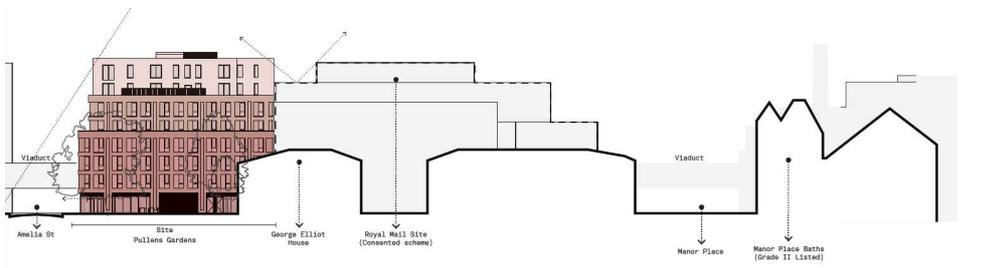


31 Amelia Street (22/AP/0850) – WS Objection

22/AP/0850 | Demolition of existing building on the site and erection of a mixed-use development comprising 726 sq. m. commercial floorspace (Class E) and student accommodation (152 rooms) | 31 Amelia Street London Southwark SE17 3PY

Application Received Date Fri 04 Mar 2022
Application Validated Date Thu 17 Mar 2022
Expiry Date Thu 28 Apr 2022
Determination Deadline Thu 16 Jun 2022



Streetscape view from Pullens Gardens



WS Objection

Reasons for Comment

- Conflict with local plan
- Loss of privacy
- Noise nuisance
- Out of keeping with character of area
- Over development

The Walworth Society objects strongly to this application. In an area where there is a huge need for housing at social rent, a key site is being prioritised to achieve maximum potential return as student housing with an emphasis on studios – the most expensive kind of student accommodation. Notwithstanding the pandemic, consultation for this development has been cursory at best and none of the ideas proposed have been integrated into the development. The development addresses none of the concerns of local people about the impact of noise and behaviour of students on local residents and the local open space - Pullens Gardens. This application should be rejected in favour of housing that meets the needs of local people and the creation of a scheme that has been developed in conjunction with the local community rather than simply being foisted onto it.

The Walworth Society objects on the following specific grounds:

1. The Need for Housing. We believe that the site should be developed as housing with an emphasis on social rented accommodation. The adopted March 2012 Elephant & Castle SPD states at page 97 (5.4.8) that the strategy for the Walworth Road is to “Ensure that there is not an over-concentration of student developments in the north of the character area”. At SPD 33 Land Uses, it is stated that “Student housing development at the northern end of the character area (north of Amelia Street) will not be supported”.

The reason for this is explained further at 5.4.10 with the statement that “Because of the concentration of student developments, further student developments, which take the number of bedspaces beyond 700, in the character area north of Amelia Street will not be supported”. It is further stated that “Our objective is to ensure that there is a choice of housing types to create mixed and balanced communities”.

The site sits within the Rail Corridor (5.5 page 102) and 31 Amelia Street is identified as one of the potential opportunity sites in it. It is stated that inter alia, development can:

- a) the potential to knit together the often-fragmented townscape to give the area a more consistent character.
- b) there are opportunities to help green streets through additional tree planting and other measures to help link existing open spaces.

Already in the immediate vicinity there are three developments of student housing totalling 687 bedspaces. These are the Highline Building, 10 Steedman St SE17 3AF (221 beds), Julian Markham House Walworth Road SE17 1JL (234 beds) and Dashwood Studios Walworth Road SE17 1JL (232 beds). Southwark’s Strategic Housing Market Assessment highlights an acute need for more family and affordable housing in the borough. Local residents and the Pullens TRA were given assurances at planning committee that following the granting of planning for these three developments in and around the time of the adoption of the E&C SPD, they were given assurances that no further student housing schemes would be granted; hence the statements concerning further development of student housing in the Rail Corridor Character Area in the adopted E&C SPD.

In the light of the above, we are, therefore, shocked and surprised that student accommodation is being considered and that the planning statement can assert (page 10) that in the first pre-app meeting with

officers (January 2021) “The principle of development in terms of land use is considered acceptable. Student accommodation is appropriate and is a supported use in this location.”

We assert that this support is mistaken and that student accommodation on this site is not appropriate as not being in conformity with the E&C SPD and that this application should be rejected.

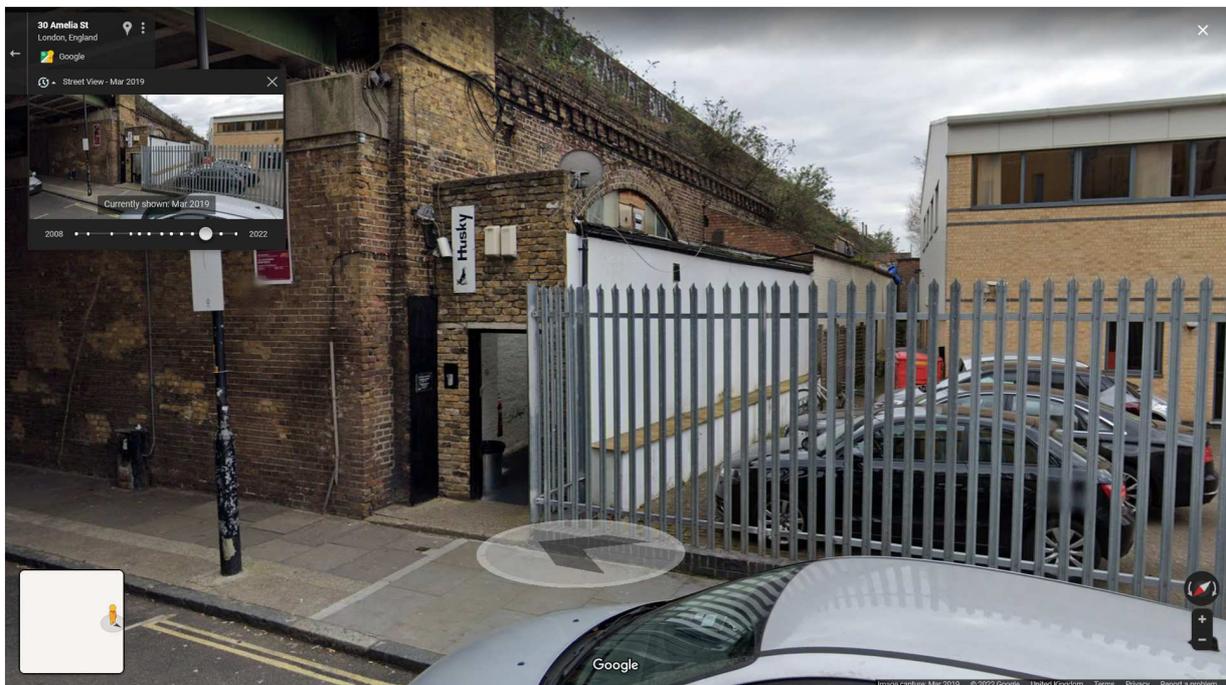
2. Harm to the Pullens Estate Conservation Area. We believe that owing to its massing, height and poor-quality design, the development harms the character of the Pullens Estate Conservation Area which the planning statement concedes that the site forms the setting for its edge. This harm relates to both the impact on the Pullens Gardens which lies within the Conservation Area and the residences on the north wide of Amelia Street. The harm to the park stems from the sense of overbearing of the 26 metres high building. This will impact negatively on the community growing bed located on the corner of Crampton St and Amelia St. The development will block off morning light as it sits to the south-east of the park. There will also be a significant impact of noise from the use of the student communal roof terrace. There will be further impact on local residents as many of the Pullens Estate flats have been reconfigured so that the bedrooms on Amelia St overlook the park as do the houses on Thrush St.

The top two storeys above the brick clad floors will be clearly seen from Pullens Gardens – the attempt to step back is completely negated because the long view along the park will meet with the poor-quality metal cladding which will be clearly visible thus further harming the character and appearance of the Conservation Area.

3. Poor quality public realm design. Policy P51 of the Southwark Plan 2022 states that development must “Ensure routes and access are safe and designed to be inclusive and meet the needs of all pedestrians, with particular emphasis on disabled people and the mobility impaired.” The majority of the people on the Pullens Estate do not have cars and move around on foot. Recent changes to the streets have increased safety through the removal of through traffic and improved safety for pedestrians. As the developer openly acknowledges, this development maximises its use of the plot and, as a result, fails to contribute to the needs of pedestrians in what is a key location. Amelia St, from Crampton St to the Walworth Road, is a key pedestrian access route for residents of the Pullens Estate and residents of the Alberta Estate and Berryfield Road. The impact of the new building constructed right up to the edge of the site is to create a dark and overshadowed canyon making this route potentially windy and always overshadowed. The development does nothing to ameliorate this for example by creating wider pavements, planting and allowing sunlight. Local residents have been campaigning since 2008 around all aspects of the design of the frontages on Amelia St to ensure that it is not perceived as a service road by motor vehicle users. The current design fails to take the needs of people on foot into account by improving the conditions for them.

These proposals have a further negative impact on the quality of and safety of the public realm as it creates potentially blank frontages via its ground floor commercial. There are real concerns about unlet commercial units in the long term and commercial units that create blank windows to protect their privacy.

4. The Low Line. The Southwark Plan 2022 states that development in Walworth should “Contribute towards the development of the Low Line, a new public realm corridor adjacent to historic railway arches, with lively accessible spaces for creativity, new jobs and retail”. Policy 51 Walking and 52 Low Line Routes state that development must enhance the strategic networks such as the Low Line and “support its implementation”. The policy is associated with “creating new attractive routes alongside rail arches and viaducts and their associated spaces and streets to improve accessibility and the quality of experience for walking”. The Low Line aims to create high-quality walking route along the railway viaducts that pass through Southwark. All developments that sit on the viaducts should enable walking routes and the enabling of the Low Line is protected as infrastructure by policy in the Southwark Plan 2022. Provision for the Low Line route has been made in the consented scheme for the Sorting Office immediately to the south. We assert that the Low Line route planned for this site is of low quality and not at all in line with the quality of the aspirations that Southwark has for a high-quality walking route. The application states that the building is also set back approximately 1.8m from the rear boundary which is providing for a minimal quality of route. No thought has been given to opportunities for planting and greening and the quality of the intersection with the consented Sorting Office scheme when that comes forward for redevelopment. We object at page 63 of the Design & Access Statement to the quality of the Low Line provision which appears to require the demolition of the much-valued Husky Studios (which provides facilities and space for local young people who are interested in dance and music and which is a unique facility in the area) for anything close to an appropriate width of Low Line to be created. There is no consideration given as to the means that the demolition of a property that is not in the control of the application will occur. No designs apart from these most cursory drawings are provided to indicate how a quality route will be developed. This is a low quality and minimum provision leading to an unusable and unsafe access for what has been emerging in recent years as a key piece of 21st Century active travel infrastructure in the borough.



Google Streetview of the Husky Studios

Overall, we assert that no significant consideration has been given to the design of the Low Line section which is meant to be accessible, usable and safe. Examples of this can be seen in Spare St where the student accommodation was designed in conjunction with the creation of the public realm. In this case on Amelia St the fears is that there will be an array of blank frontages and a gated poor quality Low Line. This development is a clear move backwards at a time when the significance of the Low Line has just been confirmed in the adopted Southwark Plan 2022.



Very narrow proposals for the Low Line part of the development. What evidence is there that the existing buildings are going to be demolished?

5. Affordable student accommodation. There is a concern in the proposed mix of rooms (38 cluster/114 studios) that the developer is not meeting the needs for affordable student accommodation. This was highlighted as an issue in the first pre-app response “The applicant should consider communal facilities for student rooms over self-contained studio units”, remained an issue at the second pre-app and in the third pre-app meeting as well “The applicant should provide a higher proportion of cluster beds to ensure social interaction and it is advised to provide communal amenity space on every floor”. The application scheme proposes 38 cluster bedrooms (25%) and 114 studio rooms (75%). Two untypical student housing schemes are cited to justify this very heavily studio-weighted approach – Capital House 42-46 Weston Street SE1 (85% studios) and 11-13 Spa Road London SE16 (100%). There are specific policies in the New Southwark Plan relating to the development of student accommodation and its affordability (NSP Policy - P5 Student homes) but studios attract a significant premium over cluster flat bedrooms. The Need assessment associated with the application from Cushman & Wakefield states that in the Borough of Southwark the average weekly en-suite bedroom rent was £267.95 in 2021/22 while studios were priced at an average of £427.70 per week. This heavy skew towards studios against the consistent advice of Southwark officers through the pre-app process is seeking to gain a significant income advantage as studios are priced at 60% above the level of ensuite rooms in cluster flats. We believe that the developer is attempting to maximise income from students rather than fairly meet the needs of and provide a service for those who are less well off.

6. Design of the Accommodation. We object to the quality of the student bedrooms which are designed as long thin spaces with only one window. The corridors leading to them will be dark with minimal natural light. The principal communal space on each floor overlooks a dark and small light well with no long views or sunlight; this exacerbates the cell-like qualities of the sequence of spaces that the students can use. If there is noise being made in any one of those rooms, owing to the sound transfer, noise will reverberate up and down the lightwell. The only space in the whole development with natural light with views over the park and fresh air is the communal roof terrace. This will inevitably drive up the usage of

the roof terrace and the sound will be easily heard in Pullens Gardens and in surrounding residences on Amelia Street and Crampton Street.

There is a harmful impact on the Pullens Estate and the Pullens Estate Conservation Area owing to the design of the development. This relates to the mass of the building, its height and its sense of overbearing. This will impact negatively an historic quarter of this part of Walworth and, it should be noted, that the Pullens Estate is currently under consideration for listing by Historic England as part of the Walworth Heritage Action Zone project. Overall, we have been expecting a much more sophisticated response in terms of massing and design in response to the Pullens Estate and Pullens Gardens.

7. Greening. The E&C SPD requires that “there are opportunities to help green streets through additional tree planting and other measures to help link existing open spaces”. We note at page 69 (4.7 Landscaping) that all of the greening benefits from the site will only be visible to residents as they are being made on the roof. No greening is occurring at ground level as the developer admits that “The proposed building largely fills the site at ground floor level.” Once again there is no gain to the local area from the development and the requirements of the SPD are not being met.

8. Consultation. We dispute the assertion in the Planning Statement (page 5) that The Applicant has “engaged with residents” and that the “project team have worked hard to respond positively to the feedback received”. The Walworth Society stated its concerns to the developer that “far too little time was being given for local people to respond” to their consultation (by 22nd December 2021) given that local people had not become aware of the consultation until the previous week. Although a virtual public meeting was held in early January 2022 and, following that, detailed feedback was supplied to the applicants by the society, there was no subsequent conversation about how those comments were being incorporated into the designs and no subsequent dialogue has occurred with the applicants.

9. Sustainability. Of concern is the lifespan of the existing building and the fact that it is being considered for redevelopment with a lifespan of less than 20 years. It is simply not the case that this is a 1980s’ building as the developer has asserted in their consultation materials. In the time of the climate emergency and Southwark’s net-zero carbons targets for 2030, it is concerning that demolition of such a new building is proposed. It should be noted that a ground source heat pump project is being piloted on the Newington Estate immediately to the north. Evidence of high levels of renewables are demanded from this development. We do not believe that the achievement of a 62.8% on site carbon reduction beyond a Building Regulations Part L (2013) is compatible with Southwark Council’s net zero targets and that greater demands should be made of the developer to achieve the net zero standards that Southwark now demands.