



Elizabeth Woodall &lt;ewoodall@hghconsulting.com&gt;

**Re: Avonmouth House planning application (21/AP/4297)**

1 message

Elizabeth Woodall &lt;ewoodall@hghconsulting.com&gt;

3 February 2022 at 11:11

To: "Lewis, Yvonne" &lt;Yvonne.Lewis@southwark.gov.uk&gt;

Cc: "Weaver, Thomas" &lt;Thomas.Weaver@southwark.gov.uk&gt;, Roger Hepher &lt;rhepher@hghconsulting.com&gt;

Bcc: Lauren Manoharan &lt;lmanoharan@hghconsulting.com&gt;

Dear Yvonne,

Further to my email below, I attach a letter of support from LSBU which I trust provides further comfort on the applicant's commitment to provide the student accommodation via a nomination rights agreement.

In addition, we are aware that the University's Vice-Chancellor, David Phoenix, has been in touch with the Council Leader, Kieron Williams, to voice his support for the scheme and for the much needed PBSA in this area generally, given the fact that it is only a 5-minute walk from the campus and that there is on average only 1 student bed per 6 students in Southwark.

We would be grateful if you could update us on the status of the independent viability audit.

Regards

Elizabeth

On Thu, 6 Jan 2022 at 12:18, Elizabeth Woodall &lt;ewoodall@hghconsulting.com&gt; wrote:

Dear Yvonne,

As stated below, the applicant has fulfilled the policy requirements and this is exactly the same scenario as both 313-349 Ilderton Road and 671-679 Old Kent Road (KFC) which officers and members accepted. In both cases, the s106 is clear that a nominations agreement must be entered into prior to occupation of the student housing. This scheme is no different.

The basis/evidence for the rent assumptions is set out in section 14.1 of the viability report, but for the avoidance of doubt, the rents assumed for the affordable student units comply with the GLA definitions.

Kind regards

Elizabeth

On Tue, 4 Jan 2022 at 18:20, Lewis, Yvonne &lt;Yvonne.Lewis@southwark.gov.uk&gt; wrote:

Dear Elizabeth

What I want to establish is the degree of certainty attached to the nominations agreement. There appears to be no more than a general letter of interest from University of London, but the submitted viability assessment relies heavily on the assumption that the scheme would be delivered as a nomination scheme for UoL. Where schemes are assessed as nominations, there would normally be some degree of active involvement by the University itself – this was certainly the case for the UAL scheme at Peckham, where the university had been very clear on their requirements for room types and the rents that they could support. In the absence of any information from UoL, it is not clear how the stated rents have been arrived at.

If this scheme were to be reported to our Planning Committee, then to be described as a nominations scheme some reassurance would be required as to the certainty that the identified university would commit, and the s106 would have to be drafted with this as a certain outcome. As submitted, it does not seem that this level of certainty exists.

Where there is doubt, we would have to proceed on a twin track approach which also values the development as a direct let scheme.

As of this is said, of course, without prejudice to our assessment of the application, which as you know is contrary to the site allocation in the soon-to-be-adopted Southwark Plan 2022.

Kind regards

Yvonne

**Yvonne Lewis**

Group Manager, Strategic Applications

Chief Executive's Department | London Borough of Southwark

160 Tooley Street | London SE1 2QH

**(M) 07852 167052**(E): [Yvonne.Lewis@southwark.gov.uk](mailto:Yvonne.Lewis@southwark.gov.uk)

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**From:** Elizabeth Woodall <[ewoodall@hghconsulting.com](mailto:ewoodall@hghconsulting.com)>  
**Sent:** Thursday, December 23, 2021 1:17 PM  
**To:** Lewis, Yvonne <[Yvonne.Lewis@SOUTHWARK.GOV.UK](mailto:Yvonne.Lewis@SOUTHWARK.GOV.UK)>  
**Cc:** Weaver, Thomas <[Thomas.Weaver@southwark.gov.uk](mailto:Thomas.Weaver@southwark.gov.uk)>  
**Subject:** Re: Avonmouth House planning application (21/AP/4297)

Dear Yvonne,

Thanks for your email.

I understand what you're saying but there is no policy requirement (under NSP Policy P5 or London Plan Policy H15) for the nomination agreement to be in place until the point of occupation of the student accommodation. This is the view that has been taken by the Council on other PBSA schemes and indeed is reflected in the wording of the S106 agreement for Tribe's scheme at 313-349 Ilderton Road:

2. **Student Accommodation Nominations Agreement**
- 2.1 Not to Occupy the Student Accommodation until a Student Accommodation Nominations Agreement has been entered into with the University of London or other Higher Education Institution in respect of the Student Accommodation.
- 2.2 Subject to paragraph 2.1 to comply with the terms of the relevant Student Accommodation Nominations Agreement in respect of the letting of the Student Accommodation.

As per the KFC, Ilderton Road, Eagle Wharf, and other recent PBSA schemes, we have provided a letter of support from UoL with the application, which unequivocally supports the proposed development for PBSA, so it is reasonable for the Council to progress the application on the basis that it's going to be a nominations scheme.

I trust this clarifies the position and the applicant's commitment to this being a nominations scheme, but please confirm if you require anything further.

Kind regards,

Elizabeth

Elizabeth Woodall

Associate

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On Wed, 22 Dec 2021 at 15:36, Lewis, Yvonne <[Yvonne.Lewis@southwark.gov.uk](mailto:Yvonne.Lewis@southwark.gov.uk)> wrote:

Dear Elizabeth

I have been reviewing your application with Tom. The documents suggest that it is the applicant's intention to provide the student accommodation via a nomination rights agreement. As such, it would be assessed under clause (3) of Policy P5 of the Southwark Plan 2022, and I understand the proposal is to provide 35% of the proposed student rooms as affordable student rooms in order to comply with this policy.

The submitted planning statement specifies that the accommodation would be provided for the London Southbank University or a University of London member institution. A letter expressing support for the provision of affordable student rooms from the University of London has also been submitted. However, under the current submission there is little indication that a nomination rights agreement has seriously been explored or progressed with potential partners to date. To be accepted as a nominations scheme, all rooms would have to be used exclusively by students of the partner institution, and this would be secured within a s106 agreement.

It is important to be absolutely clear on this point at the outset, because without a firm commitment to the nominations being demonstrated in the application, we will be required to assess the application on the basis of it being a direct-let scheme, including compliance with the requirement for 35% conventional affordable housing (as well as affordable student housing) under clause (2) of Policy P5.

It would be best to understand your position before we start the process of assessing the scheme viability, since the letting type would clearly have an impact on values in the FVA.

I look forward to hearing from you.

Kind regards

Yvonne

**Yvonne Lewis**

Group Manager, Strategic Applications

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**Elizabeth Woodall**

Associate

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