suppression system designed, installed, commissioned, and maintained in line with British Standard 9251:2021. Further details are contained within the Fire Statement, which demonstrate how the proposed development complies with London Plan Policy D12 and national planning gateway one.

Air Quality

- 8.14 London plan policy SI 1 'Improving air quality' states that proposals should not cause further deterioration to air quality or create unacceptable risks to poor air quality. Design solutions should be incorporate ways to prevent or minimise increased exposure to air pollution.
- 8.15 NSP Policy P64 'Improving air quality' outlines that development must achieve or exceed air quality neutral standards and address the impacts of poor air quality on building occupiers and public realm users.
- 8.16 The potential air quality impacts associated with the proposed development have been assessed within the Air Quality Assessment (AQA).
- 8.17 This concludes that there is potential for dust soiling and human health impacts generated by on-site demolition, earthworks and construction activities, however, with the proposed mitigation measures in place, the residual overall effect will be 'not significant'. Furthermore, potential impacts from emissions associated with demolition and construction traffic generated by the proposed

development will be temporary only and may be mitigated to some degree by the implementation of a Construction Environment Management Plan.

- 8.18 The volume of operational traffic associated with the proposed development falls below the relevant screening criteria, therefore, the potential impacts of emissions from operational development-generated traffic can be screened out as being 'not significant'.
- 8.19 Concentrations of pollutants at sensitive locations within the proposed development are predicted to be well below the relevant objectives, therefore future student residents are anticipated to experience good air quality.
- 8.20 The proposed development is substantially better than 'air quality neutral' in terms of both building and transport. Accordingly, the proposed development complies with London Plan Policy SI 1 and NSP Policy P64.

Noise and Vibration

- 8.21 NPPF paragraph 185(a) states that new development should avoid pollution of all kinds and mitigate potential adverse noise impacts resulting from new development. Noise should not cause adverse impacts on health and quality of life.
- 8.22 London Plan Policy D14 'Noise' states that proposals should mitigate, minimise, and avoid significant adverse noise impacts without placing unreasonable restrictions on existing noise-generating uses. Design factors such as layout, orientation, and materials, can be used as mitigation.
- 8.23 NSP Policy P65 'Reducing noise pollution and enhancing soundscapes' states that development must avoid, mitigate and manage adverse impacts caused by noise and vibration on health and quality of life.
- 8.24 A Noise and Vibration Assessment has been undertaken by Ardent Consulting Engineers in liaison with the Environmental Protection Officer at Southwark to support of the application.
- 8.25 This concludes that vibration is not of concern to the proposed development based on the measured vibration levels at the site. From an acoustic perspective, the proposed development is considered acceptable for its intended use providing that appropriate sound insulation mitigation measures outlined in the report are implemented at detailed design stage. During construction, control measures will be implemented to manage potential impacts from construction noise. On this basis, the proposed development complies with the NPPF, London Plan Policy D14 and NSP Policy P65.

Flood Risk and Sustainable Urban Drainage

- 8.26 NPPF paragraph 159 states that inappropriate development in areas at risk of flooding should be avoided by directing development away from high risk areas.
- 8.27 NSP Policy P67 'Reducing flood risk' states that development must not increase flood risk on or off site by ensuring that development is resilient to flooding; and finished floor levels are set no lower than 300mm above the predicted maximum water level where they are located in an area at risk of flooding; and major development reduces surface water run-off to greenfield run-off rates. This is also reflected by London plan policy SI 12 'Flood risk management'.

- 8.28 A Flood Risk Assessment (FRA) and preliminary foul and surface water drainage strategy for the proposed development has been prepared by Ardent Consulting Engineers.
- 8.29 As the entire site is within Flood Zone 3 (defended) and the development is classified as “more vulnerable” the development is subject to the exception tests. The FRA has demonstrated that the development will be safe for its lifetime taking account of the vulnerability of its users and would not increase flood risk elsewhere.
- 8.30 The site is defended by the Thames Barrier but is located within the modelled extents of a breach in the defences. The site has been assessed as having a medium risk of groundwater flooding. Flooding from all other sources is assessed as being very low or low.
- 8.31 Flood risk management measures have been recommended to ensure that, in line with the NPFF, the site will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere. These include the following:
- Residential accommodation will be located at least 300mm above the MLWL breach level (3.4m AOD+300mm = 3.7m AOD);
 - Access to areas above the tidal breach level (3.5m AOD) should be provided as emergency refuge; and
 - Flood resistant/resilient construction methods should be implemented.
- 8.32 The surface water drainage strategy will reduce flood risk by restricting surface water flows in accordance with the London Plan and Southwark’s requirements. A sustainable urban drainage system has been designed to incorporate green roofs, permeable paving and a geocellular attenuation tank. Storm water attenuation is provided for all storms up to and including the 1 in 100-year critical event (including a 40% allowance for climate change). The proposed development results in significant betterment over the pre-development scenario in terms of a reduction of surface water runoff.
- 8.33 Foul water would be discharged to the existing Thames Water combined sewer in Avonmouth Street, which Thames Water has confirmed has sufficient capacity to accommodate the proposed foul (and surface) water discharge from the proposed development.
- 8.34 Accordingly, the FRA demonstrates that the proposals are consistent with the aims of the NPFF, London Plan and NSP policies on flood risk and drainage.

Wind and Microclimate

- 8.35 London Plan Policy D8 stipulates that development plans and proposals should ensure that appropriate shade, shelter, seating and, where possible, areas of direct sunlight are provided, with other microclimatic considerations, including temperature and wind, taken into account in order to encourage people to spend time in a place. Policy D9 relates specifically to tall buildings and requires wind, daylight, sunlight penetration and temperature conditions around building(s) to be carefully considered and not compromise comfort and the enjoyment of open spaces.
- 8.36 Draft NSP Policy P13 requires development proposals to comply with a number of design criteria, which includes ensuring that they do not create adverse local climatic conditions (e.g., wind shear).

Likewise, Policy P16 says that tall buildings are required to avoid harmful and uncomfortable environmental impacts, including wind shear.

- 8.37 A Wind Microclimate Assessment has been carried out by Urban Microclimate Ltd to assess the likely impact of the proposals on pedestrian level wind conditions in and around the site based on the industry standard Lawson criteria for pedestrian comfort and safety. The report concludes that the proposed development is not expected to have any significant impact on wind conditions with regards to pedestrian safety. In terms of pedestrian comfort, thoroughfares within and alongside the site are expected to be suitable for pedestrian access to, and passage past, the proposed development. Recreational spaces within the proposed development, such as the roof terrace, are expected to enjoy suitable conditions for outdoor seating. No significant cumulative effects with consented future surrounding developments are expected. The proposed development therefore complies with London Plan Policies D8 and D9 and NSP Policies P13 and P16.

9.0 S106 Planning Obligations and Community Infrastructure Levy

- 9.1 Under Section 106 of the Town and Country Planning Act 1990 (as amended), local planning authorities have the power to enter into planning obligations with any person interested in land in their area for the purpose of restricting or regulating the development or use of the land.
- 9.2 In accordance with Regulation 122 of the Community Infrastructure Levy ('CIL') Regulations, and paragraph 57 of the NPPF, planning obligations must only be sought where they meet all the following tests:
- 1) Necessary to make the proposed development acceptable in planning terms;
 - 2) Directly related to the proposed development; and
 - 3) Fairly and reasonably related in scale and kind to the proposed development.
- 9.3 As set out in paragraph 55 of the NPPF, planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition.
- 9.4 The Applicant is willing to enter into a Section 106 Agreement with the London Borough of Southwark to secure the reasonable and necessary planning obligations associated with the proposed development in accordance with Regulation 122 of the CIL Regulations and draft Policy IP3 within the New Southwark Plan. The anticipated obligations are:
- 35% affordable purpose-built student accommodation;
 - Nominations Agreement with the University of London or London South Bank University;
 - 5% wheelchair student housing provision;
 - An element of affordable workspace;
 - Student Housing Management Plan;
 - Contribution towards carbon off-setting (to achieve net zero carbon);
 - Futureproofing for connection to District CHP;
 - Public realm and highway improvements (via Section 278 Agreement);
 - Parking permit restrictions;
 - Delivery and servicing plan bond;
 - Construction skills and employment plan; and
 - Administration and monitoring fee.

Community Infrastructure Levy

- 9.5 The proposed development will be subject to the following CIL rates:
- Mayoral CIL: £60 per square metre (index linked) on all liable net additional floorspace; and
 - Southwark CIL: £109 per square metre (index linked) on all liable student housing. Note, the CIL rate for office floorspace in Zone 2 (which the site falls within) is nil.

10.0 Conclusion

- 10.1 Tribe proposes to redevelop Avonmouth House for an innovative and exciting mixed-use scheme comprising purpose-built student housing for the University of London alongside flexible employment floorspace and/or health/education uses.
- 10.2 This opportunity has arisen because etc. venues who currently occupy the site are closing the premises as part of their business consolidation strategy. They have recently signed a 10 year lease extension at Prospero House on Borough High Street which will be able to support former Avonmouth House clients as well as all five existing employees at the site.
- 10.3 The site is an underutilised but highly accessible brownfield site within the Central Activities Zone and Elephant and Castle Opportunity Area. It forms part of a wider allocation for redevelopment, which could include taller buildings, as identified in the New Southwark Plan.
- 10.4 The existing two storey building is of utilitarian design; it is visually impermeable and illegible and is not of heritage significance. The ground floor plane is of poor quality with extensive dead frontage providing an unattractive backdrop to the non-designated heritage asset, Newington Gardens.
- 10.5 The site therefore presents a major opportunity for redevelopment that will optimise its development potential. The proposal would provide 233 student bed spaces, 35% of which would be affordable, for the globally recognised University of London in an area identified as suitable for student housing and in a part of London where students compete with other residents for private rented accommodation. The quick delivery of student housing would help address an identified need locally and strategically and would contribute towards the Mayor's target of 3,500 purpose-built student bedspaces to be provided annually across London. The delivery of student housing would also contribute the equivalent of 93 homes towards Southwark's housing targets and assist in reducing pressure on the local private rented market by releasing this number of dwellings back to the private rented sector.
- 10.6 At the lower levels, the proposed development would provide 1733sqm of floorspace for either Class E employment use, a health hub, and/or education use, contributing to the vitality and mix of uses within Elephant and Castle, supporting its function as a major town centre. This represents a 426sqm uplift in employment floorspace compared with the existing site and a net increase of up to 139 full-time jobs to contribute towards the target of 10,000 new jobs within the Elephant and Castle Opportunity Area up to 2036. Alongside this, the proposal would deliver active ground floor frontages onto Avonmouth Street and Tiverton Street to enliven the streetscape which is somewhat compromised by the expansive area of dead frontage presently on the site.
- 10.7 The submission of this application follows a period of pre-application engagement with key statutory consultees, including LB Southwark, TfL and the GLA. In addition, the Applicant has consulted with the locally elected politicians and the local community, including residents and businesses, local community groups, and adjoining landowners, who have been largely supportive of the proposals, recognising that the scheme would contribute to the ongoing regeneration of this part of Elephant and Castle.
- 10.8 The significant benefits of the proposed development include:

- Regeneration and optimisation of a brownfield site, allocated for redevelopment within the emerging New Southwark Plan, to contribute to the ongoing regeneration of the Elephant and Castle Opportunity Area;
- First class, flexible new employment floorspace, including 10% affordable workspace, fronting Avonmouth Street and Tiverton Street with views across Newington Gardens;
- 233 high quality purpose-built student rooms, including 35% affordable and 5% wheelchair accessible rooms, supporting the Borough's higher education establishments and contributing towards the Mayor's target of 3,500 new purpose-built student bedrooms per annum;
- An indirect contribution of 93 homes towards Southwark's and the GLA's housing targets (based on the London Plan ratio of 2:5:1), which in turn, would free up conventional housing thus reducing pressure on the local private rental housing market;
- Active frontages and enhanced public realm on Avonmouth Street and Tiverton Street that would create an attractive, safe and high quality environment for people and students to work, live and visit, better revealing local distinctiveness and providing a strong sense of place;
- Exemplary new architecture that is sympathetic to the local character and history while optimising the site's potential, providing benefits in townscape and streetscape terms;
- Up to 144 new jobs once the building is operational/completed, as well as indirect employment in the construction and supply chain;
- Fiscal benefits through increased spending power in the area from the future student residents; CIL payments; section 106 contributions; and annual business rates;
- A highly sustainable, zero carbon, air quality neutral development with BREEAM 'Excellent' rated employment floorspace;
- Introduction of urban greening to improve the biodiversity of the area;
- The potential for public realm improvements to the wider area including a newly created "pocket park" and associated highway improvements.

10.9 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires applications for planning permission to be determined in accordance with the development plan unless material considerations indicate otherwise. This Town Planning Statement together with the comprehensive suite of reports submitted in support of this planning application have assessed the proposed development against the development plan and other relevant planning policy and guidance at national, regional and local policy levels.

10.10 In conclusion, the proposed development complies with the aims and objectives of national, regional and local planning policy and the development. Furthermore, the proposed development comprises sustainable development within the meaning of the NPPF, such that it engages the "presumption" set out in paragraph 11. Accordingly, the proposed development should be granted planning permission without delay.



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Appendix 1 Submission Documents

SUBMISSION DRAWINGS AND DOCUMENTS

Drawings

Drawing number	Title	Scale	Revision	Author
Existing Drawings				
21235 - STCH - XX - ZZ - DR - A - 1001	Existing site location plan	1:1250 @ A3	-	Stitch
21235 - STCH - XX - ZZ - DR - A - 1002	Existing site plan	1:500 @ A3	-	Stitch
21235 - STCH - XX - ZZ - DR - A - 1003	Existing site elevation – northeast	1:500 @ A3	-	Stitch
21235 - STCH - XX - ZZ - DR - A - 1004	Existing site elevations	1:500 @ A3	-	Stitch
21235 - STCH - XX - ZZ - DR - A 1005	Existing site section	1:500 @ A3	-	Stitch
Proposed Site Plans				
21235 - STCH - XX - ZZ - DR - A - 1050	Proposed site plan	1:500 @ A3	-	Stitch
21235 - STCH - XX - ZZ - DR - A - 1051	Proposed block plan	1:500 @ A3	-	Stitch
Proposed General Arrangement Plans				
21235 - STCH - XX - B2 - DR - A - 1100	Proposed building – Basement 2 plan	1:250 @ A3	-	Stitch
21235 - STCH - XX - B1 - DR - A - 1101	Proposed building – Basement plan	1:250 @ A3	-	Stitch
21235 - STCH - XX - 00 - DR - A - 1102	Proposed building – Ground floor plan	1:250 @ A3	-	Stitch
21235 - STCH - XX - 01 - DR - A - 1103	Proposed building – 1st floor plan	1:250 @ A3	-	Stitch
21235 - STCH - XX - 02 - DR - A - 1104	Proposed building – 2nd floor plan	1:250 @ A3	-	Stitch
21235 - STCH - XX - ZZ - DR - A - 1105	Proposed building – 3 rd – 6 th floor plan	1:250 @ A3	-	Stitch
21235 - STCH - XX - 07 - DR - A - 1106	Proposed building – 7 th floor plan	1:250 @ A3	-	Stitch
21235 - STCH - XX - ZZ - DR - A - 1107	Proposed building – 8 th – 13 th floor plan	1:250 @ A3	-	Stitch
21235 - STCH - XX - ZZ - DR - A - 1108	Proposed building – 14 th – 15 th floor plan	1:250 @ A3	-	Stitch
21235 - STCH - XX - RF - DR - A - 1109	Proposed building – Roof plan	1:250 @ A3	-	Stitch
Proposed Elevations				
21235 - STCH - XX - ZZ - DR - A - 1200	Proposed building – North west elevation	1:250 @ A3	-	Stitch
21235 - STCH - XX - ZZ - DR - A - 1201	Proposed building – North east elevation	1:250 @ A3	-	Stitch
21235 - STCH - XX - ZZ - DR - A - 1202	Proposed building – South east elevation	1:250 @ A3	-	Stitch
21235 - STCH - XX - ZZ - DR - A - 120	Proposed building – South west elevation	1:250 @ A3	-	Stitch
21235 - STCH - XX - ZZ - DR - A - 1204	Proposed building – North east site elevation	1:500 @ A3	-	Stitch
21235 - STCH - XX - ZZ - DR - A - 1205	Proposed building – South east site elevation	1:500 @ A3	-	Stitch
Proposed Sections				
21235 - STCH - XX - ZZ - DR - A - 1300	Proposed building - Section AA	1:1250 @ A3	-	Stitch

21235 - STCH - XX - XX - DR - A - 1301	Proposed building - Section BB	1:1250 @ A3	-	Stitch
Proposed Layouts				
20221 - STCH - XX - ZZ - DR - A - 1400	Proposed layouts Typical Ensuite 01	1:50 @ A3	-	Stitch
20221 - STCH - XX - ZZ - DR - A - 1401	Proposed layouts Typical Ensuite 02	1:50 @ A3	-	Stitch
20221 - STCH - XX - ZZ - DR - A - 1402	Proposed layouts Typical studio	1:50 @ A3	-	Stitch
20221 - STCH - XX - ZZ - DR - A - 1403	Proposed layouts Typical accessible studio	1:50 @ A3		Stitch
Proposed Details				
20221 - STCH - XX - ZZ - DR - A - 1500	Detail elevation study 01	1:50 @ A3	-	Stitch
20221 - STCH - XX - ZZ - DR - A - 1501	Detail elevation study 02	1:50 @ A3	-	Stitch
20221 - STCH - XX - ZZ - DR - A - 1502	Detail elevation study 03	1:50 @ A3	-	Stitch
20221 - STCH - XX - ZZ - DR - A - 1503	Detail elevation study 04	1:50 @ A3	-	Stitch
20221 - STCH - XX - ZZ - DR - A - 1504	Detail elevation study 05	1:50 @ A3	-	Stitch
3D Model				
20221 - STCH - XX - ZZ - M1 - A - 1700	3D Massing Model	N/A	-	Stitch
Landscaping Plans				
TM-502-LA-101	Landscape GA	1:250 @ A3	Rev A	Turkington Martin
TM-502-LA-102	Landscape Terrace	1:250 @ A3	-	Turkington Martin

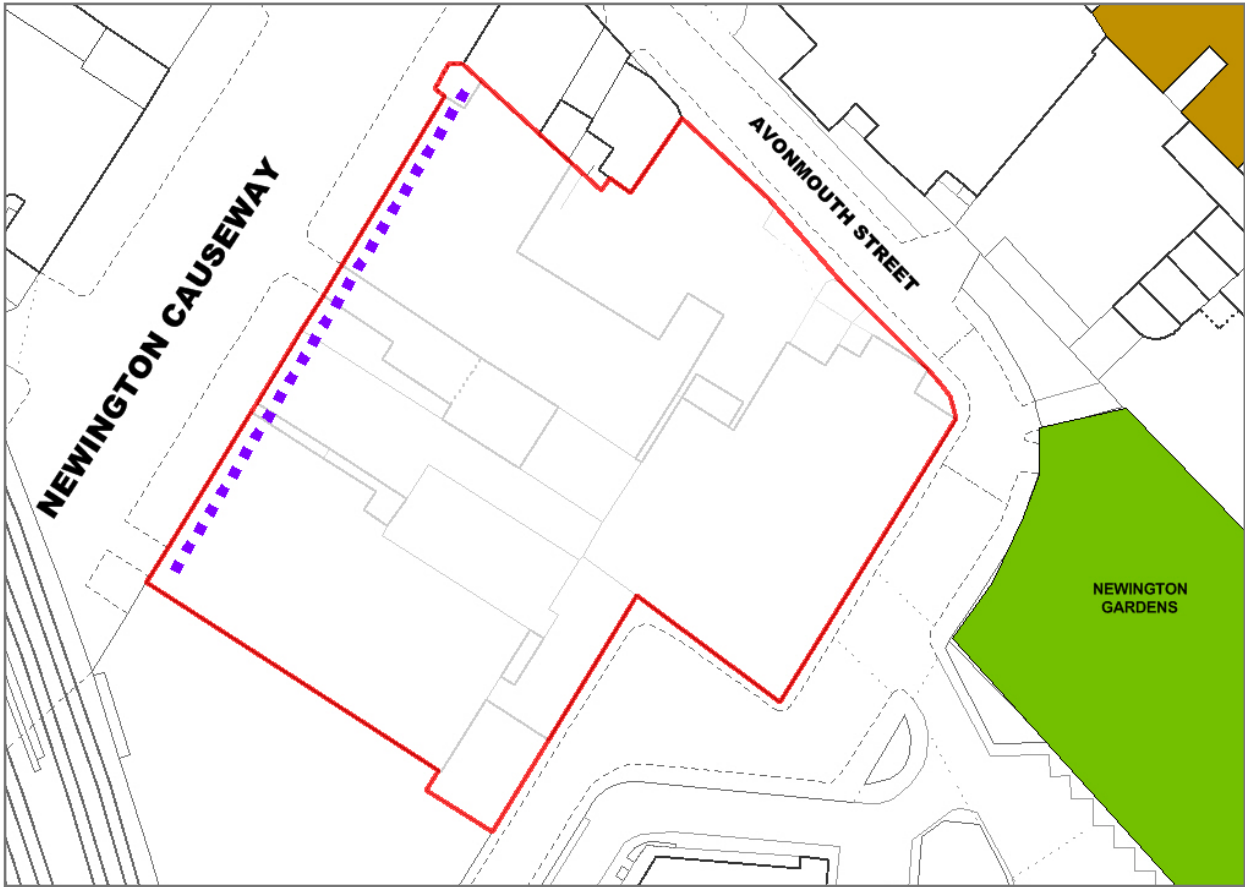
Documents

Title	Author
Planning Application Form and Ownership Certificate B	hgh Consulting
CIL Additional Information Form	hgh Consulting
Design and Access Statement, including: <ul style="list-style-type: none"> - Accessibility Statement - Secure by Design Statement 	Stitch Architects
Accommodation and Area Schedule	Stitch Architects
Landscape Statement (including Urban Greening Factor calculation)	Turkington Martin
Letter of support from the University of London	UoL
Letter from ETC Venues	ETC Venues
Planning Statement	hgh Consulting
Air Quality Assessment	Ardent
Flood Risk Assessment and Drainage Strategy (including SuDs Proforma)	Ardent
Delivery and Servicing Management Plan	Ardent

Car Park Management Plan	Ardent
Outline Construction Logistics Plan	Ardent
Student Management Plan (Transport)	Ardent
Framework Travel Plan	Ardent
Noise and Vibration Assessment	Ardent
Utilities and Services Statement	Ardent
Healthy Streets Transport Assessment	Ardent
Daylight and Sunlight Assessment	Point 2
Overheating Assessment	JAW Sustainability
Circular Economy Statement	JAW Sustainability
Energy Strategy (including Carbon Emissions Reporting Spreadsheet)	JAW Sustainability
Sustainability Statement (including BREEAM Pre-Assessment)	JAW Sustainability
Life Cycle Carbon Assessment	JAW Sustainability
Archaeological Desk-Based Assessment	RPS
Fire Statement	Clarke Banks
Preliminary Ecological Appraisal	The Ecology Partnership
Wind Microclimate Assessment	Urban Microclimate
Statement of Community Involvement	Carvil Ventures
Engagement Summary (Development Consultation Charter)	Carvil Ventures
Ground Investigation and Basement Impact Assessment	Jomas Associates
Student Housing Management Plan	Tribe
Heritage Townscape and Visual Assessment	Citydesigner (AVRs by The Visualiser)
Aboricultural Survey	PJC Consultancy
Arboricultural Impact Assessment, Arboricultural Method Statement and Tree Protection Plan	PJC Consultancy
Plant Assessment	hgh Consulting
Viability Report (Private and Confidential) and Executive Summary (Public)	James R Brown & Co
Southwark Student Housing Demand Study	Knight Frank
Employment Land Report	Union Street Partners



Appendix 2 Draft Site Allocation NSP43: 63 – 85 Newington Causeway, New Southwark Plan



- | | |
|----------------------------------|--|
| Site Boundary | Improved connectivity for pedestrians and cyclists |
| Conservation Area | Open Spaces |
| Grade I Listed Building | Buildings of architectural and historic merit |
| Grade II Listed Building | Buildings of townscape merit |
| Grade II* Listed Building | Locally Significant Industrial Sites |
| Opportunity for Active Frontages | Strategic Protected Industrial Land |
| Cycleways | New Public Open Space |

Site Area	<ul style="list-style-type: none">• 3,784 m²	
Existing uses (GEA)	<ul style="list-style-type: none">• Southwark Playhouse (D2) – 816 m²• Office (B1) – 4,168 m²• Light industrial uses (B1c) – 827 m²• Job Centre (A2) – 546 m²	
Indicative residential capacity	<ul style="list-style-type: none">• 93 homes	
Site	<p>Redevelopment of the site must:</p> <ul style="list-style-type: none">• Provide at least the amount of employment floorspace (B use class) currently on the site or provide at least 50% of the development as employment floorspace, whichever is greater; and• Retain the existing theatre use or provide an alternative cultural use (D2); and• Provide active frontages including ground floor town centre uses (A1, A2, A3, A4, D1, D2) on Newington Causeway. <p>Redevelopment of the site should:</p> <ul style="list-style-type: none">• Provide new homes (C3). <p>Redevelopment of the site may:</p> <ul style="list-style-type: none">• Provide a new community health hub. <p>Planning application 12/AP/2694 is relevant to this site.</p>	
Design and accessibility guidance	<p>Redevelopment should deliver a more complementary and harmonious mix of uses alongside the retained Southwark Playhouse theatre that emphasises its cultural significance, attracts more visitors to the area and creates active frontages on Newington Causeway. Redevelopment should enhance accessibility to public transport, walking and cycle routes.</p> <p>Southwark needs to accommodate significant growth for offices and other workspaces which are growing in demand contributing to the central London economy and status as a world city. Sites that are within the Central Activities Zone are most in demand for delivery of offices and will be required to contribute to this growth by providing an increase in the amount of employment floorspace.</p>	
The site location		
	Approach to tall buildings	Comprehensive mixed-use redevelopment of the site could include taller buildings subject to consideration of impacts on existing character, heritage and townscape.
	Impacts Listed Buildings or undesignated heritage assets	The site is within the setting of Grade II listed building Inner London Sessions Court and the undesignated heritage asset Newington Gardens and undesignated heritage assets on Newington Causeway.
	Impacts a Conservation Area	The site is within the setting of the Trinity Church Square Conservation Area.

Impacts a distinctive Borough View or London View Management Framework View (LVMF)	No
Impacts an Archaeological Priority Area	Tier 1 APA designation. Located in APA1 - North Southwark and Roman Roads. The site has high potential to contain multi-phase archaeological deposits that would require protection.
Impacts a Scheduled Ancient Monument	No
Is in close proximity to the River Thames	No
Is in a Town Centre	Elephant and Castle Major Town Centre
Is in an Opportunity Area	Elephant and Castle Opportunity Area
Is in the Central Activity Zone (CAZ)	Yes
Can provide Low Line walking routes	No
Impacts a designated open space	The site is in close proximity to Newington Gardens (Borough Open Land).

Appendix 3 Figure 14: Tall buildings strategy (view from south) and Figure 15: Tall buildings strategy (view from north), Elephant and Castle SPD and OAPF

SPD 17: Building heights

- > Tall buildings in the opportunity area will help signal its regeneration. In accordance with the strategy shown in Figures 14 and 15. The tallest buildings should act as focal points in views towards the Elephant and Castle along main roads and strengthen gateways into the central area. Moving away from the tallest points, they should diminish in height to manage the transition down to the existing context. They should be used to add interest to London's skyline and when viewed in a cluster, should be articulated to ensure that they do not coalesce to form a single mass.
- > Tall buildings should:
 - Conserve the Outstanding Universal Value (OUV), integrity and authenticity of both the Westminster and Tower of London World Heritage sites and their settings.
 - Have due regard to the London View Management Framework (LVMF), World heritage Management Plans and conservation area appraisals.
 - Conserve or enhance the significance of heritage assets and their settings including listed buildings, locally listed buildings, conservation areas, registered parks and gardens and archaeological remains.
 - Help reinforce way-finding and the legibility of the area.
 - Help reinforce the hierarchy of spaces and streets in the area; the amount of public space provided at ground level will be expected to be proportionate to the height of a building.
 - Help reinforce the character and function of the area; they will be expected to interact with the streetscape providing a generously proportioned active frontages at their base.
 - Achieve visual separation from adjoining development around the base of the building.
 - Demonstrate a considered relationship with other tall buildings and building heights in the immediate context; cumulatively, tall buildings should not coalesce visually to form a single mass.
 - Ensure that buildings which will have a significant impact on the skyline are slender and elegant with regard to the width-to-height ratio; they should be attractive city elements with a strong geometry when viewed from all angles and the tops of buildings should be well articulated and recessive.
 - The skyline and relationships between buildings should help reinforce the character and identity of the area and contribute positively to London's skyline, when viewed locally and in more distant views.
 - Allow adequate sunlight and daylight into streets, public spaces and courtyards.
 - Avoid harmful microclimate and shadowing effects or adverse affects on local amenity.
 - Demonstrate an exemplary standard of design, provide high quality accommodation which significantly exceeds minimum space standards and promote housing choice by providing a mix of unit types.
 - Incorporate communal facilities for residents.

Form of application

- > Outline applications may be acceptable for tall buildings providing that the following information can be supplied:
 - A design strategy which:
 - Specifies parameter plans containing descriptions and plans of:
 - Plot layout.
 - The spaces between plots.
 - Vertical massing (maximum and minimum heights and their distribution).
 - Quantum of floorspace (maximum and minimum).
 - Vehicular, pedestrian and cycle access routes.
 - Circulation routes.
 - Hard and soft public and private open space.
 - Contains 3 dimensional wire-line analysis of the maximum parameters which tests the proposals in appropriate views.
 - A design and access statement which provides illustrative material showing how the maximum parameters might take effect and which describes the relationship of each plot and its proposed development with the surrounding context.

Figure 14: Tall buildings strategy (view from south)

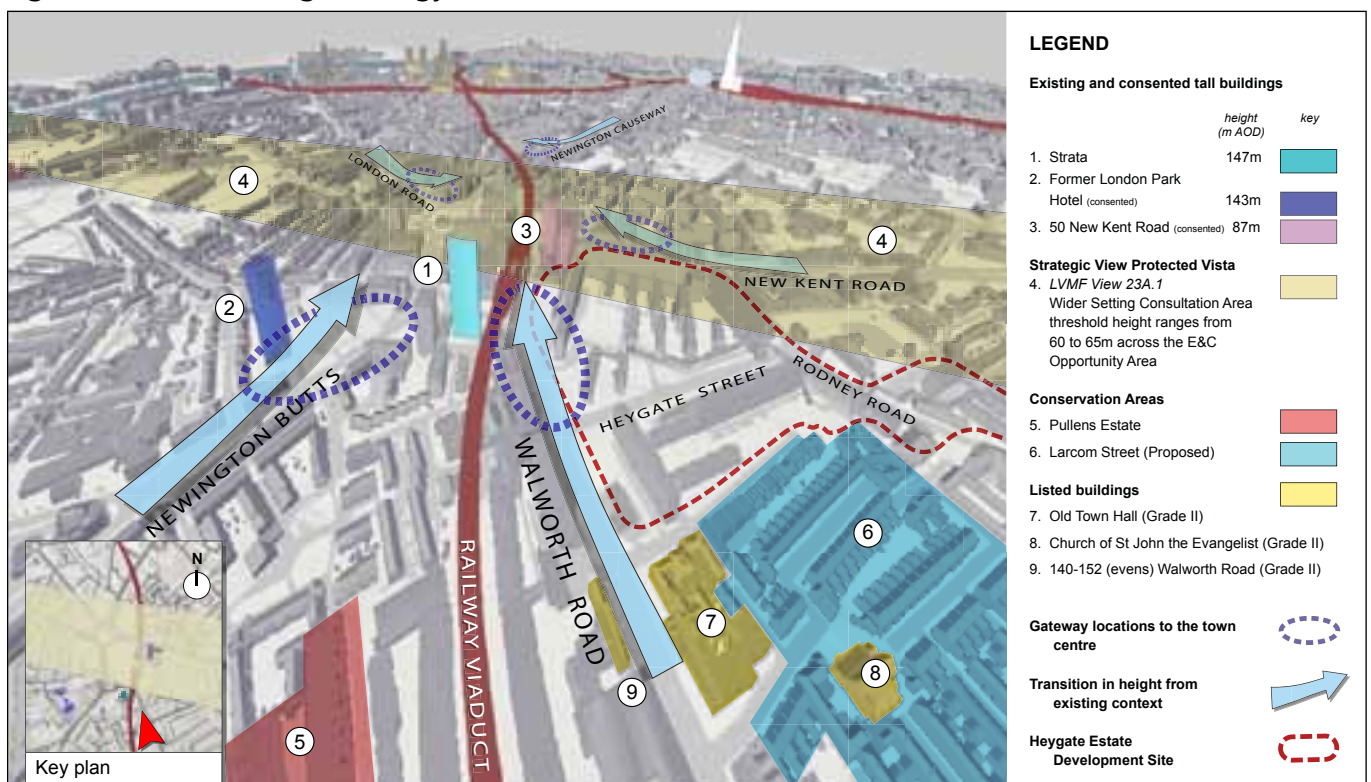
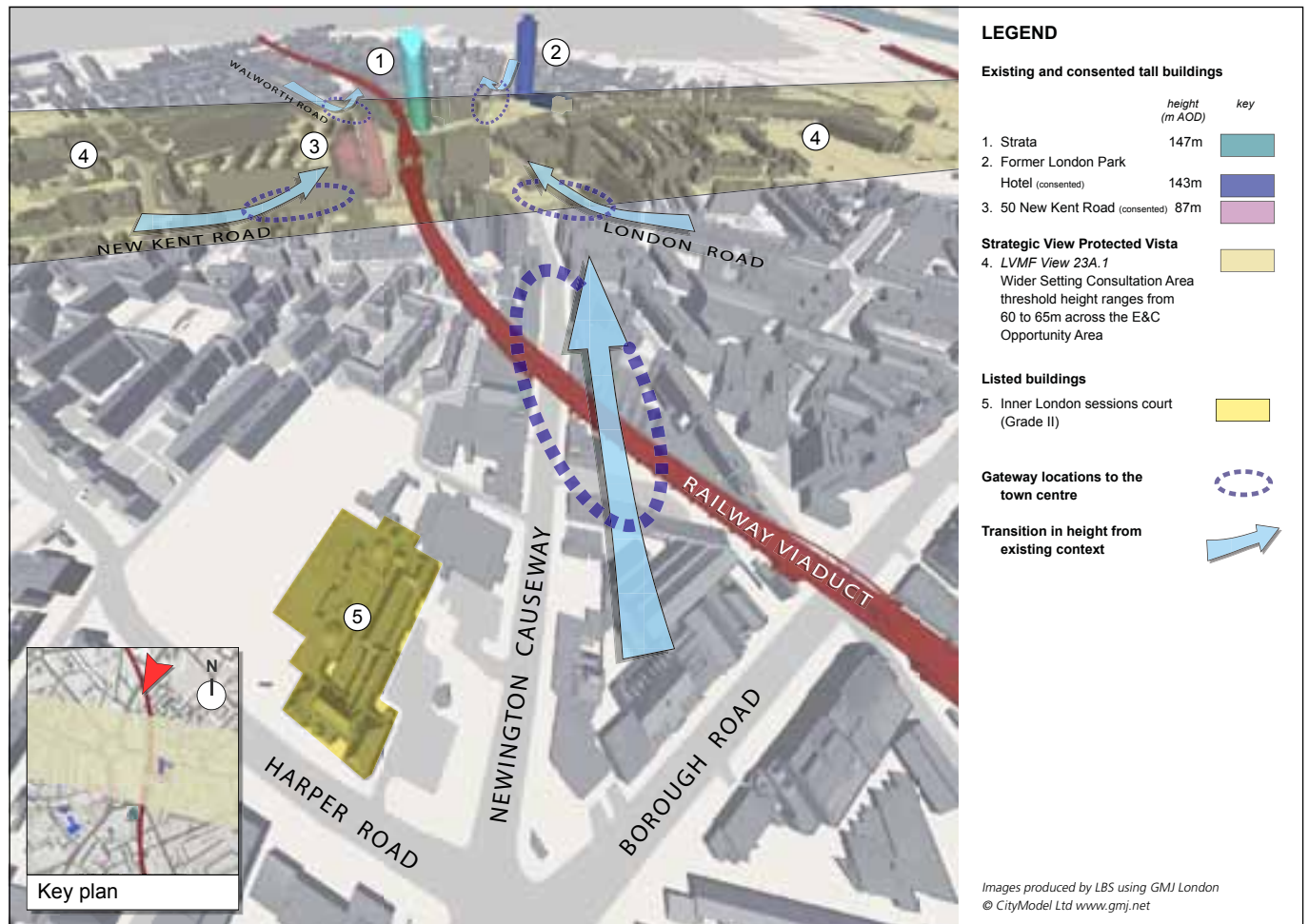


Figure 15: Tall buildings strategy (view from north)



We are doing this because

4.5.15 The London Plan indicates that tall buildings may be appropriate in the Central Activities Zone and opportunity areas. This is also recognised in policy 12 of the Core Strategy which sets out that tall buildings could be accommodated in the Elephant and Castle opportunity area.

4.5.16 To inform the policy, we carried out a characterisation appraisal of the opportunity area. There are a number of tall buildings in the opportunity area. The tallest is Strata at 147m. Others include Draper House (75m), Metro Central Heights (55m), Hannibal House (54m), London College of Communication (51m), the Salvation Army building (43m), Keyworth 2 (37m), the Heygate Estate (35m) and Perronet House (30m). There are locations where additional tall buildings will be appropriate. Planning consent has been granted for buildings of 87m on 50 New Kent Road and 143m on the former London Park Hotel. However, the existing character of parts of the west, south and east of the wider opportunity area comprises low scale residential development, conservation areas or open spaces. These areas cannot accommodate significantly taller development.

- 4.5.17 In order to determine where we would consider tall buildings could be appropriate, sensitive or inappropriate we have also carried out a tall buildings study in accordance with guidance in Planning Policy statement 5 and CABE and English Heritage guidance and tested a number of options, including an option based around maintaining existing heights.
- 4.5.18 Our testing took into account the London View Management Framework 2010 which is a key constraint in the area. In 2009, the Mayor designated a new strategic view of the Palace of Westminster World Heritage Site from the Serpentine Bridge in Historic Registered Hyde Park (see Figure 13). The Elephant and Castle shopping centre is located in the background of this view. We tested the impacts of an option which located the tallest buildings on the shopping centre site. The testing of this option however suggested that tall buildings over 63m high on the shopping centre may detract from the view of the Palace of Westminster from the Serpentine Bridge. Very tall buildings in the opportunity area may also be visible in views of the Palace of Westminster from Parliament Square and proposals will also need to test impacts in that view.
- 4.5.19 Our testing indicated that tall buildings can be used to help reinforce the gateways into the centre and provide a focus in views along main roads. These gateways are shown on Figures 14 and 15. This will mean that the tallest elements of development will generally be in these gateway locations. Tall buildings will need to respond to the surrounding context. In the south of the opportunity area, moving south along Walworth Road the context changes quickly. Development on the Heygate estate, will need to manage the transition from very tall buildings to lower heights around the Old Town Hall and the proposed Larcom Street conservation area.
- 4.5.20 All proposals for tall buildings will need to comply with saved policy 3.20 of the Southwark Plan. SPD17 also sets out more detailed criteria which are consistent with the tests set out in policy 3.20 of the Southwark Plan.
- 4.5.21 Proposals for tall buildings should demonstrate that in accordance with Planning Policy Statement 5 they will conserve or enhance the significance of historic environment and heritage assets and their settings and wider historic environment particularly when located in the immediate context of these assets. Proposals should contribute positively to the skyline and should help reinforce the hierarchy of streets and spaces in the area. The width-to-height ratio of tall buildings which will have a significant impact on the skyline should be above approximately 1-4.
- 4.5.22 The setting of tall buildings is particularly important. Taller buildings should be used to signal more important spaces and the taller the building the greater the amount of activity which should take place around the base of the building. Floor-to-ceiling heights at ground level should be generously proportioned with doors and windows providing active frontages. A real advantage of building high is that it enables more public realm at ground level to be provided. To create an appropriate setting for tall buildings, the amount of public space at the base of the building should relate to its height, ensuring that the space around the base of tall buildings does not appear cramped or unwelcoming. The base of tall buildings should be permeable and they should not appear as extrusions from podiums.

Appendix 4 Figure 40: Indicative proposals for the Enterprise Quarter character area, Elephant and Castle SPD and OAPF

Figure 39: Heritage assets in the Enterprise Quarter character area

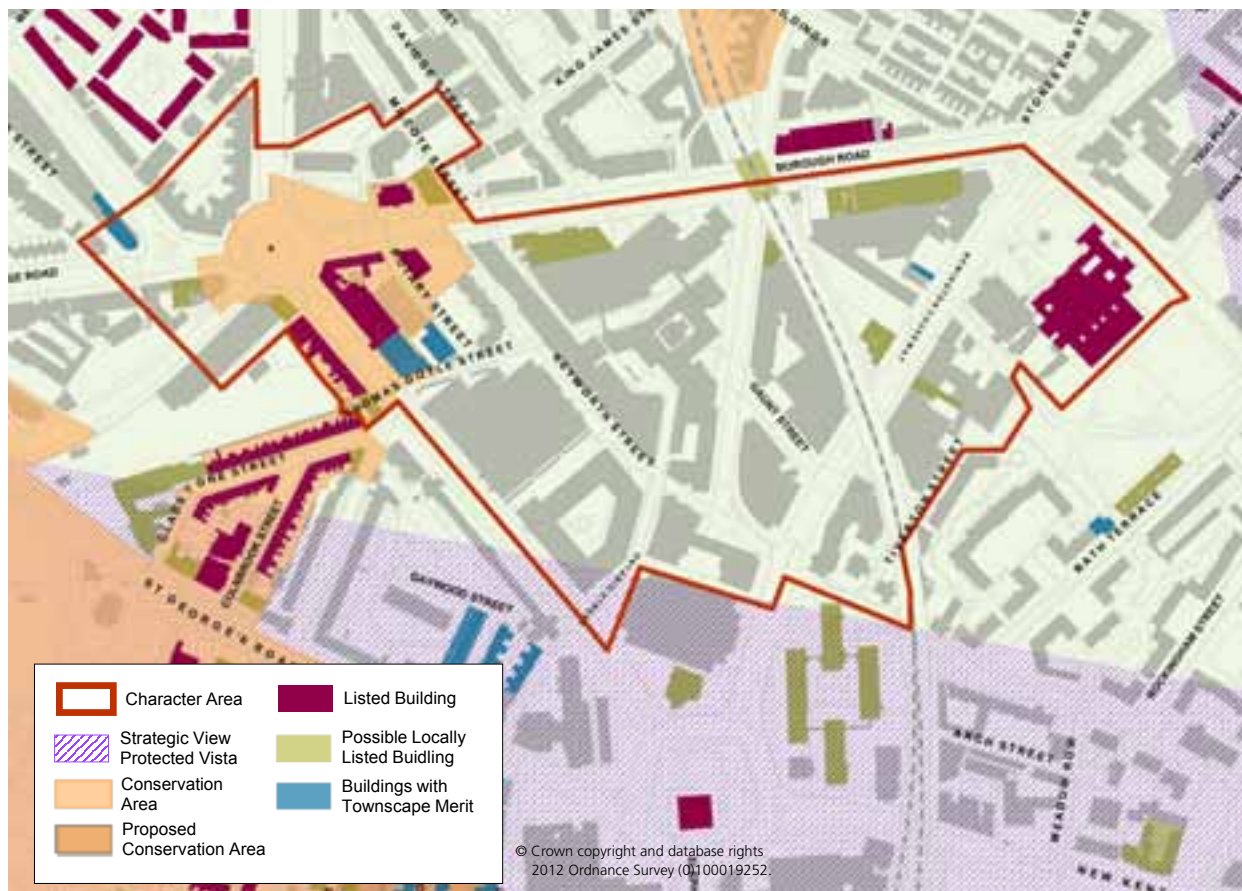


Figure 40: Indicative proposals for the Enterprise Quarter character area

