### PURPOSE

1. To consider the above application. This application requires Committee consideration due to the number of objections received and because the introduction of residential uses within a defined employment area represents a departure from the Council's adopted Unitary Development Plan [July 1995].

### RECOMMENDATION

2. To grant planning permission subject to a Section 106 legal agreement to secure the affordable housing contribution and a financial contribution of £375,000 towards environmental, transport and training projects in the vicinity of the site.

3. That the Interim Development and Building Control Manager be authorised to issue planning permission should the Secretary of State decide not to call the application in for his own determination as it is a departure from the adopted UDP.

### BACKGROUND

4. The application site comprises an industrial estate located to the south of the Elephant and Castle. The site is two thirds of a hectare and occupied by four large single storey industrial sheds. The Council's records suggest that the site has been in use as an industrial estate since the 1970s. The majority of units within the industrial estate are still in use.

5. The application site occupies a large island bounded by Crampton Street to the west, Amelia Street to the south and The Railway Viaduct to the east. The site sits adjacent to the eastern boundary of the proposed Pullens Estate Conservation Area. The proposed designation has been adopted for the purposes of public consultation and will go to Full Planning Committee in
February 2005.

6. The area is characterised by a mix of light industrial units (existing site), 4 storey Victorian tenement buildings to the south (Pullens Estate), low to medium rise housing blocks to the north and the railway viaduct and small businesses (in Robert Dashwood Way) to the east.

7. Planning permission was granted in November 2003 (and subsequently amended in December 2004) for the redevelopment of the former HMSO print works located to the north east of the current site comprising the erection of a part 5 to part 10 storey building comprising of 10 live work units, 3 business units and 88 flats fronting onto Robert Dashwood Way and a 7 storey building comprising of 25 flats facing onto Steedman Street with 73 basement car parking spaces for both blocks. This building is currently under construction.

8. Planning permission is being sought for the redevelopment of the existing industrial sheds to provide two five storey buildings fronting Crampton Street and a part 7, part 8 and part 9 storey building along the rear of the site adjacent to the railway line to comprise 17 live and work units, 178 new flats (comprising 42 social and 136 private flats), 5 work units, a semi-basement car park with 83 parking spaces and the retention of the existing industrial shed (units 19-24) at the western end of the site. Vehicular access to the semi-basement car park will be via Amelia Street.

**FACTORS FOR CONSIDERATION**

**Main Issues**

9. The main issues in this case are:
   - the introduction of the residential use in a designated employment area;
   - the relocation of the existing businesses;
   - the impact on neighbouring properties;
   - the scale, bulk and massing of the buildings and impact on the townscape and Pullens Estate draft conservation area;
   - the standard of accommodation proposed;
   - car parking; and
   - the Planning Gain to enable the adverse impacts of the development to be offset.

**Planning Policy**

10. **Southwark Unitary Development Plan 1995 [UDP]:**
    The site is located within a designated Employment Area and partially within Area of Community Need.
    **R.2.2 Planning Agreements** - complies; appropriate contributions have been secured to offset any adverse impacts of the development.
    **E.2.2 Heights of Buildings** - considered to comply as the scale of the development is considered to be appropriate.
    **E.2.4 Access and Facilities for People with Disabilities** - complies as the scheme will provide 4no. disabled parking spaces and a lift.
    **E.2.3 Aesthetic Control** - considered to comply with policy in terms of design
appearance and impact upon the streetscape.

E.3.1 Protection of Amenity - complies as the proposal will not result in the unacceptable loss of residential amenity of surrounding occupiers.

B.1.1 Protection of Employment Areas and Sites - Fails to comply as the proposal will comprise uses outside the B Use Class.

H.1.4 Affordable Housing - complies, the proposal will deliver a proportion of affordable housing units.

H.1.7 Density of New Residential Development - does not comply as the development exceeds adopted density range.

H.1.5 Mix of New Dwellings - complies as the majority of the units are more than one bedroom.

H.1.8 Standards for New Housing - partially complies with this policy through the SPG for Standards Controls and Guidelines for Residential Development however there is not an adequate provision of amenity space.

T.1.3 Design of Development and Conformity with Council Standards - the parking provision does not fully accord with the adopted 110% parking standard.


The site also falls within the Elephant and Castle Opportunity Area and a Transport Development Area.

Proposals Site 43P [Elephant & Castle Core Area] - complies with aims of policy which seek to provide a mix of residential and B1 office space including accommodation for small businesses.

Policy 8.2 Elephant and Castle (including Walworth Road) Opportunity Area - complies with the policy by providing a balanced and integrated mix of residential accommodation.

Policy 5.2 Planning Obligations - complies; appropriate contributions have been secured to offset any adverse impacts of the development.

Policy 3.2 Protection of Amenity - complies as the proposal will not result in the unacceptable loss of residential amenity of surrounding occupiers.

Policy 3.10 Efficient Use of Land - complies, the proposal represents an appropriate development of the site.

Policy 3.11 Quality in Design - considered to comply with policy in terms of design appearance and impact upon the streetscape.

Policy 3.13 Urban Design - considered to comply the buildings and open space will have an acceptable relationship with the existing townscape.

Policy 3.14 Designing Out Crime - complies with the policy

Policy 4.1 Housing Density - complies; the density is 1106 habitable rooms per hectare which marginally exceeds the density range of 650-1100hrh for sites within the Central Activities Zone.

Policy 4.2 Quality of Residential Accommodation - complies with the policy and with the draft SPG on Residential Design Standards.

Policy 4.3 Mix of Dwellings - complies as the majority of the units have two or more bedrooms.

Policy 4.4 Affordable Housing - complies with interim policy (pre-April 2004) which requires 25% affordable housing provision.

Policy 4.5 Wheelchair Affordable Housing - complies, all units meet lifetime homes standard.

Policy 5.3 Walking and Cycling - 65% cycle storage provision does not comply with draft standard of 100%.

Policy 5.6 Car Parking - complies with policy as the provision does not exceed
the maximum level stipulated.
 Policy 5.7 Parking Standards for the Mobility Impaired - Complies there is an adequate provision of parking provided.

Supplementary Planning Guidance: Elephant and Castle - complies with the aims of the guidance to deliver one or more of a range of uses including those within the D Use Class, residential dwellings of a mixed tenure, offices, leisure and retail uses.

12 Other Material Considerations

London Plan
 Policy 2A.2 Opportunity Areas - complies with the aims of this policy to maximise the redevelopment of brownfield sites with potential for significant increases in density.
 Policy 3A.1 Increasing London’s Supply of Housing - complies with the aims of this policy by maximising the land available.
 Policy 3A.4 Housing Choice - complies as the proposal will deliver a mix of unit types.
 Policy 4B.3 Maximising the Potential of Sites - complies with density range.

Planning Policy Guidance
 PPG 3 [Housing] - complies with the overall aims of the guidance to provide high quality mixed use developments which are located close to services and facilities and well served by public transport.
 PPG13 Transport: complies as the development does not provide 100% car parking and aims to promote walking and cycling as alternative means of transport.

Consultations


14. Consultees:
Units 1-24 (consec), Newington Industrial Estate, 87 Crampton Street, SE17 3AZ; 44 - 188 (evens) and 186a Crampton Street, London, SE17; 1-96 (consec) and 1b, illie Street, London, SE17; 52-226 (evens) Amelia Street, SE17; Reed and Partnership, 31 Amelia Street, SE17 29a Amelia Street, SE17; Building 1-9, Amelia St, SE17; Railway Arches, Amelia Street, SE17; Euro Traveller Hotel, 18a Amelia Street, SE17 2-16 (odds) Amelia Street, SE17 3PY; Flats 1-12 (consec) George Elliot House, Thrush Street, SE17 3AQ; 1 - 12 (consec) Lynford French House, Thrush Street, SE17 3AQ; 1 - 15 (consec) Thrush Street, SE17 3AQ 1-48 (consec) Pullens Buildings, Peacock Street, SE17 3LF; Flats 1-32, Hughes House, Canterbury Place, SE17 3AH; 26-74 (evens) Canterbury Place, SE17 3AG; Crampton Primary School, Peacock Street, SE17 3LE The Tankard Pub, 178 Walworth Road, SE17; 38-72 (evens) Marlborough Close, SE17 3AP; 37-77 (odds) Marlborough Close, SE17 3AW Police Station, 12 -28 Manor Place, SE17; Sorting Office Manor Place, SE17 Property Manager, Southwark Education and Life Long Learning, John Smith House, 144-152 Walworth Road, SE17; 140-142 Walworth Road, SE17 1JW Kwick Fit, 120-138 Walworth Road, SE17; Walworth Road Service Station, 98-138 Walworth Road, SE17 1JL; 1, 2, 3, 3A, 4, 4A, 5, 5A, 6, 6A, 7, 8, 9, 10, 11, 12, 13, 14, 14A, 15, 15A, 16, 17, 17A, 18, 19, 19A, 20, 21, 21A, 22, 22A, 23
Iliffe Yard, SE17; 1, 2, 2A, 3, 3A, 4, 4A, 5, 5A, 6, 6A, 7, 7A, 8, 8A, 9, 9A, 10, 10A, 11, 11A, 12, 12A Peacock Yard, Iliffe Street, SE17.
Railway arches along Robert Dashwood Way, SE17 3PZ:
M.B Auto Check, Railway Arch 155; Mot Centre, Railway Arch 156; Chris Auto's, Railway Arch 158; H.I.L Services Ltd, Railway Arch 164; Graham Martin Screenprint, Railway Arch 167, Castle Cab Co., Railway Arch 168 Chubby's Grill, Railway Arch 170; T. Clarke PLC, Railway Arch 174; Premiere Chauffeur Drive, Railway Arch 175; Premiere Valet Services, Railway Arch 176; Cachila Garage, Railway Arch 177 and Railway Arches 157, 159, 160, 161, 162, 163, 165, 166, 169, 171, 172 & 173, 177a.

Traffic Group; Public Protection; Conservation and Design; Housing; Secure by Design; Government Office for London; Network Rail; LBS Arboriculturalist.

Replies from:

15. Responses to the scheme as originally submitted:

Linda Bailey, Chair of Pullens Residents Association and occupant of 41 Iliffe Street: The proposal will result in a loss of privacy, is excessively high, put pressure on-street parking and is of a poor quality design. The scheme will also result in a loss of local jobs.

Unit 4, Newington Industrial Estate: The proposal will result in the loss of jobs in the area.

Unit 5 Newington Industrial Estate: The proposal is too high and will result in a loss of light. The proposal should fall within the scope of the Elephant and Castle Regeneration.

Units 9, 10, 11 Newington Industrial Estate: Concerns about relocation.

Units 20 and 23 Newington Industrial Estate: The proposal will jeopardise highway safety and block access. The retention of building 5 does not make the best use of the site and could prejudice the employment activity on the site.

108 Crampton Street: The proposal will result in an unacceptable loss of light, privacy, increase in traffic, parking problems and over-stretch local services. Additionally the scheme does not respect the streetscape.

166 Robert Dashwood Way: The proposal will result in traffic problems that will impede the flow of business related traffic. The loss of businesses is also unacceptable.

44 Crampton Street: Loss of light and parking problems will be generated.

48 Crampton Street: The proposal will exacerbate overcrowding of area.

84 Crampton Street: The proposal will exacerbate the existing parking problems and loss of light.

100 Crampton Street: The proposal will result in noise pollution, a loss of privacy, loss of light, it is a poor design and will place an unacceptable strain on local amenity. The proposal will raise security problems and repeat 1960's "planning disasters".

112 Crampton Street: The proposal will result in an unacceptable loss of light. The living room will be overlooked resulting in a loss of privacy. The proposal will result in an increase of noise and pollution.

122 Crampton Street: The proposal will result in an unacceptable loss of light.

124 Crampton Street: Pressure on medical services, loss of light and privacy, pressure on local services, increase in traffic.

126 Crampton Street: The proposal will result in a loss of light, loss of privacy
exacerbate on-street parking problems and over stretch local amenities. The design is ugly and the proposal should deliver affordable housing.

134 Crampton Street: Increase noise and pollution and highlights the lack of space in the vicinity.

146 Crampton Street: Objects; loss of light, privacy, traffic problems, exacerbate rubbish collection problems pressure on local services and poor design.

154 Crampton Street: Loss of light, privacy traffic problems and pressure on local services.

160 Crampton Street: Concerns pertaining to the height, potential loss of light and overlooking and the pressure put on the parking amenity in the area.

162 Crampton Street: The proposal will result in an unacceptable loss of light, damage to street trees, loss of privacy and will not respect the Conservation Area status of the Pullens Estate.

164 Crampton Street: The proposal will result in a loss of light, excessively oppressive, loss of privacy, result in an over-supply of housing, over-stretch local services and generate excessive rubbish.

168 Crampton Street: The proposal will result in a loss of sunlight, the development should not exceed the height of the existing units.

182 Crampton Street: The proposal will result in a loss of light, its too high, will result in a significant increase in traffic, parking problems, privacy, rubbish and traffic.

10 Peacock Yard: The building is excessively high resulting in a loss of light, privacy, increase noise and traffic.

32 Peacock Street: The height will result in a loss of light and reflect the noise from the railway, pressure will be put on the parking amenity in the area.

34 Peacock Street: The proposal will result in a loss of light and should not exceed the height of the Pullens Street buildings.

33 Iliffe Street: The density is already excessive as is the light provision this scheme will worsen the situation, increase traffic and make the area more dangerous.

37 Iliffe Street: Result in a loss of light, outlook and will exacerbate the traffic situation.

61 Iliffe Street: Excessive pressure on local services and parking. The proposal is also excessively high.

71 Iliffe Street: The proposal will result in an excessively high building.

75 Iliffe Street: The proposal is excessively high resulting in too high density and a loss of light.

88 Iliffe Street: The proposal will result in noise and pollution. It will reduce the amount of light enjoyed by residents in Crampton Street.

91 Iliffe Street: The proposal will result in a loss of privacy and light, increase in noise, parking and traffic. The scheme is of a poor design and does not relate to its surroundings.

96 Iliffe Street: The proposal will result in an unacceptable over-shadowing of the Pullens Buildings which is a Conservation Area. The increase in traffic will make the area unsafe and more polluted.

Councillor Eckersley: The scheme does not provide the required uses, the density is excessive, off-street parking is inadequate particularly as no assessment of likely car ownership has been submitted. The proximity of residential units to the railway will result in a loss of amenity.

108 Amelia Street: The parking amenity is inadequate, the design is poor and
too high.

156 Amelia Street: Loss of street trees, loss of light to the dwellings in Crampton Street. The proposal will put pressure on local amenities. The development should be at a more human scale.

194 Amelia Street: The proposal represents an unacceptable design, impact upon the street scene, increase parking and traffic problems, result in unsuitable accommodation, be overly dense, makes no provision for sustainability or adequate amenity space. The live/work units will result in excessive noise and the scheme will put excessive pressure on local amenities.

206 Amelia Street: Over-development of the site.

224 Amelia Street: The proposal is too tall and will over-dominate the Pullens Estate. The proposal will put undue pressure on the parking amenity of the area.

42 Pullens Buildings: Will result in loss of privacy, light, excessive in height, ugly and will exacerbate parking problems.

43 Pullens Buildings: The proposal is a poor design, has a poor relationship with surrounding buildings, it is excessive in height and will result in an unacceptable loss of light. The proposal will exacerbate existing parking and traffic problems.

46 Marlborough Close: The proposal will result in a loss of light, parking problems, an increase in noise and rubbish levels and cause a feeling of claustrophobia.

52 Marlborough Close: Concerns regarding noise and traffic.

58 Marlborough Close: The proposal will result in excessive rubbish generation, loss of light and noise and disturbance from building works.

60 Marlborough Close: The proposal will make the area overcrowded therefore more noise, dirt and parking.

66 Marlborough Close: Generate noise, excessive height.

7 Manton Road, Enfield: The proposal will result in a loss of business space, will any relocation assistance be given?

26 Carlton Road, Sidcup: The site is a poor housing location because it is noisy and cramped.

6 Buttermere Close: The proposal will result in excessive noise.

Letters of support from 46, 48 Marlborough Close, 66 Crampton Street, Flat 2, George Elliot House, Thrush Street

Responses to the revised scheme December 2004

Linda Bailey, Chair of Pullens Residents Association and occupant of 41 Iliffe Street

The proposal will result in a loss of privacy, is excessively high, put pressure on-street parking and is of a poor quality design. The scheme will also result in a loss of local jobs. The scheme does not provide adequate assessment as to the impact it will have upon the Elephant and Castle and there will be an intolerable pressure on local services.

Capita Symonds - comments that the submitted plans will make it difficult for goods vehicles attempting to make various manoeuvres around the proposed development for the retained units including entry into the site from Crampton Street, entry into Crampton Way, queries the available headroom and the lack of column protection against vehicle strikes.
Units 4, 7 and 12 Newington Industrial Estate: The prolonged handling of the application could jeopardise the resigning of tenancies at the above units.

Units 20 and 23 Newington Industrial Estate: As before.

108 Amelia Street: There is an inadequate level of parking amenity this scheme will exacerbate it. The proposal is a poor design and colour. The proposal is excessive in size.

174 Amelia Street: The development is excessive causing overshadowing and excessive strain on local services particularly parking and traffic.

108 Crampton Street: The proposal will result in an unacceptable loss of light, privacy, increase in traffic, parking problems and over-stretch local services. Additionally the scheme does not respect the streetscape.

112 Crampton Street: The proposal will result in an unacceptable loss of privacy, noise generation and loss of light which will be intolerable.

154 Crampton Street: The proposal will result in a loss of light which the revised scheme has not taken account of.

164 Crampton Street: The proposal will still cause significant parking problems.

166 Crampton Street: The proposal will result in a loss of light, over-crowding, lack of education places, privacy and increase traffic.

27 Iliffe Street: Support of the proposal.

91 Iliffe Street: The proposal will result in an unacceptable loss of privacy and light, it will also result in noise, traffic generation, parking problems and is of a poor design.

31 Merrow Street: The loss of businesses is intolerable particularly as the site is not suitable for housing because of the railway line.

32 Peacock Street: The proposal is excessive in height and will result in an unacceptable loss of light and noise, the scheme will also result in parking problems.

48 Marlborough Close: Support of the proposal.

56 Marlborough Close: The number of parking places proposed in insufficient for the number of flats provided.

Internal Consultee Responses

Traffic Group
No objection; confirm that servicing vehicles for the remaining industrial units can turn within the site and exit via Crampton Street.

Design Team
Supports the scale and architectural language of the development which will enhance the character of the neighbourhood and the setting of the proposed Pullens Estate Conservation Area.

Secure By Design
No objections.

Elephant Links
The proposal should represent a response to the requirements for a high density, mixed use developments envisaged in the Elephant and Castle redevelopment areas. The development will re-enclose Crampton Street as it was originally intended prior to the erection of the industrial sheds. The scheme is considered consistent with the objectives of the Elephant and Castle SPA and will be regenerative benefits to the area.

PLANNING CONSIDERATIONS
Principle of the Development & Loss of Employment Space

17. Although contrary to the provisions in the adopted Unitary Development Plan, (UDP) the proposed residential led development complies with the aims and objectives of the revised UDP [March 2004], with the adopted Elephant and Castle Supplementary Planning Guidance and with policies in the London Plan. In the revised UDP, the employment area status of the site has been removed and the site re-designated for mixed use development purposes. The redesignation of the application site from employment use to residential use is in accordance with PPG3: Housing which seeks to maximise housing densities and to promote the efficient re-use of brownfield and surplus employment land. In view of the guidance contained within the adopted SPG for Elephant & Castle, the policies of the London Plan and the advice in PPG3 [Housing] it is considered that a high degree of weight should be given to the Revised Unitary Development Plan.

18. Policy 1.5 [Mixed Use Developments] of the revised UDP requires that for the redevelopment of employment generating sites located within the Central Activities Zone there should be no net loss of employment floorspace. The proposed development does not fully comply with draft policy 1.5 as there will be a net loss of some 440sqm of employment generating floorspace. The shortfall in employment floorspace can be justified because of the wider regenerative benefits that the development will bring to the Elephant and Castle. The 2422sqm of commercial floorspace provided will be B1 space in the form of office units and live work units. In response to public consultation, the Council has agreed that some of the ground floor units can be used for retail (A1) or the with some of the live/work units providing the capability of being either A1 (retail), A2 (Financial & Professional) or A3 (Food and Drink) uses.

Relocation of Existing Businesses

19. The applicant has possession of the application site and has confirmed that as of November 2004 the majority of the units are vacant or have found alternative premises. Units 1-18 are held on short term leases and if not already vacated are due to be vacated by the end of January 2005. Units 19-24 are occupied and will be retained in the development proposals as employment space in their existing format.

Contribution to the Elephant and Castle Regeneration.

20. The application site forms the south western boundary of the Elephant and Castle Development Framework which was adopted as Supplementary Planning Guidance in February 2004. The Framework is designed to guide and inform comprehensive change and regeneration in order to secure economic, environmental, social and urban design benefits. The proposed development complies with the aims of the SPG which include the provision of a balance and integrated mix of residential accommodation across the full range of private, social and other affordable housing with a target ratio of 50:50 for social rented and intermediate housing and to establish and maintain a high quality, vibrant, safe and integrated mix of homes, shops......and commerce uses and activities.
**Scale and Massing**

21. The development will comprise of two five storey buildings fronting Crampton Street and a single part seven, part eight and part nine storey building at the rear of the site adjacent to the railway. Objections have been received regarding the height of the development and in particular the five storeys proposed for Crampton Street.

22. The existing Victorian tenements to the western side of Crampton Street (Pullens Estate) rise to 4 storeys and are of an intimate scale. The new buildings proposed to the east of Crampton Street respond to the established scale and form opposite and are considered appropriate for this reason. The overall massing is broken by the provision of landscaped areas to the rear (Amelia Yard and Crampton Yard). Overall the bulk and massing of the Crampton Street building is considered to be acceptable.

23. The increase in scale and height of the development towards Crampton Way is considered appropriate given the 10 storey building recently approved east of the railway line and the absence of an established streetscape to the rear of the site. The mass of this building is further reduced by the use of a modelled façade with a variety of balcony materials and sizes. The separation provided by the landscaped area to Crampton Yard is adequate in ensuring that the stepping up from 5 storeys (Building 1) to 9 storeys (north end of Building 2) is not too imposing and overbearing especially on the Tenement blocks to the west side of Crampton Street.

**External Appearance**

24. The three building’s proposed will have a contemporary appearance with a range of external materials.

25. The buildings facing Crampton Street will enhance the streetscape of this street by completing the traditional street pattern and reinstating a broken building line to its eastern side. The street facing elevations of these buildings are of a simple design, with materials proposed being sympathetic to and in keeping with the Victorian tenement block opposite. The fenestration, in particular, has a strong vertical emphasis which responds to the traditional proportions of the Pullens Estate.

26. The design solution proposed for the 7-9 storey building is successful in breaking down the monolithic expanse of the Crampton Way and forecourt elevations. The solution adopts three different sizes of projecting bays, which have varying depths (1000mm, 1400mm & 1800mm). In addition there are three different timber surfaces that surround these box forms (Ontal, Almond & Walnut). This helps in varying and creating a sense of individuality to the flats. The dynamism of the building is further enhanced by the introduction of sliding screens, which have been designed for solar shading, privacy and spatial definition.

27. The proposal site is located opposite the proposed Pullens Estate Conservation Area. The Conservation Area comprises the four storey
tenement buildings located in Crampton Street, Iliffe Yard, Amelia Street, Peacock Yard and the Pullens Estate. It is judged that the proposed scale, detailed design and mix of uses of the development will respect the character of the tenement buildings and the character and appearance of the proposed Conservation Area.

**Density**

28. The overall density for the development is 1106 habitable room per hectare. The site is located within the 'central activities zone', as designated in the revised UDP, which aims to achieve densities in the range of 650-1100 hrh subject to appropriate scale and massing considerations. In this instance the density slightly exceeds the recommended upper limit, however the scale and massing proposed is considered acceptable in the site's contextual setting. Overall the development will provide units of satisfactory accommodation on site with excellent public transport links, shops and facilities. Overall it is considered that as the character of the local area is relatively dense and the development represents an efficient use of land, the proposal is acceptable.

**Impact upon Amenity**

29. *(i) Daylight*

The proposed five storey building which will front Crampton Street will be 2m higher than the existing residential mansion blocks on the opposite side of the street. It is accepted that there will be some loss of light to the ground floor rooms along Crampton Street, however, use of the Average Daylight Factor test on the ground floor of 154 and 126 Crampton Street demonstrates that any loss of light will be within acceptable tolerances. The Average Daylight Factor Test (ADF), which takes account of the angle of visible sky as well as the size of the window, shows that the affected rooms on the ground and first floors of the visited properties would have daylight factors in excess of the minima recommended in the BRE guide. The results show that a daylight factor of 2.51% -2.92% would be achieved whereas the BRE recommends 2% for kitchens, 1.5% for living rooms and 1% for bedrooms.

30. The impact on the live and work units in Iliffe Yard will be lessened by the fact that the north east facing windows facing the development are double aspect and are at first floor level; these units therefore enjoy more light than those affected windows of the buildings fronting Crampton Street.

*(ii) Outlook*

31. The occupiers of Crampton Street presently enjoy a relatively open outlook for an inner city urban location over an under developed site occupied by single storey industrial sheds. The proposal will inevitably result in a significant change to the outlook from the existing flats that will cause some reduction in the amenities currently enjoyed by the occupiers of the affected flats, particularly the ground floor. However it is considered that it would not be so substantial or severe a loss as to cause unacceptable harm to the living conditions of their occupiers. It is considered that any harm resulting from loss of amenity to adjacent residents in terms of light and outlook must also be balanced against the benefits that will arise from the proposed development.
The proposal will have an acceptable relationship and impact with the dwellings in Marlborough Close due to the separation distance and the fact that the existing industrial shed at 19-24 Newington Industrial Estate will be retained. Similarly the scheme will not have a detrimental impact upon the light of the west facing windows of the proposed buildings located on the eastern side of the railway because of the distance of 25 metres between the two sites.

Privacy and Overlooking

It is not considered that the proposed scheme will result in an unacceptable loss of privacy of any neighbouring residential occupiers. The front to front distance across Crampton Street will range between 14 and 14.5 metres which complies with the Council's adopted standard.

Noise

Objections have been received from local residents regarding noise and disturbance from the proposed development. It is accepted that the future occupiers of the development will generate noise and disturbance, however, this is likely to be general background noise from everyday activities. The proposal will provide a mix of residential and office uses both of which are conforming uses in a residential area. The use of a number of the ground floor units for retail purposes will not generate significant noise levels.

In assessing the impact on the neighbourhood from the increased density proposed, consideration needs to be given to the existing non-conforming industrial use which will be replaced. In addition it is likely that the part 7-9 storey building will act as a barrier for the noise from the railway line.

Traffic & Parking

The proposal has been assessed by the Traffic Group in terms of traffic generation and parking provision and is considered to be acceptable. The retained industrial sheds, the office and work units and offices will all be serviced via Crampton Street. The Traffic Group have confirmed that there will be adequate turning space for service vehicles within the site and that the servicing arrangements for the retained industrial unit at 19-24 complies with standards. which will then be able to exit the site via Crampton Street. At present service vehicles using the industrial estate must access and egress from the site via Crampton Street. The traffic generated by the 17 live and work units and 5 office units will not be significant and is unlikely to cause harm to the amenities of the neighbouring occupiers. As the development will represent a reduction in the amount of employment space on the site there is likely to be less service vehicles travelling along Crampton Street.

The development will provide 83 car parking spaces which equates to a 46% provision for both residential and employment uses. This is in accordance with parking standards in the Council's revised UDP [March 2004] and the London Plan which states that the maximum for residential in the Central Zone should be 0.4 space per unit. The scheme also provides a large number of cycle spaces (x %) although this falls short of the Council's draft standard of 1 space
per dwelling. Given that the site is in a central London location, a short distance from the Elephant and Castle transport links it is considered that the parking and cycle storage facilities are acceptable.

**Refuse Collection**

38. Residents have raised concerns regarding the adequate collection of refuse from the site. The proposal however provides adequate refuse storage in the undercroft parking area and a collection point from the site. There will not be refuse left on the street for collection. The scheme also provides recycling storage facilities on site. It is therefore considered that there is an adequate scheme of waste management in place on the site.

**Impact upon Local Services**

39. A number of letters have been received from local residents concerned about whether the local health and education services will be able to support the increased population. Whilst the development will increase the residential population of the area, it is considered that there is insufficient evidence to demonstrate that this part of Elephant and Castle has reached saturation point

**Affordable Housing**

40. The development will provide 42 flats for use as affordable housing. This will result in an affordable housing provision of 22% when measured in terms of number of units. However when measured in terms of habitable rooms, which is the Council's preferred method of calculation, the development will provide 27%.

41. The proposal does not fully comply with the Council's emerging policy on affordable housing which now requires a 35% provision in the Elephant and Castle. However as the application was submitted prior to adoption of this policy for consultation purposes in March 2004, the affordable housing provision is on balance considered acceptable. In term of tenure mix the development will provide 58% intermediate and 42% as general needs housing. This does not comply with the Elephant and Castle SPG however, it is for practical reasons as Housing Associations do not like to mix blocks of different tenure types.

**Standard of Accommodation & Mix of Units**

42. The overall floor area of the individual flats complies with the Council's adopted minimum unit sizes. There is an acceptable mix of units proposed with the majority of units comprising two or more bedrooms. As the residential units are shown as shell units a condition has been attached which will 50% of the flats to be two bedroom and 10% as three bedroom in accordance with Council policy.

43. The provision of amenity space has been made through the creation of a public square fronting Crampton Street and balconies on many of the units. This provision of amenity space is considered adequate given the site location within the Central Activity Zone. As the development has a shortfall in amenity
space provision which will result in intensification of use of the local park, the S106 will have a financial contribution to contribute towards planned improvements.

Planning Obligations (S106 Legal Agreement)

44 In order to off set the impacts of the development on the local area the applicants have under-taken to make a financial contribution of £375,000 towards environmental (e.g. open space, tree planting, pavement works, works to improve railway bridges, lighting and archaeology), training (funding towards Council funded initiatives), transport funding (funding towards local cycle routes and traffic calming works) and education. The applicants will also use their reasonable endeavours to secure possession of an adjacent railway arch from Spacia to improve pedestrian links and the general permeability of the area. It is judged that these Heads of Terms are necessary, directly related to the proposed development and are generally reasonable.

EQUAL OPPORTUNITY IMPLICATIONS

45. The proposed units are capable of meeting 'Homes for Life' standards and are all accessible by lift. The scheme also provides adequate disabled parking spaces.

LOCAL AGENDA 21 [Sustainable Development] IMPLICATIONS

46. The scheme provides a significant amount of cycle storage on site and there is not an over-provision of parking spaces on site. The scheme also makes available recycling facilities on site.

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