

**Deloitte.**

Aylesbury Estate, Southwark

Notting Hill Housing Trust

**Planning Statement**

Revised – February 2015

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# 1 Introduction

- 1.1 This Planning Statement is submitted by Deloitte LLP on behalf of Notting Hill Housing Trust (NHHT) (“the Applicant”) in support of two planning applications for the comprehensive regeneration of the Aylesbury Estate (“the Estate”), Southwark. This follows the selection of NHHT by Southwark Council (LBS) in January 2014 as the preferred developer to work in partnership with the Council in delivering the regeneration of the Estate.
- 1.2 Some of the earliest phases of the regeneration of the Estate have already been delivered or are subject to recent planning permissions. The two planning applications now submitted on behalf of NHHT relate to the remaining 30.9 hectares of the Estate only (“the Site”).

## Planning Applications

- 1.3 The Aylesbury Estate Area Action Plan (AAAP) divides the estate into a number of development phases and sub-sites within these (see Fig. 1.1). The submitted planning applications each include a number of these AAAP sites.
- 1.4 A detailed planning application is submitted in respect of the “First Development Site” which comprises AAAP sites 1b and 1c as shown at Figure 1.1. This is referred to as the “First Development Site” Application (FDS Application). The FDS area is 4.4 hectares.
- 1.5 An outline planning application is submitted for the “Outline Application” comprising AAAP phases 2, 3 and 4 and AAAP site 10 as shown at Figure 1.1. This is referred to as the “Outline Application”. The Outline Application Site area is 26.5 hectares.

## Description of Development

- 1.6 The description of development for the FDS Application is:

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“Demolition of existing buildings and redevelopment to create a residential-led development comprising 830 private and affordable units (Use Class C3); flexible community use, early years facility (Use Class D1) or gym (Use Class D2); public and private open space; formation of new accesses and alterations to existing accesses; an energy centre; gas pressure reduction station; associated car and cycle parking; and associated works.”

- 1.7 The description of development for the Outline Application is:

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“Outline application, including access, for demolition of existing buildings and redevelopment to provide up to 2,745 private and affordable units (Use Class C3); 600 to 2,500sqm of employment use (Use Class B1); 200 to 500sqm of retail space (Use Class A1); 3,100 to 4,750sqm of community use, medical centre and early years facility (Use Class D1); 600 to 3,000 sqm flexible retail use (Use Class A1/A3/A4) or workspace use (B1); new landscaping, public and private open space; energy centre; gas pressure reduction station; up to 1,098 car parking spaces; cycle parking; landscaping; and associated works.”

1.8 The proposed development is discussed in further detail at Section 4 of this Statement.



Fig. 1.1 AAAP Phases / AAAP Sites

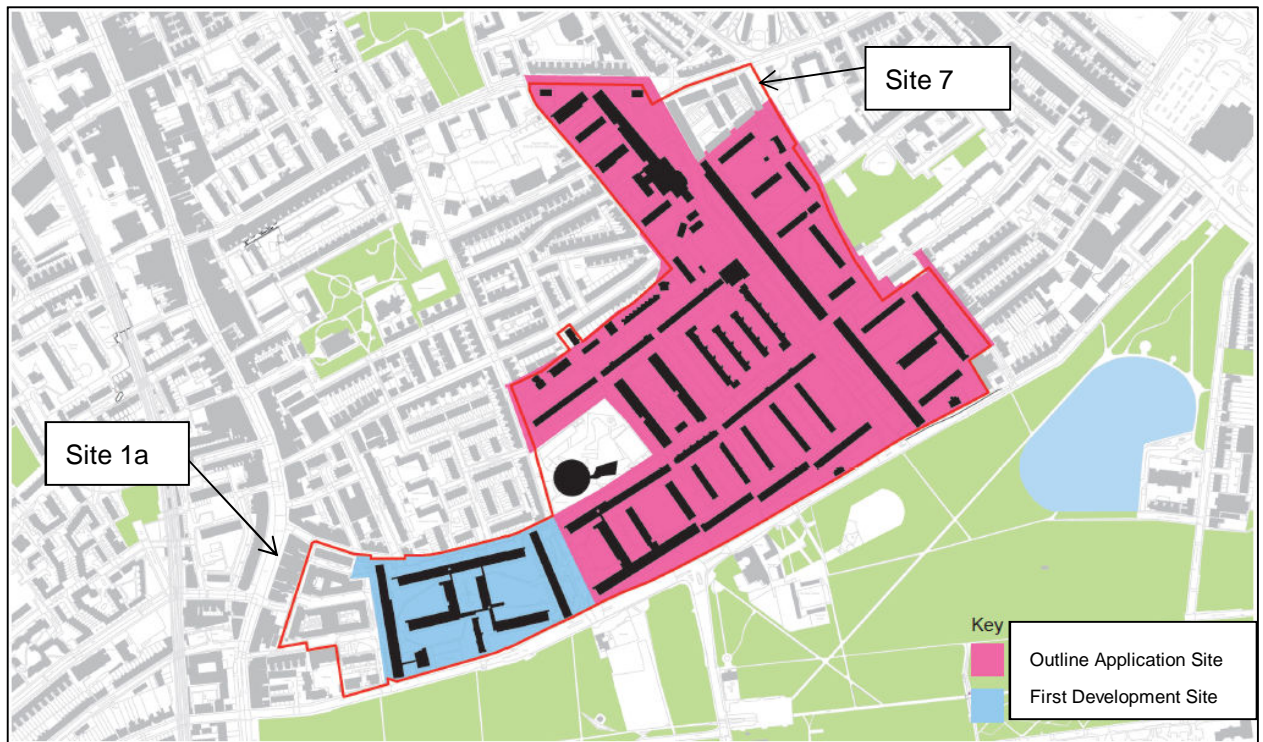


Fig 1.2 – Site Location Plan

## Scope of Planning Applications

1.9 Each planning application comprises the following documents for approval;

- Planning Application Form and Certificates;
- Planning Application Drawings.

1.10 A range of supporting documents have been submitted. In most cases a single document has been prepared which refers to or assesses both the FDS and also the Outline Applications:

- Planning Statement;
- Environmental Statement
- Development Specification;
- Affordable Housing Statement;
- Section 106 Heads of Terms;
- Energy Strategy;
- Travel Plan;
- Statement of Community Involvement;
- Landscape Strategy;
- Sustainability Statement;
- Waste Statement;
- Flood Risk Assessment; and
- Transport Statement.

1.11 In addition, the following is submitted in support of the FDS Application:

- Design and Access Statement;

1.12 The following are submitted in support of the Outline Application:

- Design and Access Statement;
- Design Code;

1.13 The Environmental Statement that is submitted in respect of both applications comprises the following technical chapters:

- Socio-Economics;
- Townscape, Heritage and Visual Impact;
- Construction Methodology;
- Archaeology;
- Ecology, Nature Conservation and Trees;
- Ground Conditions and Contamination;
- Water Resources, Water Quality, Flood Risk and Drainage;
- Sunlight, Daylight and Overshadowing;
- Wind Microclimate;
- Noise and Vibration;
- Air Quality;
- Traffic and Transportation; and
- Telecommunications.

## February 2015 Submission of Revised Material

1.14 In February 2015 a set of revisions have been made to both the applications. The revisions have been made to respond to consultation comments, feedback from planning Officers and to take account of design evolution. Various documents have been updated to reflect the revision or addendums to the original documents have been produced. This is the revised Planning Statement.

## Structure of this Planning Statement

1.15 This Planning Statement sets out the planning case for the regeneration of the Aylesbury Estate and assesses the development in the context of national, regional and local planning policy.

1.16 The format of this Planning Statement is as follows:

- Section 2 describes the existing context of the site and surrounding area;
- Section 3 explains the background to the Estate Regeneration;
- Section 4 sets out the development proposals;
- Section 5 assesses the proposals against relevant planning policies;
- Section 6 provides a summary of the community engagement undertaken by the Applicant; and
- Section 7 provides our conclusions.

## Glossary of Terms

1.17 The following sets out a summary and definition of the key terms used throughout this document:

- **The Estate** – This refers to the whole Aylesbury Estate as existing. It includes the application sites and also AAAP sites 1a and 7 which have already been redeveloped or have planning permission for redevelopment.
- **The Early Phases** – AAAP sites 1a and 7 which have already been redeveloped or have planning permission for redevelopment.
- **First Development Site (FDS)** – The part of the Estate to which the detailed planning application for the redevelopment of AAAP sites 1b and 1c as shown within the AAAP relates. A detailed planning application is submitted for this site – the **FDS Application**.
- **Outline Application Site** – The part of the Estate to which the outline application for the redevelopment of the remainder of the Estate relates incorporating phases 2, 3 and 4 and AAAP site 10 as defined within the AAAP. An outline planning application is submitted for this site – the **Outline Application**.
- **Comprehensive Redevelopment** – The development proposed by the FDS Application and Outline Application taken together.
- **The Applications** – The FDS Application and Outline Application.
- **The Applicant** – Notting Hill Housing Trust.

- **AAAP** – The Aylesbury Area Action Plan Supplementary Planning Document adopted by the London Borough of Southwark in 2010.

## 2 Aylesbury Estate – Site and Surrounding Area

2.1 This section describes the application sites and their surroundings and relevant planning history.

### Site Location and Description

- 2.2 The Aylesbury Estate is situated approximately 0.6 miles to the south east of Elephant and Castle station in the London Borough of Southwark. The Estate is broadly located to the east of Walworth Road, west of Old Kent Road and north of Burgess Park and Albany Road.
- 2.3 The Estate is currently home to approximately 7,500 residents. The accommodation on the Estate includes houses, flats and maisonettes totalling 2,400 homes in blocks ranging between 2 – 14 storeys. The Estate was constructed between 1966 and 1977 and also accommodates several schools, offices, community facilities, shops and other uses.
- 2.4 The Applications relate to 30.9 hectares of the Estate comprising the FDS and the Outline Application Site. The remainder of the Estate has either been redeveloped or planning permission has been secured for its redevelopment.

### Surrounding Uses

- 2.5 The Estate is located within a primarily residential area that includes the Heygate Estate and Elephant and Castle to the north. A greater variety of uses including retail, industrial and commercial can be found nearby along Walworth Road and the Old Kent Road.
- 2.6 Other uses within close proximity include East Street market, one of London's oldest, largest and busiest markets, which is situated to the north of the Estate.
- 2.7 The Estate, with its grid layout and Jespersen panelised housing blocks has a distinctly different built character to the surrounding area. The Liverpool Grove Conservation Area is located to the north west of the site and is characterised by 2 storey terraced housing.
- 2.8 A number of planning applications for the initial phases of the Estate regeneration have been granted consent within the last few years and are under construction or are complete. Phase 1a, located immediately to the west of the FDS, has been constructed and occupied and AAAP Site 7, to the north of the site, is currently under construction.

### Accessibility

- 2.9 The Estate has a varied TfL Public Transport Accessibility Level (PTAL) of between 2 and 3.
- 2.10 The site is within a short walk of Elephant and Castle overground and underground stations (Northern and Bakerloo lines) with links to central London and the wider south east region. In addition, the site is well served by bus routes both through the Estate and along Walworth Road and Old Kent Road.



2.11 Both vehicular and pedestrian access to the Estate is primarily from Walworth Road, Thurlow Street, Albany Road or Old Kent Road. The Estate is well served by a network of smaller roads which connect into this wider network.

## Planning History

2.12 There is no planning history of significance within the application sites since the Estate was redeveloped in the 1960s and 1970s. The relevant planning history of the surrounding sites within the Estate is summarised at Table 2.1 below.

Reference	Location	Description	Decision
<u>Site 1A</u>			
07/CO/0046	Open land east of Red Lion Row & North of Boyson Road, 1-41 Bradenham, 1-12 Red Lion Close & The Aylesbury Day Centre London SE17 2ES	Outline Planning Application for the demolition of 1-41 Bradenham, 1-12 Red Lion Close, the Aylesbury Day Centre, the elevated pedestrian link across Bradenham Close and the single storey garages on Red Lion Close, and the erection of a series of buildings ranging in height from 1 (c.4.5m) to 10 storeys (29.9m) in height comprising around 260 dwellings, 404m <sup>2</sup> of retail floorspace, a new day centre and provision of public open space and public realm improvement work.	Approved 11/06/2007
05/CO/0161	Open land east of Red Lion Row and north of Boyson Road & Aylesbury Day Centre 2 Bradenham Close SE17 2QB	Demolition of existing garages and out buildings, erection of 45 new dwellings, 10 new garages and a new day centre north of Boyson Road. Demolition of the existing day centre and the erection of 75 new dwellings west of Bradenham Close and public realm improvement works along Bradenham Close and Boyson Road. (Siting Only)	Approved 18/01/2006
<u>Site 1C</u>			
04/CO/0126	Garages 51 & 52 Chartridge House, Aylesbury Estate, Westmoreland Road SE17	Conversion of garages into a temporary information centre for exhibitions and meetings over estate regeneration proposals	Approved 10/05/2005
<u>Site 7</u>			
12/AP/2332	1-27 and 28-59 Wolverton, Sedan Way, London, SE17 2AA	Demolition of existing buildings and redevelopment of the site to provide 147 residential units including flats, maisonettes and houses (30 x 1 bed, 71 x 2 bed, 13 x 3 bed, 28 x 4 bed, 5 x 5 bed) of which 58% would be affordable housing. The proposed residential blocks range between 3 and 10 storeys in height (10 Storeys at Thurlow Street) with a basement car park together with new vehicle access, plant, landscaping, cycle storage and	Approved 19/02/2013

		refuse/recycling facilities.	
<u>Site 10</u>			
07/AP/2628	Boilerhouse Gardens, Former Amersham Youth Centre, Inville Road, London, SE17 2HY	Erection of fencing around the perimeter of the boilerhouse roof, installation of an intensive green roof system and a ramp leading up to the elevated allotment level.	Approved  13/02/2008
06/CO/0157	Unit 7/8 Aylesbury Access Centre, Thurlow Street, London, SE17 2UN	Demolition of existing buildings; Erection of a two storey building to provide offices and exhibition space to be used as an 'Information Shop' for the Aylesbury Estate redevelopment.	Approved  30/01/2007

**Table 2.1: Planning History**

# 3 Aylesbury Estate Regeneration

- 3.1 This Section provides an overview of the background and strategy context for the regeneration of the Aylesbury Estate.

## Aylesbury Estate – Background

- 3.2 The Aylesbury Estate was constructed between 1966 and 1977 and is one of the largest housing estates in South London. It is home to approximately 7,500 people. It includes a range of buildings and housing types and includes shops, schools and community buildings. In addition, it includes large areas of open space which vary in quality and use.
- 3.3 Since it was built the Aylesbury Estate has become known as one of most deprived estates in London. In 1999 the Aylesbury New Deal for Communities (NDC) was launched to improve the physical environment of the Estate and through this improve the lives of residents, enhance educational and employment prospects and reduce crime and the fear of crime.
- 3.4 The NDC was replaced by the Creation Trust, a community development trust working to drive forward the regeneration in conjunction with local residents, community groups, local and central government and business.
- 3.5 Following previously unsuccessful attempts to redevelop and regenerate the Estate, a structural survey was undertaken in 2005. A review of this concluded that the cost of refurbishing the existing Estate to an appropriate standard was prohibitive and therefore demolition and redevelopment of the existing buildings was the only way to achieve regeneration objectives.
- 3.6 This review informed the preparation of the Aylesbury Area Action Plan (AAP) which was prepared by Southwark Council in consultation with the local community and the Creation Trust. The purpose of the AAP was to establish a planning framework to enable the regeneration of the Estate in a comprehensive manner. The AAP was subsequently adopted by Southwark Council in 2010.
- 3.7 In 2012, under the Public Contracts Regulations 2006, Southwark Council began a detailed procurement process to secure a development partner to work with the Council in the delivery of the redevelopment. Two applicants were shortlisted to submit their Best and Final Offer (BAFO) proposals and these were received by the Council on 1 November 2013.
- 3.8 Following a detailed evaluation process by officers, Southwark's Cabinet took the decision to approve the selection of Notting Hill Housing Trust as the Council's preferred development partner for the regeneration of the Aylesbury Estate.
- 3.9 Notting Hill Housing Trust and Southwark Council have entered a development partnership agreement to regenerate the Estate in line with an agreed business plan. This plan includes a development programme for the whole regeneration with a final completion date of January 2034.

## Aylesbury Estate – Vision

- 3.10 During the production of the AAAP, Southwark Council, in conjunction with stakeholders, established a vision for the redevelopment of the Estate. The AAAP vision states:

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“We want the Aylesbury area to become a successful neighbourhood incorporating the highest design standards, a good mix of uses and a layout that will meet the needs of current and future generations. We want the Aylesbury area to be known for high quality social rented and private homes that address a variety of local needs, including those of the elderly and vulnerable. We also want to be known for an outstanding environment with excellent parks and great streets which are accessible for all. We want residents to choose to stay in the area because of the quality of its schools and community facilities. Overall we want to create a place with a strong sense of community.

We want to contribute to the regeneration of our neighbourhood by setting out key principles on the quality of new homes, improved access and transport, great streets, squares and parks and better social and community facilities.

We also want to contribute by encouraging all those who take decisions that affect our community to aspire to and maintain the highest standards.

In this way we shall build an exemplary neighbourhood in which we and our children will want to live and of which we can be rightly proud.”

- 3.11 It is this vision which is at the heart of the redevelopment of the Estate and the proposals which form these Applications.

# 4 The Proposed Development

- 4.1 The proposed development comprises two separate planning applications which together seek planning permission for the comprehensive regeneration of the Aylesbury Estate. A detailed planning application is submitted for the FDS whilst an outline planning application is submitted for the Outline Application Site. Both of the applications are discussed in further detail in this section of the Planning Statement.
- 4.2 Proposals for the FDS and Outline Application Site are built around the following shared design principles:
- **Re-creating ‘streets’ within the Aylesbury Estate:** Using the ‘street’ as a key element of a people orientated urban design.
  - **Seamless boundaries:** Creating a seamless piece of the city that connects with surrounding areas through the removal of physical and psychological barriers and boundaries.
  - **A sustainable future:** Creating high quality homes that are light, spacious, comfortable and energy efficient.
  - **A cluster of connected neighbourhoods:** Establishing a variety of connected neighbourhoods centred around a network of open spaces and community facilities, each with distinct qualities and characteristics.
  - **A network of open spaces:** Providing diverse and attractive open spaces across the Estate to enable a view of green space from each home.
  - **Homes for all:** Delivering a wide range of homes to establish a diverse, family-orientated community that will meet the needs of its residents for the duration of their lives.
- 4.3 These principles and other key design features are discussed in further detail in the submitted Design and Access Statements and Design Code.

## Use and Amount

### First Development Site

- 4.4 A detailed planning application is submitted in respect of the FDS which is situated to the south west corner of the Estate. Full planning permission is sought for 830 mixed tenure homes and a flexible community facility / early years centre or gym (263 sqm). A detailed schedule of residential accommodation is provided at Table 4.1 below. It is proposed that the homes and community facility / early years centre or gym will be delivered in a variety of building types with heights ranging from 3 to 20 storeys.



Key:  
— FDS Application Boundary

**Fig. 4.1 FDS Application Boundary**

4.5 The description of development for the FDS is as follows:

“Demolition of existing buildings and redevelopment to create a residential-led development comprising 830 private and affordable units (Use Class C3); flexible community use, early years facility (Use Class D1) or gym (Use Class D2); public and private open space; formation of new accesses and alterations to existing accesses; an energy centre; gas pressure reduction station; associated car and cycle parking; and associated works.”

4.6 The residential accommodation for the FDS is as follows:

	Flats				Maisonette and Duplex			Houses			Total
	Priv.	Target Rent	Aff. Rent	Inter.	Priv.	Target Rent	Inter.	Priv.	Target Rent	Inter.	
1 Bed	199	108	27	37	0	0	0	0	0	0	371
2 Bed	162	60	0	42	21	8	6	0	0	0	299
3 Bed	7	41	0	0	23	22	15	0	0	0	108
4 Bed	0	0	0	0	0	3	2	10	17	0	32
5 Bed	0	0	0	0	0	0	0	2	18	0	20
<b>Sub Total</b>	<b>368</b>	<b>209</b>	<b>27</b>	<b>79</b>	<b>44</b>	<b>33</b>	<b>23</b>	<b>12</b>	<b>35</b>	<b>0</b>	<b>830</b>
<b>Total</b>	<b>683</b>				<b>100</b>			<b>47</b>			<b>830</b>

**Table 4.1: FDS, Schedule of Accommodation**

- 4.7 Within the total of 830 units there will be 50 extra care dwellings of which 10 will be shared ownership 20 will be target rent and 20 will be affordable rent. There will also be 7 dwellings for people with learning disabilities (affordable rent).

Units	Private	Target rent	Affordable Rent	Intermediate	Total Units
Flats	368	209	27	79	683
Maisonette and Duplex	44	33	0	23	100
Houses	12	35	0	0	47
<b>Total</b>	<b>424</b> <b>(Units 51.1%)</b> <b>(HR 48.7%)</b>	<b>277</b> <b>(Units 33.4%)</b> <b>(HR 37.3%)</b>	<b>27</b> <b>(Units 3.2%)</b> <b>(HR 2.0%)</b>	<b>102</b> <b>(Units 12.3%)</b> <b>(HR 12.0%)</b>	<b>830</b>

Table 4.2: FDS – By Type and Tenure

(HR = Habitable Rooms)

- 4.8 As evidenced at Tables 4.1 and 4.2, a varied residential mix is proposed in terms of type, tenure and size. All residential homes will be sustainable and of a high quality.
- 4.9 A community facility of 263sqm is also proposed within Block 1 of the FDS. This has been designed to provide a multi-use space which will be leased to LBS. If, following subsequent discussions with LBS, it is identified that this community space is no longer required for use by LBS or other community organisations, then it will be made available for use as an early years facility or a gym. A flexible consent is sought for this unit to permit this possible range of uses.

### Outline Application Site

- 4.10 An outline planning application is submitted for the remainder of the Estate and seeks outline planning permission with all matters reserved, bar means of access, for the following uses:
- Up to 2,745 mixed tenure homes;
  - 600 to 2,500 sqm of employment floorspace (B1);
  - 200 to 500 sqm of retail use (A1);
  - 3,100 to 4,750 sqm of community use / medical centre / early years facilities (D1); and
  - 600 to 3,000 sqm of flexible use which with either be retail space (A1 / A2 / A3) and / or workspace (B1).
- 4.11 There will be a range of building types across the Outline Application Site with heights of between 2 and 20 storeys.



**Key:**  
— Outline Application Boundary

**Fig. 4.2 Outline Application Boundary**

4.12 The description of development for the Outline Application Site is as follows:

“Outline application, including access, for demolition of existing buildings and redevelopment to provide up to 2,745 private and affordable units (Use Class C3); 600 to 2,500sqm of employment use (Use Class B1); 200 to 500sqm of retail space (Use Class A1); 3,100 to 4,750sqm of community use, medical centre and early years facility (Use Class D1); 600 to 3,000 sqm flexible retail use (Use Class A1/A3/A4) or workspace use (B1) ; new landscaping, public and private open space; energy centre; gas pressure reduction station; up to 1,274 car parking spaces; cycle parking; landscaping; and associated works.”

4.13 The indicative schedule of residential accommodation is set out at Tables 4.3 and 4.4 below:

	Flats			Maisonette and Duplex			Houses			Total
	Priv.	Target Rent	Inter.	Priv.	Target Rent	Inter.	Priv.	Target Rent	Inter.	
<b>1 Bed</b>	283	264	118	0	0	0	0	0	0	665
<b>2 Bed</b>	318	310	120	145	19	55	0	0	0	967
<b>3 Bed</b>	148	120	26	162	69	13	0	0	0	538
<b>4 Bed</b>	0	3	0	23	9	3	169	148	33	388
<b>5 Bed</b>	0	0	0	0	0	0	101	76	10	187
<b>Sub Total</b>	749	697	264	330	97	71	270	224	43	2,745
<b>Total</b>	1,710			498			537			2,745



**Table 4.3: Outline Application Site, Schedule of Accommodation**

<b>Units</b>	<b>Private</b>	<b>Target rent</b>	<b>Intermediate</b>	<b>Total</b>
<b>Flats</b>	749	697	264	1,710
<b>Maisonette and Duplex</b>	330	97	71	498
<b>Houses</b>	270	224	43	537
<b>Total</b>	<b>1,349</b>	<b>1,019</b>	<b>377</b>	<b>2,745</b>
	<b>(Units 49.1%)</b>	<b>(Units 37.1%)</b>	<b>(Units 13.8%)</b>	
	<b>(HR 50.8%)</b>	<b>(HR 37.1%)</b>	<b>(HR 12.1%)</b>	

**Table 4.4: Outline Application Site, Housing Mix by Type and Tenure**

- 4.14 The non-residential uses will be provided at ground floor and some upper levels across the Outline Application site on key routes to provide shops, services and employment opportunities for the local community.

## Layout and Orientation

- 4.15 The layout of the existing Estate is currently hard to navigate and is made up of poor linkages and public spaces which do not have a coherent strategy. In addition, much of the ground floor layout of the existing buildings have dead frontages, garages and undercrofts which has led to a feeling of inactivity.
- 4.16 Providing a coherent layout and high quality, active streets has been fundamental to the design of the comprehensive redevelopment from plot layout to detailed street design.
- 4.17 The access strategy has therefore been a key influence on layout and is based on a clearly defined hierarchy of connections which interact within the surrounding streets. Running north-south through the Estate are the existing connections of Portland Street and Thurlow Street which run parallel to Walworth Road and Old Kent Road. Running east-west is the 'community spine' which is a clearly defined route through the Estate providing a quiet, calmed alternative route parallel to Albany Road.
- 4.18 The FDS layout consists of 6 distinct blocks which are connected via new pedestrian and vehicular routes. In response to the lower density and lower height buildings to the north, the houses within the FDS have been focused to the north of the site.
- 4.19 In order to maximise the park frontage 3 higher density perimeter blocks have been provided to the south of the site.
- 4.20 The layout parameters of the Outline Application Site Repeats the principles established by the FDS with the lower height and lower density housing blocks being located to the north and higher density perimeter blocks being located to the south along the park edge.
- 4.21 The increased height along the park edge helps to provide local landmarks and provides 'gateways' into the north-south routes through the Estate. This layout has been informed by the illustrative Outline Application Site within the AAAP.
- 4.22 A medium density zone will connect the park edge with the low density housing to the north of the Estate. This will act as a 'transitional' zone in the centre of the Estate.

## Scale and Massing

- 4.23 The AAAP requirement for high unit numbers and a significant proportion of houses has resulted in a development proposals which achieve a mix of heights and massing.
- 4.24 The heights of the buildings across the site will vary from three storey houses to 20 storey towers at key locations along the park frontage.
- 4.25 The FDS and Outline Application developments will be predominantly made up of three types of block as follows:
- High-density perimeter blocks – These will be focused along the park frontage and provide heights up to 20 storeys subject to location and defined landmark points. A shared courtyard is proposed in the internal area of each block.
  - Medium-density blocks – These will be located in the transitional zone and along key routes through the site such as Thurlow Street. The heights will vary from 4 to 8 storeys. The blocks will consist of flats and houses across a mix of tenures. Flats within these blocks will have shared communal space and houses will have private amenity space.
  - Low-density blocks – These are proposed primarily to the north of the site and will consist predominantly of houses of no more than 4 storeys. The houses will all have private amenity space.

## Landscaping, Public Realm and Open Space

- 4.26 The proposed development places public open space at its heart. Key to this strategy is the emphasis on a network of 'pocket open spaces' across the whole of the site. This approach allows for variety and richness of character and maximises the number of homes which will benefit from direct access to open space and green views.
- 4.27 In addition, the site's proximity to the significant amenity of Burgess Park has informed the open space strategy. Specifically the development includes a network of tree-lined and landscaped streets which connect the area with Burgess Park.
- 4.28 The pocket open spaces throughout the site are linked together through pedestrian and cycle routes increasing accessibility to these spaces.
- 4.29 Each open space within the development has a specific purpose and place within the hierarchy of the Outline Application Site with children's play key to the success of each space.

## Cycle and Car Parking

- 4.30 The Aylesbury Estate is well located in relation to central London and as such cycling has been placed at the heart of the scheme. New cycling routes through the site are proposed which will connect into the wider cycling network and provide enhanced cycling provision.
- 4.31 Cycle parking is provided in secure locations which are easily accessible by residents. In the case of the houses and maisonettes, these will be located in bespoke internal foyers. Within the flat blocks, the cycle parking will be provided in secure communal spaces in a mix of 'stacked' cycle parking or Sheffield stands.

Within the Outline Application Site, cycle parking will be provided at a ratio of 1 space per 1 bed residential unit and 2 spaces per 2+ bed unit. Within the FDS, 1,184 cycle parking spaces will be provided. In addition, 71 cycle parking spaces will be provided within the FDS which will be available to both residents and visitors.

- 4.32 Provision is made for the inclusion of TfL Bike Hire stands within the FDS and Outline Application Site.
- 4.33 Car parking has been kept to a minimum through the scheme. Within the FDS 308 car parking spaces will be provided within undercroft car parks and on-street spaces. In terms of parking for wheelchair units, 88 parking spaces are being provided for the 96 wheelchair units.
- 4.34 Across the Outline Application Site, a maximum car parking ratio of 0.4 per residential unit will be provided.

## Summary of Proposals

- 4.35 In delivering the regeneration of the Estate, NHHT is seeking to create a high quality, mixed, inner London neighbourhood and community.
- 4.36 Provided outline planning permission is granted, a series of reserved matters planning applications seeking full planning permission for the regeneration of the Outline Application Site will follow. These will be submitted on a phase by phase basis as different stages of the regeneration come forward.
- 4.37 With regard to the FDS, it is the intention of the applicant to commence the development on site in mid-2015, assuming planning permission is granted.

# 5 Planning Policy Context

- 5.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the Development Plan unless material considerations indicate otherwise.
- 5.2 In this instance the Development Plan comprises the London Plan: Spatial Development Strategy for Greater London (2011) and updates, the Southwark Core Strategy (2011), the Saved Policies of the Southwark Plan (2007) and the Aylesbury Area Action Plan (2010).
- 5.3 It is noted that the Further Alterations to the London Plan (2015) (FALP 2015) are due to be adopted by the Greater London Authority in March 2015. Therefore, consideration is also given to the emerging policies.
- 5.4 The National Planning Policy Framework (NPPF, March 2012), the National Planning Policy Guidance (NPPG, March 2014), and regional and local level Supplementary Planning Documents are material considerations.
- 5.5 The relevant planning policy documents have been duly considered as the development proposals have emerged.

## Supplementary Planning Documents (SPD)

5.6 At a regional level the following London Plan SPDs are relevant to this application:

- Shaping Neighbourhoods: Play and Informal Recreation (2012)
- Sustainable Design and Construction (2006)
- Housing (2012)
- Housing Design Guide (2010)

5.7 At the local level the following SPDs are relevant:

- Affordable Housing (2008) and Draft (2011)
- Residential Design Standards (2011)
- Sustainable Transport (2010)
- Sustainable Design and Construction (2009)
- Sustainability Assessment (2009)
- Design and Access Statements (2007)
- Section 106 Planning Obligations (2007)

## Aylesbury Estate Planning Designations

5.8 The site-specific planning policy designations set out within the Development Plan and other policy documents are listed below:

### *LB Southwark Core Strategy (2011)*

- Urban Density Zone

- Air Quality Management Area

### *Aylesbury Area Action Plan (2010)*

- Aylesbury Action Area Core

5.9 These designations and the wider policies of relevance to the planning applications are discussed in the following section.

## **Key Planning Considerations**

5.10 This section discusses the key planning considerations relevant to the regeneration of the Aylesbury Estate under the following headings:

- Principle of Use
- Residential Mix
- Wheelchair Housing
- Affordable Housing
- Cycle Parking
- Car Parking
- Open Space
- Play Space
- Design
- Heritage
- Energy and Sustainability
- Sunlight, daylight and overshadowing
- Servicing and Refuse
- Archaeology
- Arboriculture
- Wind
- Noise
- Air Quality
- Ecology
- Flood Risk and Drainage

## **Principle of Use**

### *National Planning Policy*

5.11 The NPPF articulates the priorities of the Government's Plan for Growth within planning policy. With an overriding emphasis on sustainable development, the document sets out the role that the economy has to play in achieving this alongside environmental and social objectives (paragraph 7). In this regard, the NPPF seeks to build a strong, competitive economy.

5.12 The NPPF places a strong emphasis on the 'Presumption in Favour of Sustainable Development.' Specifically, paragraph 4 states:

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“At the heart of the National Planning Policy Framework is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking.”

- 5.13 Paragraph 17 of the NPPF sets out the core land-use planning principles of the planning system. These include that the planning system should:

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“Proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth. Plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential business communities.”

- 5.14 The Core planning principles in Paragraph 17 also emphasise the importance of reusing brownfield land, as follows:

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“encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value.”

- 5.15 Paragraphs 19 and 20 state that the Government is seeking to ensure that the planning system does everything possible to support sustainable economic growth, and Local Planning Authorities should plan proactively. In particular, paragraph 19 states:

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“Planning should operate to encourage and not act as an impediment to sustainable growth. Therefore significant weight should be placed on the need to support economic growth through the planning system.”

- 5.16 Paragraph 47 sets out measures that Local Authorities should take to boost significantly the supply of housing in order to deliver a wide choice of high quality homes.

### *Regional Planning Policy*

- 5.17 London Plan Policy 3.3 – *Increasing Housing Supply* identifies the pressing need to deliver more homes in London and sets an annual average housing target of delivering at least 32,210 net additional homes per annum. Similarly, Policy 3.4 – *Optimising Housing Potential* places significant emphasis on the importance of increasing the supply of housing across London.
- 5.18 Policy 3.7 – *Large Residential Developments* relates specifically to those on sites exceeding 5 hectares or capable of accommodating more than 500 dwellings. The London Plan advises that sites of this size or capacity should be progressed through an appropriately plan-led process that includes engagement with local communities and other stakeholders.
- 5.19 The Further Alterations to the London Plan (January 2014) establish the minimum ten year target for housing supply within each London borough. Between 2015 and 2025, the plan establishes a target of 27,362 new homes with an annual target of 2,736 within Southwark.

### *Local Planning Policy*

- 5.20 Strategic Policy 1 – *Sustainable Development* of the adopted Southwark Core Strategy seeks to achieve sustainable growth by:

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“Allowing more intense development for a mix of uses in the growth areas and making sure development makes the most of a site’s potential and protects open space.

5.21 A key part of this will be regenerating areas including Aylesbury Estate, Elephant and Castle, Peckham, Camberwell, Old Kent Road and Canada Water. The Core Strategy identifies the Aylesbury Action Area as defined by the AAAP and identifies this is an area of phased redevelopment between 2009 and 2027.

5.22 Core Strategy Strategic Policy 5 – *Providing New Homes* sets out Southwark’s overall approach to housing delivery in the Borough:

“Development will meet the housing needs of people who want to live in Southwark and London by providing high quality new homes in attractive environments particularly in our growth areas. Development will provide as much housing as possible whilst also making sure that we have enough land for other types of development and that new housing is in keeping with the character of the area.”

5.23 To achieve this, the Core Strategy states that LBS will deliver 24,450 net new homes in the 2011 – 2026 plan period including 4,200 new homes (1,450 net new homes) in the Aylesbury Action Area. The extent and location of the Action Area is defined at figure 15 of the Core Strategy.

5.24 The AAAP divides the action area core into blocks that relate to the phasing of the development. Policies MP1 – *The Masterplan* and MP2 – *Proposals Sites* require development proposals for each of the blocks to be in general compliance with the principles set out in the AAAP and accompanying masterplan.

5.25 AAAP Policy BH1 – *Housing Targets* - requires 1,450 net additional homes to be delivered in the Action Plan Area.

5.26 Appendix 5 of the AAAP goes on to provide further details as to the provision of new residential units across the AAAP area. The relevant residential proposals from Appendix 5 of the AAAP are summarised below:

	AAAP Proposal (Appendix 5)	Total
<b>First Development Site</b>	AAAP Site 1b – 408 homes	880 homes
	AAAP Site 1c – 472 homes	
<b>Outline Application Site</b>	Phase 2 – 645 homes	2,898 homes
	Phase 3 – 449 homes	
	Phase 4 – 1,692 homes	
	AAAP Site 10 – 112 homes	
<b>Total</b>		<b>3,778 homes</b>

**Table 5.1 – Summary of AAAP Residential Proposals**

*Response*

5.27 The principle of the redevelopment of the Aylesbury Estate is well established in Planning Policy terms. The Applications relate to a brownfield site which is capable of providing sustainable residential-led mixed use development to provide a significant contribution towards housing supply and quality within London.

- 5.28 In accordance within the National and Regional strategic aims, at the local level, the LBS Core Strategy identifies that the Estate will be comprehensively redeveloped in accordance with the detailed policies set out within the AAAP.
- 5.29 The Applications deliver a cohesive masterplan for the Estate with the highest design standards. The overall Masterplan allows a neighbourhood to be created with a clear vision which would not be possible through a series of smaller ad hoc applications. The Design Code and Design and Access Statement which support the Outline Application establish a robust set of principles which will guide the design of future phases so that they are consistent with the overall vision.
- 5.30 The Applications accord with AAAP Policy BH1 by providing 1,225 net additional homes which will contribute to LBS's housing targets and the London Plan.
- 5.31 The residential unit numbers proposed as part of the Applications is compared against Appendix 5 of the AAAP in Table 5.2 below:

	AAAP Proposals (Appendix 5)	Proposals
<b>First Development Site</b>	880 homes	830 homes
<b>Outline Application Site</b>	2,898 homes	2,745 homes
<b>Total</b>	<b>3,778 homes</b>	<b>3,575 homes</b>

**Table 5.2 – Proposed Unit Numbers**

- 5.32 As set out in the table above, the proposed number of units in the FDS is 50 units below the AAAP level and within the Outline Application Site 153 units below the AAAP level. Overall, there is a 5 % reduction in unit numbers.
- 5.33 This reduction in number has followed detailed discussions and design work in conjunction within the London Borough of Southwark. In particular, the layout of the two sites and the need to deliver high quality homes within an acceptable height and massing has resulted in a reduction in the overall unit numbers. The minor shortfall is considered acceptable in the context of the many regeneration benefits that the scheme delivers.
- 5.34 On this basis the principle of the redevelopment of the Aylesbury Estate to provide a sustainable, mixed use community delivering high quality new homes and open spaces accords with the relevant National, Regional and Local planning policy.

## Residential Mix

### *National Planning Policy*

- 5.35 Paragraph 50 of the NPPF sets out measures to deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities.
- 5.36 With regards to the role of a Local Planning Authority it states that they should:

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“Plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community.”



## Regional Planning Policy

5.37 London Plan Policy 3.8 – *Housing Choice* seeks to maintain a range of housing types and states:

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“Londoners should have a genuine choice of homes that they can afford and which meet their requirements for different sizes and types of dwellings in the highest quality environments.”

5.38 Paragraph B of the Policy states that to achieve this, Boroughs should work with the Mayor and local communities to ensure that:

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“New developments offer a range of housing choices, in terms of the mix of housing sizes and types, taking account of the housing requirements of different groups and the changing roles of different sectors including the private rented sector, in meeting these.”

5.39 Paragraph B of Policy 3.9 adds that a more balanced mix of tenures should be sought in all part of London.

## Local Planning Policy

5.40 Core Strategy Strategic Policy 7 – *Family Homes* specifically seeks to provide more family housing (3 or more bedrooms) across all tenures. This will be achieved by requiring development of 10 or more units to have the following:

- At least 60% 2 or more bedrooms; and
- At least 20% 3, 4 or 5 bedrooms in the urban zone and the CAZ, which should be split between private, social and intermediate housing.

5.41 Saved Southwark Plan policy 4.3 – *Mix of Dwellings* requires all major residential new-build development and conversions to provide a mix of dwelling sizes and types.

5.42 Policy BH4 *Size of Homes* in the AAAP requires the following mix of housing sizes will be provided in the action area core:

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“- A maximum of 3% studios all in private tenure;  
- At least 70% of homes to have two or more bedrooms;  
- At least 20% of homes to have three bedrooms;  
- At least 7% of homes to have four bedrooms; and  
- At least 3% of homes to have five or more bedrooms.”

5.43 AAAP Policy BH5 – *Type of Homes* states:

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“The redevelopment of the action area core will provide a mix of types of homes reflecting the following proportions:

Flats – 60%

Maisonettes/ Houses over houses – 17%

Houses – 23% (all houses to have two bedrooms or more).”

5.44 Policy BH5 also adds that developments must provide a range of dwelling types to contribute towards the mix sought for each proposal site (as set out in Appendix 5) and that the standards for new housing should comply with the design guidance set out in Appendix 6 by the AAAP.

## Response

### Unit Sizes

5.45 The proposals for the FDS and Outline Application Sites include a varied mix of homes comprising flats, maisonettes, duplexes, houses and extra care dwellings with sizes ranging between 1 and 5 bedrooms.

5.46 Table 5.3 below sets out the proportion of unit sizes across the FDS and Outline Application Sites.

Unit Size	First Development Site	Outline Application Site *	Total
<b>1 bed</b>	371 (44.7%)	664 (24.2%)	1,035 (28.9%)
<b>2 bed</b>	299 (36.0%)	966 (35.2%)	1,265 (35.4%)
<b>3 bed</b>	108 (13.0%)	538 (19.6%)	646 (18.1%)
<b>4 bed</b>	32 (3.8%)	389 (14.2%)	421 (11.8%)
<b>5 bed</b>	20 (2.5%)	188 (6.8%)	208 (5.8%)
<b>Total</b>	<b>830</b>	<b>2,745</b>	<b>3,575</b>

\* Based on illustrative Masterplan

**Table 5.3 – FDS and Outline Application Site Unit Mix**

5.47 As such, and in accordance with Policy 3.8 of the London Plan, it is considered that the residential mix will meet the requirements of both current and future residents of the Aylesbury Estate.

5.48 71% of all homes will have 2 or more bedrooms and 36% of units will have 3, 4 or 5 bedrooms. The Applications are therefore in accordance with Core Strategy Strategic Policy 7.

5.49 The applications have been developed in accordance with Policy BH4 of the AAAP which requires a specific mix of unit sizes for the Aylesbury Estate. Table 5.4 below shows the requirements of Policy BH4 in comparison to what is proposed by the comprehensive development.

Policy BH4 Requirements	FDS and Outline Application Site Unit Mix *
<b>Max of 3% studios</b>	0%
<b>At least 70% two or more bedroom units</b>	71.1%
<b>At least 20% three bedroom units</b>	18.1%

<b>At least 7% four bedroom units</b>	11.8%
<b>At least 3% five bedroom units</b>	5.8%

\* Based on illustrative Masterplan

**Table 5.4 – Comparison with AAAP Policy BH4 – Unit Sizes**

5.50 Table 5.4 demonstrates that the proposed mix of units across the FDS and Outline Application site are broadly compliant with the requirements of AAAP Policy BH4. In four of the five unit size categories a greater provision than the minimum requirements of the policy are being provided. The number of three bedroom units is marginally lower than the requirements of AAAP (18.1% against a target of 20%). However, this is considered appropriate as the number of four and five bedroom units are considerably higher than the target requirements. The proposals are therefore in broad accordance with AAAP Policy BH4.

### Unit Types

5.51 The proposals provide a mix of flats, maisonettes, duplexes and houses in accordance with the vision for the Aylesbury Estate as set in the AAAP.

5.52 Table 5.5 below sets out the proportion of unit types against the requirements of AAAP Policy BH5.

<b>Unit Type Requirements Policy BH5</b>	<b>First Development Site</b>	<b>Outline Application Site *</b>	<b>Total</b>
<b>Flats- 60%</b>	683 (82.3%)	1,707 (62.2%)	2,390 (66.8%)
<b>Maisonettes / Houses over Houses – 17%</b>	100 (12.0%)	500 (18.2%)	600 (16.8%)
<b>Houses – 23%</b>	47 (5.7%)	538 (19.6%)	585 (16.4%)
<b>Total</b>	<b>830</b>	<b>2,745</b>	<b>3,575</b>

\* Based on illustrative Masterplan

**Table 5.5 – Comparison with AAAP Policy BH5**

5.53 Policy BH5 requires that the redevelopment of the action area core reflects the unit type proportions sets out above. As demonstrated in Table 5.5, the mix of unit types as proposed by the Applications is broadly compliant with Policy BH5.

5.54 The provision of houses is below the policy requirements (16.4% against a target of 23%). This is a response to the density requirements of the scheme as set out by the AAAP. The inclusion of houses across the Estate is at a low density which significantly reduces the land available to deliver the aspirations of the AAAP in terms of overall unit numbers. Therefore, in order to provide a high overall number of units, the number of houses has been reduced slightly.

## Wheelchair Housing

## *Regional Planning Policy*

- 5.55 London Plan Policy 7.2 - *An Inclusive Environment* - requires all new development to achieve high standards of accessible and inclusive design.
- 5.56 London Plan Policy 3.8 - *Housing Choice* - requires that:

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*“...ten per cent of new housing is designed to be wheelchair accessible or easily adaptable for residents who are wheelchair users.”*

## *Local Planning Policy*

- 5.57 Saved policy 4.3 of the Southwark Plan states:

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*“iii. At least 10% of all major new residential developments should be suitable for wheelchair users, except where this is not possible due to the physical constraints of the site.*

- 5.58 LBS Residential Design Standards SPD sets out the Council’s policies for new housing to meet specific needs, including a requirement that for housing schemes over 10 units, these include a minimum of 10% of units that are suitable for wheelchair units.
- 5.59 The Residential Design Standards SPD also requires that new developments meet the standards of the South East London Housing Partnership Wheelchair Housing Design Guidelines (SELHP).

## *Response – First Development Site*

- 5.60 In the FDS, wheelchair units will be provided through the scheme in the form of units which are adapted for wheelchair use, units which are wheelchair adaptable and the extra care units. These have been provided across all of the blocks and across unit size and tenure. The provision is as follows:

- Extra Care – 50 wheelchair units.
- Learning Disabilities Units – 7 wheelchair units.
- Other residential – 40 wheelchair units.

- 5.61 In total, 97 wheelchair units will be provided within the FDS which equates to 11.6% of all units and complies with the above policies.

- 5.62 Further details of the wheelchair units and how the principles of inclusive design have been addressed are set out within the Design and Access Statement.

## *Response – Outline Application Site*

- 5.63 The Outline Application Site will provide a minimum of 10% wheelchair units distributed across tenure and unit size. The precise location and size of the units will be agreed at the reserved matters stage.

## **Affordable Housing**

### *National Planning Policy*

- 5.64 Paragraphs 47 and 50 of the NPPF set out measures to boost significantly the supply of housing in order to deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities.

## *Regional Planning Policy*

5.65 London Plan Policies 3.8 – *Housing Choice* - and 3.9 – *Mixed and Balanced Communities* - seek to ensure that Londoners have a genuine choice of homes that they can afford and that communities are mixed and balanced by tenure and household income.

5.66 Policy 3.11 of the London Plan states that boroughs:

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“should seek to maximise affordable housing provision and ensure an average of at least 13,200 more affordable homes per year in London over the term of this Plan.”

5.67 The policy also states that boroughs;

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“should set an overall target in LDFs for the amount of affordable housing provision needed over the plan period in their areas and separate targets for social rented and intermediate housing”.

5.68 Policy 3.12 states:

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“The maximum reasonable amount of affordable housing should be sought when negotiating on individual private residential and mixed use schemes, having regard to:

- current and future requirements for affordable housing at local and regional levels.
- affordable housing targets.
- the need to encourage rather than restrain residential development.
- the need to promote mixed and balanced communities.
- the size and type of affordable housing needed in particular locations.
- specific circumstances of individual sites”.

5.69 Policy 3.14 of the London Plan states that;

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“Loss of housing, including affordable housing, should be resisted unless the housing is replaced at existing or higher densities with at least equivalent floorspace.”

5.70 Paragraph 3.82 of the London Plan provides further guidance and states that;

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“Estate renewal should take into account the regeneration benefits to the local community, the proportion of affordable housing in the surrounding area and the amount of affordable housing to be provided elsewhere in the borough.”

## *Local Planning Policy*

5.71 Core Strategy Strategic Policy 6 – *Homes for People on Different Incomes* - requires residential developments to provide social rented, intermediate and private homes for people on a wide range of incomes including 2,100 affordable homes in the Aylesbury Action Area Core between 2009 and 2026. The overall affordable housing requirement for the Action Area Core is to achieve 50% affordable housing and 50% private housing.

5.72 In addition, at part (i), Strategic Policy 6 states that the Council will:

“Require as much affordable housing on developments of 10 or more units as is financially viable.”

5.73 The LBS draft Affordable Housing SPD (2011) provides further guidance and states that in some instances of estate regeneration the Council:

“may not replace all of the affordable housing lost during redevelopment.”

5.74 AAAP Policy BH3 – *Tenure Mix* – states:

“50% of new homes in the action area core will be affordable and 50% will be private..... Of the affordable housing provided, 75% should be social rented and 25% should be intermediate.”

### Response

5.75 The FDS will provide 830 residential units. Table 5.6 below sets out the proposed tenure split across the FDS.

	Private	Target rent	Affordable Rent	Intermediate	Total Affordable	Total
Flats	368 (HR 1,054)	209 (HR 628)	27 (HR 54)	79 (HR 215)	315 (HR 897)	683 (HR 1,951)
Maisonette and Duplex	44 (HR 199)	33 (HR 160)	0	23 (HR 111)	56 (HR 271)	100 (HR 470)
Houses	12 (HR 74)	35 (HR 228)	0	0 (HR 0)	35 (HR 288)	47 (HR 302)
<b>Total</b>	<b>424</b> <b>(HR 1,327)</b> <b>(Units 51.1%)</b> <b>(HR 48.7%)</b>	<b>277</b> <b>(HR 1,016)</b> <b>(Units 33.4%)</b> <b>(HR 37.3%)</b>	<b>27</b> <b>(HR 54)</b> <b>(Units 3.2%)</b> <b>(HR 2.0%)</b>	<b>102</b> <b>(HR 326)</b> <b>(Units 12.3%)</b> <b>(HR 12.0%)</b>	<b>406</b> <b>(HR 1,396)</b> <b>(Units 48.9%)</b> <b>(HR 51.3%)</b>	<b>830</b> <b>(HR 2,723)</b>

**Table 5.6 FDS Tenure Split**

**(HR = Habitable Rooms)**

5.76 Within the FDS Application the majority of the affordable housing is target rent (277 units). 27 units are provided as affordable rent comprising the 7 learning disability units and 20 extra care units. In addition there are 102 intermediate units which will be shared ownership.

5.77 As table 5.6 indicates the affordable units are distributed across the different housing types.

5.78 Table 5.7 below sets out the indicative tenure split across the Outline Application Site.

Private Units	Target rent Units	Intermediate Units	Total	Total
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			Affordable Units	Residential Units
1,349	1,019	377	1,396	2,745
(HR 5,412)	(HR 3,955)	(HR 1,292)	(HR 5,247)	(HR 10,659)
(Units 49.1%)	(Units 37.1%)	(Units 13.8%)	(Units 50.8%)	
(HR 50.8%)	(HR 37.1%)	(HR 12.1%)	(HR 49.2%)	

**Table 5.7 Outline Application Site Tenure Split**

**(HR = Habitable Rooms)**

5.79 The Outline Application is for up to 2,745 residential units. The illustrative Masterplan included within the Design and Access Statement provides 1, 396 affordable units, the majority of which are for target rent. Again, these will be spread across the various housing types.

5.80 The table below sets out the proposed tenure split across the both the FDS and the Outline Application Site.

Tenure	FDS Application	Outline Application (assumes that 2,745 units are delivered)	Total
<b>Target Rent</b>	277 (HR 1,016) (Units 33.4%) (HR 37.3%)	1,019 (HR3,955) (Units 37.1%) (HR 37.1%)	<b>1,296</b> <b>(HR 4,971)</b> <b>(Units 36.3%)</b> <b>(HR 37.1%)</b>
<b>Affordable Rent</b>	27 (HR 54) (Units 3.2%) (HR 2.0%)	0 (HR 0) (Units 0%) (HR 0%)	<b>27</b> <b>(HR 54)</b> <b>(Units 0.7%)</b> <b>(HR 0.4%)</b>
<b>Intermediate</b>	102 (HR 326) (Units 12.3%) (HR 12.0%)	377 (HR 1,292) (Units 13.8%) (HR 12.1%)	<b>479</b> <b>(HR 1,618)</b> <b>(Units 13.4%)</b> <b>(HR 12.1%)</b>
<b>Private</b>	424 (HR 1,327) (Units 51.1%)	1,349 (HR 5,412) (Units 49.1%)	<b>1,773</b> <b>(HR 6,739)</b> <b>(Units 49.6%)</b>

	(HR 48.7%)	(HR 50.8%)	<b>(HR 50.4%)</b>
<b>Total Units</b>	<b>830</b> <b>(HR 2,723)</b>	<b>Up to 2,745</b> <b>(HR 10,659)</b>	<b>3,575</b> <b>(HR 13,382)</b>

**Table 5.8 FDS and Outline Application Site Tenure Split**

**(HR = Habitable Rooms)**

5.81 Table 5.9 summarises the affordable housing provision and tenure split.

Tenure	FDS	Outline Application (assumes that 2,745 units are delivered)	Comprehensive Development
Private	424 (HR 1,327) (Units 51.1%) (HR 48.7%)	1,349 (HR 5,412) (Units 49.1%) (HR 50.8%)	1,773 (HR 6,739) (Units 49.6%) (HR 50.3%)
Affordable	406 (HR 1,396) (Units 48.9%) (HR 51.3%)	1,396 (HR 5,247) (Units 50.8%) (HR 49.2%)	1,802 (HR 6,643) (Units 50.4%) (HR 49.7%)
Affordable Tenure Split			
- Intermediate	102 units (25.1%)	377 units (27.0%)	479 units (26.6%)
- Target Rent / Affordable Rent	304 units (74.9%)	1,019 units (73.0%)	1,323 units (73.4%)

**Table 5.9 Summary of affordable housing provision**

**(HR = Habitable Rooms)**

5.82 As the above tables indicate the FDS Application will deliver 830 residential dwellings:

- Within the FDS Application 51.3% of habitable rooms are affordable, equating to 48.9% of units.
- The unit tenure split within the FDS Application is 25 / 75% intermediate / social rent.



5.83 This complies with the national, regional and local planning policies in terms of the proportion of affordable housing and the tenure mix.

5.84 The Outline Application will deliver up to 2,745 residential dwellings:

- Within the Outline Application 49.2% of habitable rooms are affordable, equating to 50.8% of units.
- The unit tenure split within the Outline Application is 27 / 73% intermediate / social rent.

5.85 This is in accordance with national planning policy and broadly accords with the London Plan and AAAP in terms of the proportion of affordable housing and the tenure mix.

5.86 The Comprehensive Development will deliver up to 3,575 residential dwellings:

- Across the Comprehensive Development 49.7% of habitable rooms are affordable, equating to 50.4% of units.
- The unit tenure split within the comprehensive development is 27 / 73% intermediate / social rent.

5.87 This is in accordance with national planning policy and broadly accords with the London Plan and AAAP in terms of the proportion of affordable housing and the tenure mix.

5.88 In order to understand the overall position for affordable housing provision across the Aylesbury Estate, Table 5.8 below sets out an overview of the delivered / committed phases (early phases) and proposed phases (FDS and Outline Application Site) of housing re-provision within the Aylesbury Estate renewal programme. The Estate baseline is the situation on the Estate prior to the early redevelopment phases 1a and 7 being implemented.

	Target and Affordable Rent Units	All Affordable Units	Private Units	All Units
Estate Baseline	2,402 (HR 7,345)	2,402 (HR 7,345)	356 (HR 1,289)	2,758 (HR 8,634)
Early Phases	148 (HR 541)	210 (HR 703)	198 (HR 591)	408 (HR 1,294)
Proposed FDS and Masterplan	1,323 (HR 5,025)	1,802 (HR 6,643)	1,773 (HR 6,739)	3,575 (HR 13,382)
Net Change	-931 (HR -1,779)	-390 (HR +1)	+ 1,615 + (HR 6,041)	+1,225 (HR + 6,042)

**Table 5.10 Housing provision overview against Estate baseline**

5.89 In accordance with London Plan Policy 3.14 there is a net increase in residential floorspace of 1,225 units (6,042 habitable rooms) when compared with the Estate baseline. In terms of affordable housing, there is a

reduction in the overall units and floorspace. However, the number of affordable habitable rooms is maintained.

5.90 The AAAP policy requires a mixed tenure scheme introducing private housing on to the Estate where today there is very little. Specifically, the AAAP requires 50% of new housing to be private tenure. This accords with the NPPF and Policy 3.9 of the London Plan in terms of widening housing choice and creating communities that are mixed and balanced in terms of tenure and household income. It is an important policy objective to create a balanced and sustainable community.

5.91 In addition, paragraph 3.3.5 of the AAAP notes:

“The private and intermediate homes will generate value to help deliver the project. Financial modelling has shown that the replacement of all the existing social rented housing would not be possible economically.”

5.92 The housing mix has been carefully considered to meet the objectives of the AAAP and to deliver the highest possible quantity of new affordable homes together with other tenures and types of housing and the open spaces and other uses needed to create a vibrant and sustainable community.

5.93 Further details on the affordable housing needs in the local area and the size and quality of units being provided is contained within the Affordable Housing Statement submitted in support of the Applications.

## Cycle Parking

### National Planning Policy

5.94 At Paragraph 35, the NPPF sets out measures to maximise the use of sustainable transport modes including cycling in new developments. In accordance with the NPPF, developments should be located and designed to protect and exploit opportunities for the use of sustainable transport.

### Regional Planning Policy

5.95 London Plan Policy 6.9 – *Cycling* - is based on the Mayor’s aim to achieve a significant increase in cycling in London, so that it accounts for at least 5% of modal share by 2026. Policies, 6.9 and 6.13 refer to Table 6.3 which provides guidance on the minimum cycle parking standards for new developments.

5.96 As per Table 6.3 of the FALP 2015, cycle parking should be provided as follows:

Use Class	Long Stay	Short Stay
A1 – Food	from a threshold of 100 sqm: 1 space per 175 sqm	from a threshold of 100 sqm: first 750 sqm: 1 space per 40 sqm. Thereafter: 1 space per 300 sqm
A1 – Non-Food	from a threshold of 100 sqm: first 1000 sqm: 1 space per 250 sqm. Thereafter: 1 space per 1000 sqm	from a threshold of 100 sqm: first 1000 sqm: 1 space per 125 sqm thereafter: 1 space per 1000 sqm
A3-A5 Cafes and Restaurants Pubs and Wine Bars Take-away	from a threshold of 100 sqm: 1 space per 175 sqm	from a threshold of 100 sqm: 1 space per 40 sqm

B1 – Business	inner/ central London: 1 space per 90 sqm	first 5,000 sqm: 1 space per 500 sqm. Thereafter: 1 space per 5,000sqm
C3 – Dwellings	1 space per studio and 1 bedroom unit 2 spaces per all other dwellings	1 space per 40 units
D1 – Health Facilities	1 space per 5 staff	1 space per 3 staff

**Table 5.11 – London Plan Cycle Parking Standards**

### *Local Planning Policy*

- 5.97 Southwark Core Strategy Policy 2 – *Sustainable Transport* - seeks to encourage walking, cycling and the use of public transport as opposed to private car use. It is envisaged that this would help the Borough to create safe, attractive, vibrant and healthy places for people to live and work by reducing congestion, traffic and pollution.
- 5.98 As such, development proposals should prioritise walking and cycling, whilst maximising the use of public transport and minimising car use. Proposals will also be required to be supported by a Transport Assessment to show that the scheme minimises their impact, minimises car parking and maximises cycle parking thus aiding sustainable transport.

### *Response*

#### **First Development Site**

- 5.99 The cycle storage strategy has been designed to deliver flexibility and offer a choice to residents. The houses and maisonettes will be equipped with individual secure storage that is designed to accommodate two or more bicycles. The storage will be inside the homes but located within an entrance vestibule so it can be easily accessed. Bike hoops will also be provided within the garden space of these dwellings.
- 5.100 For the flat accommodation, cycle storage is accessed via either a fobbed external door adjacent to the entrances or within the podium parking. The cycle storage itself offers a range of solutions, including split double stacked storage (josta or similar) and Sheffield stands. These will be allocated to best meet the needs and demographics of the block.
- 5.101 The FDS scheme has been developed over the last 12 months in accordance with the adopted London Plan policy and as such the application as submitted in November 2014 provides cycle storage on the basis of 1 space for every 1 and 2 bedroom dwelling and 2 spaces for all 3 bedroom dwellings and larger. It is understood that the FALP will potentially become adopted policy at the time this planning application is determined. As such consideration has been given to increasing the number of cycle parking spaces in accordance with the revised FALP standards, in particular the requirement to provide 2 spaces per 2 bed unit.
- 5.102 The FDS proposes 264 two bed flats which are provided with 1 cycle space per unit. The FALP standards would require the provision of an additional 264 cycle parking to achieve the 2 spaces per 2 bed unit standard. Currently, the cycle storage for the flats is provided at the ground floor within the podiums alongside the plant, entrances, car parking and circulation space. There is very limited space within the podium to provide an addition 264 cycle parking spaces. Notwithstanding this, a review of the plant provision

and cycle parking has been undertaken to assess the potential for increasing the number of cycle parking spaces. This has identified that an additional 206 spaces can be accommodated in response to the increased cycle parking provision required by the FALP.

5.103 In addition to the private cycle parking provision, a TfL Bike Hire station will be provided within the FDS within Westmoreland Square.

### **Outline Application Site**

5.104 The cycle strategy established by the FDS will be used throughout the Outline Application site. Houses and maisonettes will be provided with individual cycle storage and flats and maisonettes will be provided with communal secure storage within the communal areas of the blocks.

5.105 Cycle parking will be provided to meet or exceed the parking provision set out in the London Plan and FALP.

5.106 The cycle parking will be provided in integrated bike stores within the houses and maisonettes and communal cycle storage will be located conveniently close to shared entrances. Cycle parking will also be located at key destinations around the new development, near entrances to buildings to encourage visitors to cycle.

5.107 In addition, TfL Bike Hire stations will be provided within the Outline Application Site. TfL have confirmed that new docking stations should provide a minimum of 24 spaces and there are 4 appropriate locations identified within the Outline Application Site.

5.108 The cycle provision is therefore in accordance with adopted planning policy, although the FDS falls slightly short of the increased standards set out in the emerging FALP.

## **Car Parking**

### *National Planning Policy*

5.109 Paragraph 39 of the NPPF sets out the key considerations which local planning authorities should take into account when setting local parking standards:

- 
- “the accessibility of the development;
  - the type, mix and use of development;
  - the availability of and opportunities for public transport;
  - local car ownership levels; and
  - an overall need to reduce the use of high-emission vehicles.”

### *Regional Planning Policy*

5.110 Policy 6.13 – *Parking* - of the London Plan states developments must:

- 
- a) “ensure that 1 in 5 spaces (both active and passive) provide an electrical charging point to encourage the uptake of electric vehicles
  - b) provide parking for disabled people in line with Table 6.2
  - c) meet the minimum cycle parking standards set out in Table 6.3
  - d) provide for the needs of businesses for delivery and servicing.”

5.111 Table 6.2 of the London Plan sets out the maximum parking standards against which planning applications should be assessed. The standards for residential development vary depending on the location, PTAL and density of the development.

5.112 Within table 6.2 the Parking Standards for residential are:

<b>Maximum Residential Parking Standards</b>			
<b>No. of Beds</b>	4 or more	3	1 – 2
	2 – 1.5 per unit	1.5 – 1 per unit	Less than 1 per unit

**Table 5.12 – Maximum Residential Parking Standards**

5.113 The text supporting the table states that all developments in areas of good public transport accessibility should aim for significantly less than 1 space per unit and adequate parking spaces for disabled people must be provided preferably on-site.

### *Local Planning Policy*

5.114 At a local level, Saved Policy 5.6 of the Southwark Plan is of principle relevance and states that all developments requiring car parking should minimise the number of spaces provided.

5.115 At Appendix 15 of the Southwark Plan, the maximum car parking standards for residential development across the Borough are set out as follows:

<b>Zone of Accessibility to Public Transport (identified on Proposals Map)</b>	<b>Residential Car Parking Provision (Maximum)</b>
Central Activity Zone (High Accessibility to Public Transport)	0.4 of a maximum space per unit. On street parking permits will not be available for residents for new developments. Car free if within a Controlled Parking Zone
Public Transport Accessibility Zone (High Accessibility to Public Transport)	1 maximum space per unit. Within controlled parking zones on street parking permits will not be available for residents of new developments.
Urban Zone (Medium Accessibility to Public Transport)	1 maximum space per unit
Urban Zone (Low Accessibility to Public Transport)	1.5 maximum spaces per unit
Suburban Zone South (Low Accessibility to Public Transport)	1.5 – 2 maximum spaces per unit

**Table 5.13 – Appendix 15 of the Southwark Plan**

5.116 Southwark Plan Saved Policy 5.7 – *Parking Standards for Disabled People and the Mobility Impaired* - sets out the following requirements to ensure that developments provide adequate parking for disabled people the mobility impaired:

“A minimum of one accessible car parking space per development, where associated car parking is not provided; or

A minimum of two accessible car parking spaces in circumstances where associated parking is provided.”

5.117 AAAP Policy TP3 – *Parking Standards: Residential* - states that across the whole Action Plan Area, car parking should not exceed a maximum of 0.4 spaces per home on average. Notwithstanding this, the proposed level of car parking up to a maximum of 0.4 spaces should be justified by a Transport Assessment and Travel Plan submitted in support of any development proposals.

## Response

### Car Parking

5.118 Car parking has been minimised throughout the scheme in order to reduce reliance on the private car and encourage cycle usage.

5.119 Within the FDS a total of 308 car parking spaces will be provided. These are split by tenure as follows:

Tenure	On street	Off street	Total
<b>Affordable Dwellings</b>	125	21	146
<b>Private Dwellings</b>	12	102	114
<b>Non-standard Spaces (extra care / learning difficulties / community)</b>	43	2	45
<b>Car Club</b>	3	0	3
<b>TOTAL</b>	<b>183</b>	<b>125</b>	<b>308</b>

**Table 5.14 – FDS Car Parking**

5.120 Within the FDS, the total car parking spaces on the site equates to 0.37 per residential dwelling. Within the site boundary, 3 on-street car club bays are provided for use by the residents.

5.121 Within the Outline Application Site a maximum car parking ratio of 0.4 spaces per residential unit is proposed.

5.122 Within the Outline Application Site, 14 car club spaces will be provided. It is currently anticipated that these spaces will be managed by Zipcar who are the current preferred provider of car clubs in Southwark. The car club spaces will be phased in accordance with the development build out.

5.123 The overall car parking ratio across the Application Sites is less than 0.4 spaces per residential unit. Therefore, the car parking provision is in accordance with the London Plan, Southwark Plan and Policy TP3 of the AAAP.

5.124 Full details of the proposed car parking can be found in the Transport Assessment which accompanies the Applications. In addition, a Travel Plan has been prepared which sets out proposals to encourage the reduction in car use throughout the life of the development.

### *Disabled Parking*

5.125 Within the FDS, there are 97 wheelchair units provided as follows:

- 40 flat and maisonette units.
- 50 extra care units.
- 7 learning disabilities units.

5.126 Within the 40 flat and maisonettes wheelchair units, disabled parking will be provided at a ratio of 1:1. The extra care and learning disabilities units, will not have parking associated with them. This is because the residents who will be living in these units do not typically drive or require car parking spaces.

5.127 Within the Outline Application Site, disabled car parking will be provided at a minimum ratio of 1 space per wheelchair unit.

5.128 The disabled car parking is located within close proximity of the wheelchair units to ensure they are easily accessible.

## Open Space

### *National Planning Policy*

5.129 The NPPF states that planning decisions should aim to ensure that developments:

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“will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;

establish a strong sense of place, using streetscapes and buildings to create attractive and comfortable places to live, work and visit;

optimise the potential of the site to accommodate development, create and sustain an appropriate mix of uses (including incorporation of green and other public space as part of developments) and support local facilities and transport networks;

respond to local character and history, and reflect the identity of local surroundings and materials, while not preventing or discouraging appropriate innovation;

create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion; and

are visually attractive as a result of good architecture and appropriate landscaping.”

### *Regional Planning Policy*

5.130 The relevant London Plan policies which relate to open space and public realm are as follows:

Policy	Title	Summary
	<b>London Plan 2011</b>	

Policy	Title	Summary
7.5	Public Realm	<p><i>“Development should make the public realm comprehensible at a human scale, using gateways, focal points and landmarks as appropriate to help people find their way. Landscape treatment, street furniture and infrastructure should be of the highest quality, have a clear purpose, maintain uncluttered spaces and should contribute to the easy movement of people through the space. Opportunities for the integration of high quality public art should be considered, and opportunities for greening (such as through planting of trees and other soft landscaping wherever possible) should be maximised. Treatment of the public realm should be informed by the heritage values of the place, where appropriate.</i></p> <p><i>Development should incorporate local social infrastructure such as public toilets, drinking water fountains and seating, where appropriate. Development should also reinforce the connection between public spaces and existing local features such as the Blue Ribbon Network and parks and others that may be of heritage significance.”</i></p>

**Table 5.15 – London Plan Open Space Policy**

### Local Planning Policy

5.131 The relevant local planning policies are:

Policy	Title	Summary
<b>Core Strategy</b>		
11	Open Space and Wildlife	<i>“Improve, protect and maintain a network of open spaces and green corridors that will make places attractive and provide sport, leisure and food growing opportunities for a growing population.”</i>
<b>Aylesbury Area Action Plan</b>		
PL5	Open Space	<i>“New development must provide a high quality network of public open spaces of different sizes and functions which link well together and contain good pedestrian and cycling routes.”</i>
PL7	Private Amenity Space	<i>“All development must contain high quality private open space in the form of communal gardens, private gardens and useable balconies. The design of communal gardens should comply with the guidance in Appendix 6.”</i>
App. 6	Design Requirements	<p><i>“a) All dwellings must have direct access to private open spaces, whether in the form of a garden, roof garden, courtyard or balcony. 1/2 bedroom dwellings must have a minimum of 6 sqm of private amenity space. Larger dwellings should aim to meet the minimum standards set out in the Residential Design Standards SPD:</i></p> <p><i>B) Houses should be designed with individual private gardens or patios. They may also be designed with integral or enclosed private gardens or patio areas enveloped within the building line, thereby</i></p>



Policy	Title	Summary
		<i>providing more habitable rooms with direct views and greater access to private amenity space.”</i>
<b>Residential Design Standards SPD</b>		
<b>Para. 3.2</b>	Residential Standards	<p><i>“All flat developments must meet the following minimum standards and seek to exceed these where possible:</i></p> <ul style="list-style-type: none"> <li><i>- 50sqm communal amenity space per development</i></li> <li><i>- For units containing three or more bedrooms, 10sqm of private amenity space</i></li> <li><i>- For units containing two or less bedrooms, 10sqm of private amenity space should ideally be provided. Where it is not possible to provide 10sqm of private amenity spaces, as much space as possible should be provided as private amenity with the remaining amount added towards the communal amenity space requirement.</i></li> <li><i>- Balconies, terraces and roof gardens must be a minimum of 3sqm to count towards private amenity space.</i></li> </ul> <p><i>For new housing, a minimum of 50sqm of private garden spaces is required and this should be at least 10m in length. The private gardens should extend across the entire width of the dwellings.”</i></p>

**Table 5.16 – Local Open Space Policy**

### *Response*

#### **Publicly Accessible Open Spaces**

5.132 The provision of open space is integral to the comprehensive redevelopment of the Estate. It is recognised that the existing Estate currently has a large proportion of open space, the majority of which is communal. However, many spaces are not currently well used or maintained and have resulted in an increase in the perception of crime and anti-social behaviour.

5.133 The redevelopment will provide a significant proportion of new public and private space across the site that has been designed to be at the heart of the Masterplan. The layout has been designed to increase the distribution of open space across the site whilst at the same time ensuring that all residential units have easy access to open space.

5.134 The FDS and Outline Application Site will provide a total of 29,000sqm of publicly accessible open space as shown in Table 5.17.

Publicly Accessible Open Space	Outline Application (sqm)	FDS Application (sqm)
<b>Publicly Accessible Open Space - Civic Space</b>	2,830	2,010
<b>Publicly Accessible</b>	14,129	1,965

<b>Open Space - Parks</b>		
<b>Street Gardens</b>	7,216	-
<b>TOTAL</b>	24,175	3,975

**Table 5.17 – Open Space Provision**

5.135 In addition to this onsite provision, the Aylesbury community has good access to public parks including the adjoining Burgess Park.

5.136 This network of open spaces and design rationale behind it is set out in more detail within the Landscaping Strategy which forms part of this planning application.

### **Private Amenity Space**

Within the FDS Application private amenity space is provided throughout the scheme in the form of balconies, terraces gardens and communal gardens in accordance with the design standards within the AAAP. The AAAP standards require the following minimum private amenity space within the FDS.

<b>Unit Type</b>	<b>Private Amenity Space Minimum Standard (sqm / unit)</b>	<b>Total Amenity Space Requirement (sqm)</b>
<b>1 bed flats (371 units)</b>	6	2,226
<b>2 bed flats (299 units)</b>	6	1,794
<b>3+ bed flats (113 units)</b>	10	1,130
<b>Houses (47 units)</b>	50	
<b>Total</b>		7,500

**Table 5.18 – Private Amenity Space Standards and Requirements**

5.137 Within the FDS, a total private amenity space of 7,500 sqm is required to meet policy standards.

5.138 Table 5.19 sets out the private amenity space which will be provided within the FDS application.

<b>Private Amenity Space</b>	<b>Space Provision sqm</b>
<b>Block 1 Front Gardens and Rear Terraces</b>	1,541
<b>Block 2 Front and Rear Gardens</b>	918
<b>Block 3 Front and Rear Gardens</b>	60
<b>Block 4 Front Gardens and Rear Terraces</b>	192
<b>Block 5 Front Gardens and Rear Terraces</b>	430
<b>Block 6 Front Gardens and Rear Terraces</b>	510

<b>Balconies</b>	5,405
<b>TOTAL</b>	<b>9,056</b>

**Table 5.19 – Private Amenity Space Provision**

5.139 The total amount of private garden and balcony space delivered is 9,056sqm. This is significantly above the minimum standard required by the AAAP.

5.140 Within the Outline Application, private amenity spaces will be provided to at least the minimum standards and in accordance with the principles established within the Design and Access Statement and the Design Code.

## Play Space

### *Regional Planning Policy*

5.141 Policy 3.6 of the London Plan seeks to ensure that children and young people have safe access to good quality, well-designed, secure and stimulating play and informal recreation provision, incorporating trees and greenery wherever possible. It requires proposals which include residential use to provide play and informal recreation space, based on the expected child population generated by the scheme and assessment of future needs.

5.142 The Mayor’s ‘Providing for Children and Young People’s Play and Informal Recreations’ SPG sets out that policy objectives will be achieved by:

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“Promoting an approach that supports the presence of children and young people in the built environment/public realm;

Encouraging the creation of ‘shared’ public and communal space used by adults and children at the same time;

Introducing the concept of lifetime neighbourhoods and the importance of play and recreation opportunities to create places that meet the needs of all Londoners, at every stage of their lives;

Promoting more innovative approaches to play provision in terms of facilities, locations, design and management such as the opening of schools’ play facilities to the community, the use of natural features;

Promoting healthy lifestyles and access to nature; and

Providing benchmark standards on play requirements that can be used as a reference to guide boroughs in the development of their own local standards and to secure places to play in existing and new housing developments.”

5.143 The SPG also requires the provision of a minimum of 10sqm of usable child play space to provide per child, with play space for children under-5 provided on site.

### *Local Planning Policy*

5.144 Policy PL6 ‘Children’s Play Space’ of the AAAP reiterates the Mayor’s SPG and states:

“All development proposals must provide 10sqm of children’s play space / youth space per child bed space. Doorstep playable space should be provided within each of the housing blocks, whilst larger local playable spaces should be provided within selected housing blocks and within the green fingers and existing local parks.

*Response*

**Predicted Child Yield**

5.145 The Applications are calculated to generate a total child yield of 2,583. The table below illustrates the child yield by age groups for each of the Applications based on the Mayor’s 2-12 SPG child yield calculator.

	<b>FDS</b>	<b>Outline Application Site</b>
<b>Age Group</b>	<b>Child Yield</b>	<b>Child Yield</b>
<b>Under 5’s</b>	150	758
<b>5-11</b>	146	816
<b>12+</b>	111	602
	<b>407</b>	<b>2,176</b>

**Table 5.20 – Child yield**

**Play Strategy**

5.146 The design of the public realm across the proposals has put community open spaces, including play space at the heart of the development. The public realm has been designed to create multi-functional, high quality spaces that are inclusive for all. This has been provided in a range of doorstep play opportunities, pocket parks, community spaces, communal gardens, neighbourhood play spaces and private gardens.

5.147 This combination of public and private open spaces provides a range of playable opportunities for children of all ages within the proposals.

5.148 Through the implementation of the above Play Strategy, the play space requirements as set out in Mayor’s SPG and the AAAP are met as follows.

**First Development Site**

5.149 The FDS provides two main local playable spaces in Westmoreland Park and Portland Street Park. These spaces include formal, sculptural structures and informal elements for play. These spaces will be themed to match the character of the place and location within the FDS. Play space will also be provided within the communal courtyards which will be a combination of natural play elements and some proprietary elements.

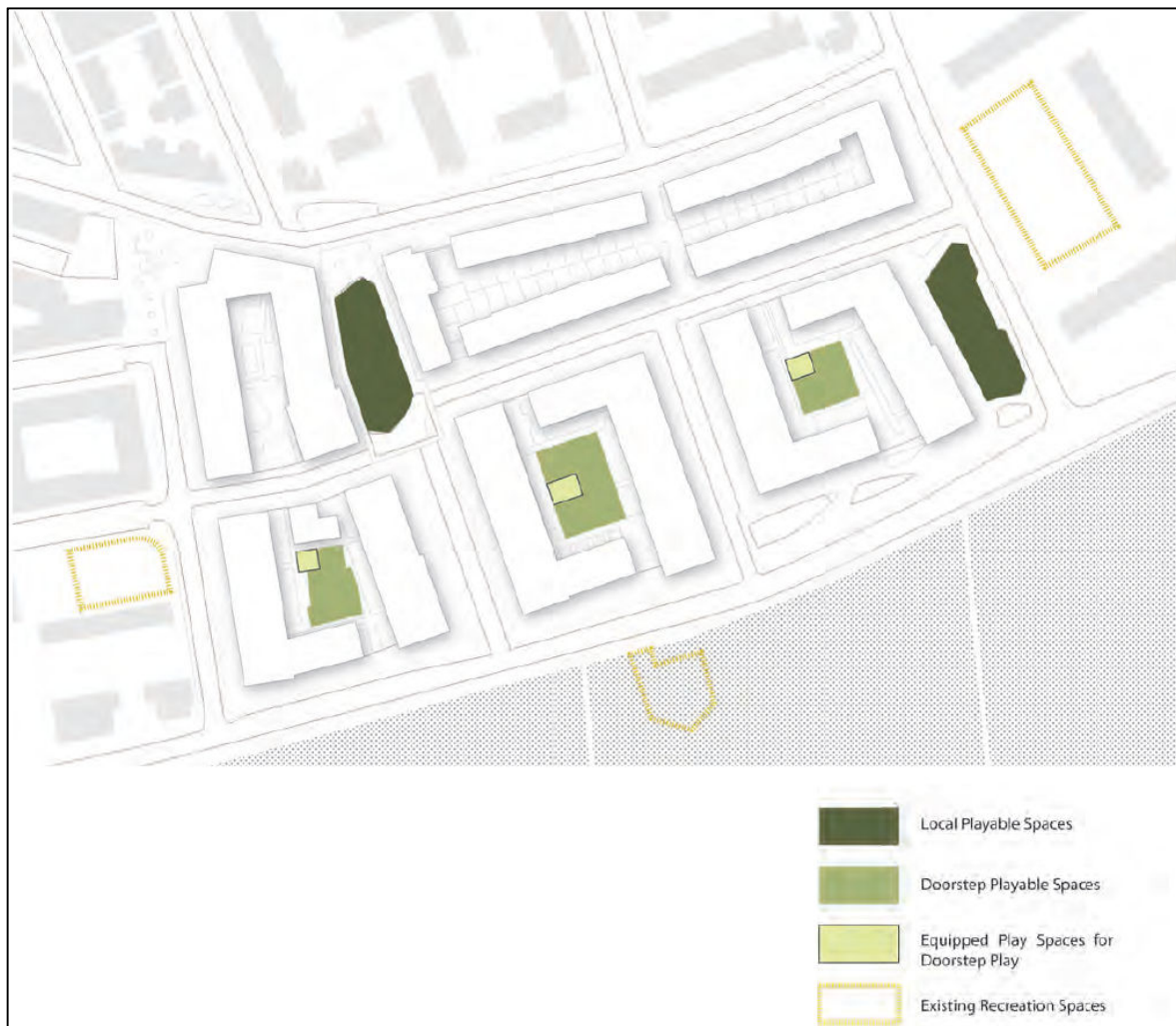
5.150 The table below sets out how this provision is provided across the FDS site.

**First Development Site**

Age Group	Child Yield	Requirement (Sqm)	Proposed on Site Provision	Identified Areas
<b>Under 5s</b>	150	1,500	2,210 sqm (1,970sqm within communal courtyard gardens - Blocks 4, 5 and 6, 240sqm in private gardens)  710sqm over-provision.	Communal Gardens, Doorstep play areas and private gardens.
<b>5-11 / 12+</b>	146 111	1,460 1,110	1,494sqm	Westmoreland Square and Portland St Park  + Off-site.
<b>Subtotal</b>		2,570		
<b>Total</b>	<b>407</b>	<b>4,070</b>	<b>3,704 + off-site provision</b>	

**Table 5.21 – FDS Play Space Requirement**

5.151 The plan below shows the proposed location of the playspace within the FDS.



5.152 The majority of this play space requirement (91%) is being provided on-site as part of the designed scheme. The breakdown of play space for the under 5s age group is met on site through the provision of private gardens and communal space. The play space for the 5-11 and 12+ age groups is partially met on site with nearby local parks and in particular, Burgess Park, providing for the deficit. At present there is a teenage play area in Burgess Park as shown on the plan above and this will be retained.

5.153 The on-site playspace provision is centred on the main playable spaces, Westmoreland Park and Portland Street Park. This space will include formal and informal elements which will be overlooked and well-lit. Playspace within the communal courtyards will include natural elements such as sand pits and logs with some proprietary equipment.

5.154 The AAAP Policy PL6 states that 'youth space' for the 12+ age group should be 'provided within larger areas of public open space.' Within the FDS, the density required by the AAAP does not allow the extra inclusion of 'larger areas of public open space' suitable for youth play. The needs of youths will be met in existing local parks and in particular Burgess Park which adjoins the FDS. Burgess Park extends to 56 hectares and provides extensive opportunities for play including sports facilities (cricket, football, tennis and running) adventure play ground, informal recreation and a BMX track.

5.155 Therefore, the proposed play space is in accordance with the relevant regional and local planning policy.

#### **Outline Application Site**

5.156 The table below sets out the indicative requirements and provision of playspace for the Outline Application site.

Outline Application Site (Indicative)				
Age Group	Child Yield	Requirement (Sqm)	Proposed on Site Provision (sqm)	Identified Areas
Under 5s	758	7,580	7,600	Private gardens, communal courtyards, and open space including equipped, informal and natural play.
5-11	816	8,160	7,400	Communal courtyards, and open space, including equipped, informal, natural play and access to nature plus off-site.
12+	602	6,020	5,300	Communal courtyards, and open space including equipped formal and, informal play and social space plus off-site.
<b>Total</b>	<b>2,176</b>	<b>21,760</b>	<b>20,300</b>	

**Table 5.22 – Outline Application Site Play Space Requirement and Provision**

5.157 The play space provision for the under 5s will be provided on site in accordance with policy. The majority of playspace for old age groups will also be provided on site with the small deficit against the standard being made up by local parks.

5.158 As described above the adjacent Burgess Park provides extremely good opportunities for play in a number of forms.

5.159 Therefore, the proposed play space is in accordance with the relevant regional and local planning policy.

## Design

### *National Planning Policy*

5.160 Paragraph 56 of the NPPF states:

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“Local The Government attaches great importance to the design of the built environment. Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people.”

## Regional Planning Policy

5.161 Policy 3.5 *Quality and Design of Housing Developments* states that:

“Housing developments should be of the highest quality internally, externally and in relation to their context and to the wider environment, taking account of strategic policies in this Plan to protect and enhance London’s residential environment and attractiveness as a place to live. Boroughs may in their LDFs introduce a presumption against development on back gardens or other private residential gardens where this can be locally justified.”

## Local Planning Policy

5.162 The AAP establishes a number of key design principles for the design and layout of the estate. The following policies are relevant:

Policy	Title	Summary
<b>AAAP</b>		
<b>PL1</b>	Street Layout	<p>“The street layout should accord with the masterplan as shown in Figure 5. The following streets will comprise the main street network:</p> <ul style="list-style-type: none"> <li>• <b>Thurlow Street</b> will be the main local street for the new neighbourhood.</li> <li>• <b>Albany Road</b> will be a calmed route and will be better integrated with the park so that it is perceived as a route through the park.</li> <li>• <b>A Community Spine</b> will connect public transport routes and town centres with the main schools and some of the community facilities in the action area core.</li> <li>• <b>Three green fingers</b> will run from Burgess Park into the AAP area connecting with Surrey Square Park, the Missenden Play area and Faraday Gardens.”</li> </ul>
<b>PL2</b>	Design Principles	<p>“Development should help to create a strong sense of local distinctiveness and be well integrated with the surrounding area. Its materials and design should exude a sense of quality and permanence. Its layout and appearance should have a “fine grain”; that is, it should:</p> <ul style="list-style-type: none"> <li>(a) contain a variety of clearly distinguishable buildings</li> <li>(b) incorporate frequent shifts in architectural design</li> <li>(c) present a choice of interesting ways through the development</li> <li>(d) have an interesting and varied roofline</li> <li>(e) contain frequent entrances on to the street</li> <li>(f) avoid the sort of large uniform buildings and blocks that can presently be seen on the estate.”</li> </ul>
<b>PL3</b>	Building Block Types and Layout	<p>“All proposals within the action area core should be designed as one of the following three building types:</p> <ul style="list-style-type: none"> <li>(a) <b>Perimeter Block</b> – buildings which continue around all four sides of a street block, with an enclosed courtyard in the middle containing secure communal open space and / or gardens.</li> <li>(b) <b>Mews Block</b> – a Perimeter Block with a narrow shared surface road cutting through it, fronted by small terraces or rows of homes.</li> <li>(c) <b>Special Building</b> – a unique design containing a landmark building</li> </ul>



Policy	Title	Summary
		<i>or special community use.”</i>
<b>PL4</b>	Building Heights	<p><i>“Most of the new development should have a general height of between 2 and 4 storeys. Height and scale should respect the setting of the conservation areas and preserve or enhance their character and appearance. The general height in Thurlow Street and Albany Road will be greater, mostly between 7 to 10 storeys. Buildings which are taller than the general height should be situated in important locations consistent with Figure 10. These buildings comprise:</i></p> <ul style="list-style-type: none"> <li><i>• one district landmark building of between 15 and 20 storeys at the junction of Thurlow Street and Albany Road to mark the main entrance to the neighbourhood and symbolise the area’s regeneration;</i></li> <li><i>• local landmark buildings of between 10 and 15 storeys to mark the entrances to Portland Street, the King William IV and Chumleigh green fingers, and also the Amersham Site.”</i></li> </ul>

**Table 5.23 – Local Design Policy**

*Response*

5.163 The development proposals have been designed at every stage in accordance with the vision and aspirations of the AAAP. In particular, the design policies set out above have been taken into account in the overall layout of both sites and in the design of the buildings. The specific aspects of the design are discussed in more detail below.

**Layout**

5.164 The layout of development proposals derives from the fundamental principles of re-creating streets that are comparable with the most successful parts of London. The layout creates a hierarchy of streets that is based on a grid and will bring back legibility to this part of London.

5.165 In accordance with AAAP Policy PL1, Thurlow Street will become one of the main streets through the Estate and act as the main artery for traffic. Albany Street will be become a calmed route which will increase linkages in-between the Estate and the park through the introduction of new pedestrian crossings.

5.166 The function and purpose of the community spine has been developed into the design by increasing east west linkages through the area to better connect Walworth Road and Old Kent Road. The route will link Michael Faraday School, proposed community uses and areas of public open space. The AAAP suggested that the community spine could accommodate public transport, however through discussions with LBS it was agreed that this would detract from the aspirations of the route for community and pedestrian use.

5.167 The layout of the scheme broadly accords with AAAP Policy PL1.

**Design Principles**

5.168 The development proposals have been developed to allow for local distinctiveness whilst integrating with the surrounding area. A fine grain approach has been adopted which increase permeability and legibility through the Estate and helps create ‘seamless boundaries’ with the surrounding residential areas.

- 5.169 In order to establish a strong sense of local distinctiveness, clearly distinguishable building types have been used throughout the FDS and Outline Application Site development proposals. These includes traditional houses and high density residential blocks which not only deliver the range of unit types required by the AAAP but enable frequent shifts in architectural design as required by AAAP Policy PL2.
- 5.170 With regard to the Outline Application Site, the approach to the Design Code for the future design of the buildings has been to allow flexibility in the detailed design whilst ensuring that future phases create a sense of place that is in accordance with the defined character areas. This is through establishing a number of mandatory design principles which must be incorporated at the reserved matters stage.
- 5.171 In the development of the 'fine grain' for the new estate, care was taken to avoid the use of large uniform buildings which currently characterise parts of the existing Estate.
- 5.172 A key design principle enshrined within the Applications is the use of entrances onto the street. Currently, parts of the existing estate have large areas of 'dead' frontages which create unwelcoming streets and public spaces. This has been addressed in the FDS and Outline Application Site proposals by ensuring that all houses and maisonettes have direct access on the street, reducing areas of blank facade.
- 5.173 The design principles of the FDS and Outline Applications accord with AAAP Policy PL2.

### **Building Block Types**

- 5.174 A defined set of block typologies have been designed for use across the FDS and Outline Application Site in accordance with the principles of AAAP Policy PL3.
- 5.175 Perimeter blocks are used across the park frontage creating buildings which continue around all four sides of a communal central courtyard. These blocks enable active frontages around the blocks and provide opportunities for increased height in key areas of the scheme. These blocks will be between 4 and 20 storeys.
- 5.176 A lower density housing block is also proposed. This will predominantly be used to the north of the site in response to the existing low density terraced housing of the Liverpool Grove Conservation Area. These blocks typically include townhouses with private front and back gardens and will be 2 to 4 storeys.
- 5.177 To ensure a smooth transition between the high and low density blocks, a medium rise block typology is also proposed. This will include mansion block type flat accommodation as well as houses. These will typically be between 4 and 8 storeys.
- 5.178 In addition to the above block typologies, consideration has also been given to the creation of 'special buildings' through the Outline Application Site. These buildings will be buildings of a unique design which will act as way finders and architectural interest. The areas of these buildings and design principles are contained within the Design Code.
- 5.179 The block typologies are in accordance with the AAAP Policy PL3.

### **Building Heights**

- 5.180 The FDS and Outline Application Site developments have been designed to contain a variety of heights which delivers the range of unit types required by the AAAP.
- 5.181 The range in heights help deliver interest and variety and enables houses, maisonettes and flats to be accommodated in close proximity.

5.182 The height across the FDS and Outline Application Site ranges from 2 to 20 storeys with the lower elements being located to the north of the site and the taller elements being located to the south, along the park frontage. This approach is in accordance with the AAAP and seeks to respect the character of the Conservation Area.

5.183 The scheme proposes a number of landmark towers along the park frontage at key markers and routes through the site such as Thurlow Street and Portland Street. In these locations tall buildings of up to 20 storeys are proposed. Policy PL4 of the AAAP identifies that one building of up to 20 storeys may be appropriate at the junction of Thurlow Street and Albany Road. At this key junction a pair of twin towers are proposed of between 16 and 20 storeys. These towers will act as a key gateway into the site and create a local landmark to aid wayfinding. In addition, a further two tall buildings are proposed on the junction of Portland Street and Albany Road of up to 20 storeys. Together these blocks are intended to read as a blocks within a family to create a legible park frontage.

5.184 Further detail on the proposed design can be found in the Design and Access Statements which accompany these Planning Applications.

## Heritage

### *National Planning Policy*

5.185 Paragraph 129 of the NPPF states:

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“Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise.”

### *Regional Planning Policy*

5.186 Policy 7.8 *Heritage Assets and Archaeology* - states that:

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“Developments affecting heritage assets and their settings should conserve their significance by being sympathetic to their form, scale, materials and architectural detail.”

### *Local Planning Policy*

5.187 Saved UDP Policy 3.18, *Setting of Listed Building, Conservation Areas and the World Heritage Site* - states that:

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“Permission will not be granted for development that would not preserve or enhance: the setting of a Conservation area.”

### *Response*

5.188 The Application sites are bounded by the Liverpool Grove Conservation Area which is located to the north of the FDS. The Conservation Area is characterised by low density terraced residential housing. The height is predominantly 2 or 3 storeys and the properties are arranged in a uniform street pattern.

5.189 The Estate does not currently have a comfortable relationship with the Conservation Area in terms of height, massing or materials. In particular, the large residential blocks of the estate create an overbearing relationship which has an adverse effect on the traditional scaled residential buildings. In addition, the modernist materials of the Estate are at odds with the palette of slate and brick that dominates the Conservation Area.

5.190 The Comprehensive Development has been designed to sensitively respond to the setting of the Liverpool Grove Conservation Area and as such will deliver a significant enhancement to the setting of the Conservation Area compared with the existing Estate. The scheme has been designed in a number of ways in response to the Conservation Area to ensure that the proposals preserve and enhance its setting. These design measures are as follows:

- The building height across the FDS and Outline Application Site, have been designed to create a gentle transition between the Conservation Area and higher density elements of the scheme. The taller perimeter blocks are located along the park frontage to the south of the Application sites and away from the Conservation Area. The smaller scale houses are proposed to be located adjacent to the Conservation Area. This ensures that the heights of the proposed houses within the FDS and Outline Application Site are in keeping with and sensitive to the Conservation Area.
- The materials of the buildings which adjoin the Conservation Area have been chosen to be in keeping with existing materials. In particular, the houses have been designed to be traditional in style and incorporate brick and tile.
- The street hierarchy in the northern parts of the Estate reflect the existing street pattern within the Conservation Area. A traditional block structure and street layout will be adopted which reflects the existing Conservation Area.

5.191 On this basis, it is considered that the Applications will enhance the setting of the Liverpool Grove Conservation Area and are in accordance with the London Plan Policy 7.8 and Saved UDP Policy 3.18.

## Energy and Sustainability

### *National Planning Policy*

5.192 The NPPF emphasises the planning system's role in helping shape places to secure radical reductions in greenhouse gas emissions to reduce the impacts of climate change.

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“In determining planning applications, local planning authorities should expect new development to:

- Comply with adopted Local Plan policies on local requirements for decentralised energy supply; and

- Take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption.”

5.193 Paragraph 99 goes on to state that new developments should be planning to avoid increased vulnerability to the range of impacts arising from climate change.

### *Regional Planning Policy*

5.194 Relevant energy and sustainability policies of the London Plan can be summarised as follows:

Policy	Title	Summary
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Policy	Title	Summary
<b>London Plan</b>		
5.2	Minimising Carbon Dioxide Emissions	<p><i>“Development proposals should make the fullest contribution to minimising carbon dioxide emissions in accordance with the following energy hierarchy:</i></p> <ul style="list-style-type: none"> <li>- <i>Be lean – use less energy</i></li> <li>- <i>Be clean; supply energy efficiently</i></li> <li>- <i>Be green; us renewable energy</i></li> </ul> <p><i>Major development proposals should include a detailed energy assessment to demonstrate how the targets for carbon dioxide emissions reduction outlined above are to be met within the framework of the energy hierarchy.</i></p> <p><i>The carbon dioxide reduction targets should be met on-site. Where it is clearly demonstrated that the specific targets cannot be fully achieved on-site, any shortfall may be provided off-site or through a cash in lieu contribution to the relevant borough to be ring fenced to secure delivery of carbon dioxide savings elsewhere.”</i></p>
5.3	Sustainable Design and Construction	<p><i>“Development proposals should demonstrate that sustainable design standards are integral to the proposal.</i></p> <p><i>Major development proposals should meet the minimum standards outlined in the Mayor’s supplementary planning guidance and this should be clearly demonstrated within a design and access statement.”</i></p>
5.5	Decentralised Energy Networks	<p><i>“The Mayor expects 25% of heat and power used in London to be generated through the use of localised decentralised energy systems by 2025. In order to achieve this target the Mayor prioritises the development of decentralised heating and cooling networks at the development and area wide levels, including larger scale heat transmission networks.”</i></p>
5.6	Decentralised Energy	<p><i>“Development proposals should evaluate the feasibility of Combined Heat and Power (CHP) systems and energy systems should be selected in accordance with the defined hierarchy.”</i></p>
5.7	Renewable Energy	<p><i>“Within the framework of the energy hierarchy, major development proposals should provide a reduction in expected carbon dioxide emissions through the use of on-site renewable energy generation, where feasible.”</i></p>
5.9	Overheating and Cooling	<p><i>“Major development proposals should reduce potential overheating and reliance on air conditioning systems, and demonstrate how the design, materials, construction and operation of the development would minimise overheating and also meet its cooling needs.”</i></p>

Policy	Title	Summary
5.15	Water Use and Supplies	<i>“Development should minimise the use of mains water.”</i>
<b>Sustainable Design and Construction SPG</b>		
2.4	Energy and Carbon Dioxide Emissions	<i>“To avoid complexity and extra costs for developers, the mayor will adopt a flat carbon dioxide improvement target beyond Part L 2013 of 35% to both residential and non-residential development.”</i>

**Table 5.24 – Regional Energy Policy**

### Local Planning Policy

5.195 Relevant energy and sustainability policies at a local level can be summarised as follows:

Policy	Title	Summary
<b>Core Strategy</b>		
13	High Environmental Standards	<p><i>“Requiring development to meet the highest possible environmental standards, including targets based on the Code for Sustainable Homes and BREEAM.</i></p> <p><i>Requiring all new development to be designed and built to minimise greenhouse gas emissions across its lifetime. This will be achieved by applying the energy hierarchy:</i></p> <ul style="list-style-type: none"> <li><i>• Designing all developments so that they require as little energy as possible to build and use.</i></li> <li><i>• Expecting all major developments to set up and/or connect to local energy generation networks where possible. We will develop local energy networks across Southwark.</i></li> </ul> <p><i>Requiring developments to use low and zero carbon sources of energy.”</i></p>
<b>Southwark Plan</b>		
3.4	Energy Efficiency	<i>“All developments must be designed to maximise energy efficiency and to minimise and reduce energy consumption and carbon dioxide (CO2) emissions. Major Developments will be required to provide an assessment of the energy demand of the proposed development (such as those contained within the BREEAM and EcoHomes Schemes). These should also demonstrate how the Mayor’s energy hierarchy will be applied.”</i>
3.5	Renewable Energy	<p><i>“Planning permission will not be granted for development unless:</i></p> <p style="padding-left: 40px;"><i>i. It incorporates renewable energy technology and design where this would not adversely affect the viability of the development; and</i></p>

Policy	Title	Summary
		<i>ii. Where it is a major development outside a conservation area, it draws at least 10% of the energy requirements from renewable energy production equipment on-site or renewable energy sources.”</i>
<b>Aylesbury Area Action Plan</b>		
<b>BH6</b>	Energy Supply	<i>“The energy supply for the action area will be generated by combined heat and power (CHP). All developments within the action area core must connect to the CHP system. “</i>
<b>BH7</b>	Sustainable Design and Construction	<i>“All homes in the action area core must achieve at least Code for Sustainable Homes Level 4 rating or the equivalent in any successor rating system.”</i>

**Table 5.25 – Local Energy Policy**

### Response

5.196 The Applications are supported by an Energy Statement prepared by WSP and a Sustainability Statement prepared by HTA Design. These documents sets out in detail the energy and sustainability measures for the Applications and how they accord with the planning policies set out above.

5.197 The energy and sustainability strategy for the FDS and Outline Application Site schemes have been developed concurrently so that the comprehensive regeneration of the estate has a consistent energy strategy. The energy strategy outlines the approach to providing heating and power efficiently whilst meeting policy objectives for both the FDS Application and Outline Application.

5.198 In summary, the energy strategy for the Applications has been developed in accordance with the following targets:

- Minimise energy consumption through energy efficiency
- The inclusion of a district heating network and connection to all dwellings.
- Provide a contribution to emissions reductions from on-site renewables with a target of 10% contribution.
- Achieve a 35% improvement on emissions against the Part L Building Regulations 2013.

### First Development Site

5.199 The FDS scheme has been designed to include a number of energy efficiency measures in the design of the dwellings that go beyond Part L of the Buildings Regulations. These measures include:

- Mechanical ventilation and heat recovery
- High performance building fabric
- High performance glazing
- 100% low energy lighting
- Improved air tightness

5.200 In addition, the scheme includes measures to minimise the overheating and cooling of the residential dwellings though the inclusion of:

- Mechanical ventilation and heat recovery
- Green roofs

- Natural ventilation
- Recessed window fenestrations and balconies

5.201 These measures achieve a 3% carbon dioxide savings and ensure the scheme is 'lean' in terms of emissions as required by the London Plan hierarchy.

5.202 Following the inclusion of the above energy efficiency measures, consideration was given to the technologies which can provide further improvements in CO2 emissions. Detailed consideration was given to connecting to an existing heat network within proximity of the Applications site. This concluded that connecting to an existing network was not feasible due to the cost of connection, the level of heat loss and available capacity. Full detail of this analysis is provided within the Energy Statement.

5.203 As an existing connection has been ruled out, decentralised energy has been considered in line with London Plan Policy 5.6. In particular, a Combined Heat and Power Plant (CHP) system has been included within the FDS, with the energy centre located in the base of Block 5. This will provide a 32% reduction in carbon dioxide emissions and will have the potential to connect to the CHP network proposed within the Outline site to provide a comprehensive energy strategy for both Applications. This ensures that the FDS is 'clean' in accordance with the London Plan hierarchy.

5.204 To provide further reductions in CO2 emissions, a range of renewable technologies were evaluated. This assessment concluded that photovoltaic panels were the most effective and will be installed on roofs within the FDS. These will be located on appropriate roofs with the right orientation.

5.205 The use of photovoltaics will provide a CO2 savings of 3% and when combined with the energy efficiency measures and proposed CHP network will meet the 35% CO2 reduction target established by the Sustainable Design and Construction SPG.

### **Outline Application Site**

5.206 The energy strategy for the Outline Application Site has been developed concurrently with the strategy for the FDS. Therefore the approach taken in terms of the London Plan Hierarchy is replicated within the Outline Application Site.

5.207 The same energy efficiency measures utilised for the FDS are proposed for the Outline Application site. In addition, measures which exceed those used in the FDS include:

- More efficient glazing
- Improved thermal bridging
- Improved performance of floors

5.208 The same overheating and cooling measures as used in the FDS will be utilised.

5.209 As a connection to an existing heating network has been ruled out a CHP district heating system is proposed. It is proposed that when constructed this will connect with the CHP network within the FDS to create a site-wide heating system for the Applications site. In the interim, temporary plant in the form of gas-fired boilers will serve the initial phases of the Outline Application Site until 60% of the dwellings are occupied at which point the CHP plant will provide the supply.

5.210 Photovoltaic panels are proposed to be a recommended technology for the later phases and will be included alongside the high level of green roofs proposed.

5.211 The above measures will achieve the 35% CO2 reduction target established by the Sustainable Design and Construction SPG.



## Sustainability

- 5.212 In accordance with the requirements of the GLA and LBS Sustainable Design and Construction SPDs, the proposed developments sustainable credentials have been assessed and are set out in the supporting Sustainability Statement.
- 5.213 In accordance with Core Strategy Policy 13, the FDS will achieve Code for Sustainable Homes Level 4. Although the Code for Sustainable Homes is set to be removed from Government policy in the near future, the proposals are committed to producing a 'Code compliant' scheme as this standard represents a good and well-understood benchmark for sustainable development.
- 5.214 Subsequent phases of the Outline Application Site will meet the standards required in the relevant London Plan in force as each reserved matters application is brought forward. It is envisaged that this will be at least equivalent to the Code 4.

### *Energy and Sustainability Conclusion*

- 5.215 The FDS and Outline Application Site proposals accord with the relevant energy policies set out above. Energy consumption has been minimised through energy efficiency and a district heating network will connect to all dwellings across the Applications site.
- 5.216 The inclusion of these measures will achieve the 35% CO<sub>2</sub> improvement target established by the Sustainable Design and Construction SPG.

## Sunlight, Daylight and Overshadowing

- 5.217 London Plan Policy 7.6 - *Architecture* - states:

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*“Developments must not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings, in relation to privacy, overshadowing, wind and microclimate. This is particularly important for tall buildings.”*

- 5.218 Saved Policy 3.1 – *Environmental Effects* – states:

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*“Planning permission for the establishment of uses that would cause material adverse effects on the environment will not be granted, and proposals for activities that will have a material adverse impact on the environment and quality of life will be refused.”*

- 5.219 Saved UDP Policy 4.2 – *Quality of Residential Accommodation* – states:

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*“Planning permission will be granted for residential development, including dwellings within mixed use schemes, provided that they:*

*Achieve good quality living conditions; and*

*Include high standards of:*

*...natural daylight and sunlight.”*

## Response

- 5.220 As assessment of the impact of the proposed development on surrounding sunlight, daylight and overshadowing as well as the quality of the daylight and sunlight within the proposed residential units has been carried out by HTA Design to inform the design of the scheme. A full assessment can be found within the Environmental Statement which accompanies the Applications. A summary of the results are set out below.
- 5.221 An assessment of the comprehensive development of the existing and proposed buildings surrounding the site identified that there are unlikely to be any significant impacts. There will be two windows which will be affected in terms of daylight with a minor negative effect. These windows are located adjacent to a subsequent phase within the Outline Application Site and therefore, it is envisaged that the appropriate mitigation measures will be taken to ensure that these impacts are negligible once the scheme reaches detailed design stage.
- 5.222 With regard to impact on the surrounding external amenity spaces an overshadowing analysis was undertaken. The assessment concludes that the impacts were predominantly negligible with a proportion receiving a positive improvement. One private garden located to the south west part of the Outline Application Site will receive a minor negative impact. It is envisaged that as this relates to the outline element of the scheme, appropriate mitigation can be undertaken at the detailed design stage to ensure that the impacts will be negligible.
- 5.223 An assessment of the daylight and sunlight provision within the FDS has also been undertaken. This assessed the kitchens, living rooms and bedrooms of typical units across the scheme following the methodology set out in the BRE Guide. 70% of rooms assessed complied with the BRE daylight standards and 79% of rooms complied with the BRE sunlight standards. The shortfall in meeting the targets in full are the result of a number of factors which are specific to the site as follows:
- The scheme has been developed in accordance with the density and unit mix requirements of the AAAP. This necessitates a high proportion of houses and high density blocks in close proximity. As such, this results in an adverse effect on a number of the residential units.
  - The development proposes the tall buildings along the park boundary to maximise the number of apartments with a view of the park and ensure that the scheme has an appropriate relationship with the existing buildings.
  - The density of the proposals compared to the existing site is approximately 50% higher. Whilst every effort to minimise the impact on daylight and sunlight has been made, the impacts are partially a result of the increase in density.
  - A high proportion of the units are designed to include balconies. This has an adverse impact on the daylight and sunlight however these units enjoy increased privacy and extra outdoor amenities.
- 5.224 Therefore, whilst there are some failures in daylight and sunlight on the proposed units, these are considered acceptable in the context of the high quality redevelopment proposals.
- 5.225 On this basis, the proposals accord with London Plan Policy 7.6 and Saved UDP Policies 3.1 and 4.2.

## Servicing and Refuse Management

5.226 London Plan Policy 6.13 states:

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*“Developments must...provide for the needs of businesses for delivery and servicing.”*

5.227 The supporting text to Core Strategy Policy 2 - Sustainable Transport - in paragraph 5.23, states:

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*“We will also make sure servicing is in place for businesses...”*

5.228 Saved UDP Policy 5.2 – Transport Impacts – states:

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*“Planning Permission will be granted for development unless:*

*Adequate provision has not been made for servicing, circulation and access to, from and through the site...”*

5.229 In relation to refuse management, London Plan Policy 5.17 - Waste Capacity - states:

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*“Suitable waste and recycling storage facilities are required in all new developments.”*

5.230 Saved UDP Policy 3.7 – Waste Reduction – states:

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*“All developments are required to ensure adequate provision of recycling, composting and residual waste disposal, collection and storage facilities. The design of waste and recycling facilities must be easily and safely accessible, improving local amenity.”*

## **Response**

5.231 It is estimated that the Comprehensive Development could potentially generate up to 2,990 tonnes of household waste per annum (up to 58 tonnes per week).

5.232 Residential units will incorporate sufficient internal waste storage containers to promote the separation of recycling and compostable material at source.

5.233 Each house and maisonette will be provided with sufficient external space for three 240 litre wheeled bins to accommodate mixed dry recycling, general waste and mixed food and garden waste.

5.234 Waste storage for flats will comprise good quality communal bin stores with larger capacity wheeled bins for the separate collection of waste and recycling materials. These stores have been designed so that residents do not have to walk further than 30 metres.

5.235 The non-residential elements will be provided with their own/ shared waste storage areas for refuse and recycling with ease of access by collection vehicles.

5.236 Therefore, the proposals accord with London Plan Policy 5.17 and Saved UDP Policy 3.7.

## **Archaeology**

5.237 London Plan Policy 7.8 states:

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*“New development should make provision for the protection of archaeological resources, landscapes and significant memorials. The physical assets should, where possible, be made available to the public on-site. Where the archaeological asset or memorial cannot be preserved or managed on-site, provision must be made for the investigation, understanding, recording, dissemination and archiving of that asset.”*

5.238 Saved UDP Policy 3.15 – Effects on the Historic Environment – states:

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*“Development should preserve or enhance the special interest or historic character or appearance of buildings or areas of historical or architectural significance. Planning proposals that have an adverse effect on the historic environment will not be permitted.”*

5.239 Saved UDP Policy 3.19 – Archaeology – states:

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*“Planning applications affecting sites within Archaeological Priority Zones (APZs) shall be accompanied by an archaeological assessment and evaluation of the site, including the impact of the proposed development.”*

## Response

5.240 A desk-based Archaeological Assessment to understand the prospect of archaeologically significant remains at the application site has been prepared by WSP and accompanies the planning application.

5.241 The application site is not located in an Archaeological Priority Zone as defined by the Southwark Plan.

5.242 The Archaeological Assessment concludes that:

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*“Based on a review of the baseline evidence there is a very low potential within the Site boundary for currently unknown archaeological remains to existing dating between the prehistoric and medieval periods. There is a moderate to high potential within the site boundary for currently unknown archaeological remains to exist dating between the post-medieval and modern periods. Such mitigation measure include further archaeological works to be agreed with LBS through the preparation of the WSI”*

5.243 Therefore, the proposals accord with London Plan Policy 7.8 and Saved UDP policies 3.15 and 3.19.

## Arboriculture

5.244 In relation to trees, London Plan Policy 7.21 ‘ Trees and Woodland’ states:

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*“Existing trees of value should be retained and any loss as the result of development should be replaced following the principle of ‘right place, right tree’. Wherever appropriate, the planting of additional trees should be included in new developments, particularly large-canopied species.”*

5.245 Within the Core Strategy, Strategic Policy 11 is relevant. This identifies an approach and action, to include:

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*“Our approach is we will improve, protect and maintain a network of open spaces and green corridors that will make places attractive and provide sport, leisure and food growing opportunities for a growing population. We will protect and improve habitats for a variety of wildlife. We will do this by:*

*- Protecting woodland and trees and improving the overall greenness of places, including through promoting gardens and local food growing.”*

5.246 The FDS and Outline Applications will create a new urban forest. The retention of the existing trees and the large number of new tree planting within the streets and open spaces will ensure that every house will look out onto a tree.

5.247 A detailed assessment of the existing trees on the site was undertaken which identified that there are 377 (274 non-U category trees) existing trees in the Outline Application Site and 118 (66 non-U category trees) existing trees on the FDS. Of these 140 of the 274 non-U category trees in the Outline Application Site and 17 of the 66 non-U category trees in the FDS Site will be retained.

5.248 As part of the FDS Application, 215 new trees will be planted within streets, parks, squares and communal courtyards.

5.249 As part of the Outline Applications 528 new trees will be planted. This equates to an additional 291 trees across the FDS and Outline Application site. The new trees will be planted in streets, parks and squares.

5.250 The proposals will significantly increase the number of trees on the Sites. Therefore, the proposals are in accordance with London Plan Policy 7.21 and Core Strategy Policy 11.

5.251 Further details are set out within the Tree Strategy which is submitted as part of the Applications.

## Wind

5.252 A wind assessment was carried out by HTA Design as part of the Environmental Statement in accordance with London Plan Policy 7.6, which states:

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“...not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings, in relation to privacy, overshadowing, wind and microclimate. This is particularly important for tall buildings.”

5.253 The assessment concluded:

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“With the completed comprehensive development, the pedestrian comfort and safety at ground level is expected to be suitable for the intended uses. The same good conditions are expected on the roof areas and on the balconies.”

## Noise

5.254 A Noise Impact Statement has been prepared by WSP in accordance with the following policies.

5.255 London Plan Policy 7.15 states:

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“Development proposals should seek to reduce noise by:

a) minimising the existing and potential adverse impacts of noise on, from, within, or in the vicinity of, development proposals

b) separating new noise sensitive development from major noise sources wherever practicable through the use of distance, screening, or internal layout in preference to sole reliance on sound insulation.”

5.256 Core Strategy Policy 13 states that the Council will:

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“...setting high standards and supporting measures for reducing...noise...pollution and avoiding amenity and environmental problems that affect how we enjoy the environment in which we live and work.”

5.257 Saved Southwark Plan Policy 3.2 states:

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“Planning permission for development will not be granted where it would cause loss of amenity, including disturbance from noise, to present and future occupiers in the surrounding area or on the application site.”

5.258 An environmental noise assessment has been carried out by WSP to understand the baseline noise levels on the Applications site and make recommendations for façade treatment, glazing and ventilation methods.

5.259 The Noise Assessment concludes:

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“Temporary noise and vibration effects during demolition and construction activities have been assessed. With respect to demolition and construction noise effects of mostly minor negative significance are expected following the implementation of mitigation measures, although occasional effects of moderate to major negative significance are likely to occur during some activities when works are at their closest to nearby sensitive receptors. With respect to vibration, residual effects of mostly minor negative significance are anticipated when works are at their closest to nearby vibration sensitive receptors. The increase in road traffic noise arising from the demolition and construction of the FDS is expected to result in an effect of negligible significance along all roads.

Operationally, the change in road traffic noise as a result of the Site Wide Development Option is anticipated to be negligible and therefore no mitigation measures are necessary and residual effects remain unchanged. There would be no change in road traffic noise as a result of the FDS Only Development Option.”

## Air Quality

5.260 The application site is located within an Air Quality Management Area.

5.261 London Plan Policy 7.14 states:

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“Development proposals should minimise increased exposure to existing poor air quality and make provision to address local problems of air quality (particularly within Air Quality Management Areas (AQMA) and where development is likely to be used by large numbers of those particularly vulnerable to poor air quality, such as children or older people) such as by design solutions, buffer zones or steps to promote greater use of sustainable transport modes through travel plans.”

5.262 Saved Southwark Plan Policy 3.67 states that:

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“Planning Permission will not be granted for development that would lead to a reduction in air quality.”

5.263 An Air Quality Assessment by WSP has been prepared to assess any impacts of the proposed development on the surrounding area. The Air Quality Assessment concludes that:

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“Overall, with the recommended mitigation measures in place, the Proposed Development would comply with European and national air quality legislation, and national, regional and local planning policy”

## Ecology

5.264 London Plan Policy 7.19 states:

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“Development Proposals should wherever possible, make a positive contribution to the protection, enhancement, creation and management of biodiversity.”

5.265 Core Strategy Policy 11 aims to protect and improve habitats for a variety of wildlife by requiring developments to:

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“...help meet the needs of a growing population by providing space for children’s play, gardens and other green areas and helping to improve the quality of and access to open spaces and trees, particularly in areas deficient in open space.

and

... to avoid harming protected and priority plants and animals and help improve and create habitat.”

5.266 An Ecological Assessment has been carried out by WSP as part of the Environmental Statement to assess the ecological interest of the site as a whole, the importance of the habitats and species present, where necessary, mitigation measures to safeguard any significant existing ecological interest within the site and where appropriate, opportunities for ecological enhancement. The Assessment, which is submitted with the planning application, concludes that:

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“The Site comprises a highly urbanised environment with limited habitat of inherent nature conservation value. A proportion of the buildings present have features suitable for use by small number of crevice roosting bats such as common pipistrelle, and introduced shrub and mature trees provide suitable foraging and commuting habitat which is used by five species of bat (as shown by automated detectors surveys completed in August and September 2014). A proportion of the buildings and shrubs and trees located within courtyard areas also provide suitable nesting habitat for common and widespread nesting bird species, including those of conservation concern such as house sparrow and starling. Taller buildings present could be used as vantage points by peregrine, however given the availability of taller, more prominent buildings in the vicinity (to the north) on balance it is considered unlikely that this species would nest on the Site.

In the absence of mitigation, removal of habitat could have direct effects upon bats in so far as there would be a reduction in potential roost resource, and temporary reduction in foraging and commuting habitat availability. Should small numbers of common pipistrelle occupy non-breeding, transitional roosts within buildings in the absence of mitigation legislation protecting this species group could be contravened. Mitigation entailing a combination of seasonal timing of works, appropriate working methods and replacement of roosting opportunities is proposed to avoid negative effects upon this species group. It is considered probable that as a consequence, effects upon bats during the demolition and construction phase will be of negligible significance.”

## Flood Risk and Drainage

5.267 The application site lies within defended Flood Zone 3a and as such a Flood Risk Assessment must be submitted with the planning application, in accordance with London Plan and NPPF paragraph 100, which states:

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“Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere.”

5.268 London Plan Policy 5.12 states:

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“Development proposals must comply with the flood risk assessment and management requirements set out in PPS25 over the lifetime of the development and have regard to measures

proposed in Thames Estuary 2100 (TE2100 – see paragraph 5.55) and Catchment Flood Management Plans.”

5.269 Core Strategy Policy 12 states the Council will:

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“Allow development to occur in the protected Thames flood zone as long as it is designed to be safe and resilient to flooding and meets the Exceptions Test.”

5.270 A Flood Risk Assessment (FRA) has been undertaken by WSP.

5.271 The FRA concludes that:

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“The EA [Environment Agency] have confirmed that the River Thames defences to the north of the site provide the site with fluvial flood protection up to and including the 1 in 1000 year fluvial flood event.

Further EA analysis of nine breach/overtopping locations along the River Thames in line with the 2011-2012 Halcrow studies has identified that none of the nine breach locations would result in flood water inundation of the Application Site. As such the Application Site is considered at insignificant risk of fluvial and tidal flooding.”



# 6 Consultation

- 6.1 This section summarises the consultation that has been undertaken during the evolution of the proposals and how it has influenced the design of the scheme.
- 6.2 A separate Statement of Community Involvement (SCI), prepared by Soundings is submitted as part of the Applications and summarises the public consultation and engagement with local stakeholders that has been carried out in parallel with statutory and other technical consultees.

## Consultation Overview

- 6.3 The Applicant has engaged with relevant stakeholders throughout the design development, with a particular emphasis on residents currently living on the estate. This public consultation continues the consultation undertaken by LBS during the tender period and sought to involve key groups, organisations and residents in the design process.
- 6.4 During the pre-application stage, the Applicant and design team undertook a comprehensive stakeholder consultation strategy. This included pre-application consultation meetings with LBS, the Greater London Authority (GLA) and Transport for London (TfL). In addition, consultation was also undertaken with various technical consultees during the preparation of the ES.

## Scheme Changes

- 6.5 In response to the community consultation undertaken, a number of key changes were made to the emerging scheme design during the pre-application process. These were in specific response to issues raised during the community consultation events and presentations. These are summarised in table 6.1 below.

Key topic / Issues	Response
Places to socialise, meet up and the inclusion of more shops and cafes.	The local centre will create a social centre to the regeneration with places to shop, meet and access services. The Outline Application Site includes flexible ground floor spaces on Thurlow Street and across the Outline Application Site that can be adapted from retail/business to residential or vice versa should the need arise.
Improved east-west connections.	Central to the scheme is the east-west movement through the estate . This is emphasised by the network of open spaces and street hierarchy.
A cycle and pedestrian friendly area.	Where possible, cyclists and pedestrians have been given priority.
Need for a community centre/hub to replace Thurlow Lodge	A community facility such as community centre, gym or early years centre will be delivered as part of the FDS. Further community facilities will be provided in the

Outline Application Site.	
Retention of trees	Several of the green space layouts have been adapted in order to retain more trees. Many of the street layouts have been designed around the retention of as many trees as possible
Height of building within the FDS is too high	The height of buildings in the FDS have been lowered.
Relationship of open space with school is important	The open space adjacent to the school has been reconfigured in response to consultation with the school
Community gardens should be scattered throughout the estate	Instead of only one central community garden, there will be three community gardens delivered in different phases of the regeneration
Mix of open and green spaces, catering for different age groups	A variety of open spaces will be delivered throughout the estate.
Sports areas should be separate from housing	The games areas have been positioned on the more active streets away from homes

**Table 6.1 – Summary of key changes**

- 6.6 The Applicant will continue to engage with and update the key stakeholders and the local community throughout the application process.

# 7 Summary and Conclusions

- 7.1 The proposals have been brought forward in accordance with the vision for the Aylesbury Estate as set out within the AAAP.
- 7.2 The Applications will see the comprehensive redevelopment of the Estate to provide a successful neighbourhood through high design standards, a good mix of uses and a layout that will meet the needs of current and future generations.
- 7.3 The schemes have been designed to deliver a high proportion of affordable housing that responds to the requirements of LBS by providing a mix of tenures which meets local needs including those of the elderly and vulnerable.
- 7.4 The Applications have been designed to provide a coherent and legible layout that is permeable and ensures that the Estate will become a continuous part of the London streetscape. This is achieved by providing a range of street typologies that respond to the existing surroundings.
- 7.5 The schemes have will provide a significant proportion of new open space in a range of parks, communal areas, play spaces and green spaces. This will play a key role in ensuring high residential amenity with the area and help create a strong sense of community.
- 7.6 The Applications respond to the requirements of the community by providing a range of additional non-residential uses including retail, employment space, community facilities, health care and early years facilities. These have been designed to be flexible through the build period of the scheme to respond to the changing demands which may occur in the area.
- 7.7 The Applications will deliver a highly sustainable community which meets the sustainability targets established by national, regional and local planning policy. In addition, the scheme has been designed to be energy efficient.
- 7.8 The Applications have been subject to a comprehensive community consultation which has shaped and informed every aspect of the design. The scheme therefore reflects a collaborative approach between the Applicant, design team and residents and key stakeholders.
- 7.9 The planning policy assessment in this Statement indicates a high degree of compliance with the relevant development plan policies and it is requested that planning consent is granted for these Applications.
- 7.10 The Aylesbury Estate will become an exemplary neighbourhood in which residents will want to live and be proud of.

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