

# Supporting Statement

## **Notting Hill Housing Trust**

Section 73 Minor Material Amendment  
Aylesbury Estate – First Development Site  
Land bounded by Albany Road,  
Portland Street, Westmoreland Road  
and Bradenham Close  
London SE17

October 2017 v2

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## Quality Standards Control

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This document must only be treated as a draft unless it has been signed by the Originator and approved by a Business or Associate Director.

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26 Oct 2017

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### Limitations

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## 1 INTRODUCTION

1.1 This Supporting Statement has been prepared by GL Hearn in support of a Section 73 (S.73) Application on behalf of Notting Hill Housing Trust (“NHHT”) (hereinafter referred to as ‘the Applicant’), in relation to the Aylesbury Estate – First Development Site (FDS) – land bounded by Albany Road, Portland Street, Westmoreland Road and Bradenham Close, London SE17. Full planning permission (ref: 14/AP/3843) was granted for FDS in August 2015 in relation to:

- *“Demolition of existing buildings and redevelopment to provide a mixed use development comprising a number of buildings ranging between 2 and 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”.*

1.2 This application in relation to the FDS is made under S.73 of the Town & Country Planning Act 1990 to vary Condition 2 (approved plans) of the original permission 14/AP/3843 granted on 5<sup>th</sup> August 2015. All other elements of the permission remain unchanged. This permission established detailed development proposals and set out specific parameters as to the future quantum and form of development.

1.3 This S.73 application has been subject to extensive pre-application discussions with the LPA and a public exhibition.

### Environmental Impact Assessment

1.4 This S.73 application is accompanied by a Supporting Statement from WSP.

### Associated Changes to First Development Site

1.5 Outline planning permission (ref: 14/AP/3844) for the wider Aylesbury regeneration area was also granted in August 2015. A Reserved Matters Application pursuant to Phase 2A (also referred to as ‘Plot 18’) of the outline planning permission was subsequently submitted in respect of access; layout; scale; appearance; and landscaping in July 2016 and was approved on 21 December 2016 (ref: 16/AP/2800).

1.6 A separate S.73 application has been prepared and submitted to the Local Planning Authority (LPA) for parallel consideration. This separate S.73 application is in relation to the Plot 18 (‘P18’) – land

bounded by Thurlow Street to the east, Dawes Street to west, Inville Road to the south and Plot 9 (A/B) of the Aylesbury Regeneration to the north, London SE17. This S.73 application seeks amendments to the Reserved Matters application at P18:

- *“Minor material amendment to vary Condition 1 (Approved Drawings/Documents) of Planning Permission (16/AP/2800 dated 21/12/2016) for ‘Approval of Reserved Matters pursuant to Condition 1 (access; layout; scale; appearance; and landscaping) to provide a mixed-use development at ‘Plot 18’ (Phase 2A) comprising 122 residential units (C3), retail (A1/A3/A4) and a community facility (library D1) in a part 15, part 7 and part4/6 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’ to allow alterations to provide (1) a revised mix of residential tenures within Block 1 and Block 3; and (2) consequential alterations to the siting and façade of Block 3 of the North Block”.*

- 1.7 These ‘applications’ seek to refine tenure mix within the housing provision in both the FDS and P18 development and add 12x residential units to the 830 units permitted in FDS. Whilst technically these are separate submissions, the relationship between these two initial phases of the Aylesbury Regeneration means that they are effectively linked and the Applicant considers that the two applications should be considered in tandem by the LPA.

## Rationale

- 1.8 The Applicant has taken the opportunity to review unit and tenure mix in light of the reprogramming of Compulsory Purchase Order (CPO) resolution matters pursuant to the FDS. Following a detailed review of the approved unit and tenure mix and delivery context, the Applicant has identified an opportunity to increase the provision of affordable housing tenures within the FDS, which will result in the accelerated delivery of critical affordable housing supply in the early phases of delivering the Aylesbury Regeneration and also facilitate the re-housing of existing residents in these early phases of development. Importantly, the Applicant remains committed to meeting the overall requirement for affordable housing provision and ensuring that the affordable options remain affordable and accessible to Southwark residents.
- 1.9 In addition, the completion of a detailed design review has presented an opportunity to deliver a total of 12x additional residential units, namely 9x additional units within the footprint of the permitted FDS scheme, making efficient and effective use of otherwise surplus floorspace; and 3x new units delivered on land located between sub-plot 6b and sub-plot 6c on what was originally proposed to be the Gas Pressure Reduction System, which has now been identified as surplus to requirements following confirmation that gas demand to the FDS can be derived from existing low

pressure infrastructure. These additional units will further contribute to increasing the supply of new housing in a sustainable location.

- 1.10 Owing to unit mix and tenure requirements being secured within extant planning permissions and the supporting Section 106 Agreement (dated 5 August 2015) for the development, the Applicant seeks to advance these minor amendments to the approved schemes (ref: 14/AP/3843 and 16/AP/2800) by way of S.73 applications to regularise the amendments in planning. This approach has been subject to, and reflects, extensive pre-application discussions held with the LPA.

## Submission Documents

- 1.11 The following documentation, in addition to this Supporting Statement, supports this application:

- Completed application form
- Location plan
- Amended drawings pack:
  - Site wide  
*HTA-L-D01-X-XX-2900-B, D01-004B, D01-100B, D01-101C, D01-102C, D1-106C, D01-130C, D01-131D, D01-132C, D01-133D, D01-134C, D01-135D, D01-136C, D01-138C, D01-139C.*
  - Block 1  
*1305-07-100-D4, 1305-07-101-D2, 1305-07-102-D1, 1305-07-103-D1, 1305-07-104-D1, 1305-07-105-D2, 1305-07-106-D1, 1305-07-107-D1, 1305-07-108-D1, 1305-07-109-D1, 1305-07-110-D1, 1305-07-111-D1, 1305-07-300-D2, 1305-07-301-D1, 1305-07-302-D1, 1305-07-303-D1, 1305-07-304-D2, 1305-07-305-D2, 1305-07-306-D2, 1305-22-400-D2, 1305-22-401-D2, 1305-22-404-D3, 1305-06-464-D3.*
  - Block 2  
*NHH-FDS\_HTA-A\_DR\_S02-101-B, NHH-FDS\_HTA-A\_DR\_S02-102-C, NHH-FDS\_HTA-A\_DR\_S02-103-C, NHH-FDS\_HTA-A\_DR\_S02-130-C, NHH-FDS\_HTA-A\_DR\_S02-131-C, NHH-FDS\_HTA-A\_DR\_S02-132-C, NHH-FDS\_HTA-A\_DR\_S02-300-B.*
  - Block 5  
*NHH-FDS\_HTA-A\_DR\_S05-101-B, NHH-FDS\_HTA-A\_DR\_S05-102-B, NHH-FDS\_HTA-A\_DR\_S05-103-C, NHH-FDS\_HTA-A\_DR\_S05-104-C, NHH-FDS\_HTA-A\_DR\_S05-105-C, NHH-FDS\_HTA-A\_DR\_S05-106-C, NHH-FDS\_HTA-A\_DR\_S05-107-C, NHH-FDS\_HTA-A\_DR\_S05-108-C, NHH-FDS\_HTA-A\_DR\_S05-109-C, NHH-FDS\_HTA-A\_DR\_S05-110-C, NHH-FDS\_HTA-A\_DR\_S05-111-B, NHH-FDS\_HTA-A\_DR\_S05-112-B, NHH-FDS\_HTA-A\_DR\_S05-113-B, NHH-FDS\_HTA-A\_DR\_S05-120-B, HTA-A-S05-130-B, HTA-A-S05-131-B, NHH-FDS\_HTA-A\_DR\_S05-133-C, NHH-FDS\_HTA-A\_DR\_S05-134-B, NHH-FDS\_HTA-A\_DR\_S05-135-C, NHH-FDS\_HTA-A\_DR\_S05-136-B, HTA-A-S05-137-B, HTA-A-S05-138-D.*
  - Block 6  
*NHH-FDS\_HTA-A\_DR\_S06-101-B, NHH-FDS\_HTA-A\_DR\_S06-102-B, NHH-FDS\_HTA-A\_DR\_S06-103-C, NHH-FDS\_HTA-A\_DR\_S06-104-C, NHH-FDS\_HTA-A\_DR\_S06-105-C, NHH-FDS\_HTA-A\_DR\_S06-106-D, NHH-FDS\_HTA-A\_DR\_S06-107-D, NHH-FDS\_HTA-A\_DR\_S06-108-D, NHH-FDS\_HTA-A\_DR\_S06-109-D, NHH-FDS\_HTA-*

A\_DR\_S06-110-D, NHH-FDS\_HTA-A\_DR\_S06-111-C, NHH-FDS\_HTA-A\_DR\_S06-112-B, NHH-FDS\_HTA-A\_DR\_S06-130-D, NHH-FDS\_HTA-A\_DR\_S06-131-C, NHH-FDS\_HTA-A\_DR\_S06-132-B, NHH-FDS\_HTA-A\_DR\_S06-133-C, NHH-FDS\_HTA-A\_DR\_S06-134-B, NHH-FDS\_HTA-A\_DR\_S06-135-B, NHH-FDS\_HTA-A\_DR\_S06-136-D, NHH-FDS\_HTA-A\_DR\_S06-137-D.

➤ Sections

HTA-L-D01-X-XX-2202-B, HTA-L-D01-X-XX-2204-B, HTA-L-D01-X-XX-2208-A, HTA-L-D01-X-XX-2902-B, HTA-L-D01-X-XX-2904-B, HTA-L-D01-X-XX-2905-B, HTA-L-D01-X-XX-2908-A.

- HTA's design addendum
- WSP's supporting statement
- Internal Daylight and Sunlight Assessment
- £195 Application Fee

## Context

- 1.12 There is no statutory definition of a 'minor material amendment' to an existing permission although the Government supports the following definition:

*"A minor material amendment is one whose scale and nature results in a development which is not substantially different from the one which has been approved".*

- 1.13 Minor Material Amendments can be carried out on planning consent which has a planning condition that can be varied to achieve the aim of the minor material amendment.

## Summary

- 1.14 This S.73 application seeks to amend Condition 2 of the original detailed planning permission (ref: 14/AP/3843) by replacing those plans listed in Paragraph 3.2 of this statement with the new plans listed at Paragraph 3.3 of this statement.
- 1.15 It is acknowledged that a S.73 application requires the LPA to issue a new planning permission. Section 5 of this statement sets out the justification for the proposed amendments.
- 1.16 It will be demonstrated in the following sections that, within the context of the existing consent and the wider Aylesbury regeneration area as a whole, the proposals are considered "minor material amendments" in nature and the proposals will remain consistent with both national and local planning policies.

## **2 SITE AND SURROUNDINGS**

- 2.1 The Aylesbury Estate, which measures 22.1ha, is located in the Walworth area of the London Borough of Southwark (LBS). It is situated to the east of Walworth Road, west of Old Kent Road and extends along the northern boundary of Burgess Park, within the northern part of LBS. The Aylesbury Estate is home to over 7,000 people and includes residential units, offices, community buildings and retail units.
- 2.2 The Aylesbury Estate is centrally located between London travel Zones 1 and 2, with Elephant and Castle station to the north-west and Camberwell directly south. The area is well connected to existing public transport routes and cycle networks. There are three designated cycle routes which pass through the Aylesbury Estate via Burgess Park and numerous local bus services, including three routes which run through the Estate along Thurlow Street and Albany Road, two of which run through the night.
- 2.3 There are three underground stations in close proximity including Elephant and Castle (1.1 miles), Kennington (1.1 miles) and Oval (1.3 miles). All three underground stations are served by the Northern Line. Elephant and Castle is also served by the Bakerloo Line. Elephant and Castle also has a Train Station (1.1 miles) which provides direct rail links to Sevenoaks, Sutton, Luton and St Albans.
- 2.4 The Aylesbury Regeneration Area comprises a Detailed Planning Permission covering the FDS and an Outline Planning Permission covering the wider Regeneration Area. The Aylesbury regeneration programme seeks to redevelop the entire Estate ultimately. This S.73 application relates to the FDS of wider Aylesbury regeneration area. The FDS is located to the southwest of the wider Aylesbury regeneration area and is approximately 4.4 hectares in size. The immediate areas surrounding the FDS are largely residential in character.
- 2.5 The proposed regeneration of the Aylesbury area is informed by a dedicated Area Action Plan prepared by Southwark Council (adopted in January 2010). The Aylesbury Area Action Plan (AAAP) sets the vision for the area, policies for its development, and a delivery plan for the future investment over the next 20 years to create a new sustainable community. The AAAP consists of two parts including the Action Area Core (which covers the Aylesbury Estate) and wider area, which includes East Street, Walworth Road, Old Kent Road and Burgess Park.



### 3 THE PROPOSED AMENDMENTS

- 3.1 Variation of Condition 2 (Approved Drawings) of Planning Permission 14/AP/3843 (dated 5<sup>th</sup> August 2015) for 'Demolition of existing buildings and redevelopment to provide a mixed use development comprising a number of buildings ranging between 2 and 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' to allow alterations to provide: (1) a revised mix of residential units and tenures within subplot 01, 02, 05 and 06; (2) alterations to external elevations of subplot 01, 02, 05 and 06; (3) removal of the approved Gas Pressure Reduction System; (4) addition of 12x residential units; (5) alterations to landscape layouts.

#### Condition 2

- 3.2 Condition 2 is currently drafted as follows:

*The development hereby permitted shall not be carried out otherwise than in accordance with the following approved plans:*

*Site wide*

*HTA-L-D01-X-XX-2900A, D01-004A, D01-100A, D01-101A, D01-102A, D1-106A, D01-130A, D01-131B, D01-132A, D01-133B, D01-134A, D01-135B, D01-136A, D01-137A, D01-138A, D01-139A.*

*Block 1*

*1305-NHH-AES-S01-100A, 1305-NHH-AES-S01-102A, 1305-NHH-AES-S01-104A, 1305-NHH-AES-S01-106A, 1305-NHH-AES-S01-110A, 1305-NHH-AES-S01-120A, 1305-NHH-AES-S01-121A, 1305-NHH-AES-S01-122A, 1305-NHH-AES-S01-123A, 1305-NHH-AES-S01-124A, 1305-NHH-AES-S01-125A, 1305-NHH-AES-S01-126A, 1305-NHH-AES-S01-130A, 1305-NHH-AES-S01-131A, 1305-NHH-AES-S01-132A, 1305-NHH-AES-S01-300A.*

*Block 2*

*S02-101A, S02-102A, S02-103A, S02-130A, S02-131A, S02-132A, S02-140A, S02-141, S02-300A.*

*Block 3*

*S03-101A, S03-102A, S03-103A, S03-104A, S03-130A, S03-131A, S03-132A, S03-140, S03-141A.*

*Block 4*

*NNH-AES-S04-100A, NNH-AES-S04-101A, NNH-AES-S04-102A, NNH-AES-S04-103A, NNH-AES-S04-104A, NNH-AES-S04-105A, NNH-AES-S04-106A, NNH-AES-S04-107A, NNH-AES-S04-108A, NNH-AES-S04-109A, NNH-AES-S04-110A, NNH-AES-S04-111A, NNH-AES-S04-112A, NNH-AES-S04-122A, NNH-AES-S04-130A, NNH-AES-S04-131A, NNH-AES-S04-132A,*

*NNH-AES-S04-133A, NNH-AES-S04-134A, NNH-AES-S04-135A, NNH-AES-S04-136A, NNH-AES-S04-137A, NNH-AES-S04-138A, NNH-AES-S04-139A, NNH-AES-S04-140A, NNH-AES-S04-141A, NNH-AES-S04-150A, NNH-AES-S04-151, NNH-AES-S04-152, NNH-AES-S04-300A, NNH-AES-S04-301A, NNH-AES-S04-302A.*

*Block 5*

*S05-101A, S05-102A, S05-103B, S05-104B, S05-105B, S05-106B, S05-107B, S05-108B, S05-109B, S05-110B, S05-111A, S05-112A, S05-113A, S05-120A, S05-130A, S05-131A, S05-133B, S05-134A, S05-135B, S05-136A, S05-137A, S05-138B, S05-140A, S05-142A, S05-143A, S05-144A, S05-145A, S05-146A, S05-147A, S05-300A, S05-301A, S05-302A.*

*Block 6*

*S06-101A, S06-102A, S06-103B, S06-104B, S06-105B, S06-106C, S06-107C, S06-108C, S06-109C, S06-110C, S06-111B, S06-112A, S06-130B, S06-131A, S06-132A, S06-133B, S06-134A, S06-135A, S06-136B, S06-137B, S06-138A, S06-140A, S06-141A, S06-142A, S06X-DR\_300\_U2A.*

*Sections*

*HTA-L-D01-X-XX-2202A, HTA-L-D01-X-XX-2203A, HTA-L-D01-X-XX-2204A, HTA-L-D01-X-XX-2205A, HTA-L-D01-X-XX-2206, HTA-L-D01-X-XX-2207A, HTA-L-D01-X-XX-2208, HTA-L-D01-X-XX-2902A, HTA-L-D01-X-XX-2903A, HTA-L-D01-X-XX-2904A, HTA-L-D01-X-XX-2905A, HTA-L-D01-X-XX-2906, HTA-L-D01-X-XX-2907A, HTA-L-D01-X-XX-2908, HTA-L-D01-X-XX-2909.*

*Highways*

*0304-ATR-003B, 0304-ATR-004A, 0304-GA-007D, 0304-RP-001C, 0304-RP-002C*

*Reason:*

*For the avoidance of doubt and in the interests of proper planning.*

## Amendment to the Condition 2 sought

### 3.3 Condition 2 to be amended to facilitate the following revised approved plans:

*The development hereby permitted shall not be carried out otherwise than in accordance with the following approved plans:*

*Site wide*

***HTA-L-D01-X-XX-2900-B, D01-004B, D01-100B, D01-101C, D01-102C, D1-106C, D01-130C, D01-131D, D01-132C, D01-133D, D01-134C, D01-135D, D01-136C, D01-137A, D01-138C, D01-139C.***

*Block 1*

***1305-07-100-D4, 1305-07-101-D2, 1305-07-102-D1, 1305-07-103-D1, 1305-07-104-D1, 1305-07-105-D2, 1305-07-106-D1, 1305-07-107-D1, 1305-07-108-D1, 1305-07-109-D1, 1305-07-110-D1, 1305-07-111-D1, 1305-07-300-D2, 1305-07-301-D1, 1305-07-302-D1, 1305-07-303-D1,***

**1305-07-304-D2, 1305-07-305-D2, 1305-07-306-D2, 1305-22-400-D2, 1305-22-401-D2, 1305-22-404-D3, 1305-06-464-D3.**

*Block 2*

**NHH-FDS\_HTA-A\_DR\_S02-101-B, NHH-FDS\_HTA-A\_DR\_S02-102-C, NHH-FDS\_HTA-A\_DR\_S02-103-C, NHH-FDS\_HTA-A\_DR\_S02-130-C, NHH-FDS\_HTA-A\_DR\_S02-131-C, NHH-FDS\_HTA-A\_DR\_S02-132-C, NHH-FDS\_HTA-A\_DR\_S02-300-B.**

*Block 3*

**S03-101A, S03-102A, S03-103A, S03-104A, S03-130A, S03-131A, S03-132A, S03-140, S03-141A.**

*Block 4*

**NNH-AES-S04-100A, NNH-AES-S04-101A, NNH-AES-S04-102A, NNH-AES-S04-103A, NNH-AES-S04-104A, NNH-AES-S04-105A, NNH-AES-S04-106A, NNH-AES-S04-107A, NNH-AES-S04-108A, NNH-AES-S04-109A, NNH-AES-S04-110A, NNH-AES-S04-111A, NNH-AES-S04-112A, NNH-AES-S04-122A, NNH-AES-S04-130A, NNH-AES-S04-131A, NNH-AES-S04-132A, NNH-AES-S04-133A, NNH-AES-S04-134A, NNH-AES-S04-135A, NNH-AES-S04-136A, NNH-AES-S04-137A, NNH-AES-S04-138A, NNH-AES-S04-139A, NNH-AES-S04-140A, NNH-AES-S04-141A, NNH-AES-S04-150A, NNH-AES-S04-151, NNH-AES-S04-152, NNH-AES-S04-300A, NNH-AES-S04-301A, NNH-AES-S04-302A.**

*Block 5*

**NHH-FDS\_HTA-A\_DR\_S05-101-B, NHH-FDS\_HTA-A\_DR\_S05-102-B, NHH-FDS\_HTA-A\_DR\_S05-103-C, NHH-FDS\_HTA-A\_DR\_S05-104-C, NHH-FDS\_HTA-A\_DR\_S05-105-C, NHH-FDS\_HTA-A\_DR\_S05-106-C, NHH-FDS\_HTA-A\_DR\_S05-107-C, NHH-FDS\_HTA-A\_DR\_S05-108-C, NHH-FDS\_HTA-A\_DR\_S05-109-C, NHH-FDS\_HTA-A\_DR\_S05-110-C, NHH-FDS\_HTA-A\_DR\_S05-111-B, NHH-FDS\_HTA-A\_DR\_S05-112-B, NHH-FDS\_HTA-A\_DR\_S05-113-B, NHH-FDS\_HTA-A\_DR\_S05-120-B, HTA-A-S05-130-B, HTA-A-S05-131-B, NHH-FDS\_HTA-A\_DR\_S05-133-C, NHH-FDS\_HTA-A\_DR\_S05-134-B, NHH-FDS\_HTA-A\_DR\_S05-135-C, NHH-FDS\_HTA-A\_DR\_S05-136-B, HTA-A-S05-137-B, HTA-A-S05-138-D.**

*Block 6*

**NHH-FDS\_HTA-A\_DR\_S06-101-B, NHH-FDS\_HTA-A\_DR\_S06-102-B, NHH-FDS\_HTA-A\_DR\_S06-103-C, NHH-FDS\_HTA-A\_DR\_S06-104-C, NHH-FDS\_HTA-A\_DR\_S06-105-C, NHH-FDS\_HTA-A\_DR\_S06-106-D, NHH-FDS\_HTA-A\_DR\_S06-107-D, NHH-FDS\_HTA-A\_DR\_S06-108-D, NHH-FDS\_HTA-A\_DR\_S06-109-D, NHH-FDS\_HTA-A\_DR\_S06-110-D, NHH-FDS\_HTA-A\_DR\_S06-111-C, NHH-FDS\_HTA-A\_DR\_S06-112-B, NHH-FDS\_HTA-A\_DR\_S06-130-D, NHH-FDS\_HTA-A\_DR\_S06-131-C, NHH-FDS\_HTA-A\_DR\_S06-132-B, NHH-FDS\_HTA-A\_DR\_S06-133-C, NHH-FDS\_HTA-A\_DR\_S06-134-B, NHH-FDS\_HTA-A\_DR\_S06-135-B, NHH-FDS\_HTA-A\_DR\_S06-136-D, NHH-FDS\_HTA-A\_DR\_S06-137-D.**

*Sections*

**HTA-L-D01-X-XX-2202-B, HTA-L-D01-X-XX-2203A, HTA-L-D01-X-XX-2204-B, HTA-L-D01-X-XX-2205A, HTA-L-D01-X-XX-2206, HTA-L-D01-X-XX-2207A, HTA-L-D01-X-XX-2208-A, HTA-L-D01-X-XX-2902-B, HTA-L-D01-X-XX-2903A, HTA-L-D01-X-XX-2904-B, HTA-L-D01-X-XX-2905-B, HTA-L-D01-X-XX-2906, HTA-L-D01-X-XX-2907A, HTA-L-D01-X-XX-2908-A, HTA-L-D01-X-XX-2909.**

*Highways*

*0304-ATR-003B, 0304-ATR-004A, 0304-GA-007D, 0304-RP-001C, 0304-RP-002C*

*Reason:*

*For the avoidance of doubt and in the interests of proper planning.*

3.4 Appendix A of this statement sets out the summary of approved and proposed drawings.

#### **4 MATERIAL PLANNING CIRCUMSTANCES**

- 4.1 Since the grant of the existing planning permission, there have been no material changes to national planning policy as set out in the National Planning Policy Framework (NPPF) and National Planning Practice Guidance (NPPG).
- 4.2 At regional level, the Greater London Authority (GLA) published the *Housing Standards Minor Alterations to the London Plan* and the *Parking Standards Minor Alterations to the London Plan* in March 2016. These were minor alterations to the London Plan and no other material changes have been made to the London Plan since the grant of existing consent. The London Plan was updated in March 2016 to consolidate the minor alterations.
- 4.3 At local level, the LPA adopted its Core Strategy in 2011, the Southwark Plan in 2007 and the Aylesbury Area Action Plan in 2010. The LPA is currently preparing the New Southwark Plan which, once finalised and adopted, will replace the Core Strategy and the Southwark Plan. At present, there are no new adopted policies contained within the local level Development Plan that materially change the policy circumstances associated with this proposal.

## 5 PLANNING ASSESSMENT

5.1 This S.73 application to amend Condition 2 of 14/AP/3843 is considered entirely appropriate in planning terms. The amendments should be considered alongside the amendments proposed at P18 of the wider Aylesbury regeneration site.

### Summary of amendments

5.2 The amendments proposed to the FDS can be summarised as follows:

- A revised mix of residential units and tenures within subplot 01, 02, 05 and 06;
- Alterations to external elevations of subplot 01, 02, 05 and 06;
- Removal of the approved Gas Pressure Reduction System;
- Provision of 12x additional dwellings through 3x townhouses and 9x apartments; and
- Minor alterations to landscape layouts.

5.3 The amendments proposed to the P18 by way of separate S.73 application for parallel consideration can be summarised as follows:

- A revised mix of residential units and tenures within Blocks 1 and 3 (of the North Block); and
- Alterations to external façade of Block 3 (of the North Block).

5.4 Where relevant the following sections set out information in relation to (i) FDS, (ii) Plot 18 and (iii) combined FDS & Plot 18. This statement is primarily concerned with FDS but the delivery of affordable housing must be understood as phase specific and also in the context of the wider delivery of the Aylesbury Estate Regeneration.

### Additional residential units

5.5 Table A5.1 of the Aylesbury Area Action Plan (2010) indicates that approximately 880 residential units and 250sqm retail uses (A Use Classes) are designated for the FDS.

5.6 However, the LPA previously considered in 14/AP/3843 that the delivery of 880 residential units and 250sqm retail uses would actually compromise the quality of the accommodation and the retail uses would not be viable. As such, the LPA approved planning permission for 830 residential units and a 263sqm community space for multi-use purposes.

5.7 The design of the scheme has been reviewed since the grant of the existing permission and it has been concluded that the scheme can now deliver 12x additional residential units without compromising the quality of accommodation. The Gas Pressure Reduction Station in Block 6 is no

longer required following confirmation that gas demand to the FDS can be derived from existing low pressure infrastructure. There will be 3x new townhouses on the Gas Press Reduction Station land instead. An additional 9x apartments can fit into the approved building footprints in the FDS through more efficient use of the floorspace. This S.73 proposal to increase the number of residential units from 830 to 842 in the FDS will positively contribute to maximising the housing supply and will bring the proposed development more in line with the original vision of 880 residential units anticipated within the FDS. The approved 263sqm multi-use community space will remain as approved.

- 5.8 The more effective land use through the delivery of additional units will be wholly consistent with the aims and provisions of Policy 3.3 of the London Plan (2016); Strategic Policy 5 of the Core Strategy (2011); and the wider vision of the Aylesbury Area Action Plan (2010) to significantly increase the supply of new homes. Furthermore, the proposed amendments are consistent with the existing planning permission 14/AP/3843 in delivering a significant amount of new housing.

### Affordable housing – Amount

- 5.9 Policy BH3 of the Aylesbury Area Action Plan (2010) states that 50% of new homes in the action area core will be affordable and 50% will be private. The policy introduces differential splits in Phases 1 and 4 in order to assist in the rehousing programme and deliverability. The policy indicates that Phase 1 should deliver 59% affordable and 41% private, and Phase 4 should deliver 42% affordable and 58% private. In other words, the policy requires the regeneration programme to deliver more affordable housing early in the programme.
- 5.10 The current S.73 application proposes to deliver more affordable units in the FDS (more than approved in the existing consent 14/AP/3843) to expedite the wider delivery of the Aylesbury Estate Regeneration including the rehousing programme. Some of the private units in the originally approved scheme for the FDS will be replaced with affordable units and the private units will be rebalanced in subsequent delivery phases.
- 5.11 The existing permission 14/AP/3843 would deliver 51% affordable and 49% private in habitable rooms, and this S.73 proposal will deliver 64% affordable and 36% private instead in the FDS. This is a net gain of 386 additional affordable habitable rooms (153 additional affordable units) in FDS.
- 5.12 The tenure swap between the FDS and P18 would allow the affordable units to be delivered early on in the programme, and would not result in a reduction of affordable housing as a whole. In fact, the FDS will deliver over and above the tenure swaps between the FDS and P18, and the combined affordable housing provision at FDS/P18 would increase from 51% to 60% (habitable rooms) as a result of the proposed amendments at the two sites.

5.13 The proposed amendments therefore not only lead to early delivery of more affordable housing in line with the vision of Policy BH3 of the Aylesbury Area Action Plan (2010) but also deliver more affordable housing than the previously approved schemes. This is consistent with the aims and provisions of Policies 3.8, 3.9 and 3.11 of the London Plan (2016); Strategic Policy 6 of the Core Strategy (2011); and Policy 4.4 of the Southwark Plan (2007) to maximise affordable housing provision. Furthermore, the proposed amendments are consistent with the existing planning permission 14/AP/3843 in maximising the affordable housing delivery.

	Affordable			Private	
	Habitable Rooms	Habitable Rooms	%	Habitable Rooms	%
FDS (Approved)	2721	1394	51%	1327	49%
FDS (Proposed)	2764	1780	64%	984	36%
Difference +/-	43	386		-343	

	Affordable			Private	
	Habitable Rooms	Habitable Rooms	%	Habitable Rooms	%
P18 (Approved)	351	180	51%	171	49%
P18 (Proposed)	351	82	23%	269	77%
Difference +/-	0	-98		98	

	Affordable			Private	
	Habitable Rooms	Habitable Rooms	%	Habitable Rooms	%
FDS & P18 (Approved)	3072	1574	51%	1498	49%
FDS & P18 (Proposed)	3115	1862	60%	1253	40%
Difference +/-	43	288		-245	

Table 1: Affordable housing and private housing at FDS and P18

## Tenure

5.14 Policy BH3 of the Aylesbury Area Action Plan (2010) notes that, of the affordable housing provided, 75% should be social rented and 25% should be intermediate.

5.15 The existing consent 14/AP/3843 at FDS has a tenure split of 77% social rent and 23% shared ownership in habitable rooms. The proposal would change this tenure split to 67% social rent and 33% shared ownership in habitable rooms for FDS, as the early/additional delivery of affordable housing in the FDS will largely be in the form of shared ownership housing.



- 5.16 The overall provision of affordable housing at FDS/P18 would achieve a combined tenure split of 68% social rent and 32% shared ownership in habitable rooms.
- 5.17 It is acknowledged that this is a departure from the originally envisaged tenure mix of the Aylesbury Area Action Plan. However, we justify this change on the basis that we would be exceeding the AAAP's other target of a minimum 50% affordable units. The proposed amendments at FDS/P18 will actually deliver 36 additional habitable rooms in social rent and 252 additional habitable rooms in shared ownership, when compared to the previously approved schemes.
- 5.18 Given the increased amount of overall affordable housing proposed, it is noteworthy that the proposed amendments at FDS will deliver more affordable housing both in social rent and shared ownership tenures than a fully policy compliant (50% affordable, of which 75% is social rent and 25% is intermediate) proposal. It is also noted that Paragraph 1.2.10 of Schedule 3 of the signed S106 agreement for 14/AP/3843 allows the Applicant to adjust affordable housing provision in a subsequent stage of Aylesbury Regeneration to reflect any over-provision in an earlier stage.
- 5.19 The significant public benefit of increased affordable housing provision in early phases outweighs the departure from the 75-25 tenure split. The proposed amendments will in fact deliver a greater number of both Social Rent habitable rooms and shared ownership habitable rooms.

	Social Rent		Shared Ownership	
	Habitable Rooms	%	Habitable Rooms	%
FDS (Approved)	1068	77%	326	23%
FDS (Proposed)	1191	67%	589	33%
Difference +/-	123		263	

	Social Rent		Shared Ownership	
	Habitable Rooms	%	Habitable Rooms	%
P18 (Approved)	155	86%	25	14%
P18 (Proposed)	68	83%	14	17%
Difference +/-	-87		-11	

	Social Rent		Shared Ownership	
	Habitable Rooms	%	Habitable Rooms	%
FDS & P18 (Approved)	1223	78%	351	22%
FDS & P18 (Proposed)	1259	68%	603	32%
Difference +/-	36		252	

Table 2: Affordable housing tenure mix at FDS and P18

- 5.20 A strict application of the AAAP targets of 50% affordable housing with 75-25 tenure split would deliver 1,037 social rent habitable rooms and 346 shared ownership habitable rooms in FDS.
- 5.21 This S.73 application proposal with 64% affordable housing and a 67-33 split will deliver 1,191 social rent habitable rooms and 589 shared ownership habitable rooms in FDS. A clear increase in supply of all affordable tenures.
- 5.22 Similarly, the combined FDS/P18 set in the context of a strict application of the AAAP targets with 50% affordable housing with 75-25 tenure split would deliver 1,168 social rent habitable rooms and 389 shared ownership habitable rooms in FDS/P18, whereas the current S.73 application proposals with 60% affordable housing and a 68-32 split will deliver 1,259 social rent habitable rooms and 603 shared ownership habitable rooms in FDS/P18.
- 5.23 Therefore, the combined amendments to FDS/P18 will deliver more affordable housing than applying the AAAP targets.
- 5.24 In this context, the proposed tenure split for the affordable housing element is considered acceptable in ensuring that local residents benefit from sufficient provision of genuinely affordable homes which is consistent with the vision of the existing planning permission 14/AP/3843.

### Unit mix

- 5.25 Policy BH4 of the Aylesbury Area Action Plan (2010) seeks to achieve a range of housing unit mix to contribute to a genuine choice in size of homes.
- 5.26 The existing consent 14/AP/3843 would deliver 45% of its housing in 1-bed units, 36% in 2-bed units, 13% in 3-bed units, 4% in 4-bed units and 2% in 5-bed units in FDS. The LPA previously considered this unit mix to be acceptable and concluded that this unit mix would lead to a meaningful housing choice. The proposed S.73 changes will deliver 5x additional 1-bed units, 1x additional 2-bed unit, 2x additional 3-bed units and 4x additional 4-bed units. This means that the proposal will deliver 45% of its housing in 1-bed units, 36% in 2-bed units, 13% in 3-bed units, 4% in 4-bed units and 2% in 5-bed units in FDS. It is evident that the amendments will maintain the broad distribution of housing mix throughout FDS which the LPA previously found acceptable in 14/AP/3843. Therefore, the proposed amendments in unit mix are consistent with the existing planning permission 14/AP/3843.

	Unit Sizes										
	1-Bed		2-Bed		3-Bed		4-Bed		5-Bed		Total
	Units	%	Units	%	Units	%	Units	%	Units	%	Units
<b>FDS (Approved)</b>	371	45%	299	36%	108	13%	32	4%	20	2%	<b>830</b>
<b>FDS (Proposed)</b>	376	45%	300	36%	110	13%	36	4%	20	2%	<b>842</b>
<b>Difference +/-</b>	5		1		2		4		0		<b>12</b>

Table 3: Unit mix at FDS

5.27 Paragraph 3.4.6 of the Aylesbury Area Action Plan (2010) indicates that at least half of 2-bed units should be designed to accommodate 4 people, rather than 3. The existing consent 14/AP/3843 would deliver 65% of the 2-bed units as 2b4p units in FDS. The amendments will lower this proportion but will still ensure that 50% of the 2-bed units are 2b4p units in FDS.

### Affordable housing – Tenure/Unit mix

5.28 As mentioned previously, the tenure swap between FDS and P18 means that more affordable housing will be delivered upfront in FDS, and moreover there will be additional affordable homes than originally approved for FDS/P18 as a whole.

5.29 The proposed amendments will deliver 101x additional 1-bed affordable units, 62x additional 2-bed affordable units, 8x fewer 3-bed affordable units and 2x fewer 4-bed affordable units than the existing consent 14/AP/3843 in FDS.

5.30 P18 will deliver 18x fewer 1-bed affordable units, 13x fewer 2-bed affordable units and 2x fewer 3-bed affordable units than the existing consent 16/AP/2800.

5.31 Taken together, the amendments on FDS/P18 will deliver 83x additional 1-bed affordable units, 49x additional 2-bed affordable units, 10x fewer 3-bed affordable units and 2x fewer 4-bed affordable units. In other words, the amendments will significantly increase 1-bed and 2-bed affordable units at FDS/P18 but will slightly decrease 3-bed and 4-bed affordable units.

5.32 Although the proposed amendments will slightly reduce the provision of 3-bed and 4-bed affordable units at FDS/P18, it should be noted that these losses will be in the form of Shared Ownership units and not social rent units.

5.33 Whilst the proposed amendments will lose 15x 3-bed Shared Ownership units and 2x 4-bed Shared Ownership units, there will actually be a gain of 5x 3-bed social rent units to provide more family-sized affordable units at genuinely affordable prices.

5.34 Furthermore, the approved 15x 3-bed Shared Ownership units and 2x 4-bed Shared Ownership units would not be genuinely affordable units in any event as their values would most likely exceed £600,000 in this location. Indeed, the Mayor's Affordable Housing and Viability SPD (2017) advises that generally Shared Ownership is not appropriate where unrestricted market values of a home exceed £600,000 and should not be considered genuinely affordable.

5.35 In this context, the loss of 15x 3-bed Shared Ownership units and 2x 4-bed Shared Ownership units will not result in a material loss of affordable housing provision in real terms, and will be comfortably compensated by the significant increase in the genuinely affordable 1-bed and 2-bed affordable units.

	Tenure (Units)																		
	1-Bed			2-Bed			3-Bed			4-Bed			5-Bed			Total			
	SR	S/O	Private	SR	S/O	Private	SR	S/O	Private	SR	S/O	Private	SR	S/O	Private	SR	S/O	Private	TOTAL
FDS (Approved)	135	37	199	68	48	183	63	15	30	20	2	10	18	0	2	304	102	424	830
FDS (Proposed)	161	112	103	79	99	122	70	0	40	20	0	16	18	0	2	348	211	283	842
Difference +/-	26	75	-96	11	51	-61	7	-15	10	0	-2	6	0	0	0	44	109	-141	12

	Tenure (Units)																		
	1-Bed			2-Bed			3-Bed			4-Bed			5-Bed			Total			
	SR	S/O	Private	SR	S/O	Private	SR	S/O	Private	SR	S/O	Private	SR	S/O	Private	SR	S/O	Private	TOTAL
P18 (Approved)	15	8	45	29	2	21	2	0	0	0	0	0	0	0	0	46	10	66	122
P18 (Proposed)	0	5	63	17	1	34	0	0	2	0	0	0	0	0	0	17	6	99	122
Difference +/-	-15	-3	18	-12	-1	13	-2	0	2	0	0	0	0	0	0	-29	-4	33	0

	Tenure (Units)																		
	1-Bed			2-Bed			3-Bed			4-Bed			5-Bed			Total			
	SR	S/O	Private	SR	S/O	Private	SR	S/O	Private	SR	S/O	Private	SR	S/O	Private	SR	S/O	Private	TOTAL
FDS & P18 (Approved)	150	45	244	97	50	204	65	15	30	20	2	10	18	0	2	350	112	490	952
FDS & P18 (Proposed)	161	117	166	96	100	156	70	0	42	20	0	16	18	0	2	365	217	382	964
Difference +/-	11	72	-78	-1	50	-48	5	-15	12	0	-2	6	0	0	0	15	105	-108	12

Table 4: Housing tenure and unit mix at FDS and P18

## Housing type

5.36 Policy BH5 of the Aylesbury Area Action Plan (2010) seeks to achieve a range of dwelling types across flats, maisonettes/duplexes and houses.

5.37 The existing consent 14/AP/3843 would deliver 82% of the overall housing as flats, 12% as maisonettes/duplexes and 6% as houses in FDS. The LPA previously considered this housing type mix to be acceptable on the whole and concluded that it would make effective use of the site.

5.38 The proposed amendments will maintain the approved housing type mix, and will deliver 82% of the overall housing as flats, 12% as maisonettes/duplexes and 6% as houses in FDS. Therefore, the

proposed house type mix in FDS is acceptable as the LPA considered previously and it is consistent with the existing planning permission 14/AP/3843.

### Unit size

- 5.39 Table A6.1 of the Aylesbury Area Action Plan (2010) and Table 1 of the Residential Design Standards SPD set out the internal space standards. The expectation is that the higher unit size will always be the minimum requirement regardless of which policy document it comes from.
- 5.40 Approximately 98.9% (821 of 830) of all residential units met the relevant minimum requirements in the existing planning permission 14/AP/3843 for FDS and the LPA found this to be acceptable. The proposed amendments will ensure that 100% (842 of 842) of all residential units meet the relevant minimum floorspace requirements. As such, the proposed accommodation will be acceptable and provide generous flat sizes, and will result in an improvement from the arrangement approved in the existing planning permission 14/AP/3843.

### Dual aspect

- 5.41 Paragraph A6.7.8 of the Aylesbury Area Action Plan (2010) notes that at least 75% of apartments should have dual aspect.
- 5.42 This S.73 application proposal will provide approximately 71% of apartments and maisonettes/duplex units as dual aspect whilst 100% of the houses would be dual aspect. Whilst this falls marginally below the 75% target, the LPA previously considered 70% to be acceptable in the existing consent 14/AP/3843. The current S.73 application proposal will slightly improve the proportion of dual aspect units when compared to the existing planning permission 14/AP/3843. The proposed amendments are also consistent with the vision of Paragraph A6.7.8 of the Aylesbury Area Action Plan (2010) to secure as many dual aspect units as practicably feasible.

### Wheelchair access

- 5.43 Policy 3.8 of the London Plan (2016) and Policy 4.3 of the Southwark Plan (2007) seek to ensure that 10% of new housing is wheelchair accessible units.
- 5.44 A total of 99 units suitable for wheelchair users will be provided in the FDS which equates to approximately 12% of all units. The proposed amendments maintain the 12% proportion approved in the existing planning permission 14/AP/3843 and exceed the aims of Policy 3.8 of the London

Plan (2016) and Policy 4.3 of the Southwark Plan (2007) to deliver at least 10% wheelchair accessible units.

### Daylight, Sunlight and Overshadowing

- 5.45 This application is accompanied by an independent Internal Daylight and Sunlight Assessment. The assessment notes that, together with the newly proposed 12x residential units, approximately 80% of all relevant rooms in the scheme will receive sufficient daylight and sunlight. This is consistent with the existing planning permission 14/AP/3843 which also ensured that approximately 80% of all relevant rooms in the scheme would receive sufficient daylight and sunlight. The proposed amendments do not change the height of the blocks. There is therefore no need to retest the impact on the surrounding buildings as this would remain the same.

### Privacy and overlooking

- 5.46 Paragraph A6.6.13 of the Aylesbury Area Action Plan (2010) states that proposals should ensure that the privacy of occupants is protected without compromising the ability to create a compact urban neighbourhood with streets that provide a good sense of enclosure. The Aylesbury Area Action Plan (2010) does not set out specific requirements for separation distances but says that most residential development will need to follow the guidelines on privacy and security in the adopted Residential Design Standards SPD. The SPD advises that development should achieve a minimum distance of 12m at the front of the building and any elevation that fronts onto a highway, and a minimum distance of 21m at the rear of the building.
- 5.47 The 3x new townhouses proposed in Block 6 will meet the SPD separation distance requirements and no other new buildings are proposed. All other separation distances will remain as approved in 14/AP/3843 which the LPA considered to be acceptable. As such, the proposal will not result in any unreasonable loss of privacy for neighbouring occupiers and will be consistent with the aim of the Aylesbury Area Action Plan (2010) to safeguard privacy. This is consistent with the existing planning permission 14/AP/3843.

### Private amenity space

- 5.48 Paragraph 3.1 of the Residential Design Standards SPD advises that new houses should provide a minimum of 50sqm private garden space.

5.49 The proposed amendments will reduce the private amenity spaces for the 4x 5b7p social rent terraced houses located in the western end of subplot 02 facing the Westmoreland Park. The proposal is to remove the first floor roof terraces on these 4x units but retain the rear gardens as approved. The private amenity spaces for the 4x units will change as follows (North to South):

- Unit 1: from 82.5sqm to 77.4sqm
- Unit 2: from 47.0sqm to 36.4sqm
- Unit 3: from 46.6sqm to 35.6sqm
- Unit 4: from 46.9sqm to 33.4sqm

5.50 The existing permission 14/AP/3843 shows that the access to the first floor roof terrace will be via the first floor bedroom in each of the 4x houses. This arrangement is not practical as the future residents of these 5 bed properties would need to go through a private bedroom first to access their outdoor amenity space.

5.51 The loss of first floor roof terraces for 4x units is not considered to be significant in scale and the vast majority of the approved private amenity spaces approved for the 4x houses will remain untouched. The future occupiers of the 4x units will continue to benefit from sufficient private amenity space and will also have direct access to the Westmoreland Park. Indeed, the LPA previously found the overall shortfall in private amenity space for subplot 2 to be negligible and concluded that the development would deliver an acceptable level of outdoor amenity space even though the 50sqm SPD private garden space guidance was not strictly adhered to by all units.

5.52 The proposed marginal loss of impractical outdoor amenity spaces for the 4x houses will not result in a material reduction of private amenity space for the 4x houses and subplot 2 as a whole which will continue to benefit from good levels of outdoor amenity space. As such, the proposed amendments to remove the first floor roof terrace for the 4x houses are acceptable and the level of private amenity space provision is broadly consistent with the existing permission 14/AP/3843.

### Child play space

5.53 Policy 3.6 of the London Plan (2016) notes that new development proposals should make provision for play and informal recreation based on the expected child population generated by the scheme. The Mayor's Play and Informal Recreation SPG (2012) provides further information on how much new child play space should be expected.

- 5.54 The proposed amendments for FDS create an additional child population of 27. The play space requirement for “Under 5s” will increase from 1,600sqm to 1,650sqm, and the amended scheme will comfortably exceed this requirement. The play space requirement for “12+” will increase from 1,130sqm to 1,180sqm, and the amended scheme will provide this off-site in accordance with the existing planning permission 14/AP/3843.
- 5.55 The play space requirement for “5-11” will increase from 1,500sqm to 1,580sqm. The existing planning permission 14/AP/3843 would deliver 1,631sqm play space for “5-11” which would be an overprovision of 131sqm based on requirement. This 1,631sqm play space would comfortably provide for the amended requirement of 1,580sqm and still result in an overprovision of 51sqm. However, the scheme is now required to remove the Portland Park (150sqm) to accommodate the “Quietways” initiative by Transport for London (see “Car parking” section of this statement). As such, there will be a shortage of 99sqm for the “5-11” group. This shortage only arises due to the “Quietways” initiative and in any event the shortage of 99sqm is considered relatively marginal in scale. It is noteworthy that future residents will have convenient and readily available access to Westmoreland Park (956sqm of dedicated local play area) and Burgess Park. In this context, the “5-11” group will still benefit from sufficient play space availability.
- 5.56 The proposed amendments will deliver adequate child play space for all age groups and this is consistent with the aim of Policy 3.6 of the London Plan (2016) and the existing planning permission 14/AP/3843 to provide sufficient child play space.

### Car parking

- 5.57 Policy TP3 of the Aylesbury Area Action Plan (2010) states that the amount of car parking in development proposals should not exceed a maximum of 0.4 spaces per home averaged over the whole masterplan (which includes the FDS).
- 5.58 The existing planning permission 14/AP/3843 would deliver 0.35 spaces per unit in FDS and the proposed amendments will amend this to 0.29 spaces per unit in FDS. The reduction in car parking is primarily due to the “Quietways” initiative by Transport for London (TfL).
- 5.59 According to TfL, “Quietways” will be a network of radial and orbital cycle routes throughout London and will follow backstreet routes, through parks, along waterways and tree-lined streets. The routes will overcome barriers to cycling, targeting cyclists who want to use quieter, low-traffic routes, providing an environment for those cyclists who want to travel at a gentler pace.



- 5.60 The “Quietway 7” route will cut through Portland Street and Burgess Park, linking Elephant & Castle and Crystal Palace. As such, the FDS will need to remove some of the approved on street parking spaces to accommodate the “Quietway” route.
- 5.61 The proposed 0.29 spaces per unit in FDS is consistent with the vision of the LPA (including emerging New Southwark Plan targeting 0.4 spaces per unit in Aylesbury Action Area) and the Mayor of London’s objective to encourage sustainable forms of transport over private cars. The FDS benefits from a very good level of public transport accessibility (PTAL 4-5). As such, the proposed reduction in car parking is considered to be wholly acceptable and is consistent with the existing planning permission 14/AP/3843 in that it meets the aim of Policy TP3 of the Aylesbury Area Action Plan (2010) to ensure that development proposals do not exceed a maximum of 0.4 car parking spaces per home.
- 5.62 It is noteworthy that there will be 1x additional wheelchair access car parking space in subplot 01.

### Cycle parking

- 5.63 Table 6.3 of the London Plan (2016) advises that new development should provide 1 cycle parking space per 1-bed unit and 2 cycle parking spaces per 2-bed+ unit. The proposed amendments mean that the relevant target for FDS is 1,308 cycle parking spaces.
- 5.64 The proposed amendments will deliver 1,308 cycle parking spaces and meet the policy target. This is an improvement to the scheme as the existing planning permission 14/AP/3843 has a shortfall of 58 cycle parking spaces. The proposed amendments will be an improvement to the cycle parking provision and will be consistent with the existing planning permission 14/AP/3843 in that adequate cycle parking provision will be made.

### Design and landscape

- 5.65 Chapter 7 of the London Plan (2016); Strategic Policy 12 of the Core Strategy (2011); Policies 3.12 and 3.13 of the Southwark Plan (2007); and the Aylesbury Area Action Plan (2010) seek to ensure that new development is well designed to create an attractive neighbourhood and high quality built environment. The proposed amendments include various design and cosmetic changes to the elevational treatments of subplot 01, 02, 05 and 06, and alterations to landscaping layout.

- 5.66 As detailed in the Design and Access Statement, the proposed changes are well thought-through and relatively minor in scale and nature, and are of only minor material impact upon the overall scheme design. As such, the changes do not raise any planning or design issues.
- 5.67 The additional 3x townhouses in subplot 6 will adopt a consistent design approach to that adopted for the other townhouses in the scheme and will respect the architectural style of the surrounding buildings. In this context, the townhouses will blend aesthetically with the surroundings and will contribute to delivering a high quality built environment through high quality design.
- 5.68 The various design and landscape alterations are consistent with the aims and provisions of Chapter 7 of the London Plan (2016); Strategic Policy 12 of the Core Strategy (2011); Policies 3.12 and 3.13 of the Southwark Plan (2007); and the Aylesbury Area Action Plan (2010) to seek well designed new development, and also consistent with the overall scheme design approved in the existing planning permission 14/AP/3843.

### Other considerations

- 5.69 All other elements of the scheme remain the same as approved and are therefore consistent with the existing planning permission 14/AP/3843.

## 6 CONCLUSION

- 6.1 This application is made under S.73 of the Town & Country Planning Act 1990 to vary Condition 2 (approved plans) of the FDS's original permission 14/AP/3843 granted on 5<sup>th</sup> August 2015.
- 6.2 A separate S.73 application is submitted to vary Condition 1 (approved plans) of the P18's original permission 16/AP/2800 granted on 21<sup>st</sup> December 2016.
- 6.3 Whilst technically these are separate submissions, the relationship between these two initial phases of the Aylesbury Regeneration means that they are effectively linked particularly in regard to affordable housing context and the Applicant considers that the two applications should be considered in tandem by the LPA.
- 6.4 The amendments proposed to the FDS can be summarised as follows:
- A revised mix of residential units and tenures within subplot 01, 02, 05 and 06;
  - Alterations to external elevations of subplot 01, 02, 05 and 06;
  - Removal of the approved Gas Pressure Reduction System;
  - Provision of 12x additional dwellings through 3x townhouses and 9x apartments; and
  - Minor alterations to landscape layouts.
- 6.5 The amendments proposed to the P18 by way of the separate S.73 application for parallel consideration can be summarised as follows:
- A revised mix of residential units and tenures within Blocks 1 and 3 (of the North Block); and
  - Alterations to external façade of Block 3 (of the North Block).
- 6.6 The relevant Development Plan framework has not materially changed since the grant of the FDS's original planning permission in August 2015. For the reasons discussed in Section 5 of this statement, it has been demonstrated that, within the context of the existing consent and the wider Aylesbury Estate regeneration area as a whole, the proposed amendments are considered "minor material amendments" in nature and the proposals will remain consistent with both national and local planning policies since the original grant of the existing consent.
- 6.7 For all practical purposes the full planning permission 14/AP/3843 remains essentially intact and in any event it has been demonstrated that the extent of the proposed amendments are entirely consistent with the national framework and the LPA's Development Plan.
- 6.8 The application is commended for approval on this basis.

**APPENDIX A:** Summary of approved and proposed drawings.

	Approved	Proposed
<b>Site wide</b>	HTA-L-D01-X-XX-2900A; D01-004A; D01-100A; D01-101A; D01-102A; D1-106A; D01-130A; D01-131B; D01-132A; D01-133B; D01-134A; D01-135B; D01-136A; D01-137A; D01-138A; D01-139A.	HTA-L-D01-X-XX-2900-B; D01-004B; D01-100B; D01-101C; D01-102C; D1-106C; D01-130C; D01-131D; D01-132C; D01-133D; D01-134C; D01-135D; D01-136C; As approved; D01-138C; D01-139C.
<b>Block 1</b>	1305-NHH-AES-S01-100A; 1305-NHH-AES-S01-102A; 1305-NHH-AES-S01-104A; 1305-NHH-AES-S01-106A;  1305-NHH-AES-S01-110A; 1305-NHH-AES-S01-120A; 1305-NHH-AES-S01-121A; 1305-NHH-AES-S01-122A; 1305-NHH-AES-S01-123A; 1305-NHH-AES-S01-124A; 1305-NHH-AES-S01-125A; 1305-NHH-AES-S01-126A; 1305-NHH-AES-S01-130A; 1305-NHH-AES-S01-131A; 1305-NHH-AES-S01-132A; 1305-NHH-AES-S01-300A.	1305-07-100-D4 and 1305-07-101-D2; 1305-07-102-D1 and 1305-07-103-D1; 1305-07-104-D1 and 1305-07-105-D2; 1305-07-106-D1 and 1305-07-107-D1 and 1305-07-108-D1 and 1305-07-109-D1; 1305-07-110-D1 and 1305-07-111-D1; 1305-07-300-D2; 1305-07-301-D1; 1305-07-302-D1; 1305-07-303-D1; 1305-07-304-D2; 1305-07-305-D2; 1305-07-306-D2; 1305-22-400-D2; 1305-22-401-D2; 1305-22-404-D3; 1305-06-464-D3.
<b>Block 2</b>	S02-101A; S02-102A; S02-103A; S02-130A; S02-131A; S02-132A; S02-140A; S02-141; S02-300A.	NHH-FDS_HTA-A_DR_S02-101-B; NHH-FDS_HTA-A_DR_S02-102-C; NHH-FDS_HTA-A_DR_S02-103-C; NHH-FDS_HTA-A_DR_S02-130-C; NHH-FDS_HTA-A_DR_S02-131-C; NHH-FDS_HTA-A_DR_S02-132-C; Approved S02-140A to be discontinued; Approved S02-141 to be discontinued; NHH-FDS_HTA-A_DR_S02-300-B.
<b>Block 3</b>	S03-101A; S03-102A; S03-103A; S03-104A;	As approved; As approved; As approved; As approved;



	<p>S05-134A;                  S05-135B;                  S05-136A;                  S05-137A;                  S05-138B;                  S05-140A;                  S05-142A;                  S05-143A;                  S05-144A;                  S05-145A;                  S05-146A;                  S05-147A;                  S05-300A;                  S05-301A;                  S05-302A.</p>	<p>NHH-FDS_HTA-A_DR_S05-134-B;                  NHH-FDS_HTA-A_DR_S05-135-C;                  NHH-FDS_HTA-A_DR_S05-136-B;                  HTA-A-S05-137-B;                  HTA-A-S05-138-D;                  Approved S05-140A to be discontinued;                  Approved S05-142A to be discontinued;                  Approved S05-143A to be discontinued;                  Approved S05-144A to be discontinued;                  Approved S05-145A to be discontinued;                  Approved S05-146A to be discontinued;                  Approved S05-147A to be discontinued;                  Approved S05-300A to be discontinued;                  Approved S05-301A to be discontinued;                  Approved S05-302A to be discontinued.</p>
<b>Block 6</b>	<p>S06-101A;                  S06-102A;                  S06-103B;                  S06-104B;                  S06-105B;                  S06-106C;                  S06-107C;                  S06-108C;                  S06-109C;                  S06-110C;                  S06-111B;                  S06-112A;                  S06-130B;                  S06-131A;                  S06-132A;                  S06-133B;                  S06-134A;                  S06-135A;                  S06-136B;                  S06-137B;                  S06-138A;                  S06-140A;                  S06-141A;                  S06-142A;                  S06X-DR_300_U2A.</p>	<p>NHH-FDS_HTA-A_DR_S06-101-B;                  NHH-FDS_HTA-A_DR_S06-102-B;                  NHH-FDS_HTA-A_DR_S06-103-C;                  NHH-FDS_HTA-A_DR_S06-104-C;                  NHH-FDS_HTA-A_DR_S06-105-C;                  NHH-FDS_HTA-A_DR_S06-106-D;                  NHH-FDS_HTA-A_DR_S06-107-D;                  NHH-FDS_HTA-A_DR_S06-108-D;                  NHH-FDS_HTA-A_DR_S06-109-D;                  NHH-FDS_HTA-A_DR_S06-110-D;                  NHH-FDS_HTA-A_DR_S06-111-C;                  NHH-FDS_HTA-A_DR_S06-112-B;                  NHH-FDS_HTA-A_DR_S06-130-D;                  NHH-FDS_HTA-A_DR_S06-131-C;                  NHH-FDS_HTA-A_DR_S06-132-B;                  NHH-FDS_HTA-A_DR_S06-133-C;                  NHH-FDS_HTA-A_DR_S06-134-B;                  NHH-FDS_HTA-A_DR_S06-135-B;                  NHH-FDS_HTA-A_DR_S06-136-D;                  NHH-FDS_HTA-A_DR_S06-137-D;                  Approved S06-138A to be discontinued;                  Approved S06-140A to be discontinued;                  Approved S06-141A to be discontinued;                  Approved S06-142A to be discontinued;                  Approved S06X-DR_300_U2A to be discontinued.</p>
<b>Sections</b>	<p>HTA-L-D01-X-XX-2202A;                  HTA-L-D01-X-XX-2203A;                  HTA-L-D01-X-XX-2204A;                  HTA-L-D01-X-XX-2205A;                  HTA-L-D01-X-XX-2206;                  HTA-L-D01-X-XX-2207A;                  HTA-L-D01-X-XX-2208;                  HTA-L-D01-X-XX-2902A;                  HTA-L-D01-X-XX-2903A;                  HTA-L-D01-X-XX-2904A;                  HTA-L-D01-X-XX-2905A;                  HTA-L-D01-X-XX-2906;                  HTA-L-D01-X-XX-2907A;</p>	<p>HTA-L-D01-X-XX-2202-B;                  As approved;                  HTA-L-D01-X-XX-2204-B;                  As approved;                  As approved;                  As approved;                  HTA-L-D01-X-XX-2208-A;                  HTA-L-D01-X-XX-2902-B;                  As approved;                  HTA-L-D01-X-XX-2904-B;                  HTA-L-D01-X-XX-2905-B;                  As approved;                  As approved;</p>

	HTA-L-D01-X-XX-2908; HTA-L-D01-X-XX-2909.	HTA-L-D01-X-XX-2908-A; As approved.
<b>Highways</b>	0304-ATR-003B; 0304-ATR-004A; 0304-GA-007D; 0304-RP-001C; 0304-RP-002C.	As approved; As approved; As approved; As approved; As approved.