

**Walworth Society Objection to redevelopment of 51 East Street London Southwark SE17 2DJ  
(20/AP/0685)**

Demolition of existing building and construction of a four-storey building with basement and roof accommodation to comprise a 48 room hotel (C1 use class) with a ground floor and basement cafe (A3 use class) and deskspace business.

<https://planning.southwark.gov.uk/online-applications/centralDistribution.do?caseType=Application&keyVal=Q6QAA4KBM9W00>



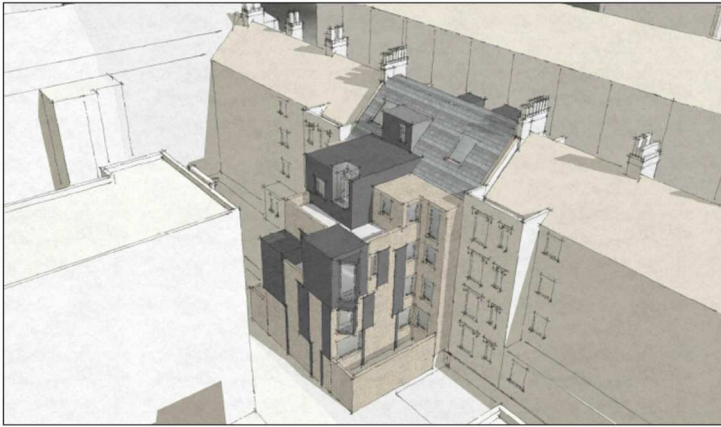
Current view of frontage on to East St



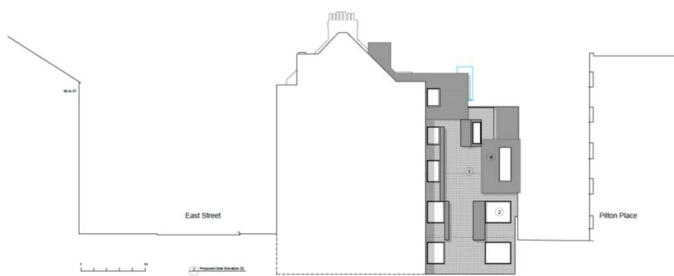
Proposed frontage on to East St



Current view of the rear in the Pilton Estate



Proposed massing at the rear



Proposed side elevation

**The Walworth Society objects to this application and sets out below our assertions that this application is in breach of a number of Southwark Council and London-wide planning policies and in particular:**

**A. Policy P40. Hotels and other visitor accommodation as outlined in the New Southwark Plan 2019 To 2034: Submission Version January 2020.** Policy states that “Development for hotels and forms of visitor accommodation must ensure the design, scale, function, parking and servicing arrangements respond positively to local character and protect the amenity of the local community and visitors to the hotel”. We assert that these proposals are in breach of these criteria in particular in relation to the quality and appropriateness of the design and scale and that these proposals do not response positively to local character and fail to protect the amenity of the local community. We set out our objections relation to these breaches of planning policy in paragraphs 1, 2, 3, 4, 5, 6, 7 and 10 below. We further assert that the application is in breach of Policy P40 in terms of the proposals fail to protect the amenity of visitors to the hotel owing to the poor quality of the interior planning of the rooms and in particular their extremely small size and the quality of the provision of accessible rooms. Objections on these grounds are set out in particular para 10 below.

**B. Policy P69 Energy.** The Submission Version of the NSP requires the development to minimise carbon emissions on site in accordance with the following energy hierarchy:

1. Be lean (energy efficient design and construction); then
2. Be clean (low carbon energy supply); then
3. Be green (on site renewable energy generation and storage).

We assert in paragraph 8 below that this is in no way achieved by the delivery of a very limited number of PV cells.

**C. Consultation.** We are also mindful of the inadequate levels of and quality of consultation prior to the submission of this application. Local residents are unaware of this significant development. Consultation and dialogue with them could have resulted in a far more nuanced development being proposed and one which responded far better to its context. We assert that this lack of engagement runs contrary to Southwark Council's guidelines on Community Involvement.

We would note that The Bell at 51 East St is subject to the Southwark Council Article 4 Direction in relation to Demolition and Alteration as set out in Article 4 Directions: Public houses Appendix C of February 2017.

**1. Over development of the site.** It should be acknowledged that the target of 48 rooms has been driven by the desire to make an economically viable hotel and therefore 48 rooms have been shoe-horned into a small site where the impact of that overdevelopment is most apparent and most impactful at the rear. The Pilton Place tenements were all designed to be accessed from the rear, so every resident of the estate uses this quieter courtyard space to access their flats, for some childrens' play, gardening and relaxation.

**2. Noise and disturbance to residents.** In such a densely occupied and contested environment with multiple users, it is important that a quieter courtyard space is maintained as a buffer to the noise and smells and intense activity of East Street market. This space should not be filled with commercial activity and noise from a 24-hour operation, with different activities occurring all through the day and night.

**3. Unsuitability of site for a large hotel: Overlooking and lack of privacy.** Residents of Pilton Place access their flats across the rear courtyard and amenity space, entering via the arched entrance on King and Queen Street. It is significant that several years ago residents were surveyed by Peabody about access to the estate at a time when they were being affected by East St traders using that entrance as a short-cut and parking their vehicles on the estate. The overwhelming response of the residents was to padlock the East Street gate; this shows clearly that residents require a quiet space away from the bustle and these proposals would very much remove this amenity. For access, residents walk around the boundary wall at the rear of the public house to access their homes. The rear bedroom windows of the proposed hotel will look directly out onto all the residents moving through the courtyard to access their homes. The impact of this is a severe loss of privacy for both hotel guests and local residents.

The windows of a number of properties on the Pilton Place estate and those in the floors above immediately face those of the hotel bedrooms which will result in their loss of privacy, exacerbated at night time and in winter when the interior lights will be switched on.

**4. Loss of Amenity.** As highlighted in the historical statement (see below), James Hartnoll erected high-density tenement buildings on cramped and difficult sites. He was known for delivering high buildings and high-density development with smaller amenity spaces. The further impact of this tall building and the activity of an additional 50 users on the amenity spaces will be significant. The central play area for children is a very short distance away from the hotel and results in a safeguarding issue. How will residents be able to allow their children to play safely, when there is significant overlooking from the hotel and the possibility of guests using this space too? The privacy and security currently afforded because this is essentially a private courtyard will be removed.

The rear courtyard is already a much-contested space because of its use by residents and the retail traders, especially on market days. There are existing issues with illegal parking, rubbish, fly tipping and vermin. The proposed intensification of use and the introduction of an additional series of users placing demands on an already much contested space will be severely disadvantageous to all.

The current public house building, even though it is 3 storeys high, casts a shadow across the amenity space. This shadow will be increased hugely and negatively impact the quality of an amenity space that is much needed by the residents to access their flats, do gardening, chat etc. The noise from hotel activities, services and plant will further reduce the ability of existing residents to use the amenity space.

#### **5. Proximity to adjoining properties & Loss of light; disturbance during construction**

The proposed development is too close to existing residents and will impact them severely. There are 10 bedrooms, living rooms and front doors, less than 1.5 metres to either side of the proposed hotel. The noise and vibration caused by the construction period and then the use of the rear of the site as bedrooms with openable windows, will make existing residents flats uninhabitable because of the noise, vibration, increase in dust and the impact on privacy.

The flats and windows immediately overlooking (opposite) the rear of the hotel will lose much of their natural daylight and all of their sunlight. This is highly likely to contravene policy and will make the quality of life in those rooms facing the hotel far poorer.

**6. Out of keeping with character of area.** This is not as the applicant asserts an infill site. From 1850s until 2013, historic images show that the Royal Albert, then the Bell public house building was proud and characterful, well used by visitors and market traders. Since then it has been neglected and uncared for. It is not an infill site, but the story of a local public house, busy and rooted in the street, even while the Pilton Place estate was built up around it.

The proposal is out of keeping with the character of the area in terms of its analysis, approach to the design, its materiality and its proposed use. It is evident that the applicant has no knowledge of the history of the building, the market street or experience of using it.

Whilst we are not opposed to redevelopment of the site, a much better quality and more responsible and contextual approach is needed to the massing, design and materiality. The public house sits proud of the Pilton Place estate frontage and therefore this building will become very prominent, especially if taller. Considered analysis of the building and how it sits within this historic context would be expected, especially the height at the front which should be subservient to the Pilton Place estate as this is not an infill site and a much lower and more stepped approach at the rear is needed which does not impact on the quality of life for the residents and children of Pilton Place estate.

**7. Design.** The proposed building is of a poor design. As we have noted, not enough consideration has been given to the context in order to develop an appropriate design. The design should demonstrate how it is tailor made for this location. What we have is generic and a clear repeat of similar designs in the architect's portfolio. There are a number of indicators of poor-quality design. The powder coated panels seek to add interest to an otherwise flat and generic façade. Large plain black panels will become quickly defaced with rain, bird excrement, may become dented and even graffitied. The brick slips proposed are of poor quality and are a function of the need for speedy construction rather than considered or long-lasting high-quality design for this key Walworth and Southwark street market.

There has been no attempt to repeat the rhythm of bay windows or any other architectural features demonstrated by the Pilton Place Estate and its linear fascia. The corner stone quoins are a very distinctive feature of Pilton Place as are the bay windows and the horizontal banding of the cills. These serve to reduce the scale and height of the development and this is again lacking in this development. It is unclear how these quoins will be treated or covered up where they meet the proposed building at the front and rear. The colour of the proposed bricks is extremely important and needs to contrast and not look too new and uniform against the variety of colours of Pilton Place. There is a strong rhythm set up by the Pilton Place shop fronts such as number 55 next door. The tiles are apparent as is the stone cornice which is a strong

feature of Pilton Place. The proposed shopfront design pays no attention to this important feature. Of higher quality would be the use of a contemporary dark coloured brick with a façade that has both depth, decoration and at high levels emphasises the horizontal banding of Pilton Place. Lining up with the first floor and second floor windows as well as the roof line would ensure that this development fights less with the overall design and feel of the north side of East Street in the way that the current proposals do by their use of plain black metal panels to simply dress up a flat brick-faced box.

Our examination of Pilton Place shows that, as with other Peabody developments in North Southwark (Ilfracombe House on Marshalsea Road and Devon Mansions on Tooley St) in Conservation Areas, they are landmark buildings in significant locations. Pilton Place plays a similar role being a strong dominant set of tenement buildings that provide a historic backdrop for the street market with a strong rhythm provided by the bay windows and the horizontal banding with impressive entrances into the courtyards. It differs from the other two examples by being built later and being more vernacular and more Arts & Crafts in origin, emphasised by the outline and shape of the roof and dormer windows. These features are clearly expressed at either side of the public house; therefore, the design of this hotel as a new proposal should pick up on that vernacular style and the Arts and Crafts element and should not simply deliver a pragmatic low-cost development into East Street. Something that is more contextual and which sits better in this vernacular context is required.

Overall, the proposed riot of materials and metal panels sprinkled across the facade will simply add to the visual confusion in the street with differing post-war styles. It should be noted that the quality of postwar architecture on this street is overall not good and this building should not contribute to that milieu, but seek to raise the standard in terms of design and build quality.

**8. Energy.** In the light of the focus of Southwark Council on developments being lean, clean and green and the Council's declaration of a climate emergency and the goal of being carbon neutral by 2030, we assert that the delivery of 11 PV panels on the front roof slope by no means meets the criteria of the development being compliant with the strategy and being lean clean and green, especially in a situation where water usage, heating of water and ventilation are the key issues. We identify no analysis by the applicant of what proportion of the building's energy requirements will be delivered by these panels and what the emphasis should actually be when designing and delivering a hotel. We see no consideration of other forms of renewable energy such as ground or air-source heat pumps.

**9. Basement Rental Desk Rental Scheme - Viability.** We would question the viability of this desk rental scheme in a basement without windows or fresh air and contrast this with other proximate schemes which currently offer light at ground levels, views and fresh air.

**10. Quality of Amenity for Visitors to the Hotel.** The quality of the provision of hotel visitor amenity is deficient in a numbers way and breaches Southwark planning policy for hotel accommodation.

**a. Accessibility.** There is only one (room 001) room shown with a disability bathroom marked on the plans and no accessibility management plan (as set out in Policy 4.5 LFA London's visitor infrastructure). The drawings show how a disabled visitor could use the bathrooms but not access the beds or turn around in the small rooms and corridor leading to the bed area. The disability room is shown as a single room. The hotel does not appear to accommodate couples, one of whom is disabled. No evidence is given for how the bed, placed in a corner of the room and next to a window is desirable/ accessible. There is no evidence for how guide dogs would be accommodated (as set out in Policy 4.5 LFA London's visitor infrastructure).

**b. Bedroom design quality.** The bedroom design is of poor quality and it is not clear who the customer might be for these small and sub-standard rooms - is the aim to make a hostel with bunk beds due to the small size of the rooms? Many of the double beds have no space around them; some have walls on three sides, so the only access into the bed is from the end; others have access from only one side, so one person has to climb over another to get into and out of bed: many beds are situated in front of windows. These

layouts are unpractical and not desirable. None of these arrangements would pass Southwark planning guidelines for habitable bedrooms in new dwellings and we are concerned that they are being proposed as acceptable for hotel accommodation. One of the bedrooms (room 104) appears to have no windows.

It is unclear how ventilation would be provided to the bedrooms and bathrooms and how these services and the noise produced from them would directly impact on the amenity of residents of Pilton Place. It is unclear as to how one could open the window without lying on the bed. When in bed, guests would be unable to sleep with the windows open as they are directly next to or above the beds.

Furthermore, the current proposal does not follow the guidelines set out on in LFA Policy 4.5 London's visitor infrastructure:

a *"Seek to ensure that all new visitor accommodation meets the highest standards of accessibility and inclusion and encourage applicants to submit an accessibility management plan with their proposals".*

b *"Promote high quality design of new visitor accommodation so that it may be accredited by the National Quality Assurance Scheme."* The room layout and aspect for guests is of poor quality and therefore it is unclear what type of accreditation this hotel might achieve.

c *"Identify opportunities for renovation of the existing visitor accommodation stock."*

The existing building could be renovated to provide characterful hotel accommodation and good-sized rooms by upgrading and extending of the existing public house building in a more sensitive manner which would not severely inconvenience the amenity of existing residents.

4.30 *"Providing a world-class experience is vital to encouraging repeat visitors and the quality of London's visitor accommodation is central to this. Accommodation providers are encouraged to join national quality assurance schemes and to extend the range of products to meet customer expectations at all levels."* There must be some scrutiny at the planning stage about whether a proposed scheme actually delivers the kind of experience that encourages repeat visits and provides pleasant and useable ancillary facilities.

## **11. Historical Context. A. Pilton Place History**

There has been no attempt in the Design and Access statement to acknowledge the valuable heritage of Pilton Place, the public house building or the market/ historic village context. Although Pilton Place is not part of the Conservation Area, it sits next to both The Walworth Conservation Area and the Walworth Heritage Action Zone. These should have been a driving factors in the design, including full consideration of the Article 4 designation of the former Bell PH.

The developer of Pilton Place, James Hartnoll, born in 1853 in St Mary Newington was a joiner turned architect and developer who was, "in his own words, 'exceptionally experienced in the successful planning, erection and maintenance of (approx. 4,000) Model Dwellings, as well as being the largest individual owner of this class of property in London'.." Ref: Survey of London

He typically bid for the awkwardly shaped and therefore cheaper sites offered for sale by the authorities as part of slum clearance programmes in the late C19th. He delivered higher rise blocks, with less amenity and social space than some of the more philanthropic companies such as Improved Industrial Dwellings Company (IIDC). However, this approach did help to alleviate some problems for the authorities who were bound to provide accommodation to house the same number of people that had been displaced by the clearance.

His developments in Southwark include Devon Mansions, part of the Tooley Street Conservation Area; Monarch and Ilfracombe Flats, part of the Liberty of the Mint Conservation Area; and Ipsden Buildings Waterloo. He also erected many (now protected) residential buildings in and around Roseberry Avenue, Holborn.

Charles Booth thought some of Hartnoll's work among the best of the 'modern' blocks, which he regarded as a 'great advance', visually, on older dwellings. Each flat had its own WC and scullery." A British Library advert shows that, "his houses were fitted with the latest fittings such as an inside toilet and piped water that was supplied to a sink in the kitchen. At this time these flats would have been in great demand".

Pilton Place is a later development, completed after the death of Hartnoll, in 1933, (according to Peabody). The western blocks of Pilton Place were damaged in World War 2, but repaired, while other buildings on the south side of East Street were demolished and replaced. The Hartnoll estates were sold to Peabody in 1970/1. Pilton Place was modernised in 1970 including the erection of a number of brick-built lift towers at the rear, although overall Pilton Place appears to be less compromised by later additions than other Hartnoll estate blocks in Southwark.

The Pilton Place estate was erected with classic Hartnoll building features include maximum use of the site, a relatively plain exterior, with vertical stacks of bay windows and wide sash windows overlooking the street, but no entrance directly into the flats. The main entrances are expressed architecturally as impressive tall arches that allow access to the flats via external stairs and walkways from the inner courtyard. Distinctive corner quoins and horizontal banding of the sills around the principle facades are used to combat the impression of mass and vertical height.

Maps show that the public house precedes the housing estate, trading on the site since the 1850s. It appears that the tenements were actually constructed around the existing public house and its rear yard. This would account for the plan form at the rear of the public house where residents need to skirt around the boundary wall of the pub to reach their flats. The public house fabric appears to be late C19th, perhaps older, but it was simply refaced in the late 1930s (see photographs <https://pubwiki.co.uk/LondonPubs/Newington/RoyalAlbert.shtml>)



**Royal Albert, 51 East Street, Walworth**

### **B. Historical significance**

The remaining tenements across the borough are becoming recognised as an impressive and important housing type that contributes positively to the C19th townscape. Once dominant, indeed a defining feature of working-class Walworth, almost all have been demolished postwar. Once they may have seemed tall and overbearing in their context, now they fit well with the taller contemporary context. Their quoins and blind windows; undulating facades with sashes windows and bays; and decorative arches and cornices make distinctive “landmark” features in the contemporary landscape. This is certainly true for Pilton Place. The architecture provides an architectural rhythm to the street and suitable architectural backdrop for what is known as an historic street market, in a street where there is little actual trace of its mid C19th origins. The public house, being two storeys lower tells the story of the much older building around which Pilton Place estate was constructed.