

Aylesbury Estate Regeneration Phase 2B Planning Application

Internal Daylight and Sunlight Report

May 2022



Planning Statement
Aylesbury Estate Phase 2B

Relating to site at
Land bound by Thurlow Street, Kinglake Street, Bagshot
Street and Albany Road, Southwark

May 2022



hghconsulting.com

Contents

2.0	Site and Surroundings	8
3.0	Estate Regeneration and Planning History.....	12
4.0	Pre-application Discussions and Consultation	15
5.0	Proposed Development.....	18
6.0	Planning Framework.....	26
7.0	Affordable Housing Statement.....	44
8.0	CIL & Planning Obligations.....	52
9.0	Summary and Conclusions.....	53

1.0 Introduction

Purpose of Statement

- 1.1 This Planning Statement has been prepared by hgh Consulting on behalf of Notting Hill Genesis (NHG) (the Applicant) in support of a full planning application for a residential-led scheme on the site known as 'Phase 2B' which is located within the Aylesbury Estate.
- 1.2 The Site comprises land bound by Kinglake Street to the north, Bagshot Street to the east, Albany Road to the south, and Thurlow Street to the west. As set out within the Southwark Plan (2022), the Site is within an area designated as the Aylesbury Area Action Core - Phase 2. The Site comprises the southern part of Phase 2, and for the purposes of this planning application, including pre-application consultation, is known as Phase 2B. The Site location (outlined in red) is shown in Figure 1 below.

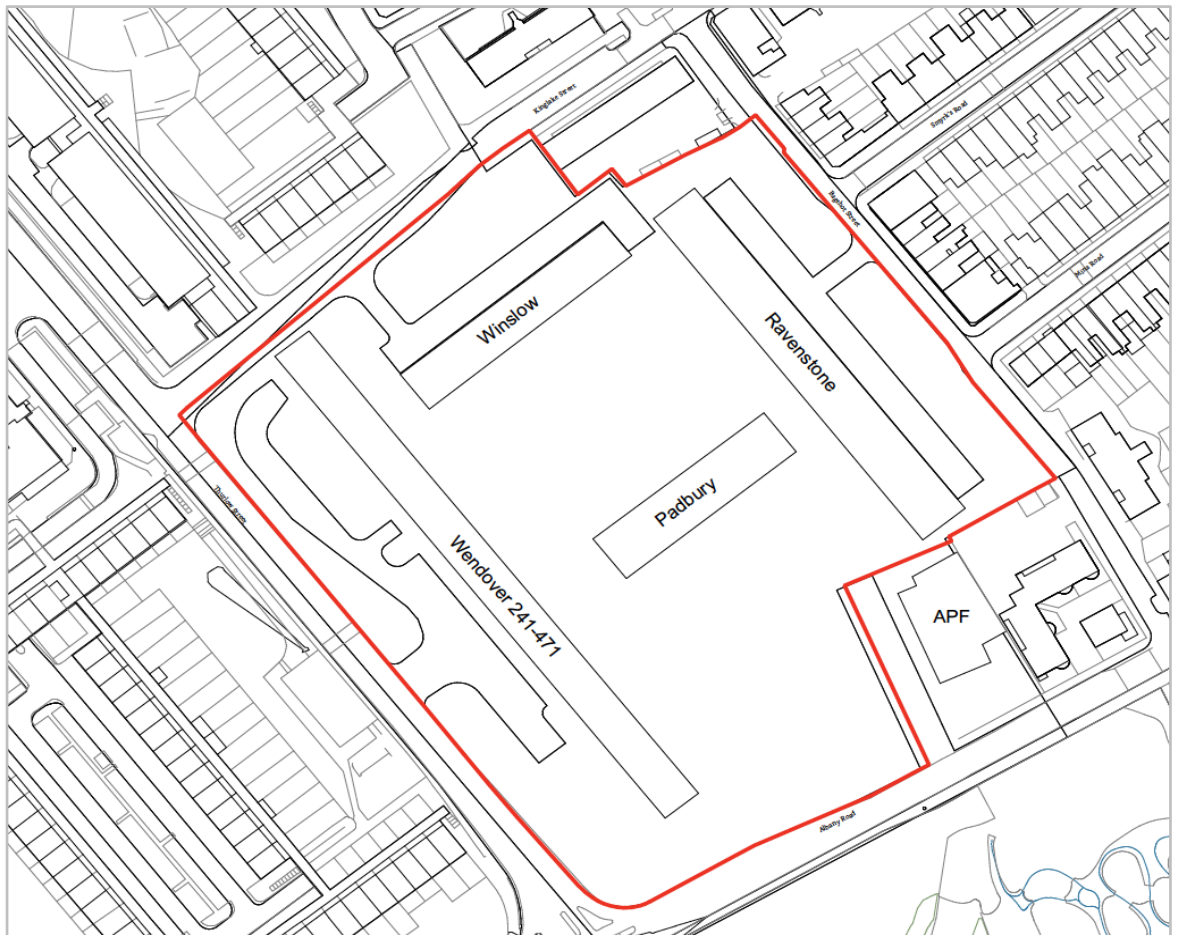


Figure 1 (Site Location Plan)

- 1.1 The planning application is for the following development:
- “Demolition of the existing buildings and redevelopment to provide a mixed use development comprising five buildings of a variety of heights with basements, providing affordable and market homes (Class C3); flexible floorspace for commercial business and service uses (Class E) and local*

community and learning uses (Class F1/F2(a)(b)); public open space and playspace; private and communal amenity space; formation of new accesses and routes within the site; alterations to existing accesses; and associated car and cycle parking; refuse storage; and hard and soft landscaping; and associated works.”

- 1.2 The application is made under the provision of the Town and Country Planning Act 1990 (England and Wales) and is accompanied by an Environmental Statement under the Environmental Impact Assessment Regulations.
- 1.3 This Statement provides background information on the Site and its history and a detailed assessment of the proposals in relation to planning policy and other material considerations.
- 1.4 The application scheme has evolved through pre-application consultation with LB Southwark (LBS or the Council), the Greater London Authority (GLA), Transport for London (TfL) and other key stakeholders. Extensive public engagement has also been undertaken with members of the local community
- 1.5 The proposals will contribute towards the wider regeneration of the Aylesbury Estate with a high-quality residential-led scheme which responds to the existing and emerging context and contributes positively towards wider growth aspirations for this evolving and important part of Central London.
- 1.6 Overall, the proposed development constitutes sustainable development within the terms of national and local planning policy and the grant of planning permission will allow it to be progressed without delay.
- 1.7 This Planning Statement should be read alongside all other submission documents, which are listed below:
 - Arboricultural Impact Assessment and Method Statement;
 - Biodiversity Net Gain Report;
 - Circular Economy Statement;
 - Delivery and Servicing Plan;
 - Design and Access Statement;
 - Energy Assessment;
 - Environmental Statement;
 - Equalities Impact assessment;
 - Fire Statement;
 - Flood Risk Assessment and Drainage Strategy;
 - Ground Investigation Report;
 - Health Impact Assessment;
 - Landscape DAS;
 - Preliminary Ecology Assessment;

- Statement of Community Involvement;
- Sustainability Statement;
- Transport Assessment;
- Travel Plan Statement;
- Parking Management Plan;
- Outline Delivery and Servicing Plan;
- Outline Construction Management Plan;
- Outline Demolition Environmental Management Plan;
- Overheating Assessment;
- Utilities Statement;
- Financial Viability Assessment;
- Whole Life Carbon Assessment.

Background

- 1.8 The Aylesbury Estate has been earmarked for regeneration since 2005 when the Council decided to reprovide new homes for the area on a phased basis and worked with the community to develop a planning framework called the Aylesbury Area Action Plan (AAP) (now replaced by the Southwark Plan (2022)) to guide the regeneration. The Council began rebuilding the Aylesbury Estate in 2010 and expect redevelopment to take place in a number of phases.
- 1.9 The principle of the regeneration of the wider Estate was confirmed through outline planning permission (reference 14/AP/3844), granted in 2015 for phased redevelopment to provide a mixed use development of up to 2,745 residential units, employment, retail and community floorspace. The initial phases of the regeneration of the Estate have commenced following the grant of outline permission for the wider estate. Reserved matters for Plot 18 and full planning permission (and subsequent amendments) for the First Development Site (FDS) (as detailed in the planning history below) have been progressed and development commenced in these areas.
- 1.10 Since the grant of this outline, the planning and development context has changed significantly, and now places increasing demands on the scheme to deliver over a range of planning objectives, including those within the London Plan (2021) and Southwark Plan. Of note is Policy H8 in the London Plan, which requires that the demolition of affordable housing must be replaced by an equivalent amount of affordable housing floorspace.
- 1.11 Having undertaken a comprehensive assessment of the approved masterplan against the prevailing planning context, the Applicant has identified a number of issues which compromise their ability to

successfully deliver the proposals as previously conceived. These include both the deliverability of the phases within the masterplan (in terms of the speed at which construction can commence) and the policy requirement for the re-provision of existing affordable floorspace, which cannot be accommodated within the approved masterplan parameters.

- 1.12 The assessment identified the Site as being best placed to form the next part of the Aylesbury Estate regeneration. This application proposes a standalone scheme for the Site that will deliver on the principal regeneration aims for the Aylesbury Estate while also responding to the current planning policy environment. The proposed development builds upon the overarching principles of the approved masterplan and comprises a high quality mixed-use scheme that will provide 614 residential units and community/commercial floorspace, contributing towards the regeneration of the wider Aylesbury Estate.

Land Ownership and Developer Agreement

- 1.13 The Site comprises land which is in the public ownership of LBS. NHG will be delivering the regeneration of Phase 2B of the Aylesbury Estate.

Referral to the Mayor

- 1.14 The Town and Country Planning (Mayor of London) Order 2008 requires planning applications that are of potential strategic importance (PSI) to be referred to the Mayor of London. An application is referable to the Mayor if it meets any of the criteria set out in the Order. The proposed development meets the criteria in the Order in categories:

- 1A (development including the provision of 150 houses);
- 1C (the building is more than 30 metres high and is outside the City of London); and
- 3A (the development would result in the loss of more than 200 houses, flats or houses and flats (irrespective of whether the development would entail also the provision of new houses or flats).

- 1.15 As such this planning application is referable to the Mayor of London under the provisions of the Order.

Need for Environmental Impact Assessment

- 1.16 The proposed development falls within the classification of Schedule 2, 10(b) of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (the “EIA Regulations”).
- 1.17 Given the scale of development there is potential for significant effects to arise and it has been concluded that proposed development should constitute ‘EIA Development’ under the EIA Regulations and there is an Environmental Statement (ES) required to accompany the planning application. The scope of the ES has been agreed with LBS through a formal Scoping Request.
- 1.18 An ES has been submitted to accompany the planning application along with a Non-Technical Summary (NTS). The ES Volume 1 includes the following chapters:
- Phasing, Demolition and Construction;
 - Air Quality;

- Daylight, Sunlight and Overshadowing;
- Ground Conditions;
- Noise and Vibration;
- Socio-Economics and Health;
- Transportation;
- Water Resources; and
- Wind.

1.19 The ES also includes a separate Volume (Volume II) comprising an assessment of Heritage, Townscape and Visual Impact.

Structure of Statement

1.20 This statement is set out in the following sections:

- **Section 2** provides a description of the Site and surrounding area.
- **Section 3** sets out the background to the proposals including a summary of the relevant planning history.
- **Section 4** explains the recent background to the proposals including pre-application consultation.
- **Section 5** provides a description of the proposed development.
- **Section 6** summarises the development plan and material considerations.
- **Section 7** provides an analysis of the main planning considerations.
- **Section 8** sets out the affordable housing statement;
- **Section 10** sets out a draft heads of terms and details of the CIL payment; and
- **Section 11** provides a summary and conclusion which demonstrates why planning permission should be granted without delay.

2.0 Site and Surroundings

Application Site

- 2.1 The Site is 2.72 hectares and lies within the Aylesbury Estate, a local authority housing estate located in the Faraday Ward of London Borough of Southwark.
- 2.2 The Site fronts Thurlow Street to the west; Bagshot Street to the East; Kinglake Street to the north; and Albany Road to the south. The Site (Phase 2B shown in green) in the context of the wider estate and other phases of regeneration is shown in Figure 2 below. It should be noted that Phase 1A and Site 7 sit outside of the outline planning permission (detailed in Section 3) and are not being delivered by NHG.

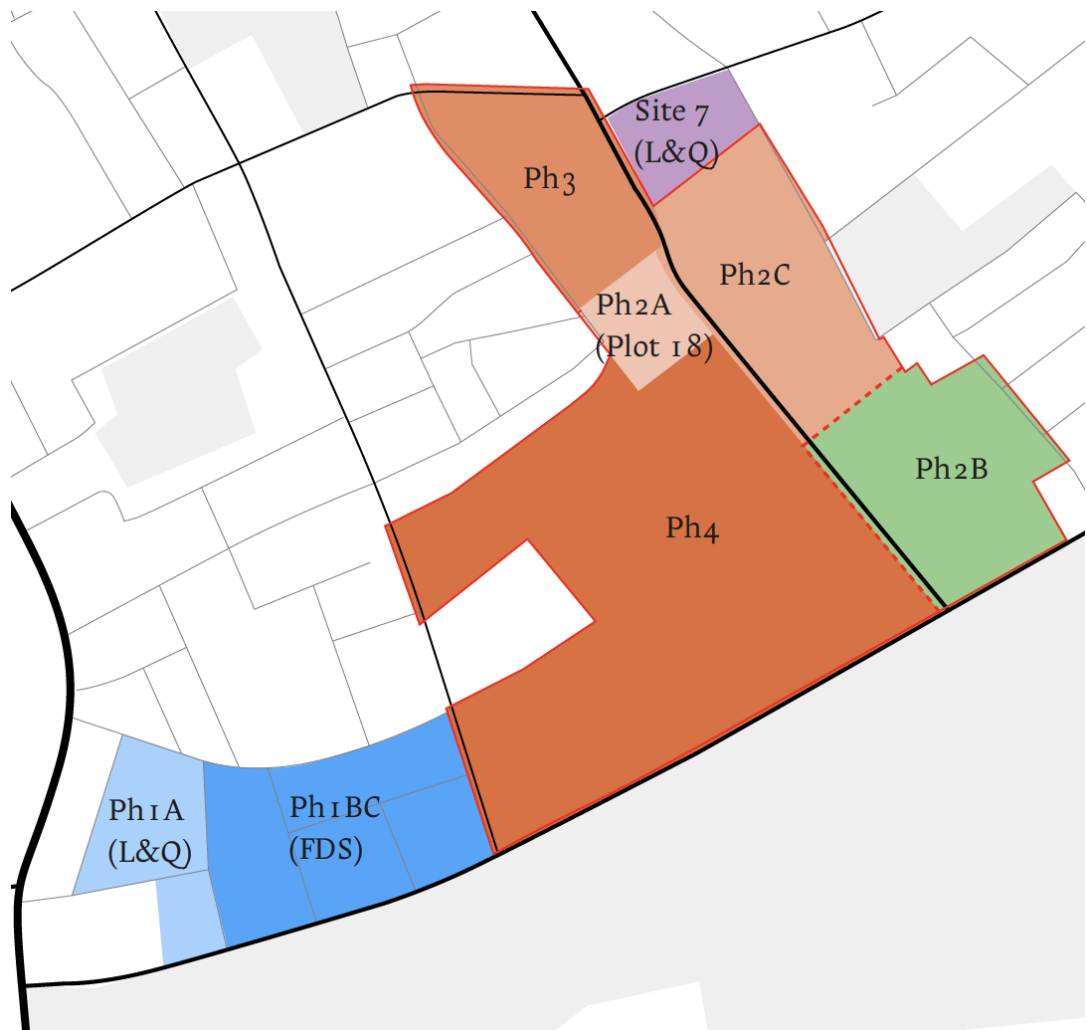


Figure 2: Aylesbury Estate Regeneration Phases

- 2.3 The Aylesbury Estate was constructed between 1966 and 1977 and is one of the largest housing estates in south London, covering a total area of 28.5 hectares and containing approximately 2,700 dwellings within circa 50 residential blocks that range between 4 and 14 storeys. The Estate is predominantly residential but includes a concentration of community facilities along Thurlow Street.
- 2.4 The Site is located within the southeast of the Aylesbury Estate. As shown in Figure 3 below, there are currently four blocks on the Site (Wendover (units 241-471), Winslow, Padbury, and Ravenstone). All four buildings are linear housing blocks of between six and 14 storeys in height which comprise residential accommodation. Within Wendover, there is a Learning Centre, Music Room, and offices, although these are now all vacant. The building to the south of the Site (Foxcote) has already been demolished



Figure 3: 3D Aerial View of the Site

- 2.5 The Site currently comprises 373 residential units (of which 327 are social rented) and 529 sqm of public open space. Current occupation is scattered sporadically across each of the existing buildings and comprises leaseholders, secure tenants and those in temporary accommodation. At present a total of 90 units are occupied. LBS is in the process of rehousing residents and the existing residents will be rehomed within Phase A of the First Development Site which is located within the Aylesbury Estate to the west of Phase 2B. It is anticipated that this accommodation will be available in 2023.

Accessibility

- 2.6 The Site is in a reasonably accessible part of London. The majority of the Site is shown as having Public Transport Accessibility Level (PTAL) 4, with some areas fronting Thurlow Street having a PTAL 2. The TfL mapping does not include all pedestrian connections through the Site and a more detailed assessment finds that the whole site is PTAL 4 (see Transport Assessment for details).
- 2.7 The Site is situated approximately 1 mile to the south east of Elephant and Castle Underground Station (Bakerloo and Northern Lines) and Elephant and Castle Station (Thameslink and

Southeastern), and approximately 1.2 miles to Kennington Underground Station (Northern Line). The Site is also directly served by multiple buses along Thurlow Street and is a short walk to several bus stops on Old Kent Road which have a high frequency of services.

- 2.8 Thurlow Street adjacent to the Site is designated as Southwark Cycle Spine Route by LBS who are progressing designs for this route.

Designations

Local Plan Policy Designations

- 2.9 As set out in the Southwark Plan Policies Map (shown on the extract below), the Site is designated within the Aylesbury Area Action Core - Phase 2 (black outline). It is also within an area suitable for tall buildings (pink shading). Other designations include an Air Quality Management Area, and Hot food Takeaway Secondary School Exclusion Zone (beige shading).
- 2.10 There are no ecological designations on the Site. Burgess Park to the South of the Site is designated as Metropolitan Open Land (MOL) (yellow shading) and Site of Importance for Nature Conservation (SINC) (green outline). Surrey Square to the north of the Site is also designated as a SINC and Borough Open Land (green shading).

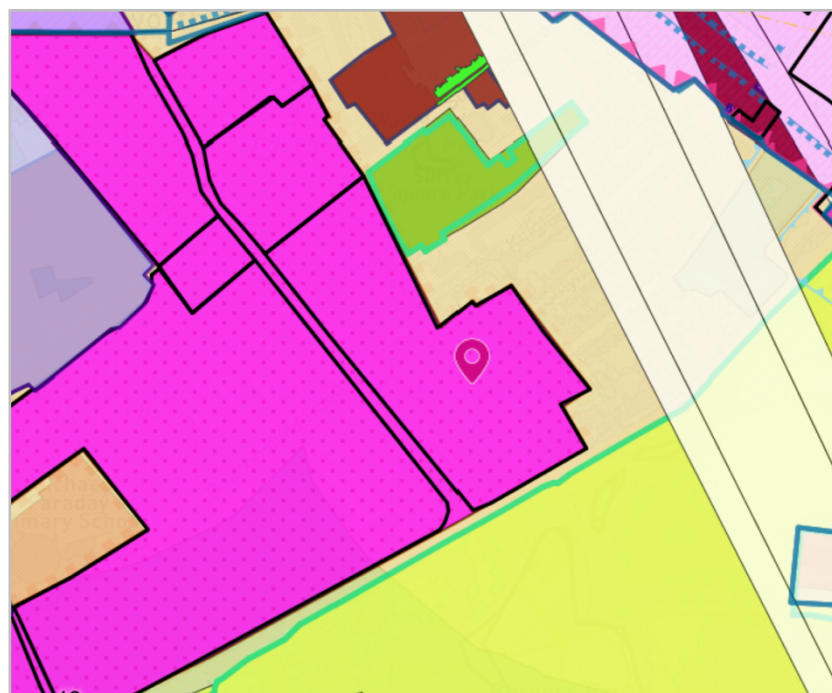


Figure 4: Extract from the Local Plan Policies Map

Other Designations

- 2.11 As per the Environment Agency Flood Risk Map for Planning, the whole Site is located in Flood Risk Zone 3 (in an area that benefits from flood defences).

- 2.12 There are no locally or statutorily listed buildings on the Site, nor is the Site located within a Conservation Area. The nearest Grade II listings to the Site include the Former Fire Station on Old Kent Road (approximately 330 metres from the Site), and Numbers 20-54 and attached railings and the raised pavement in front of numbers 20-54 Surrey Square (approximately 235 metres from the Site).
- 2.13 The nearest Conservation Areas to the Site include: Cobourg Road, Trafalgar Avenue, and Glengall Road (approximately 320 metres to the south east); Addington Square (approximately 800 metres to the south); Liverpool Grove (approximately 250 metres to the north west); Pages Walk (approximately 640 metres to the north); Walworth Road (approximately 620 metres to the west); Larcom Street (approximately 830 metres to the north west); Thornburn Square (approximately 750 metres to the east); and Peckham Hill Street (approximately 830 metres to the south).

Surrounding Area

- 2.14 The Aylesbury Estate is located within a wider primarily residential area that includes the Elephant and Castle (major town centre) and Heygate Estate to the north.
- 2.15 Just south of Albany Road lies Burgess Park which as stated is designated as a Site of Importance for Nature Conservation (SINC) and Metropolitan Open Land (MOL). The park contains many facilities including restaurants, leisure, and amenity/play spaces. Further to the north of the Site is Surrey Square Park (approximately 135m from the application Site) which, as also stated, is designated as a SINC and Borough Open Land.
- 2.16 The area immediately surrounding the Site is largely residential in character with building heights ranging from two to 10 storeys. Directly to the south east of the Site is a new development known as the Approved Premises Facility.
- 2.17 A few shops, takeaways and restaurants are located along Bagshot Street directly adjacent to the Site. A greater variety of shops and services including retail, supermarkets, and commercial are located nearby along Walworth Road High Street to the west and Old Kent Road to the east. As an Opportunity Area, the Old Kent Road is pursuant to a number of mixed-use redevelopment proposals coming forward.
- 2.18 Elephant and Castle (major town centre) and the former Heygate Estate is located to the north of the Aylesbury Estate (approximately 1 mile from the Site), which is also undergoing significant regeneration for high density development.
- 2.19 Several schools also exist in the surrounding area, including Ark Walworth Academy School to the east (approximately four minute walk from the Site) and Surrey Square Primary School (approximately three minute walk from the Site).
- 2.20 Several planning applications for the initial phases of the Aylesbury Estate regeneration have been granted permission and are under construction or complete. Further details of the planning history of the application Site and the wider Estate are provided in Section 3.

3.0 Estate Regeneration and Planning History

Background to Aylesbury Estate Regeneration

- 3.1 The existing buildings on the site are at the end of their intended design life. Numerous reports and investigations (including structural surveys and pre demolition audits) have been carried out in the past to investigate if the existing structures can be re-purposed. The reports highlighted concerns over concrete degradation and the fact that the structural system used lacks inherent robustness. The remedial details to resolve these issues are not considered to be appropriate. The demand for more housing results in denser urban environments and the current housing demand would not be met with the current dwelling numbers in the existing buildings.
- 3.2 The review informed the preparation of the Aylesbury Area Action Plan (AAP), which was prepared by LBS in consultation with the local community and the Creation Trust. The purpose of the AAP, which was adopted by LBS in 2010, was to establish a planning framework to enable the regeneration of the Estate in a comprehensive manner. With the adoption of the Southwark Plan in 2022, the AAP has now been rescinded, but the core aims for the regeneration have been carried forward in the adopted Plan.
- 3.3 The initial phases of the regeneration of the Estate have commenced following the grant of outline permission for the wider estate. Reserved matters for Plot 18 and full planning permission (and subsequent amendments) for the First Development Site (FDS) (as detailed in the planning history below) have been progressed and development commenced in these areas.

Relevant Site Planning History

2015 Outline Permission

- 3.4 Outline Planning Permission (OPP) (LPA ref: 14/AP/3844) was granted on 5th August 2015 for the mixed-use redevelopment of the Aylesbury Estate. The OPP red line boundary is shown in Figure 5 below.



Figure 5: Outline permission boundary

3.5 The description of the OPP development is as follows:

“Demolition of existing buildings and phased redevelopment to provide a mixed use development comprising a number of buildings ranging between 2 to 20 storeys in height (12.45m - 68.85m AOD) with capacity for up to 2,745 residential units (Class C3), up to 2,500sqm of employment use (Class B1); up to 500sqm of retail space (Class A1); 3,100 to 4,750sqm of community use; medical centre and early years facility (Class D1); in addition to up to 3,000sqm flexible retail use (Class A1/A3/A4) or workspace use (Class B1); new landscaping; parks, public realm; energy centre; gas pressure reduction station; up to 1,098 car parking spaces; cycle parking; landscaping and associated works.”

3.6 The OPP divided the site into development phases (Phase 2A, 2B, 2C, 3 and 4) (see Figure 2). The site which is the subject of this standalone planning application primarily forms part of Phase 2B, but also overlaps with the boundary of Phase 2C.

3.7 The OPP assumed indicative provision of approximately 490 residential units and 3,900 sqm of public open space would be delivered on Phase 2B.

Other Relevant Planning History

Plot 18

3.8 The first phase of the OPP to have commenced is Plot 18. A reserved matters application was granted in December 2016 (LPA ref: 16/AP/2800) for 122 residential units (C3), retail (A1/A3/A4) and a community facility (library D1) in a part 15, part 7 and part 4/6 storey building (known as the North Block); a health centre (D1) and early years facility (D1) in a 4 storey (plus basement) building (known

as the South Block); public realm; landscaping; cycle parking and car parking. Several minor material and non-material amendments have since been permitted and works have now commenced.

- 3.9 This permission was subsequently amended by a S.73 application (ref: 17/AP/3846) which was linked to the amendment to the FDS (detailed below). Both applications were approved on the 14th February 2019. Development has commenced for Plot 18, and practical completion of residential units and community uses is anticipated to be November 2022.

First Development Site

- 3.10 The OPP was submitted simultaneously with a detailed application for the First FDS (LPA ref: 14/AP/3843) for:

“Demolition of existing buildings and redevelopment to provide a mixed use development comprising a number of buildings ranging between 2 to 20 storeys in height (9.45m - 72.2m AOD), providing 830 residential dwellings (Class C3); flexible community use, early years facility (Class D1) or gym (Class D2); public and private open space; formation of new accesses and alterations to existing accesses; energy centre; gas pressure reduction station; associated car and cycle parking and associated works.

- 3.11 The FDS application was also approved at committee on the 5th of August 2015.
- 3.12 There have been several material and non-material amendments and condition discharge applications for the FDS. The original FDS permission was subsequently amended by a S.73 application (ref: 17/AP/3885) which was approved on the 14th of February 2019. This FDS S.73 application was submitted simultaneously to a linked S.73 (ref: 17/AP/3846) application for the Plot 18 site. The extant FDS permission (LPA ref: 17/AP/3885) is for 842 residential units, comprising 283 private units, 211 intermediate and 348 for social rent, in a mixture of buildings ranging from houses to apartment blocks up to 20 storeys in height.
- 3.13 The FDS permission has been implemented and construction is being carried out within three separate contracts (known as A, B and C). Construction on Contract A is at an advanced stage.
- 3.14 The FDS site is currently subject to three planning applications; one Section 73 application (LPA ref: 22/AP/1063) to vary the approved plans and quantum of development and two non-material amendment applications (LPA ref: 22/AP/1285 and 22/AP/0719) for small changes to the energy centre enclosure and façade and window design.
- 3.15 The current Section 73 application seeks to amend the permitted scheme for FDS C to provide an additional 60 residential units with a slightly altered tenure mix of 25% social rent and 21% shared ownership.

Approved Premises Facility

- 3.16 Directly adjacent to the Site is the Approved Premises Facility which was granted permission (ref: 17/AP/0053) on the 7th April 2017 for the construction of a four storey building (Class C2(a) - Secure Residential Institution) containing 36 bedrooms and associated communal and staff areas, as well as the formation of an access road, including junction from Albany Road, parking, landscaping and associated ancillary development.

4.0 Pre-application Discussions and Consultation

Overview

- 4.1 The Good Practice Guide to Estate Regeneration (GPGER) sets out the Mayor's aspirations for full and transparent consultation, and meaningful ongoing involvement with estate residents throughout the regeneration process, to ensure resident support.
- 4.2 At a local level, LBS have recently consulted on a new Development Consultation Charter (DCC), which sets out how members of the community can expect to be consulted by applicants at different stages of the planning application process. The Applicant has undertaken consultation in accordance with the requirements of the DCC, including with:
- Greater London Authority (GLA) and Transport for London (TfL);
 - LBS Officers (including Planning, Urban Design, Regeneration, Transport etc.);
 - LBS Design Review Panel; and
 - Extensive consultations with key community groups, local residents and stakeholders.
- 4.3 A schedule of pre-application discussions is summarised below, and further details of engagement with local stakeholders, community groups and residents can be found within the Statement of Community Involvement prepared by Soundings (SCI).

Pre-application Process

- 4.4 The Applicant has undertaken extensive pre-application dialogue with planning officers and urban design officers at LBS which have included a total of 14 formal pre-application meetings and two Design Review Panels. The proposals have been comprehensively developed through an iterative process with officers which has resulted in a proposed scheme with support from the LBS. The principles of the development are also supported by both LBS and the GLA.
- 4.5 The scheme responses to key comments raised are summarised below:

LBS Planning and Urban Design

- The design team redesigned block 5A and removed 5B alleviating concerns about the gap between the two blocks and the height of 5B.
- The design team increased the width of the 4B courtyard.
- The design team introduced a set-back to Block 4D and tuned elevations to respond specifically to the different streets.
- The southern wing of Block 4D was made narrower and a set-back was introduced on the courtyard side.
- The design team created a more uniform tower form and created a larger setting space around the tower entrance so it would be a cruciform in shape.

LBS Design Review Panel

- The designs have changed to improve sunlight penetration to Blocks 5A and 4AD. Also, 5C now benefits from a very well-lit roof terrace, supplementing its private courtyard provision.
- Following this initial DRP comment the design of 5A and 5B changed to alleviate a variety of concerns with 5B (now removed).
- The landscape design now includes a masonry pergola structure which helps bring definition to the gap between 4A and 4D on Albany Road.
- The different buildings are bound together by similar materials: red/brown brick and light pre-cast concrete elements to create a cohesive neighbourhood.
- A gap was introduced between the mansion and tower on 4A to help emphasise the separation of these two distinct elements.

Greater London Authority

- The designs have evolved in response to multiple daylight and overshadowing assessments, improving sunlight and daylighting with each iteration. Widening the 5A courtyard, widening the 4B courtyard and reducing the depth of the southern 4D wing have all helped improve daylight/sunlight.
- 5B has been removed and the two public spaces have become more clearly defined as different but complimentary: one a park with a MUGA, the other a square with commercial space animating it.
- In the original AAAP the district landmark in Ph2B was intended to be taller than the local landmarks in Phase 4 and the first development site. The first development site increased the height of the local landmarks by circa 5-storeys. To compensate for this the district landmark on Ph2B increases by 5-storeys.

Public consultation

- 4.6 Extensive consultation has been carried out with local residents and stakeholders over several years as the proposals have evolved. Full details are provided within the SCI. A summary of the engagement is set out below. It is noted that the consultation period coincided with successive national lockdowns and government restrictions due to Covid-19 and the engagement programme had to adapt and respond to this context.

Stage One: June - Aug 2021

- 4.7 Stage One included a series of online youth workshops, online stakeholder meetings and street-based pop-ups. A dedicated project website was set up and feedback was collected digitally, verbally and via printed forms. The aims of Stage One were to raise awareness of the regeneration of the wider Aylesbury Estate and Phase 2B and to explain the changes to the planning and policy context which resulted in the evolution of the proposals for Phase 2B. Stage One also included

information gathering to better understand how people live on the Aylesbury Estate and what they need from the regeneration proposals.

Stage Two: Sept-Dec 2021

- 4.8 Stage Two included two in-person public exhibitions, youth club and school workshops, public online discussions and a range of stakeholder meetings. The concept designs for the proposals were presented and focussed discussions were held to discuss certain topics such as public realm, playspace, non-residential spaces and design.

Stage Three: Jan - Mar 2022

- 4.9 Stage Three included online themed workshops and a public Q&A session along with an outdoor public exhibition, street pop-ups and group walkabouts. The consultation aims for this Stage were to explain why the proposals had been amended and to request comments and feedback on the revised designs.

Stage Four: Spring 2022

- 4.10 It is intended to carry out a further stage of consultation to present the final proposals for the site in Spring 2022. Consultation is proposed to complement and support LBS's own publicity of the planning application and statutory consultation process. This includes:
- A varied programme of in-person and online events, digital and printed media and targeted outreach;
 - Members of the team being available for any direct questions;
 - Producing a public-facing summary about the planning application;
 - Making responses to the statutory planning consultation; and
 - The Aylesbury Now email and phone number will be available.

Summary

- 4.11 The objective of the pre-application consultation approach has been to provide detailed information about the proposal from the beginning of the development process and engage meaningfully with the local community and to ensure that the local community had the opportunity to understand and shape the development proposal. All feedback received has been considered carefully by the project team during the finalisation of the proposals.

5.0 Proposed Development

Description of the Proposed Development

- 5.1 The proposed development is for:

“Demolition of the existing buildings and redevelopment to provide a mixed use development comprising five buildings of a variety of heights with basements, providing affordable and market homes (Class C3); flexible floorspace for commercial business and service uses (Class E) and local community and learning uses (Class F1/F2(a)(b)); public open space and playspace; private and communal amenity space; formation of new accesses and routes within the site; alterations to existing accesses; and associated car and cycle parking; refuse storage; and hard and soft landscaping; and associated works.”

- 5.2 A summary of the proposed development is provided below.

Demolition of Existing Buildings

- 5.3 The demolition of all existing buildings is proposed to allow the full redevelopment of the Site. This approach accords with both the vision for the Aylesbury Area in the Southwark Plan and the approach taken within the outline planning permission.
- 5.4 The existing buildings on the site are at the end of their intended design life. Numerous reports and investigations (including structural surveys and pre demolition audits) have been carried out in the past to investigate if the existing structures can be re-purposed. The reports highlighted concerns over concrete degradation and the fact that the structural system used lacks inherent robustness. The remedial details to resolve these issues are not considered to be appropriate. The demand for more housing results in denser urban environments and the current housing demand would not be met with the current dwelling numbers in the existing buildings.
- 5.5 The Council’s aspiration for the full redevelopment of the Aylesbury Estate is reflected in the policies of the adopted Southwark Plan.

Masterplan

- 5.6 The masterplan for Phase 2B is based upon the following objectives:
- Providing a generous and varied public open space and play space
 - Improving connectivity across the site;
 - Accommodating high quality residential dwellings in a predominantly mid-rise layout with one high quality tower element; and
 - Optimising servicing arrangements to minimise reliance of managed waste solutions.
- 5.7 The proposed development comprises the construction of five buildings (known as Blocks 4A, 4B, 4C, 5A and 5C). The proposed building heights range from between four to 25 storeys, with the tallest element located on the corner of Albany Road and Thurlow Street, as a gateway building next to Burgess Park. The buildings are set around two new public spaces (Thurlow Square and Bagshot Park) and the Site will be connected through a network of tree-lined streets.
- 5.8 The proposed layout is shown on the extract below:



Figure 6: Proposed Development

5.9 The proposed development is based upon the following design principles

- *Heights:* A range of building heights are proposed across the site, ranging from 4 to 25 storeys. The tallest building is located on the corner of Albany Road and Thurlow Street as a gateway building next to Burgess Park.
- *Typologies:* The proposal will incorporate a mixture of maisonettes and flats, with a total of 122 maisonettes and 492 flats. The maisonettes will either be two or three-storey dwellings with front doors accessed directly from the street or from a communal access gallery.
- *Dual Aspect:* All 2 bed+ units are dual aspect, which is a total of 454 units (74% of the total number of units).
- *Materials:* All buildings include a palette of red/brown brick and light precast concrete elements to ensure that the proposals will form a cohesive neighbourhood.
- *Private Amenity:* Private amenity is provided through private rear gardens for ground floor homes and balconies for those at upper floors. The rear gardens will face onto secure communal amenity spaces, with separation and privacy provided by hedges. Front gardens are proposed to provide a buffer between the public realm and ground floor units and will comprise either hedges or railings with a paved front garden.

5.10 A brief summary of each building is set out below and full details are provided within the Design and Access Statement.

Block 4A

- 5.11 Block 4A forms part of a perimeter block with 4D and includes a communal courtyard garden to the interior. Block 4A comprises a 25 storey landmark residential tower facing onto Burgess Park and a mansion block, which is physically connected to the tower but at a much lower scale.
- 5.12 The tower marks the important gateway connection to Burgess Park and the beginning of Thurlow Street. The vertical architectural language of the tower provides an elegantly proportioned building with a cruciform shape, which will benefit from 360-degree views. The mansion block is nine storeys high along Thurlow Street (seven storeys with a two storey setback pavilion) which drops to six storeys along Mina Road.
- 5.13 Both the tower and mansion block share a common vertical architectural language, while an appropriately sized gap defines the junction between the two buildings. The layout of the buildings has been designed to maximise active frontages, with a residents room and concierge located at the ground floor of the tower and maisonettes with direct access to Mina Road and Thurlow Street provided in the mansion block.
- 5.14 Block 4A provides a total of 168 residential units within the tower and 41 units within the mansion block.
- 5.15 A basement is proposed which will provide an energy centre for the wider development along with car parking to meet the Council's requirements.

Block 4B

- 5.16 Block 4B is located on the junction of Bagshot Street and Albany Road and comprises a five storey U-shaped residential block. The architectural character of the building is a 'parkside mansion block' which addresses the new Bagshot Park to the north. The architectural language comprises a vertical emphasis using tonal material changes with variations in brick colours and contrasting stone elements.
- 5.17 The total number of residential units in Block 4B is 24, which are arranged as maisonettes with direct street access at ground floor and flats above. The flats are accessed via a communal entrance on Mina Road, which is marked by a distinctive entrance canopy.
- 5.18 A south facing communal courtyard is proposed which incorporates doorstep play and green landscaping.

Block 4D

- 5.19 Block 4D forms a perimeter block with Block 4A, and comprises a seven storey C-shaped block set around a central courtyard. The massing is stepped back in a series of cut-outs at the upper floors.
- 5.20 The architectural language of the building responds to the different context on either side, with Burgess Park to the south, Thurlow Square to the north and new and existing development to the east and west. There is a vertical emphasis to the architecture with brick piers, while changes in brick tone emphasise a clear 'base' to the building and add variation to the facades.
- 5.21 The block provides 88 residential units, with maisonettes provided at ground level and flats above. A basement is proposed which provides cycle storage, wheelchair accessible parking and plant.

- 5.22 A communal courtyard is provided, which is shared with the residents of Block 4A. Access to the courtyard is from the two cores via the public realm, which will be animated through high quality landscaping.

Block 5A

- 5.23 Block 5A is located in the northwest of the Site and comprises a perimeter block with a raised podium courtyard. The building height is part nine (facing Thurlow Street), part seven (Alvey Street) and part six storeys (Kinglake Street). The building provides residential accommodation in maisonettes and flats (a total of 250 units) and non-residential floorspace at ground floor facing onto Thurlow Square and Mina Road.
- 5.24 Undercroft parking and ancillary space is provided at ground level along with cycle parking and an area of communal amenity space. Further amenity is provided on a raised podium which provides private back gardens for the lower level maisonettes and a landscape courtyard.
- 5.25 The proposed architecture reflects the character of a traditional mansion block, with lighter brick tones at upper levels and a darker brick at ground floor.
- 5.26 Communal amenity is provided within the central landscaped courtyard which incorporates play space, and private amenity is in the form of private gardens, terraces, and balconies.

Block 5C

- 5.27 Block 5C is a six storey U-shaped building which is located in the northeast of the site. It abuts Bagshot Park to the south and Faversham House to the north.
- 5.28 Block 5C provides maisonettes and flats with a total of 43 residential units. The maisonettes at ground floor are accessed directly from the street, which communal access to the remaining units is via Alvey and Bagshot Streets.
- 5.29 The architectural language proposes both a vertical and horizontal emphasis with the arrangement of vertically proportioned windows with horizontal balcony decks. The proposed material palette is brick, with a lighter tone at lower floors. Precast concrete elements are proposed at ground floor and stone veneer spandrel panels at upper floors to add interest to the facade.
- 5.30 Amenity space is provided in the form of a communal garden in the courtyard which includes lawn, planting and doorstep play. A roof terrace is proposed on the eastern wing to provide further communal amenity.

Residential Accommodation

- 5.31 A total of 614 residential units (1,927 habitable rooms) are proposed. The proposed residential accommodation schedule is provided in Table 1 below.

Table 1: Proposed Accommodation Schedule

	Private		Social Rented		Intermediate		Total	
	Unit No.	HR	Unit No.	HR	Unit No.	HR	Units	HR
1 Bed	161	322	26	52	31	62	218	436

2 Bed	199	597	47	180	46	138	292	915
3 bed	9	45	37	185	5	25	51	255
4 bed	-	-	50	300	-	-	50	300
5 bed	-	-	3	21	-	-	3	21
Total	369	964	163	738	82	225	614	1927

5.32 The residential accommodation provides:

- 50% private, and 50% affordable (by habitable room) (with an affordable split of 77% social and 23% intermediate).
- 33.5% 1-bedroom homes, 47.6% 2-bedroom homes, 8.3% 3-bedroom homes, 8.1% 4-bedroom homes, and 0.5% 5-bedroom homes.
- 10% of units are wheelchair accessible (62 units).
- 74% of units are dual aspect and there are no single aspect north facing units.

Amenity Space

Private Amenity Space

5.33 Private for the residential units will be provided through private rear gardens for ground floor homes and balconies for those at upper floors. A total of 5,793.2 sqm of private amenity space will be provided throughout the site. Each proposed residential building will be served by a communal garden. Blocks 4B and 5C will also have a roof terrace and Block 5A will have an area of amenity on a podium. The total communal amenity provision is 4,275sqm. Further details on the communal amenity for each block are provided below.

Play Space

1.21 A total of 3,202 sqm of play space is proposed in the form of three public play spaces (including a new MUGA in Bagshot Park) as well as doorstep play in communal areas.

Communal Amenity Space

5.34 Each proposed residential building will be served by a communal garden. Blocks 4B and 5C will also have a roof terrace and Block 5A will have an area of amenity on a podium. The total communal amenity provision is 4,275sqm.

5.35 Blocks 4A and 4D will have a shared communal garden located between the two blocks which will be curated with dedicated food growing planters and a variety of areas to sit. Informal routes and doorstep play will be incorporated within the landscaping. Two distinct pre-cast concrete structures are proposed which will mark the entrances to the courtyard and provide a frame for climbing plant species. Private gardens will be provided for the ground floor maisonettes

5.36 Block 4B will have a small south facing courtyard garden which will incorporate doorstep play, including a tree and treehouse structure.

- 5.37 Block 5A will have a courtyard at grade and podium at first floor level. The courtyard will include a central tree with seating elements and natural play objects. The courtyard will have a functional purpose, providing access to the bicycle storage for the building. The podium will be accessed via the building cores and will provide both private gardens for the maisonettes and shared communal space with a series of outdoor ‘rooms’ providing areas for play, food growing and relaxation.
- 5.38 Block 5C landscaping proposals include the enhancement of the playground on the corner of Kinglake and Alvey Streets, along with a courtyard providing planting and doorstep play. A roof terrace is also proposed on the northwestern corner of the building.

Non-residential

- 5.39 The proposed development proposes 414sqm (GIA) of flexible floorspace for commercial business and service uses (Class E) and local community and learning uses (Class F1/F2(a)(b)). This is proposed to be located on the ground floor of Block 5A. Two non-residential units are proposed, one facing onto Thurlow Square and one wrapping around the corner onto Mina Road.

Public Realm and Landscaping

- 5.40 The landscape and public realm proposals are structured around two new public spaces, Thurlow Square to the west and Bagshot Park to the east. Each space will have a distinct character.
- 5.41 Thurlow Square is envisaged to have a more urban feel, providing a neighbourhood square supporting the non-residential uses on the ground floor of Block 5A with an area of paving to support outdoor seating. At the centre of Thurlow Square will be an area for meeting, socialising and sitting with an informal area for play.
- 5.42 Bagshot Park is proposed to be a new neighbourhood park, and the proposed landscaping is based on the principles of a traditional garden square with denser planting around the edges and an area of lawn and play elements in the centre. A new MUGA is proposed in the eastern corner of the park which will be surfaced with combined markings to allow for multiple sports to be played.
- 5.43 A further area of play is proposed within a playground situated on the corner of Kinglake Street and Alvey Street. The play elements within this area include a play trail and treehouse.
- 5.44 Within the site, a network of tree-lined streets are proposed, which are SSDM compliant. These comprise the extension of Mina Road and two new routes running north to south, Haywood Street and extension of Alvey Street.
- 5.45 The landscaping at the edges of the site have been carefully considered to tie in with the existing uses and spaces on Albany Road, Bagshot Street, Kinglake Street and Thurlow Street. New street planting is proposed along Bagshot Street to provide a green link between Burgess Park and Surrey Square Park, in accordance with LBS policy aspirations to create a ‘green finger’ along this route. On the western side of the site, landscaping proposals on Thurlow Street reflect the aspiration to articulate this route as a green urban boulevard.
- 5.46 Existing trees will be retained where possible. The delivery of the proposed regeneration of the Site will require the removal of a number of existing trees, but the proposals include a compensation strategy for the planting of new trees. Full details are provided within the Design and Access Statement.

Transport

Car Parking

- 5.47 Car parking for wheelchair users and existing residents is provided on-street, within the Block 5A podium and within the Block 4A/D basement. A total of 79 spaces are provided, six of which are car club spaces.
- 5.48 The residential units will be served by 21 disabled parking spaces (3.4%).
- 5.49 A total of 20% of the parking spaces will have Electric Vehicle Charging Points.

Cycle Spaces

- 5.50 A total 1,194 cycle spaces are provided across the site, including:
- 1124 long stay residential spaces
 - 70 visitor spaces;
- 5.51 The cycle parking stands comprise a combination of Sheffield stands, two-tier stands and spaces for cargo bikes.

Servicing

- 5.52 Loading bays are located throughout the development, with five bays in total.

Refuse

- 5.53 Each plot will accommodate its own refuse storage within communal stores, which will include food storage and bulky waste storage. All refuse storage accords with the Southwark Waste Management Guidance Note for Residential Developments (2014).

Energy and Sustainability

- 5.54 The energy strategy will involve the provision of a district heating system fed by Air Source Heat Pumps (ASHPs) with local Heat Interface Units (HIUs). Back up highly efficient gas boilers are proposed for peak heat loads, which will be facilitated within a single energy centre. Renewable energy is also proposed such as photovoltaic panels.

Phasing

- 5.55 The proposed development is expected to be delivered in the following phases, as shown on the indicative phasing plan below. It should be noted that at this stage the dates are necessarily indicative at this stage as it will be subject to the grant of planning permission, the discharge of planning conditions and vacant possession.
- Phase 1 – Construction of Block 4D (March 2023 – April 2025);
 - Phase 2 - Demo of existing buildings (November 2023 – May 2025);
 - Phase 3 - Construction of Block 4B and Block 5A (June 2024 – June 2026),

- Phase 4 - Construction of Block 5A (May 2025 – August 2027).

5.56 The indicative phasing plan is below.



Figure 7: Indicative Phasing Plan

6.0 Planning Framework

- 6.1 Section 38 (6) of the Planning and Compulsory Purchase Act 2004 requires that the determination of any planning application shall be in accordance with the development plan unless material considerations indicate otherwise.

Development Plan

- 6.2 The adopted development plan for LB Southwark comprises:
- The Southwark Plan 2022 (February 2022); and
 - London Plan 2021 (March 2021).
- 6.3 The GLA and LBs have prepared a series of Supplementary Planning Documents (“SPD”) and Supplementary Planning Guidance (“SPG”) which provide further details of how to interpret the planning policies within the development plan.
- 6.4 As aforementioned, within the Southwark Plan 2022, the Site is designated as Aylesbury Area Action Core - Phase 2, an area suitable for tall buildings, an Air Quality Management Area, and Hot food Takeaway Secondary School Exclusion Zone.

Material Considerations

- 6.5 The following are important material planning considerations for the determination of the application:
- National Planning Policy Framework (NPPF) (July 2021); and
 - National Planning Practice Guidance (PPG) (November 2016, as amended).
- 6.6 A summary of the relevant planning policy can be found in **Appendix 1**.

2.0 Planning Assessment

6.7 This section provides an assessment of the proposed development against the planning framework identified above under the following topics:

- Principle of Development;
- Land Use;
- Design Quality;
- Heights and Density;
- Heritage and Townscape;
- Housing;
- Quality of Accommodation;
- Amenity Space;
- Residential Amenity;
- Public Open Space;
- Environment;
- Transport; and
- Energy and Sustainability.

6.8 The policy requirements for affordable housing provision and the proposed re-provision of social rent floorspace are discussed in detail in Section 8 of this report (Affordable Housing Statement).

Principle of Development

Principle of Estate Regeneration

6.9 The principle of the redevelopment of the Aylesbury Estate is well established in planning policy and is supported at both a strategic and local level. The Southwark Plan identifies the Aylesbury Area as one suitable for growth, and Site Allocation NSP01 envisages the delivery of 4,200 new homes (including the re-provision of at least 2,249 social rented homes) and employment, retail and workspace within the Aylesbury Area Action Core. The Site sits within Phase 2 of this Area.

6.10 At a strategic level, the London Plan supports the uplift in additional housing under Policy H1, which sets 10 year targets for each local authority and confirms that boroughs should optimise the potential for housing delivery on all suitable and available brownfield sites. The proposal optimises the potential for housing delivery on the Site, with the provision of 614 residential units in accordance with Policy H1.

6.11 The regeneration of existing housing estates is subject to Policy H8 (Loss of existing housing and estate redevelopment). Part A of this policy states that the loss of existing housing should be replaced by new housing at existing or higher densities with at least the equivalent level of overall floorspace.

- 6.12 The proposed development provides 614 residential units, with a total residential floorspace of 58,569.51sqm (GIA) and residential ancillary floorspace (including communal areas and car parking) of 4,467.66sqm (GIA). This comprises an uplift in density over the existing 373 residential units (floorspace 23,448sqm), in accordance with Policy H8 Part A.
- 6.13 Policy H8 Part B relates to the loss of hostels, staff accommodation and shared and supported accommodation, which is not relevant to this application.
- 6.14 Policy H8 Part C sets out how alternative options to the demolition and replacement of affordable homes should be considered and states:

“Before considering the demolition and replacement of affordable homes, boroughs, housing associations and their partners should always consider alternative options first. They should balance the potential benefits of demolition and rebuilding of homes against the wider social and environmental impacts and consider the availability of Mayoral funding and any conditions attached to that funding.”

- 6.15 The existing buildings on the site are at the end of their intended design life. Numerous reports and investigations (including structural surveys and pre demolition audits) have been carried out in the past to investigate if the existing structures can be re-purposed. The reports highlighted concerns over concrete degradation and the fact that the structural system used lacks inherent robustness. The remedial details to resolve these issues are not considered to be appropriate. The demand for more housing results in denser urban environments and the current housing demand would not be met with the current dwelling numbers in the existing buildings.
- 6.16 The principle of demolition and redevelopment has been further established through the grant of outline planning permission in 2015 for the redevelopment of the wider Estate (as set out in Section 3 of this report). The outline permission confirms the principle of the regeneration and redevelopment of the Site including the demolition of the existing buildings and replacement of new homes.
- 6.17 Supporting text to Policy H8 in para. 4.8.2 provides the basis for the Mayor’s Good Practice Guide to Estate Regeneration. The text advises that only once the objectives of an estate regeneration scheme have been formulated in consultation with residents, should the physical interventions required to achieve them be considered. Para. 4.8.4 emphasises the importance of delivering schemes with existing residents and communities in mind. All proposals for such schemes should take account of the requirements of the Mayor’s Good Practice Guide to Estate Regeneration and the requirement for a ballot of residents when accessing Mayoral funding for schemes that involve demolition.
- 6.18 The application proposals form part of the wider planned redevelopment of the Aylesbury Estate. The GLA has granted the Aylesbury Estate exemption to the Resident Ballot Requirement pursuant to chapter 8.6 of the GLA’s Affordable Housing Capital Funding Guide.
- 6.19 At a local level, the redevelopment of Phase 2B is in accordance with policies contained within the Southwark Plan which identifies the wider Estate as having a minimum residential capacity of 4,200 homes (gross) under Site Allocation NSP01. The site allocation recognises the Aylesbury Area Action Core as:

“undergoing significant regeneration to provide mixed use development, centred around the reversion of new homes with a range of tenures that will attract existing residents to stay and welcome new residents. Redevelopment will come forward in four phases as indicated in the site allocation.

- 6.20 The Site is located within Phase 2 of the Aylesbury Area Action Core. The redevelopment of the Site will make a significant contribution towards the delivery of Site Allocation NSP01.
- 6.21 Policy AV.01 sets out the vision for the Aylesbury Area including the development. In line with policy AV.01, the proposed development:
- will generate a new neighbourhood with a range of housing tenures and sizes;
 - will enhance the ability for pedestrians and cyclists to get around with a network of attractive tree-lined streets and public open spaces through carefully considered hard and soft landscaped areas and the promotion of sustainable modes of transport;
 - provides spaces for flexible non-residential use at the heart of the development that will benefit the local community and provide a range of employment opportunities;
 - deliver homes for a wide range of residents with a tenure mix of 50% affordable (by habitable room) and 50% private, a range of unit sizes including 16.9% family dwellings, the provision of 10% wheelchair homes, and amenity space with appropriate facilities for all age groups on-site; and
 - provides a range of high-quality public and private amenity space with two new parks (Bagshot Park and Thurlow Square) and communal courtyards and terraces.

Land Use

Uplift in Residential Accommodation

- 6.22 Section 5 of the NPPF sets out the Government’s commitment to increasing the overall level of supply and mix of housing in order to meet local needs. Recent changes in planning policy, including the updated NPPF and the London Plan, have added emphasis to making as much use as possible of previously developed land and optimising housing densities.
- 6.23 Paragraph 118 of the NPPF states that substantial weight should be given to the value of using suitable land within settlements for homes and gives support for the development of under-utilised, particularly where this would help meet identified needs for housing where supply is constrained.
- 6.24 The London Plan has adopted a similar approach with Policy GG2 and Part B of Policy H1. The latter states that boroughs should optimise the potential for housing delivery on all suitable and available brownfield sites, particularly on sites with existing PTAL ratings of 3-6 and which are located within 800m of a station or boundary.
- 6.25 The requirement for housing delivery is reflected at a local level in the Southwark Plan Policy SP1: Homes for all, which seeks to deliver at least 40,035 homes between 2019 and 2036 (2,355 new homes per year).

- 6.26 The Housing Delivery Test 2021 indicates that the LBS housing delivery target over the previous 3 years was 6,459 homes. The data demonstrates that over the same time period, LBS has only been able to deliver a total of 5,789 homes, which is a delivery rate of approximately 90%. This under-delivery puts LBS within the 'Action Plan' category meaning the authority is required to prepare a plan to analyse the reasons for under-delivery and set actions to improve delivery within the area.
- 6.27 The requirement for a significant number of new homes on the Aylesbury Estate is also well established in policy under Site Allocation NSP01, which anticipates the delivery of 4,200 homes within the Aylesbury Action Area Core.
- 6.28 The proposed development will provide 614 new homes, which would provide an uplift of 241 on the Site and will make a significant contribution to housing provision in the borough in accordance with Policy H1 of the London Plan and Policy SP1 of the Southwark Plan.
- 6.29 The policy requirement for affordable housing and the proposed re-provision are discussed in detail in Section 8 of this report (Affordable Housing Statement).

Non-residential Floorspace

- 6.30 The requirement for non-residential floorspace is set out in Site Allocation NSP01, which requires a minimum of 600sqm employment space, 6,500sqm of retail, community and leisure uses, 600sqm of flexible retail or workspace across the whole Aylesbury Action Area Core.
- 6.31 The proposed development includes 414sqm of flexible floorspace for commercial business and service uses (Class E) and local community and learning uses (Class F1/F2(a)(b)).

Design Quality

- 6.32 Planning policy at all levels seeks high quality design of new developments. The NPPF establishes that the Government gives great importance to the design of the built environment and recognises that it is a key aspect of sustainable development and is indivisible from good planning. The requirement for high quality design is iterated within London Plan Policies D1 (London's form, character and capacity for growth) and D3 (Optimising site capacity through the design-led approach), and Southwark Plan Policies P13 (Design of Places), P14 (Design Quality) and P15 (Residential Design).
- 6.33 The proposed masterplan for Phase 2B has been designed by Maccreanor Lavington Architects (MLA), an award winning architectural and urban design practice. MLA are joined by Architecture Doing Place, East, Sergison Bates Architects and Haworth Tompkins Architects, who together form an architectural team for this project. Each architectural practice has worked within the masterplan framework and designed one building. While each building is individual, the use of similar materials means that together they form a cohesive neighbourhood and overall the proposals comprise a high-quality development with a distinctive character and sense of place that sits comfortably within the wider setting and contributes to the visual interest and diversity of the area. The full architectural details are set out within the DAS.
- 6.34 In terms of layout, the proposed development has been arranged to maximise efficient use of the land whilst still ensuring good living conditions with generous amenity spaces for future residents. The routes through the Site will ensure high levels of permeability and the design of these spaces

will ensure that they are safe, pleasant routes to travel along, encouraging the movement of pedestrians and cyclists. The provision of high quality public realm has been a key focus and the proposal incorporates two new public spaces (Thurlow Square and Bagshot Street), each with their own unique character and function. Playspace is provided both within the public realm and in the landscaped communal courtyards. It is considered that the masterplan fully complies with the requirements of Policy P13 and will create a vibrant neighbourhood which responds to the existing and emerging surrounding context and will significantly contribute to the regeneration of the wider Aylesbury Estate.

- 6.35 Each building within the Phase 2B masterplan has been carefully designed to provide high quality residential accommodation, incorporating innovative design solutions in order to provide a comfortable environment for future residents, with adequate levels of daylight, sunlight, outlook and amenity. Each building has sought to provide active frontages where possible to activate the public realm and contribute towards the pedestrian environment at ground floor. In addition, the buildings have incorporated the principles of sustainable design, seeking to reduce carbon dioxide emissions through the use of a district heating network and renewable energy and ensuring that the design minimises the risk of overheating.
- 6.36 Each building has been designed in consultation with LBS design officers and the Design Review Panel, and the proposals have evolved to respond to their comments and guidance. The proposals fully comply with Policy P14 (Design Quality).
- 6.37 In addition to the design of the individual buildings, the proposed development will help to create a healthy neighbourhood by promoting the use of sustainable transport modes (including walking and cycling); creating a better pedestrian experience through improvements to the public realm and landscaping; reducing vehicular trips and improving air quality; and transitioning towards a sustainable energy strategy (with the potential for a connection to the district heating network in the future). The Health Impact Assessment (HIA) demonstrates that, of the 51 criteria considered by the London Healthy Urban Development Unit, the proposed development will have a positive impact on 36 and a neutral impact on 15. No negative impacts have been identified. The proposed development is therefore considered to have an overall positive impact on human health.

Heights and Density

- 6.38 The London Plan Policy D3 requires a “design-led” approach to determining the height and densities of development and Policy D9(b) states that “tall buildings” (to be defined by individual local authorities but which shall be no less than 6-storeys) should be developed in locations identified as suitable in development plans. The site is suitable for tall buildings as identified in the Southwark Plan. Policy D9(c) requires development proposals for tall buildings to address the following impacts:
- Visual impacts (including on views and heritage assets);
 - Functional impacts;
 - Environmental Impacts; and
 - Cumulative impacts.
- 6.39 A detailed assessment of the visual impact of Block 4A is included within the Heritage, Townscape and Visual Appraisal, which is discussed in detail below. Details of the building function, including

access and servicing are provided within the Design and Access Statement, while the functional capacity of the local area and transport network to support the quantum of development is assessed within the Environmental Statement (specifically within the Transport and Socio-Economic Chapters). The environmental and cumulative impacts of the Block are assessed in detail within the Environmental Statement.

- 6.40 Southwark Plan Policy P17 states that areas where tall buildings are expected are shown on the map in Figure 4, which includes the Aylesbury Action Area Core. The policy includes a number of criteria that proposed tall buildings must meet, including the requirement to make a positive contribution to the skyline, not cause a harmful impact on strategic views and respond positively to local character and townscape.
- 6.41 The supporting text for Policy P17 sets out the rationale for the policy, and Paragraph 11 states that “opportunities for taller buildings in the Aylesbury Action Area are focused on the main routes and their junctions, and sites adjacent to Albany Road and Burgess Park. General building heights are lower.”
- 6.42 The proposed development proposes five blocks ranging in heights from five - 25 storeys with the tallest element located on the corner of Albany Road and Thurlow Street, as a gateway building next to Burgess Park.
- 6.43 The proposed heights are considered to be acceptable for the following reasons:
- the site is located in the Aylesbury Action Area Core which is set to see considerable redevelopment and is allocated for regeneration in the Southwark Plan;
 - the principle of a tall building in this location was established in the previous outline permission;
 - Public Transport Accessibility will notably improve in the local area as a result of the Bakerloo Line Extension;
 - the tallest elements of the scheme have been carefully positioned to the south of the site so as to minimise their impact on neighbouring properties;
 - the Southwark Plan is supportive of tall buildings in the Aylesbury Area Action Core in locations of landmark significance and the location of the tower on the junction of Albany Road and Thurlow Street is considered a landmark location due to the significance of the junction and the position fronting onto Burgess Park;
 - the Daylight and Sunlight Report concludes that neighbouring properties will receive good levels of daylight and sunlight;
 - the Wind Microclimate Assessment demonstrates that there will be no safety issues on or around the site as a result of new wind conditions;
 - the proposed development will not adversely affect any local important or strategic views as demonstrated in the Townscape and Visual Appraisal;

- a high standard of design is proposed that responds to comments from the Southwark DRP, including the provision of all amenity space requirements on-site and improvements to the public realm through new landscaping;
- the proposals reduce energy demands as far as is feasible through passive design, energy efficiency measures, generating heat in a clean and efficient system and by using on-site renewable energy systems to further reduce the overall carbon emissions of the development;
- the proposal will deliver 50% affordable housing, 64.5% family homes (including 3 and 4 bedroom homes) and 10.1% wheelchair accessible housing, meaning that it is inclusive and meeting a variety of important housing needs; and
- the proposals will result in a net gain in biodiversity and significant urban greening.

- 6.44 The proposed development has a density of 714 habitable rooms per hectare when measured in accordance with the Southwark Residential Design Standards SPD (2015). Given the high standards of design achieved, this is considered to optimise the Site's development potential with a measured approach that ensures an efficient use of sustainable brownfield land in accordance with the NPPF.
- 6.45 Overall, the proposed density and heights are considered to be acceptable given the Site's location within the Aylesbury Action Core Area, the need to make effective use of land to meet London's development requirements; future anticipated improvements to public transport and accessibility in the local area; and the high standards of design and landscaping for the new blocks proposed.

Heritage and Townscape

- 6.46 The NPPF sets out that heritage assets should be conserved in a manner appropriate to their significance. The Council will not permit the loss of or substantial harm to a designated heritage asset unless the public benefits of the proposed development convincingly outweigh that harm.
- 6.47 In line with London Plan Policy HC3 a Heritage, Townscape and Visual Appraisal has been submitted with the Environmental Statement. This includes an assessment of the proposals upon the setting and significance of 28 listed buildings, 16 locally listed buildings and seven conservation areas within a 500m radius. The HTVIA confirms that there will be no impacts upon the significance of any heritage assets.
- 6.48 With regard to townscape, the Assessment confirms that the proposed massing responds positively to the existing and emerging townscape and the proposed heights are commensurate with the surrounding area. The proposals will provide an enhancement to the edge of Burgess Park, with a new landmark tower which will provide a distinctive piece of legibility to the area between Old Kent Road and Walworth Road. The proposed masterplan connects well into the existing streets and creates a new and permeable layout. The Assessment concludes that the proposals will provide a significant and demonstrable beneficial intervention in townscape and visual impact terms.

Housing Mix

- 6.49 London Plan Policy H12 advises that schemes should generally consist of a range of unit sizes, having regard to a number of factors including housing need and demand, the requirement to deliver mixed and inclusive neighbourhoods, the mix of uses in the scheme, the range of tenures in the scheme, the nature and location of the site (i.e. a higher proportion of one and two bed units are

generally more appropriate in locations close to a town centre or station or with higher public transport accessibility) and the aim to optimise housing potential.

- 6.50 Southwark Plan Policy P2 requires the following unit mix within the Aylesbury Action Core Area, which is identified as a Family Housing Area:
- A minimum of 70% 2+ bed homes
 - A minimum of 20% family homes with 3+ beds
 - A minimum of 7% 4 bed homes
 - A minimum of 3% 5 bed homes
 - A maximum of 3% studios (which can only be used for private housing)
 - Two-bedroom homes as a mix of 2b3p and 2b4p homes
 - Family homes in apartment blocks should have direct access to outdoor amenity space and allow oversight of children outside.
- 6.51 It is noted that Policy P2 was updated during the course of the Southwark Plan Examination to include the unit mix within the Aylesbury Area Action Plan (which dated from 2010), and thus includes different standards for this area than are required for the rest of the borough.
- 6.52 The proposed development will provide an overall mix of 218 x 1 bed (33.5%), 292 x 2 bed (47.6%), 51 x 3 bed (8.3%), 50 x 4 bed (8.1%), and 3 x 5 bed (0.5%). Within this, the unit mix will provide 64.5% 2+ bed homes.
- 6.53 The proposed tenure split is 50% private and 50% affordable (77% social and 23% intermediate). Further details of the affordable housing provision are provided in Section 8 of this Statement. Four of the five buildings are mixed in tenure and the tenures are distributed evenly to ensure that all tenures benefit from views over the key public spaces.
- 6.54 The proposed development includes a mixture of flats and maisonettes. The maisonettes are primarily in the social rent tenures, with some also included in the private sale and shared ownership.
- 6.55 The unit mix breakdown, particularly with regards to the affordable units, has been agreed with the LBS Regeneration team to ensure that it responds to their housing requirements for this part of the Aylesbury Estate.
- 6.56 The unit mix mostly accords with the Southwark Plan and London Plan that seek to provide a range of housing choices. In particular, the proposed unit mix includes a majority of units with two or more bedrooms (including 76.7% of the affordable as 2+ units), 16.9% family homes (3+ bedroom homes),
- 6.57 It is acknowledged that there is a slight shortfall of family sized units and 5 bed homes, however the provision is predominantly focused in the affordable tenures where the need is greatest (where of the affordable tenure 38.8% are family sized homes and all 4 and 5 bedroom units are located). The unit mix has also been discussed with LBS Regeneration team, and a greater provision of 1 and 2 bed units have been delivered to enable the provision of 50% affordable housing.

- 6.58 The proposed unit mix responds to the current housing need identified for this location and will provide high-quality homes across a range of sizes (from one to five-bedroom properties) across different tenures, which will assist in creating a mixed and balanced community.

Quality of Accommodation

- 6.59 The NPPF sets out that decisions should ensure that developments create places that are safe, inclusive and accessible and which promote health and wellbeing, with a high standard of amenity of future and existing users.
- 6.60 London Plan Policy D2 sets out that new homes should have adequately sized rooms and convenient and efficient room layouts which are functional and fit for purpose, to meet the changing needs of Londoners over their lifetime. The London Plan and Southwark Plan incorporate the National Described Space Standards (NDSS).
- 6.61 Southwark Plan Policy P15 sets out internal space standards for Aylesbury Action Area Core which are set out in Table 7. It is noted that the space standards for the Aylesbury Action Core Area were updated during the course of the Southwark Plan Examination to include the standards within the Aylesbury Area Action Plan (which dated from 2010), and different standards are required for intermediate and social rented units in this area than for the rest of the borough.
- 6.62 The proposed development has been designed to be of a high quality and the layout has been well designed to ensure an attractive residential environment for new residents. All units have been laid out with daylight and sunlight, overheating, aspect, and amenity in mind to create spacious, high-quality and liveable environments with residents in mind. All units have been carefully designed to conform with the minimum space standards set out in Table 7 of the Southwark Plan.
- 6.63 There are no single aspect north facing units in the proposed development, and overall 74% of units are dual aspect in accordance with Southwark Plan Policy P15. All 2+ bed units are dual aspect.
- 6.64 Furthermore, all units have access to amenity spaces in the form of private balconies and gardens, communal amenity space in the form of podiums and new high-quality landscaped public open space.
- 6.65 In accordance with London Plan Policy D3 and Southwark Plan Policy P8 the proposed development has been designed with the highest standards of inclusivity and accessibility. All homes are designed to be accessible and adaptable to meet the AD Part M4(2) standards. In addition, 10% of the homes (62 units) are designed to meet AD Part M4(3) wheelchair accessible or wheelchair adaptable standards. These are located in Plots 5A, 4A, and 4D and are located close to wheelchair accessible parking spaces in the two covered car parks.
- 6.66 As set out in the Fire Strategy, the fire safety of the proposed development and the fire safety information satisfy the requirements of London Plan Policy D12A and D5 and the functional requirements of the Building Regulations.

Amenity Space

Private and Communal Amenity Space

- 6.67 London Plan Policy D6 states that a minimum of 5sqm of private outdoor space should be provided for 1-2 bedroom dwellings and an extra 1sqm should be provided for each additional occupant.
- 6.68 Furthermore, Southwark Plan Policy P15 provides minimum amenity space standards for new residential development in the borough. The policy sets a communal amenity space requirement of 50sqm per residential block. The policy states that flatted developments must provide 10sqm of private amenity space for units containing three or more bedrooms. For units containing two or less bedrooms, 10 sqm of private amenity space should be provided but where this is not possible, as much space as possible should be provided as private amenity space and the shortfall is added to the communal space amenity requirement. The policy also states that new houses should provide a minimum of 50 sqm of private garden space.
- 6.69 The proposed development has been designed with inclusive accesses to amenity spaces. Private amenity space is provided in the form of balconies, gardens, and terraces. There is a minor shortfall of private amenity space, but as per Policy P15, this has been added to the basic communal amenity space requirement. Communal amenity space is provided across the blocks within courtyards, podium and roof terraces which significantly exceeds the policy requirement. Private amenity space is provided in the form of balconies, gardens and terraces.
- 6.70 The overall total amenity space requirement is 6,877.4sqm (6,140sqm of private amenity space and 737.4sqm of communal amenity space). This is exceeded by the proposed development which provides 10,068.2 sqm of amenity space (5,793.2sqm of private amenity space and 4,275sqm of communal amenity space).

Table 2: Amenity Space

Block	Units	Policy requirement for private amenity	Private amenity provision	Shortfall	Policy requirement for communal amenity	Communal amenity provision
4A	209	2,090sqm	1,886.6sqm	201.4sqm	251.4sqm	845sqm
4B	24	240sqm	380.6sqm	No shortfall	111.8sqm	845sqm
4C	88	880sqm	818.2sqm	61.8sqm	50sqm	250sqm
5A	250	2,500sqm	2,282.4sqm	217.6sqm	267.6sqm	1,835sqm
5C	43	430sqm	432.4sqm	6.6sqm	56.6sqm	500sqm
Total	614	6,140sqm	5,793.2sqm	487.4sqm	737.4sqm	4,275sqm

Play Space

- 6.71 London Plan Policy S4 states that development proposals for schemes that are likely to be used by children and young people should increase opportunities for play and informal recreation and enable young people to be independently mobile. For residential developments, at least 10sqm metres of

playspace should be provided per child. The GLAs Population Yield Calculator should be used to calculate child yield of various ages ranges to ensure a mix of play space is provided. Southwark Plan Policy P15 confirms that play space should be provided in accordance with London Plan Policy S4.

- 6.72 Based on the GLA's Population Yield Calculator, the proposal generates a yield of 1422.8 persons, Of these, 320.2 will be children. Based upon a requirement of 10sqm playspace per child, the scheme generates a total playspace requirement of 3201.5sqm.
- 6.73 A policy compliant total of 3,202sqm of multi-generational playspace is being proposed across the Site, with an emphasis on doorstep play (0-4 years) in communal spaces for each plot. Further play provision is provided through three public play spaces.
- 6.74 Thurlow Square provides play for all ages, with a bias towards 0-4 years interpretive play, Bagshot Park's mix provides increased opportunities for 5-11 and 12+ years play. A new MUGA located in the south-east corner of the park is complemented with a range of traditional, natural, adventurous and interpretive play elements developed with local young people through a number of play workshops. At the corner of the Alvey Street extension and Kinglake Street a reconfigured play space is proposed which is focussed on 0-4 years doorstep play.

Residential Amenity

Wind

- 6.75 The ES includes a chapter presenting an assessment of the likely significant environmental effects of the proposed development on the local wind microclimate, within and surrounding the site.
- 6.76 The assessment confirms that with proposed landscaping mitigation measures (for example increasing the porosity of the fencing and including additional trees) the proposed development would have an acceptable micro climate, with the majority of the site suitable for the intended use. The only location where wind conditions may be slightly higher is at the entrance to Block 4A, where these would be strolling conditions. These can be addressed through mitigation, such as the inclusion of hedges. There are no instances of strong winds across the site.
- 6.77 The proposals are therefore compliant with London Plan policies P13 (design quality) and P16 (tall buildings) and London Plan policies D3 (optimising site capacity through design-led approach), D8 (public realm) and D9 (tall buildings).

Daylight, Sunlight and Overshadowing

- 6.78 The ES includes a chapter presenting an assessment of the daylight, sunlight and overshadowing of the proposed development in accordance with BRE guidance.
- 6.79 The Daylight and Sunlight chapter demonstrates that retained levels of amenity to neighbouring properties will remain good post development, and the results are commensurate with the Site's urban context. The majority of properties will experience a negligible to minor effect. When considered against the maximum parameters within the permitted outline planning permission, the proposals will have a reduced impact on neighbouring properties.

- 6.80 The internal daylight/sunlight for the proposed development has been assessed, which demonstrates that there will be acceptable levels of natural light for future occupants in the proposed development. The overall internal ADF compliance rate is 78%, which is consistent with the Site's urban location.
- 6.81 With regard to overshadowing, the impact on the majority of amenity spaces within the surrounding area is considered to be negligible due to the existing conditions within these spaces. The only areas which do not satisfy the BRE Guidelines are the amenity areas of 176 and 179 Alvey Street to the north of the Site. These are small gardens principally shaded by their boundary fences. Furthermore, these properties are within Phase 2C of the outline planning permission and as such it is anticipated that they will come forward for redevelopment as part of the ongoing redevelopment of the Aylesbury Estate. The overshadowing impact on these amenity areas is therefore considered to be temporary.
- 6.82 In terms of overshadowing within the proposed development, four out of eight of the proposed amenity areas will fully comply with the BRE Guidelines for Sun on Ground. With regard to the amenity spaces which do not fully comply, this non-compliance is considered to be acceptable for the following reasons. While the courtyards of Blocks 4A/D and 5A do not achieve two hours of sunlight to 50% of their area on 21st March, this target is achieved only three weeks later (on 15th April). While the amenity for Block 5C does not achieve two hours of sunlight to 50% of its area on 21st March, further amenity for this building is located on the roof, and this area achieved two hours of sunlight to 80% of its area on 21st March, far in excess of the BRE Guidelines.

Noise

- 6.83 The ES includes a chapter presenting an assessment of the likely significant environmental effects of the proposed development on the noise environment, within and surrounding the site.
- 6.84 The Noise and Vibration chapter sets out mitigation measures which will be implemented during both the construction and operational phases of the proposed development. These measures include the implementation of a Demolition Environmental Management and a Construction Environmental Management Plan which requires works to be restricted to 08:00-18:00 Monday to Friday and 09:00-14:00 on Saturdays, detailed construction methodologies (including the selection of quite and well maintained equipment and the use of hoarding and enclosures around equipment) and following best practice guidance.
- 6.85 Once completed the internal noise environment within the residential units will meet the requirements in BS 8233:2014 through the facade specification and inclusion of mechanical ventilation. Operational plant will be designed to be at least 10dB below existing background sound levels.
- 6.86 With these mitigation measures in place, the residential noise effects from the construction and operation of the proposed development are considered to be 'not significant' at all noise receptors.

Air Quality

- 6.87 The ES includes a chapter presenting an assessment of the likely significant environmental effects of the proposed development on the air quality, within and surrounding the site.

- 6.88 The Site is within the Southwark Air Quality Management Area for annual mean concentrations of NO₂ and daily mean concentrations of PM₁₀. The high concentrations are attributed to road traffic sources. Long-term local air quality monitoring is undertaken by LB Southwark.
- 6.89 The chapter confirms that the air quality impacts associated with emissions from the temporary energy centre will be negligible, with no exceedances of legislated standards at any existing or new receptors.
- 6.90 During construction, mitigation measures will be implemented to ensure no adverse significant effects due to dust and PM₁₀ emissions. These measures are set out within the Demolition Environmental Management and a Construction Environmental Management Plan and include measures such as wheel washing and damping down.
- 6.91 Once the proposed development is operational, there are considered to be negligible impacts from the permanent energy centre, with no exceedances of legislated standards.
- 6.92 An Air Quality Neutral Assessment has been carried out which concludes that the total annual NO_x emission for the new buildings is 25kg, which is significantly below the Building Emissions Benchmark of 374kg. With regard to traffic emissions, based upon the estimated vehicle movements (included in the Transport Assessment) the number of car trips is less than the Transport Emission Benchmark. Overall, the proposed development is air quality neutral.

Public Open Space

- 6.93 Within the Southwark Plan, the area vision for Aylesbury (AV.010) states that development in the Aylesbury Area should 'enhance the ability for pedestrians and cyclists to get around a network of attractive tree-lined streets and public open spaces, arranged around a loose grid of well designed urban blocks'. The Site Allocation NSP01 does not specify a quantum of public open space.
- 6.94 Policy P13 requires development to provide high quality public realm which is safe, legible and attractive and eases the movement of pedestrians, cyclists, pushchairs, wheelchairs, mobility scooters and vehicles. Policy P14 requires active frontages and entrances to successfully engage with the public realm.
- 6.95 The proposed development provides a total of 4,030sqm of high quality public open space, primarily located within two new areas; Thurlow Square and Bagshot Park. Each of these spaces will have a distinct character as described in Section 3 of this statement. A network of tree-lined streets are proposed, which are SSDM compliant. These new routes tie in with the existing uses and spaces on Albany Road, Bagshot Street, Kinglake Street and Thurlow Street.
- 6.96 The proposed public realm and open spaces have been carefully considered and designed to ensure that they provide a welcoming and attractive environment for pedestrians and cyclists and other users. Thurlow Square and Bagshot Park will provide high quality, accessible public amenity space which incorporates playspace. The entrances and frontages of each building integrate with the public realm, and the landscaping adjoining the frontage of the commercial floorspace in Block 5A has been carefully designed to provide seating for customers. It is considered that the proposed public open space fully complies with the requirements of the Southwark Plan.

Environment

- 6.97 Southwark Plan Policy 60 requires development to contribute to net gains in biodiversity through enhancing the nature conservation value and protecting and avoiding damage to Sites of Importance for Nature Conservation (SINCs) and other designated areas and introducing features such as green and brown roofs into developments.
- 6.98 There are no statutory designated sites for nature conservation within 2km of the site. The Site is however located immediately adjacent to Burgess Park (a SINC), which has the potential to support a range of species.
- 6.99 The proposed development will introduce planting and landscaping in and around the site, in amenity areas and on the site boundaries which will indirectly enhance and connect to the SINC.
- 6.100 London Plan Policy G5 states that major developments should contribute to the greening of London. It states that an Urban Greening Factor (UGF) should be applied to identify the appropriate amount of greening required in new developments. The London Plan recommends that boroughs set targets for the UGF but where these do not exist, an interim target score of 0.4 is recommended for developments which are predominantly residential.
- 6.101 The Site achieves an Urban Greening Factor calculation of 0.39 through the inclusion of a wide range of contributors including intensive green roofs, an attenuation swale, rain gardens, areas of semi-natural habitat planting, flowering and grass planting, permeable paving where possible and extensive tree planting. The proposals seek to maximise the urban greening score in accordance with Policy G5, however the constraints within the proposed scheme (including the quantum of playspace required and the quantity of adoptable highway with a non-permeable surface) mean it is not possible to achieve the interim target score of 0.4. Full details are set out in the Landscape Design and Access Statement.
- 6.102 Through the level of urban greening on the Site, there will also be a net biodiversity gain of 38.97% net gain in area based habitats and 100% gain in hedgerow habitats, which will contribute to net gains in biodiversity in the surrounding area in accordance with Southwark Plan Policy 60.

Transport

- 6.103 Paragraph 108 of the NPPF states that when assessing sites, it should be ensured that: 1) appropriate opportunities to promote sustainable transport modes are taken up, 2) safe and suitable access can be achieved, and 3) any significant impacts from the development on the transport network can be cost effectively mitigated to an acceptable degree.
- 6.104 London Plan Policy T6.1 states that car free development should be the starting point for all development well connected by public transport and that new residential development shall not exceed maximum parking standards. For Inner London sites with a PTAL of 4 development should be car free with the exception of disabled spaces.
- 6.105 Within the Southwark Plan, specific car parking standards are provided for the Aylesbury Action Area; 0.25 maximum spaces per home for the entire site redevelopment. Some sites may provide up to 0.4 maximum spaces per home where this is demonstrated to be required to enable rehousing of existing residents.
- 6.106 London Plan Policy T5: Cycling requires developments to secure the provision of cycle parking in accordance with minimum standards. These include 1 space per 1 bed dwelling, 1.5 spaces per 2

bed dwelling and 2 spaces for all other dwellings along with 2 spaces for between 5-40 dwellings and 1 additional space per 40 dwellings (visitor parking) for residential units. For commercial (Class B1 (now Class E) uses, 1 space per 150sqm (GEA) (long stay) and 1 space per 500sqm (short stay) is required.

Residential Parking

- 6.107 The proposed development provides a total of 41 on-plot car parking spaces, 32 on-street parking spaces within the new public realm and 6 on-street car club spaces. This results in an overall provision of 79 spaces (including 6 car club spaces) and equates to a parking provision of approximately 1 space per 0.13 dwellings. This is in line with the current policy requirements of the Southwark Plan.
- 6.108 It is proposed that the 614 residential dwellings are served by 21 disabled parking spaces which equates to a 3.4% provision.

Cycle Parking

- 6.109 Cycle parking is to be provided in line with the latest standards of the London Plan, the proposed development will provide 1194 cycle parking spaces (1124 long stay and 70 short stay).
- 6.110 The residential long stay cycle parking will be provided within secure cycle stores and short stay cycle parking will be provided in the form of sheffield stands located at key destinations near entrances and additional parking adjacent to the public spaces of Thurlow Square and Bagshot Park.
- 6.111 Non-residential cycle parking will be located at the ground floor of Block 5A, adjacent to Thurlow Square.

Delivery and Servicing

- 6.112 Vehicle access to the Site will be via Thurlow Street and Albany Road to create two internal loops which will return to the original road of entry. There will be no vehicle access between the two loop roads.
- 6.113 The internal road layout has been designed to accommodate the required refuse vehicles (which are typically larger in size than delivery vehicles). Five loading bays are spread throughout the Site. It is anticipated that the proposed development will generate a total of 120 vehicle movements per day (60 arrivals and 60 departures). This results in a maximum accumulation of five vehicles within the Site at one time, which can be accommodated within the five servicing bays. Full details are provided within the Delivery and Servicing Plan submitted with this application.
- 6.114 It is considered that the proposed servicing strategy fully complies with Policies P14, P18 and P50 of the Southwark Plan as all servicing can take place within the Site and the provision of sufficient servicing bays mean that there should be no impact upon the public highway.

Energy and Sustainability

- 6.115 London Plan Policy SI2 (Minimising greenhouse gas emissions) states that major new development should be net-zero, which means reducing greenhouse emissions in operation and minimising annual and peak energy demand in accordance with the Be Lean, Be Clean, Be Green, and Be Seen energy hierarchy. It states that major development applications should include a detailed energy strategy to demonstrate how the zero-carbon target will be met within the framework of the energy hierarchy.
- 6.116 An Energy Strategy has been submitted with this application, which proposes the provision of a district heating system fed by Air Source Heat Pumps (ASHPs) with local Heat Interface Units (HIUs). Back up highly efficient gas boilers are proposed for peak heat loads, which will be facilitated within a single energy centre. Renewable energy is also proposed in the form of photovoltaic panels.
- 6.117 The regulated carbon emissions of the proposed scheme will be reduced by 55% for domestic and >40% for non-domestic, giving a site wide improvement of 54% over Building Regulation Part L 2013 minimum requirements. The remaining offset requirements will be met through a payment to the Council's carbon offset fund.
- 6.118 A Sustainability Statement is submitted in support of this planning application which summarises the key measures which will be undertaken to ensure the proposals adapt to climate change, prioritise the health and wellbeing of residents, protect and enhance the surrounding environment and include careful consideration of materials and waste.
- 6.119 Southwark Plan Policy 69 sets out sustainability standards, requiring development to reduce the risk of overheating in accordance with the cooling hierarchy. Design measures have been incorporated into the scheme to limit the amount of heat that enters and is generated within the buildings. These measures include facade and glazing treatment, including an energy efficient heating system, using lightweight construction and providing passive and mechanical ventilation. An Overheating Report is submitted in support of this planning application which includes the results of dynamic overheating modelling. This confirms that the development meets CIBSE compliance criteria for the DSY1 weather file with only one space failing the criteria. This is a small kitchen. The window design for this kitchen is being optimised through detailed design to reduce the risk of overheating.
- 6.120 The Policy requirement for BREEAM 'Excellent' for non-residential accommodation is not triggered as the proposed development provides under 500sqm of non-residential floorspace.
- 6.121 In accordance with London Plan Policy SI 7 and Southwark Plan Policy P62, a Circular Economy Statement has been submitted with the planning application. The Circular Economy Statement demonstrates that the proposed development has considered the circular economy principles to minimise embodied carbon and operate within a circular economy, maximising the value extracted from materials and prioritising the reuse and recycling of materials.
- 6.122 In accordance with London Plan Policy SI 12 and Southwark Plan Policy P70, a Whole Life Cycle Carbon Assessment has been submitted with the planning application. The Whole Life Cycle Carbon Statement identifies actions to reduce the impact of the development in each of the life cycle stages. Life Cycle Carbon principles and considerations have been taken into account in order to meet the sustainability requirements of the London Plan.

Flood Risk and Drainage

- 6.123 A Flood Risk Assessment and Drainage Strategy has been prepared and submitted in support of this planning application which demonstrates that the development does not increase flood risk on or off site, in accordance with Southwark Plan Policy 68.
- 6.124 The Site is located within Flood Zone 3 and is within an area which benefits from flood defences. The Environment Agency have confirmed that the Site is at extremely low residential risk of tidal flooding.
- 6.125 The surface water drainage is proposed to connect to the public combined sewer in Bagshot Street via the existing drain located to the east. The discharge rate from the proposed development will be restricted to the equivalent greenfield runoff rate for the 2, 30 and 100 year plus climate change storm events by a complex flow control device. Attenuation will be provided by a below ground attenuation tank and swale with underdrain with additional SuDS components including green roofs, a swale, permeable paving and tree pits. The system has been designed to accommodate all storms up to and including the 100 year + 40 % climate change storm event.

7.0 Affordable Housing Statement

Policy Background

- 7.1 The Mayor's Good Practice Guide to Estate Regeneration (GPGER) sets out a number of clear expectations which apply to estate regeneration schemes across London. This includes:
- the need to ensure that existing affordable housing floorspace is reprovided (based on the principle of like-for like replacement);
 - full rights of return or remain for existing social housing tenants;
 - a fair deal for leaseholders and freeholders; and
 - full and transparent consultation and involvement with existing residents.
- 7.2 In addition, the Mayor expects estate regeneration schemes to deliver as much affordable housing as possible and to provide an uplift in affordable housing where viable.
- 7.3 London Plan Policy H4 (Delivering affordable housing) sets a strategic target of 50% of all new homes delivered across London to be genuinely affordable. Policy H5 (Threshold approach) sets the threshold and criteria for the level of affordable housing required for schemes to be able to follow the Fast Track Route of the policy. Schemes that do not meet these criteria must follow the Viability Tested Route.
- 7.4 The supporting text states that the Viability Tested Route will assess the maximum level of affordable housing that a scheme can deliver. Paragraph 4.5.3 states that the percentage of affordable housing should be measured by habitable rooms to ensure that a range of affordable homes can be delivered, including family sized homes.
- 7.5 Policy H6 (Affordable housing tenure) states that the split of affordable products should include a minimum of 30% low-cost rented homes and a minimum of 30% intermediate products. The remaining 40% should be specified by the borough as per identified need.
- 7.6 Policy H8 (Loss of existing housing and estate redevelopment) states that the loss of existing housing should be replaced by new housing at existing or higher densities with at least the equivalent level of overall floorspace. Part E of the Policy states that all development proposals that include the demolition and replacement of affordable housing are required to follow the Viability Tested Route and should seek to provide an uplift in affordable housing in addition to the replacement affordable housing floorspace.
- 7.7 Southwark Plan Policy P1 (social rented and intermediate housing) sets out the affordable housing policies for the Borough. The Policy states that viability appraisals and reviews are required for all developments except in exceptional circumstances. With regard to the Aylesbury Area Action Core, the exceptional circumstances would be the provision of 60% social rented and intermediate housing with no grant subsidy. The proposed scheme does not meet this criteria.
- 7.8 Table 2 of Policy P1 sets out the affordable housing requirements for the Aylesbury Estate Action Area which is shown below. The table indicates that the Phase 2, which includes the application site, must provide an affordable housing provision of 50%, which should be split between 75% social rented and 25% intermediate.

Table 2: Aylesbury social rented and intermediate housing requirement

	Market housing	Social rented and intermediate housing requirement (75% social rented, 25% intermediate housing)
Area Action Core	50%	50%
Proposal Site AAP1 (Phase 1)	41%	59%
Proposal Sites AAP2 and AAP3 (Phases 2 and 3)	50%	50%
Proposal Site AAP4 (Phase 4)	58%	42%

Figure 10: Extract from Southwark Plan Policy P1

- 7.9 It is worth noting that this tenure split does not accord with the requirements in London Plan Policy H6 which states that a minimum of 30% low-cost rent and 30% intermediate should be provided as the affordable tenure split.
- 7.10 The Southwark Plan proposes that for social rented and intermediate housing and density calculation purposes habitable rooms will be counted as set out in the table below:

Area (sqm)	Habitable Rooms
0-28	1
28.1-42	2
42.1-56	3
56.1-70	4
70.1-84	5
84.1-98	6
98.1-112	7
112.1-126	8
126.1-140	9
140.1-154	10

Figure 11: Extract from Southwark Plan Policy 1

Affordable Housing Provision

- 7.11 This section details the existing affordable housing provision on Site and proposed affordable homes to be delivered in Phase 2B.

- 7.12 This section also sets out what has been delivered/permitted to date in the earlier regeneration phases of the wider Aylesbury Estate and provides commentary on delivery in future phases. While this application is for a standalone scheme, it is considered that this context is relevant to understanding how the proposals will contribute towards the regeneration of the wider Estate.
- 7.13 With regard to the existing tenants on the Site, it is LBS' intention to rehouse the existing secure tenants and those in temporary accommodation within the First Development Site Contract A, which is due to complete in 2023. The proposed social rented housing on the Phase 2B Site will provide homes for tenants currently living in later phases of the Aylesbury Estate. The proposed accommodation has been designed in consultation with LBS Regeneration to meet the re-housing needs of these residents. In this way, the proposals form part of the wider regeneration of the Estate and will facilitate the delivery of future phases.
- 7.14 It is noted that the proposal will provide a larger amount of social rented floorspace in this location than would otherwise have been achieved under the outline planning permission, and as such, the proposed development represents an overall improvement in terms of delivery of social rented accommodation. Full details are provided below.

Existing Affordable Housing on the Site

- 7.15 The existing accommodation on the Site provides 373 residential units (a total of 23,448sqm GIA floorspace). Of these, 327 units are social rented tenure (a total of 19,569sqm GIA). The remaining units are in leaseholder ownership.

Proposed Affordable Housing

- 7.16 The proposed development provides the following accommodation:

Table 3: Accommodation Schedule (including units, habitable rooms and floorspace)

	Private			Social			Intermediate			Total		
	Unit	HR	sqm (GIA)	Unit	HR	sqm (GIA)	Unit	HR	sqm (GIA)	Unit	HR	sqm (GIA)
1 Bed	159	322		28	52		31	62		218	436	
2 Bed	199	597		47	180		46	138		292	915	
3 bed	9	45		37	185		5	25		51	255	
4 bed	-	-		50	300		-	-		50	300	
5 bed	-	-		3	21		-	-		3	21	
Total	369	964	23,966	163	738	15,699	82	225	5,590	614	1927	58,569.51

- 7.17 The proposal provides 245 affordable units (comprising 963 habitable rooms), of which 163 are social rented units (738 habitable rooms) and 82 are intermediate units (to be provided as shared ownership) (225 habitable rooms).
- 7.18 While the quantity of units has reduced in comparison with the existing, due to the larger number of family units (of 3+ beds) the number of habitable rooms has increased.

- 7.19 The proposal provides 50% affordable housing (on a habitable room basis) with a breakdown of 77% social rented and 23% intermediate. This provision fully complies with Policy P1 of the Southwark Plan.
- 7.20 The proposed quantum of affordable floorspace is 26,419.05sqm (GIA). Of this floorspace, 19,113.40sqm (GIA) is social rented floorspace and 7,305.65sqm (GIA) is intermediate (which is to be provided as shared ownership). Overall, the scheme provides more affordable floorspace than currently exists on site (19,569sqm).
- 7.21 When considered on a tenure specific basis, the existing social rented floorspace on site is 19,569sqm and the proposed floorspace of the social rented units is 19,113.40sqm. When the ancillary social rented floorspace (comprising communal areas) is added to this figure, the total provision is 19,749.39sqm.
- 7.22 It is noted that the proposal provides more social rented floorspace than would have been achieved under the outline planning permission, as discussed further below.
- 7.23 When considering the reprovizion of social rented floorspace and the rehoming of existing tenants, it is important to consider this both in the context of the existing provision on Site and also in the context of the wider Aylesbury Estate. Further details are provided below:

Social Rented Reprovizion Currently Provided in the Aylesbury Estate

- 7.24 The baseline number of social rented homes and the reprovizion (permitted or proposed) across the Aylesbury Estate is summarised in Table 4 below. Figure 12 (also below) identifies the various development phases referred to. These comprise the initial phases of redevelopment.
- 7.25 All figures quoted within this section have previously been accepted by LBS and the GLA during the course of planning applications relevant to these sites.

Table 4: Summary of social rent reprovizion in the Aylesbury Estate

	Homes	Habitable rooms	Floorspace (GIA)sqm
A Baseline figures	2,249	6,866	160,025.00
Minus			
B Early Phases (Phase 1a and Site 7)	148	541	11,654.83
C First Development Site	357	1,243	28,233.49
D Plot 18 (previously known as Site 10)	23	82	1,470.70
Total reprovizion required across remaining Phases 2, 3 and 4	1,721	5,000	118,690.38

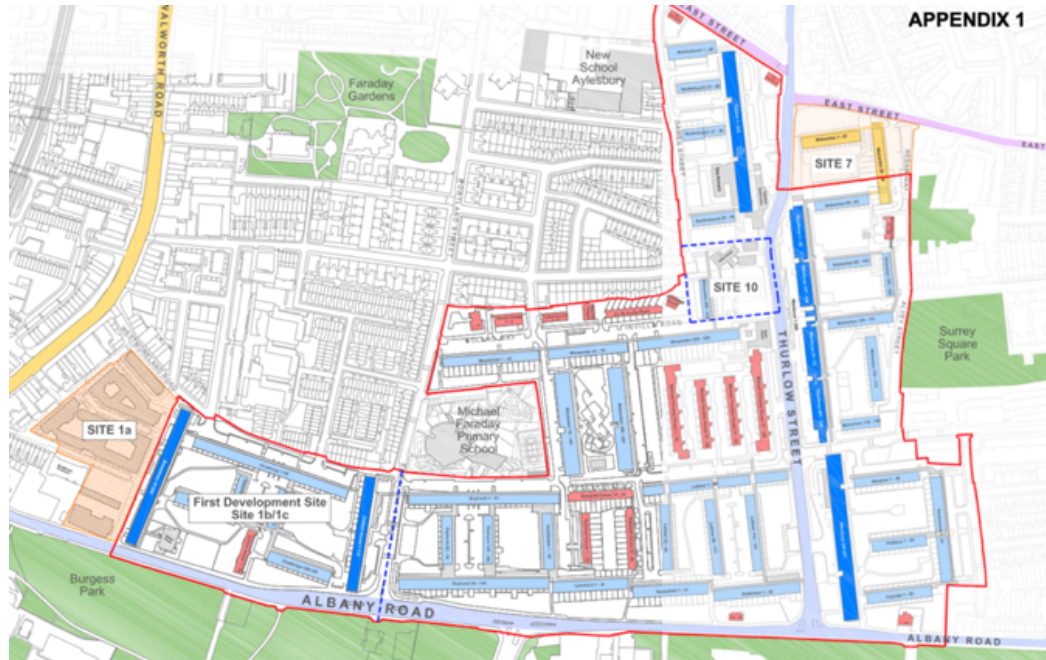


Figure 12: Development in the wider Aylesbury Estate

7.26 The figures in Table 4 are explained in more detail in the following paragraphs.

A: Baseline figures

7.27 The baseline figures for the existing number of social rented homes, habitable rooms and floorspace on the Aylesbury Estate prior to any redevelopment (including Phase 1a and Site 7) were prepared by LBS.

7.28 The baseline number of homes was established at the time of the adoption of the AAP in 2010. Further work was done to extrapolate the number of habitable rooms and floorspace during the CPO Inquiry for the First Development Site in 2017. Evidence from Daniel Davis [LB Southwark Officer] dated December 2017 confirmed that at that date the total number of social rented homes on the Estate had remained constant since the baseline was established.

B Early Phases (Phases 1a and Site 7)

7.29 The number of social rent homes and habitable rooms provided in the early phases of 1a and Site 7 was set out in the outline planning permission.

7.30 The floorspace figures for the social rent accommodation for these phases were provided as part of the s.73 application for the FDS ref: 17/AP/3885.

C. FDS Phases 1b/1c (as proposed)

7.31 The details of social rent accommodation for the FDS is taken from current planning application (LPA: 22/AP/1063).

D. Plot 18

- 7.32 The information for the social rented number of homes, habitable rooms and floorspace provided in Plot 18 was set out within application ref 16/AP/2800 as amended under s73 17/AP/3846 and NMA 20/AP/2498.

Summary

- 7.33 In summary, there is currently a requirement to reprovide an additional 1,721 social rented units (comprising 5,000 habitable rooms and 118,690.38sqm floorspace) across the future phases of the Aylesbury Estate in order to fully reprovide the baseline number of units.

Social Rented Reprovision to be Provided in the Aylesbury Estate including Phase 2B

- 7.34 Phase 2B will significantly contribute towards the reprovision of social rented housing required across the wider Aylesbury Estate. When Phase 2B is included within the table below the quantum of units required reduces to 1,558 (comprising 4,262 habitable rooms and 99,552.58sqm floorspace).

Table 5: Summary of Social Rent Reprovision including Phase 2B

	Homes	Habitable rooms	Floorspace (GIA) sqm
A Baseline figures	2,249	6,866	160,025.00
Minus			
B Early Phases (Phase 1a and Site 7)	148	541	11,654.83
C First Development Site	357	1,243	28,233.49
D Plot 18 (previously known as Site 10)	23	82	1,470.70
E Phase 2B	163	738	19,113.40
Total SR reprovision required across remaining Phases	1,558	4,262	99,552.58

Social Rent Floorspace on a Site by Site Basis

- 7.35 In addition to considering the social floorspace reprovision across the wider Estate baseline, it is also important to review this on a site by site basis to understand whether the existing social rented floorspace has been reprovided on each individual site.
- 7.36 Table 6 below sets out the baseline and proposed floorspace broken down by site. This demonstrates that within the wider Aylesbury Estate, 41,334.62sqm of social rented floorspace is currently being provided (either permitted or proposed), which is an overall increase in social rented floorspace of 886.62sqm when compared with the baseline.
- 7.37 When Phase 2B is added to this table, the overall provision of social rented floorspace is 60,448.02sqm. This is 431.02sqm more than the baseline of social rented floorspace.

Table 6: Existing and Permitted Floorspace per plot

Existing Plot	Baseline Social Rent Floorspace (sqm)	Proposed Social Rent Floorspace (sqm)
Phase 1a	2,485	11,654.83
Site 7	3,554	
Plot 18	2,587	1,446.3
Phase 1b/1c	31,822	28,233.49
Total	40,448	41,334.62
Phase 2B	19,569	19,113.40
Overall Total	60,017	60,448.02

Social Reprovision indicated in the Outline Planning Permission for Phase 2B

- 7.38 Table 7 below sets out that the Outline Planning Permission would, at Phase 2B, deliver 183 social rented units, 718 social rented habitable rooms, and 14,556sqm social rented floorspace. As such, the proposed development represents an overall improvement in comparison with the outline planning permission in terms of delivery of social rented accommodation.

Table 7: Total Social Rented Floorspace Re-provided including Outline Permission 2B

	Number of social rent units	Number of social rent habitable rooms	Social rent floorspace (GIA)sqm
B Early Phases (Phase 1a and Site 7)	148	541	11,654.83
C FDS	357	1,243	28,233.49
E Plot 18 (previously known as Site 10)	23	82	1,446.30
G Phase 2B SR Floorspace Outline Planning Permission	183	718	14,556.00
Total social rent reprovision	711	2,584	55,890.62

Viability

- 7.39 A comprehensive Financial Viability Assessment has been undertaken by Aspinall Verdi, using ARGUS Developer software to determine the viability of the proposed development. The Assessment demonstrates that the level of affordable housing required under current planning policy renders the scheme unviable, with a deficit of approximately £6.69m. If the Applicant were to absorb this deficit, the profit margin would be reduced to 12.27% on GDV, which is lower than typical target thresholds which have been accepted for similar schemes within LB Southwark.
- 7.40 The scheme therefore is unable to sustain any additional affordable housing.

Justification for Proposed Level of Social Rented Floorspace Reprovision

- 7.41 In summary, the proposals will deliver the maximum viable level of social rented housing, with a total of 245 affordable units (comprising 963 habitable rooms), of which 163 are social rented units (738 habitable rooms) and 82 are intermediate units (to be provided as shared ownership) (225 habitable rooms). When considered on a habitable room basis (in accordance with the methodology in the Southwark Plan), the proposed development provides 50% affordable housing with a breakdown of 77% social rented and 23% intermediate.
- 7.42 This affordable housing provision fully complies with Policy P1 of the Southwark Plan, which specifies the affordable housing requirements for the Aylesbury Action Core Area.
- 7.43 At a strategic level, London Plan Policy H8 requires that the demolition of affordable housing should not be permitted unless it is replaced by an equivalent amount of affordable housing floorspace. Affordable housing that is replacing social rent housing must be provided as social rent housing where it is facilitating a right of return for existing tenants. Where it is not facilitating a right of return it may be provided as either social rent or London Affordable Rent housing. All development proposals are required to follow the viability tested route.
- 7.44 Supporting text 4.8.6 states that where an affordable housing provider is redeveloping an estate as part of a wider programme then it may be possible to reprovide a different mix of affordable housing on the estate (taking account of the wishes of people who want to return to the estate) if the overall level of provision is maintained across the programme and where the approach is acceptable to the borough and, where relevant, the Mayor (further guidance is provided in the Affordable Housing and Viability SPG). The Mayor will closely scrutinise proposals and will only agree to them where he is certain that the housing is being genuinely re-provided and that no better option is available.
- 7.45 The regeneration of the Aylesbury Estate is supported at both a local and strategic level and the principles of this Estate redevelopment has been established through the outline planning permission. The proposed development for the Phase 2B site is intrinsically embedded in this wider regeneration, and will provide housing for existing tenants in Phase 4. The quantum and mix of housing has been developed with LBS Regeneration Team to ensure that the right homes are delivered to facilitate the later phases of the Estate regeneration process.
- 7.46 The existing social rented floorspace on site is 19,569sqm and the proposed social rented floorspace (of the units themselves) is 19,113.40sqm. When the ancillary social rented floorspace (comprising communal areas) is added to this figure, the total provision is 19,749.39sqm.
- 7.47 In addition, the scheme provides an overall improvement in comparison with the outline planning permission, with an additional 4,557.4sqm of social rented floorspace above the indicative provision for this phase.
- 7.48 The supporting text to Policy H8 acknowledges that different mixes of housing may be acceptable subject to overall provision across a wider programme (in this instance, across the wider Aylesbury Estate) and subject to agreement to an alternative approach by the borough and Mayor. The proposals will provide an increased quantum of social rented housing than anticipated under the permitted outline and will therefore make a more significant contribution towards the regeneration of the Aylesbury Estate. The proposed social rented provision is the maximum viable level of housing which can be provided, and the application will follow the Viability Tested Route (in accordance with Policy H8(E)) to demonstrate this.

8.0 CIL & Planning Obligations

- 8.1 The proposed development will be subject to the following Community Infrastructure Levy (“CIL”) charges (note these will be subject to indexation):
- Mayoral CIL2: £60 per square metre on all liable floorspace;
 - Southwark CIL: £54 per square metre on all liable residential floorspace; and
 - Southwark CIL: £136 per square metre on all liable commercial floorspace.
- 8.2 It is anticipated that the planning obligations for the scheme will include the following Heads of Terms:
- provision of social rent and shared ownership affordable housing tenures;
 - provision of wheelchair housing units;
 - a financial contribution of towards carbon off-setting to achieve net zero;
 - car club;
 - a construction skills employment plan;
 - a Travel Plan;
 - a financial contribution towards play space; and
 - associated administration charge.

9.0 Summary and Conclusions

- 9.1 This Planning Statement has been prepared by hgh Consulting on behalf of Notting Hill Genesis (NHG) (the Applicant) to the London Borough of Southwark (LBS) in support of a planning application for Phase 2B of the Aylesbury Estate. The proposed development is for:

“Demolition of the existing buildings and redevelopment to provide a mixed use development comprising five buildings of a variety of heights with basements, providing affordable and market homes (Class C3); flexible floorspace for commercial business and service uses (Class E) and local community and learning uses (Class F1/F2(a)(b)); public open space and playspace; private and communal amenity space; formation of new accesses and routes within the site; alterations to existing accesses; associated car and cycle parking; refuse storage; and hard and soft landscaping; and associated works.”

- 9.2 Overall the proposed development will deliver a number of planning and regeneration benefits including:

- Significant placemaking and regeneration benefits which will contribute towards the regeneration of the wider Aylesbury Estate.
- The construction of five buildings of exemplary design which respond to the existing and emerging urban context, including a landmark tower corner of Albany Road and Thurlow Street which will identify the gateway to Burgess Park.
- Creation of an innovative and high-quality public realm, with the provision of two new public spaces (Thurlow Square and Bagshot Park) and the enhancement of the existing streets surrounding the site.
- Provision of high-quality residential accommodation with the delivery of 614 residential units of a range of types and sizes which will expand housing choice and contribute towards the Council’s housing targets. All units will benefit from both private and communal amenity space.
- Provision of 24F5 affordable units (50% by habitable room) with an affordable split of 77% social and 23% intermediate.
- On-site provision of play space with three public play spaces, including a new MUGA in Bagshot Park and doorstep play in communal areas.
- Provision of flexible employment/community floorspace which will provide employment opportunities
- Employment opportunities throughout the construction period
- CIL and Section 106 contributions as appropriate which will support the infrastructure needs of the development.



Appendices

Appendix 1 – Summary of Relevant Planning Policy

NPPF (2021)

At the centre of the NPPF is a presumption in favour of sustainable development. The purpose of the planning system is to contribute to the achievement of sustainable development through three overarching objectives, to be pursued in mutually supportive ways:

- Economic objective – to build a strong, responsive and competitive economy;
- Social objective – to support strong, vibrant and healthy communities and ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and
- Environmental objective – to contribute to protecting and enhancing our natural, built and historic environment, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution and moving to a low carbon economy

Paragraph 11 advises how the presumption in favour of sustainable development is applied to decision-taking by approving development proposals that accord with an up-to-date development plan without delay.

Chapter 5 sets out the Government’s commitment to significantly boosting the supply of new homes. Paragraph 60 highlights the importance of a sufficient amount and variety of land coming forward for development where it is needed.

Chapter 8 relates to promoting healthy and safe communities and Paragraph 94 states that planning policies and decisions should consider the social, economic and environmental benefits of estate regeneration and local authorities should use their planning powers to help deliver estate regeneration to a high standard.

Chapter 9 sets out the approach to sustainable transport and states that highways issues should be considered from the earliest stages of development proposals to ensure that the impacts of transport networks can be addressed.

Chapter 11 sets out the framework’s strategic objectives for making the most effective use of land. Paragraph 118 states that substantial weight should be given to the value of using suitable land within settlements for homes and gives support for the development of under-utilised sites, particularly where this would help meet identified needs for housing where supply is constrained.

London Plan (2021)

Policy GG1 (Building strong and inclusive communities) seeks to build strong and inclusive communities and sets out how development must achieve this.

Policy GG2 (Making the best use of land) sets out that those involved in planning and development must, among other things:

“A. enable the development of brownfield land, particularly in Opportunity Areas, on surplus public sector land, and sites within and on the edge of town centres, as well as utilising small sites

B. prioritise sites which are well-connected by existing or planned public transport

C. proactively explore the potential to intensify the use of land to support additional homes and workspaces, promoting higher density development, particularly in locations that are well-connected to jobs, services, infrastructure and amenities by public transport, walking and cycling.

D. applying a design-led approach to determine the optimum development capacity of sites”.

Policy GG3 (Creating a healthy city) sets out how development must improve Londoners’ health and reduce health inequalities.

Policy GG4 (Delivering the homes Londoners Need) states that to create a housing market that works better for all Londoners, those involved in planning and development must ensure that more homes are delivered; support the delivery of the strategic target of 50% of all new homes being genuinely affordable; create mixed and inclusive communities, with good quality homes that meet high standards of design and provide for identified needs, including for specialist housing.

Policy GG6 (Increasing efficiency and resilience) states that development must seek to improve energy efficiency and support the move towards a low carbon circular economy, contributing towards London becoming a zero-carbon city by 2050. It also requires development to ensure that buildings and infrastructure are designed to adapt to a changing climate.

Policy D3 (Optimising site capacity through the design-led approach) sets out that that all development must make the best use of land by following a design-led approach that optimises the capacity of sites. Higher density developments should be located and promoted in locations that are well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling. The policy includes guidance that development should deliver buildings and spaces that positively respond to local distinctiveness and deliver appropriate amenity.

Policy D4 (Delivering good growth) requires that all proposals exceeding 30 metres in height and 350 units per hectare must have undergone at least one design review or demonstrate that they have undergone a local borough process of design scrutiny.

Policy D5 (Inclusive design) requires development proposals to achieve the highest standards of accessible and inclusive design.

Policy D6 (Housing quality and standards) sets out key design quality principles and standards. The policy seeks to ensure housing development is of high-quality design, maximises the provision of dual aspect dwellings, provides sufficient daylight and sunlight to new and surrounding housing that is appropriate to its context whilst avoiding overheating, minimising overshadowing and maximising the usability of outside amenity space, designed with adequate and easily accessible storage space, and meets the minimum private internal and external space standards.

Policy D7 (Accessible housing) requires that at least 10% of dwellings meet Building Regulation requirement M4(3) ‘wheelchair user dwellings’ (design to be wheelchair accessible or easily adaptable for residents who are wheelchair users); and all other new build dwellings must meet Building Regulation requirement M4(2) ‘accessible and adaptable dwellings’.

Policy D9 (Tall buildings) sets out that tall buildings should only be developed in locations that are identified in Development Plans. Development proposals for tall buildings should address the following impacts:

- Visual impacts (including on views and heritage assets);

- Functional impacts; and
- Environmental Impacts.

Policy D12 (Fire safety) requires future applications to be accompanied by a fire statement, prepared by a suitably qualified third party assessor, demonstrating how the development proposals would achieve the highest standards of fire safety, including details of construction methods and materials, means of escape, fire safety features and means of access for fire service personnel.

Policy H1 (Increasing housing supply) requires optimisation for the potential for housing delivery on all suitable and available brownfield sites, especially those which are with existing or planning public transport access levels (PTALs) 3-6 or which are located within 800m distance of a station or town centre boundary. In addition, sites which have capacity for housing intensification on other appropriate low-density sites in commercial, leisure and infrastructure uses.

Policy H4 (Delivering affordable housing) sets out a strategic target for 50% of all new homes delivered across London to be genuinely affordable.

Policy H5 (Threshold approach to applications) sets out a threshold approach to major development proposals which trigger affordable housing requirements.

Policy H6 (Affordable housing tenure) sets out that the affordable split of housing should be a minimum of 30% low cost rented homes as either London Affordable Rent or Social Rent, a minimum of 30% intermediate which meet the definition of genuinely affordable housing including London Living Rent and London Shared Ownership, and the remaining 40% to be determined by the borough as low-cost rented homes or intermediate products based on identified need.

Policy H8 (Loss of existing housing and estate redevelopment) states that the demolition of affordable housing, including where it is part of an estate redevelopment programme, should not be permitted unless it is replaced by the equivalent amount of floorspace. Affordable housing that is replacing social rent housing must be provided as social rent housing where it is facilitating a right of return for existing tenants. Where affordable housing that is replacing social rent is not facilitating a right of return, it may be provided either as social rent or London Affordable Rent Housing. All development proposals that include the demolition and replacement of affordable housing are required to follow the viability Tested Route and should seek to provide an uplift in affordable housing in addition to the replacement affordable housing.

Policy H10 (Housing size mix) states that schemes should generally consist of a range of unit sizes taking into account things like the requirement to deliver mixed and inclusive communities, the mix of uses in the scheme, the range of tenures in the scheme, the nature and location of the site, and the aim to optimise housing potential on sites.

Policy S4 (Play and informal recreation) requires at least 10sqm of play space to be provided per child.

Policy HC1 (Heritage conservation and growth) states that development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings.

Policy HC3 (Strategic and local views) states that boroughs should include all designated views in their Local Plans and identify local views in accordance with the London View Management Framework.

Policy G1 (Green infrastructure) notes that development proposals should incorporate appropriate elements of green infrastructure that are integrated into London's wider green infrastructure network.

Policy G5 (Urban greening) states that major development proposals should include urban greening as a fundamental element of the site and building design and incorporate measures such as high-quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage. The Mayor recommends a target urban greening factor score of 0.4 for predominantly residential developments.

Policy G6 (Biodiversity and access to nature) sets out that development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain.

Policy G7 (Trees and Woodlands) states that development proposals should ensure that, wherever possible, existing trees of value are retained.¹⁴⁰ If planning permission is granted that necessitates the removal of trees there should be adequate replacement based on the existing value of the benefits of the trees removed, determined by, for example, i-tree or CAVAT or another appropriate valuation system. The planting of additional trees should generally be included in new developments – particularly large-canopied species which provide a wider range of benefits because of the larger surface area of their canopy.

Policy SI 1 (Improving Air Quality) sets out that development proposals should not lead to further deterioration of existing air quality, create any new areas that exceed air quality limits, or delay the date at which compliance will be achieved in areas that are currently in exceedance of legal limits, or create unacceptable risk of high levels of exposure to poor air quality. Part 2 of this policy sets out a list of criteria for meeting these requirements including that development proposals must be at least Air Quality Neutral.

Policy SI 2 (Minimising greenhouse gas emissions) seeks development to be net zero-carbon, through reducing greenhouse gas emissions in operation and minimising both annual and peak energy demand in accordance with the energy hierarchy. A minimum on-site reduction of at least 35% beyond building Regulations is required for major development. Residential development should achieve 10%, and non-residential development should achieve 15% through energy efficient measures. Where it is clearly demonstrated that the zero-carbon target cannot be achieved fully on site, any shortfall should be provided, in agreement with the borough either: 1) through a cash in lieu contribution to the borough's carbon offset fund, or 2) off-site provide that an alternative proposal is identified and delivery is certain.

Policy SI 3 (Energy infrastructure) states that developers should engage with relevant energy companies to establish the future energy and infrastructure requirements and energy masterplans should be developed for large-scale development.

Policy SI 4 (Managing heat risk) states that development proposals should minimise adverse impacts on the urban heat island through design, layout, orientation, materials, and the incorporation of green infrastructure. Major development proposals should demonstrate through an energy strategy how they will reduce the potential for internal overheating and reliance on air conditioning systems in accordance with the cooling hierarchy.

Policy SI 5 (Water Infrastructure) states that in order to minimise the use of mains water, water supplies and resources should be protected and conserved in a sustainable manner. Development proposals should seek to improve the water environment and ensure that adequate wastewater infrastructure capacity is provided and take action to minimise the potential for misconnections between foul and surface water networks.

Policy SI 7 (Reducing waste and supporting circular economy) seeks resource conservation, waste reduction, increases in material re-use and recycling, and reductions in waste going for disposal. Referable applications should promote circular economy outcomes and aim to be zero waste. The policy sets out a criteria that should be demonstrated in a Circular Economy Statement.

Policy SI 12 (Flood risk management) requires development proposals to ensure that flood risk is minimised and mitigated, and that residual risk is minimised.

Policy SI 13 (Sustainable drainage) states that development proposals should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible.

Policy T1 (Strategic approach to transport) provides a strategic target for 80% of all trips in London to be made by foot, cycle or public transport by 2041 and that all development should make the most effective use of land, reflecting its connectivity and accessibility by existing and future public transport, walking and cycling routes, and ensure that any impacts on London's transport networks and supporting infrastructure are mitigated.

Policy T2 (Healthy Streets) requires development proposals to demonstrate how they will deliver improvements that support the ten Healthy Street Indicators in line with Transport for London guidance.

Policy T4 (Assessing and mitigating transport impacts) sets out that development proposals should reflect and be integrated with current and planned transport access, capacity, and connectivity.

Policy T5 (Cycling) states that cycle parking must be provided in accordance with the standards set out in Table 10.2. For residential uses, this should be 1 space per studio or 1 bedroom 1-person dwelling, 1.5 spaces per 2-person dwelling and 2 spaces for all other dwellings

Policy T6 (Car parking) sets out that car parking should be restricted in line with levels of existing and future public transport accessibility and connectivity. Car-free development should be the starting point for all development proposals in places that are (or are planned to be) well-connected by public transport, with developments elsewhere designed to provide the minimum necessary parking. Car-free development has no general parking but should still provide disabled persons parking

Policy T6.1 (Residential car parking) states that new residential development should not exceed the maximum parking standards set out in Table 10.3. All residential car parking spaces must provide infrastructure for electric or Ultra-Low Emission vehicles. At least 20 per cent of spaces should have active charging facilities, with passive provision for all remaining spaces. Disabled persons parking should also be provided for new residential developments delivering ten or more units (with at least 3% dwellings at least 1 designated disabled persons parking bay per dwelling available from the outset and demonstrate how an additional 7% of dwellings could be provided with one designated disabled persons parking space per dwelling in future).

The Southwark 2022

Policy SP1 (Homes for all) sets out a strategic target for 50% of all new homes as social rented and intermediate. It sets out a strategic target for at least 40,035 homes between 2019 and 2036 (2,355 per annum) in the borough. This policy also seeks to maintain high housing standards, build more family homes, and requires sustainable design so that new homes adapt to climate change and mitigate against climate change by reducing carbon emissions on site.

Policy SP2 (Southwark together) seeks to revitalise places and neighbourhoods to create new opportunities for residents and local businesses, to promote wellbeing and reduce inequalities so that people have better lives in stronger communities.

Policy SP3 (A Great start to life) seeks to give all young people a great start in life in a safe, stable, and healthy environment where they have the opportunity to develop, make choices and feel in control of their lives and future. Part 8 of this policy states that this can be achieved through encouraging developments where there can be more interaction between people of different ages, particularly elderly and young people.

Policy SP5 (Green and inclusive economy) states that the council will maintain and improve health and wellbeing of residents, encouraging healthy lives by tackling the causes of ill health and inequalities.

Policy SP6 (Climate Emergency) seeks to provide spaces for people to connect with nature, make people feel safe, create cleaner streets, increase recycling, reduce landfill waste, and reduce carbon and greenhouse gas emission and sets out a list of criteria to achieve this.

Policy AV.01 (Aylesbury Area Vision) sets out the area vision for Aylesbury. This policy notes that it would now be appropriate to consider an increased number of homes within the land covered by the Area Action Core replacing all the existing social rented homes in and in reasonable proximity to within the footprint of the original estate. It sets that development in the Aylesbury Area should:

- Generate new neighbourhoods with a range of housing tenures and sizes that will attract existing residents to stay and new people to move in, including Southwark residents who want to stay and benefit from the great connections, facilities and communities;
- Stitch back into the surrounding context and enhance the ability for pedestrians and cyclists to get around a network of attractive tree-lined streets and public open spaces, arranged around a loose grid of well designed urban blocks;
- Deliver the three green fingers which will run from Burgess Park into the Action Area Core connecting with Surrey Square Park, the Missenden Play area and Faraday Gardens and providing important public space;
- Establish a local hub in the vicinity of East Street and Thurlow Street with a range of community facilities including a new Health Centre, Library, pharmacy, café, employment opportunities and a public square;
- Deliver homes and a wider urban environment suitable for residents at all stages in their lives, encouraging people to live and work locally. This will include excellent cycling provision, safe secure streets with good building frontages and a choice of homes with a priority for high quality social rented housing, including a range of different sized homes, generous space standards and provision of specialist housing;
- Contribute by encouraging all those who take decisions that affect our community to aspire to and maintain the highest standards;
- Deliver an exemplary neighbourhood in which we and our children will want to live and of which we can be rightly proud;

- Reinforce its image as a place for families to live and deliver an excellent range of quality public and private open spaces, and will provide new local opportunities for shopping and employment in Thurlow Street and East Street, as well as supporting existing town centres.

Policy P1 (Social rented and intermediate housing) sets out that within Proposal site AAAP1 (Phase 1) there is a requirement for 41% market housing and 59% affordable housing by habitable room (75% social rented and 25% intermediate).

Policy P2 (New family homes) requires major residential developments to provide the following in the Aylesbury Action Area Core:

- A minimum of 70% 2+ bed homes
- A minimum of 20% family homes with 3+ beds
- A minimum of 7% 4 bed homes
- A minimum of 3% 5 bed homes
- A maximum of 3% studios (which can only be used for private housing)
- Two-bedroom homes as a mix of 2b3p and 2b4p homes
- Family homes in apartment blocks should have direct access to outdoor amenity space and allow oversight of children outside.

Policy P8 (Wheelchair accessible and adaptable housing) development to provide a mix of dwelling sizes and tenures and sets out the minimum space standards. It also sets out that new building major residential development must meet Building Regulations M4(3) standard (Wheelchair User Dwellings) in at least 10% of homes (as measured by habitable rooms), and the remaining dwellings must meet Building Regulations M4(2) (accessible and adaptable dwellings). Where those homes are affordable wheelchair user homes, 10% of social rented homes must be wheelchair accessible and meet Building Regulation M4(3)(2)(b) standard (Wheelchair accessible dwellings).

Policy P13 (Design of places) sets out the design requirements for new development.

Policy P14 (Design quality) sets out the design quality requirements for development.

Policy P15 (Residential design) states that development must achieve an exemplary standard of residential design and that all new build residential development must take into account consideration of site context, the impact of amenity of adjoining occupiers, and the quality of accommodation. Table 7 sets out the minimum space standards for the Aylesbury Area Action Core.

Policy P17 (Tall buildings) states that the areas where tall buildings are expected are shown on the Policies Map in Figure 4, which includes Action Area Cores. Individual sites where taller buildings may be appropriate have been identified in the site allocations. This policy also goes on to set out the requirements and design of tall buildings.

Policy P18 (Efficient use of land) permits development that optimises the land use, does not unreasonably compromise development potential or legitimate activities on neighbouring sites, and provides adequate servicing facilities, circulation spaces and access to, from and through the site.

Policy P19 (Listed buildings and structures) states that development relating to listed buildings structures and their settings will only be permitted if it conserves or enhances their special significance.

Policy P22 (Borough views) states that development should preserve and where possible enhance the borough views of significant landmarks and townscape, ensure the viewing locations for each view are accessible and well managed, and enhance the composition of the panorama across the borough and central London as a whole.

Policy P45 (Healthy developments) states that development must be easily accessible from the walking and cycling network and provide or support opportunities for healthy activities.

Policy P49 (Public transport) states that development must demonstrate that the public transport network has sufficient capacity to support the increase in the number of journeys by the users of the development, taking into account the cumulative impact of local existing and permitted development; and improve accessibility to public transport by creating and improving walking and cycling connections to public transport stops or stations; and improve, maintain and enhance public transport services.

Policy P50 (Highways impacts) seeks to minimise the demand for private car journeys, demonstrate that the road network has sufficient capacity to support any increase in the number of journeys by the users of the development, ensure safe and efficient operation of the local road, bus and transport for London Road networks, ensure safe and efficient delivery and servicing, incorporate delivery and servicing within major development sites and not on the public highway, and demonstrate how the construction phase of the development that needs to use the public highway can be safely accomplished and how vehicular movements will be minimised and strictly controlled to reduce to vulnerable users.

P51 (Walking) states that development must enhance the borough's walking networks by providing footways, routes and public realm that enable access through development sites and adjoining areas.

Policy P53 (Cycling) sets out the cycle parking requirements for new developments. All cycle parking should be in accordance with Tables 9 and 10. For sites with a PTAL 6a, 6b and 5, the requirement is 1 space per bedroom plus one space per dwelling, and 1 visitor space per 10 units.

Policy P54 (Car Parking) states that development must adhere to residential car parking standards in Table 11. Development must provide all car parking spaces within the development site and not on the public highway, and provide electric vehicle charging points where on site parking is permitted. In the Aylesbury Action Core, the maximum residential car parking provision is 0.25 maximum spaces per home for the entire site redevelopment. Some sites may provide up to 0.4 maximum spaces per home where this is demonstrated to be required to enable rehousing of existing residents

Policy P55 (Parking standards for disabled people and the physically impaired) states that development must provide accessible car parking spaces up to a maximum of one car parking space per wheelchair accessible unit. The number of spaces provided may be determined by considering the anticipated demand for the parking space and tenure of the development, and the quality and accessibility of the local public transport network and the access to local amenities.

Policy P56 (Protection of amenity) states that development should not be permitted when it causes an unacceptable loss of amenity to present or future occupiers or users, taking into account 1. The privacy and outlook of occupiers of both existing and proposed homes 2. Actual or sense of overlooking or enclosure 3.

Impacts of smell, noise, vibration, lighting or other nuisances 4. Daylight, sunlight, and impacts from wind and on microclimate 5. Residential layout, context and design.

Policy P59 (Green infrastructure) states that major developments must provide green infrastructure with arrangements in place for long term stewardship and maintenance funding. Major developments that is referable to the Mayor of London must provide new publically accessible open space and green links. Green infrastructure should be designed to provide multiple benefits for the health of people and wildlife; and; 2. Integrate with the wider green infrastructure network and townscape / landscape, increasing access for people and habitat connectivity; and 3. Be adaptable to climate change and allow species migration while supporting native and priority species; and 4. Extend and upgrade the walking and cycling networks between spaces to promote a sense of place and ownership for all.

Policy P60 (Biodiversity) requires development to contribute to net gains in biodiversity such as through including features such as green and brown roofs, green walls, soft landscaping, nest boxes, habitat restoration and expansion, improved green links and buffering of existing habitats. Any shortfall in net gains in biodiversity must be secured off site through planning obligations or as a financial contribution.

Policy P61 (Trees) states that development will be permitted if trees are planted as part of landscaping and public realm schemes, commensurate to the scale and type of development, and the character of the neighbourhood. Development must retain and protect significant existing trees including trees with Tree Protection Orders (TPOs), trees that have a high amenity value, and trees within Conservation Areas or the setting or curtilage of listed buildings, and veteran and notable trees. Part 3 of this policy states that development must retain and enhance the borough's trees and canopy cover. Part 4 of this policy states that where trees are removed to facilitate development, they should be replaced by new trees which result in no loss of amenity, taking into account canopy cover as measured by stem girth, either

- Within the development whereby valuation may be calculated using the Capital Asset Value for Amenity Trees (CAVAT) methodology or other assessment; or
- if this is not possible, outside the development. In this case a financial contribution must be provided to improve borough tree planting located according to 'right tree right place' principles. The financial contribution will include ongoing maintenance costs where trees are planted in the public realm.

Part 5 of Policy P61 states that tree planting should be adaptable to climate change while supporting native species. The selection and position of trees should improve air quality and they should have a long life with a high biodiversity and amenity value.

Policy P62 (Reducing waste) states that development must:

1. Demonstrate how the following waste management hierarchy will be applied during construction: Avoid creating waste; then
 - Reduce the amount of waste produced; then
 - Prepare waste materials for re-use; then
 - Recycle and compost waste materials; then
 - Recover energy from waste materials; then

- Dispose waste materials in landfill; and
- 2. Provide adequate recycling, composting and waste disposal, collection and storage facilities on site; or
- 3. Provide a suitable off site waste management strategy that does not adversely impact amenity, access or the environment where on site waste management provision is not possible.
- 4. Major referable development should submit a Circular Economy Statement.

Policy P65 (Improving air quality) sets out that development must achieve or exceed air quality neural standards, and address the impacts of poor air quality on building occupiers and public realm users by reducing exposure to and mitigating the effects of poor air quality. This must be achieved through design solutions that include:

1. Orientation and layout of buildings, taking into account vulnerable building occupiers, and public realm and amenity space users; and
2. Ventilation systems; and
3. Urban greening appropriate for providing air quality benefits proportionate to the scale of the development.

Part 2 of policy P65 states that any shortfall in air quality standards on site must be secured off site through planning obligations or as a financial contribution.

Policy P66 (Reducing noise pollution and enhancing soundscapes) states that development must: 1. Avoid significant adverse impacts on health and quality of life; and 2. Mitigate any adverse impacts caused by noise on health and quality of life; and 3. Mitigate and manage noise by separating noise sensitive developments from major noise sources by distance, screening or internal layout, in preference to sound insulation. Part 2 of policy P66 states that new spaces proposed as part of development should also assess the potential to enhance the place's character and identity through the acoustic environment and positive public soundscapes. Major development will be required to demonstrate how the noise pollution impacts created during the construction process will be reduced, mitigated and managed appropriately to minimise harm to present occupiers of the site and adjoining neighbours.

Policy P67 (Reducing water use) sets out that Development should reduce water use by:

1. Ensuring that residential development has a 'safe to drink' water use of no more than 105 litres per person per day, excluding an allowance of 5 litres or less per person per day for external water use; and
2. Incorporating measures to reduce the demand for mains water treated to drinking standard and enable the use of grey water and/or rainwater for non-drinking uses; and
3. Major development should assess the need for improvements to water supply infrastructure in discussion with water utility companies.

Policy P68 (Reducing flood risk) sets out that development must not increase flood risk on or off site, by ensuring that 1. It is designed to be safe and resilient to flooding; and finished floor levels are set no lower than 3000mm above the predicted maximum water level where they are located in an area at risk of flooding, and major development reduces surface water run-off to greenfield run-off rates (through the application of

water sensitive urban design and Sustainable Urban Drainage Systems, in accordance with the drainage hierarchy listed in the policy).

Policy P69 (Sustainability standards) sets out a number of sustainability standards, Part 4 of this policy states that development must reduce the risk of overheating, taking into account climate change predictions over the lifetime of the building in accordance with prioritised measures set out in the following cooling hierarchy:

1. Reduce the amount of heat entering a building through the orientation, shading, albedo, fenestration, insulation and green roofs and walls; then
2. Minimise internal heat generation through energy efficient design; then
3. Manage the heat within the building through exposed internal thermal mass and high ceilings; then
4. Passive ventilation; then
5. Mechanical ventilation; then
6. Active cooling systems (ensuring they are the lowest carbon options).

Policy P70 (Energy) states that development must minimise carbon emissions on site in accordance with the energy hierarchy. Major development must reduce operational greenhouse gas emissions and minimise both annual and peak energy demand. This must be in accordance with the energy hierarchy:

1. Be lean (energy efficient design and construction); then
2. Be clean (low carbon energy supply); then
3. Be green (on site renewable energy generation and storage); then
4. Be seen (monitor, verify and report on energy performance); then
5. Offset residual carbon emissions to reach zero carbon target.

Part 3 of policy 70 states that major development must be net zero carbon. Part 4 states that major residential development must reduce carbon emissions on site (100% on 2014 Building Regulations) and in exceptional circumstances, any shortfall must be secured off site through planning obligations or as a financial contribution. Part 6 of this policy states that development proposals referable to the Mayor must calculate whole life cycle carbon emissions through a nationally recognised assessment and demonstrate actions taken to reduce life cycle carbon emissions.



hghconsulting.com





hghconsulting.com