



Your ref:

Our ref: 43955

22nd February 2019

Dear Sir/ Madam,

RE: REQUEST FOR GLA PRE-APPLICATION ADVICE - LAND AT SYDENHAM HILL ESTATE , SYDENHAM HILL

Peter Brett Associates LLP is instructed by the City of London Corporation ('City Corporation') to submit a request for Level 2 pre-application advice for development on land within the Sydenham Hill Estate, 44 Sydenham Hill, London, SE26 6ND.

This pre-application request is submitted alongside the following:

- i Completed GLA Pre-Planning Payment Form
- ii Site Location Plan - Drwg SYDH-HBA-ZZ-XX-DR-A-00_0001 prepared by Hawkins\ Brown;
- iii Site Plan - Existing – Drwg SYDH-HBA-ZZ-XX-DR-A-00_0100 prepared by Hawkins\ Brown;
- iv Site Plan - Proposed - Drwg SYDH-HBA-ZZ-XX-DR-A-00_0101 prepared by Hawkins\ Brown
- v Pre-application Design Statement dated 21.02.19 prepared by Hawkins\ Brown
- vi Landscape Site Plan - Drwg TS000-1-GE-01 - prepared by TO Studio
- vii Mais House Sydenham Hill GLA Report prepared by TO Studio

The emerging proposals are referable to the Mayor as set out in the Mayor of London Order (2008) criteria as the proposals provide 150 residential units and part of Block B exceeds 30m in height.

The Site and surroundings

The Sydenham Hill Estate is located on the eastern side of Sydenham Hill, to the south of its junction with Kirkdale and lies within LB Lewisham.

The estate extends to 2.67ha and includes three distinctive elements:

- Mais House (a vacant block);
- Lammas Green (a 1950s housing scheme, comprising three terraces set around a village green); and
- Otto Close (a terrace of three storey maisonettes).

The development site for consideration includes Mais House, its associated parking area, the shared amenity space between Mais House and Otto Close, a row of garages on the south side of Otto Close and an existing elevated hardcourt play area on Otto Close which has garage unit's below.

The proposals exclude the Lammas Green part of the estate.

Mais House comprises a part two, three and four storey block which previously provided 63 flats designed for older people over 60 years old. Mais House was fully decanted in 2018 as the existing building is not fit for purpose, it does not meet or comply with current Building Regulations and Fire Regulations, and it does not provide suitable accommodation for the elderly. Residents were relocated in boroughs of their choice, some within City Corporation estates, some to care homes and some to their own properties

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Peter Brett Associates LLP is a limited liability partnership and is registered in England and Wales with registered number OC334398.
A list of members' names is open to inspection at our registered office.

Mais House is a detached block set within a landscaped amenity space that is also shared with properties off Otto Close.

Otto Close comprises approximately 30 three storey residential units. At the south east of the development site, set between Otto Close and Rose Court, are 38 single storey residential garages. The garages are split across 7 rows and it is understood that only a third of these are used for parking purposes. Several garage units are dilapidated, boarded up and not in use.

The ballcourt is located on the end of the Otto Close terrace and comprises of a gated hardstanding area. There is no play equipment, markings or seating and the space is underused by existing residents. Beneath the ballcourt is a gated parking area with small garage units. Use of the garages for parking is considered to be limited due to the low ceiling height of the access.

There are three vehicular access points to the site. Two of these are from Sydenham Hill and serve Mais House. Of these, the northernmost access is the primary access, leading to a parking area and servicing route through the site. The other access serves only the site frontage and is used infrequently. Otto Close is a private road accessed from Kirkdale. There are also separate pedestrian accesses from Sydenham Hill and Kirkdale through the development site and Lammas Green.

The site slopes steeply west to east. There are a number of mature trees within the site, concentrated on the site frontage and amenity spaces although none are subject to a Tree Preservation Order.

Mais House and Lammas Green are located within the Sydenham Hill Conservation Area while all but one dwelling within Otto Close sits outside it.

Lammas Green is Grade II listed and is located within an Area of Special Character. The Sydenham Hill Community Hall and Retaining Walls are also Grade II listed.

The site is located within a predominantly residential area. To the east on Kirkdale, is a row of two storey terraced houses with relatively long rear gardens. To the north is a four-storey nursing home, Castlebar, converted from an Edwardian detached house which is locally listed. To the west is Dulwich Wood (within the London Borough of Southwark) which is designated as Metropolitan Open Land, a Local Nature Reserve of Metropolitan Importance and Conservation Area.

There are a number of local play and recreational facilities within 800m of the site.

The site has no special site allocation on the LB Lewisham LDF Proposals Map or within the Site Allocations DPD.

The site has a Public Transport Accessibility Level (PTAL), a measure which rates locations by distance from frequent public transport services, of 2 where PTAL 6b is the highest level of accessibility and PTAL 0 is the lowest level of Accessibility.

There are 13 car parking spaces for Mais House (63 sheltered units), 15 on street marked bays for Otto Close (30 units) and 38 garage units to the south east of Otto Close and only a third are assumed to be in use for parking purposes. The current assumption on existing parking provision is that there are 41 parking spaces per 93 units, resulting in a ratio of 0.44 bays per unit.

Pre-Application Consultation by City Corporation

The City Corporation entered into a Planning Performance Agreement (PPA) with LB Lewisham in July 2018 following an initial pre-application meeting with the LPA in June 2017. To-date there have been three PPA meetings with a fourth PPA meeting expected in April 2019. Iterations of the proposals presented for pre-application advice have ranged from 127 to 146 units.

Officers have generally been supportive of the proposals subject to further consideration of scale, design and massing and impacts on the wider estate and residential properties of Kirkdale. Formal PPA responses issued by LB Lewisham are attached.

The project team has presented the initial proposals to the LB Lewisham Design Review Panel (DRP) in October 2018 and a further presentation to the DRP is proposed on 6th March 2019.

The City Corporation began consultation existing Sydenham Hill Estate residents and the local community and stakeholders in November 2018. Letters and invitations were sent to tenants, leaseholders, the local community and stakeholders inviting them to meet the team and discuss aspirations for the site.

A resident drop-in was first undertaken on Wednesday 7th November 2018 (4pm-7pm) at Lammas Green, Community Hall. This was followed by wider public consultation on Thursday 15th November 2018 (4pm-7pm) at the same venue. The project team from the City Corporation, Peter Brett Associates, Turner and Townsend and Comm Comm UK were on-hand to discuss the consultation process and answer any questions. Feedback forms were provided for attendees to complete and register for updates through Commonplace.

Further resident and community exhibitions were undertaken on 5th and 6th February 2018 and meetings have been had with the Mayor of Lewisham and civic groups including the Sydenham Hill and Forest Hill Societies.

A Residents Steering Group was also set up in November 2018 with the first meeting held on 13th December 2018. A series of meetings will be undertaken to discuss the proposals leading up to submission of the planning application and during determination. Information and feedback on the proposals and consultation to-date has been issued via newsletters and www.sydenhamhill.commonplace.is.

The Proposals

LB Lewisham is required to deliver 13,847 new homes between 2015 and 2025 in the Mayor of London's current London Plan. This increases to 21,170 by 2028/2029 in the new Draft London Plan (2018). There is high local demand for social housing in LB Lewisham, with over 4,000 households on the housing register (waiting list) for two-bedroom accommodation alone and 241 people bidding for a three-bed homes each week.

The City Corporation plans to create 3,700 new homes for Londoners, including 700 new social housing units on its estates by 2025.

The City Corporation's vision for the Sydenham Hill Estate is to create new much-needed homes as well as improve open space, landscaping and shared amenities for existing residents.

The proposals are made for the demolition of the Mais House building, the Otto Close garage units and the ballcourt block to provide 150 additional units.

Proposed unit mix is 30% one-bed, 53% two-bed, 9% three-bed and 8% four+ bed units. The unit mix has been determined through discussions between the City Corporation and LB Lewisham's Housing Team.

A stepped approach to building height is proposed along Sydenham Hill and the Mais House part of the proposals will comprise of three blocks. Block A will be 4 to 8 storeys including the principal entrance from Sydenham Hill, Block B will be six to 12 storeys and Block C will be five to six storeys.

The Otto Close garage units will be replaced by three storey family units with private gardens to the rear and infilling. The existing pedestrian route to the rear of the garages to Lammas Green will be re-located to the front of the new terrace and will continue to provide pedestrian access to Lammas Green.

The ballcourt element will be infilled to continue the existing Otto Close terrace and will extend to three storeys.

Key views and proposed storey heights are shown in the Pre-application Design Statement prepared by Hawkins\ Brown.

The site layout retains existing high-quality trees on the northern boundary and the central landscaping area to the rear of Otto Close. The landscaping plan utilises site levels and provides a series of linked amenity space areas for existing and proposed residents and includes an entrance courtyard through Block A, a courtyard to the rear of Block A & B which links to a community green. The existing woodland area and sloping play area is retained as residents have made clear in their consultation feedback that they value the openness of this space.

The City Corporation has secured grant funding from the GLA for 131 affordable units at the site.

It is currently scheduled that the units will be for social rent but this will be subject to further costing and viability review. The homes will be managed by the City Corporation and LB Lewisham will be eligible for 50% nomination rights.

Older persons accommodation previously provided in Mais House will be re-provided as affordable units for all age groups. A commitment has been made that former residents of Mais House will have the right to return to new homes on the House site if this is sought. The City Corporation will also make provision for existing tenants at Lammas Green or Otto Close to relocate to the new homes if they better suit their housing needs.

All units will meet London Plan minimum space standards with 10% of the homes being 'Category 2: Accessible an adaptable dwellings' complying with Part M4(3). All other homes will comply with Part M4(2).

Minimum London Plan disabled parking and cycle parking will be provided as a minimum. Given the site's low PTAL and comments from local residents during public consultation a car-free proposal is not considered appropriate but a parking ratio of between 0.3 per unit (including minimum disabled parking) is considered a reasonable approach to proposed provision and has been accepted in principle by LB Lewisham Highways subject to supporting evidence in the Transport Assessment.

Proposed parking will principally be provided at basement level of Block A, B & C with additional spaces provided along Otto Close and within the landscaped grounds. The basement level at Block A, B & C will also provide some cycle spaces and could also provide replacement storage facilities for residents.

Planning Application

It is expected that a planning application will be submitted to LB Lewisham in June 2019.

As agreed with LB Lewisham during PPA discussions, the application will be supported by the following documents and drawings:

- i. Application and CIL Questions forms;
- ii. Existing and proposed drawings, sections, elevations and long views;
- iii. Design & Access Statement;
- iv. Planning Statement;
- v. Affordable housing statement;
- vi. Statement of Community Involvement;
- vii. Transport Assessment (including parking surveys);
- viii. Interim Residential Travel Plan;
- ix. Outline Delivery and Servicing Plan;
- x. Outline Construction & Logistics Plan;
- xi. Landscaping details;
- xii. Tree Survey and Arboricultural Impact Assessment;
- xiii. Air quality Assessment;
- xiv. Ecological Assessment;
- xv. Daylight/Sunlight Assessment;
- xvi. Energy Assessment;
- xvii. Sustainability Assessment;
- xviii. Phase 1 Archaeology;
- xix. Heritage Assessment;
- xx. Flood Risk Assessment & SUDS/Drainage Strategy; and
- xxi. Planning Obligations Statement.

Pre-Application Advice

Pre-application advice is requested on:

- i) The principle of demolition of existing buildings and the acceptability of the initial scheme;
- ii) The design, access and layout of the proposals as shown on the proposed drawings;
- iii) The key planning issues that will need to be addressed as part of any planning application for the proposed development; and

- iv) With regard to the list of supporting documents and drawings identified above, whether any additional information will be sought by the GLA as part of the planning application and its Stage 1 Report.

We look forward to meeting with Officers to discuss the initial proposals. Should there be any queries, please do not hesitate to contact me via email at [REDACTED]

Yours sincerely

[REDACTED]

For and on behalf of
PETER BRETT ASSOCIATES LLP



City of London Corporation
PO Box 270
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Planning Services
3rd Floor Laurence House
Catford
London SE6 4RU

Date: 23/07/2018
PRE/18/107786

Dear [REDACTED]

TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED)
SYDENHAM HILL ESTATE, SYDENHAM HILL, LONDON, SE26

I refer to the pre-application submission and meeting held on the 10th July 2018. The officers present at this meeting were [REDACTED] (Senior Planning Officer) and [REDACTED] (Major and Strategic Projects Manager).

Site Description

The Sydenham Hill Estate is located on the eastern side of Sydenham Hill, to the south of its junction with Kirkdale. The estate has a site area of 2.67ha and includes three distinctive elements: Mais House (an apartment block of 63 sheltered housing units for the elderly), Lammas Green (a 1950s housing scheme, comprising three terraces set around a village green) and Otto Close (a terrace of two storey maisonettes). It was clarified during previous pre-application meetings that the pre-application enquiry does not relate to Lammas Green. The area for consideration includes Mais House, its associated parking area, the amenity space between Mais House and Otto Close, a row of garages on the south side of Otto Close and an existing elevated hardcourt play area on Otto Close.

Mais House comprises a part two/part three/part four storey block of 63 flats designed for older people over 60 years old. Previously, it was understood that all 63 units were studios, however information submitted with the most recent pre-application request in 2017, indicates a mix of studios, one bed and two bed flats. Mais House also provides on-site support and social facilities associated with the flats. Mais House is a free form block, set within landscaped amenity space that is shared with two storey maisonettes on Otto Close.

Otto Close comprises approximately 30 two storey residential units. At the north east of the Site, set between Otto Close and Rose Court, are 38 single storey residential garages. The garages are split across 7 rows.

There are three vehicular access points to the site. Two of these are from Sydenham Hill and serve Mais House. Of these, the northernmost access appears to be the primary access, leading to a parking area and servicing route through the site. The other access serves only the site frontage and appears to be used infrequently. Otto Close is a private road accessed from Kirkdale. In addition, there is a pedestrian access to the site from Kirkdale.

The site slopes steeply west to east. There are a number of mature trees within the site, concentrated on the site frontage and amenity spaces, though none are subject to a Tree Preservation Order.

Mais House and Lammas Green are located within the Sydenham Hill Conservation Area, while all but one dwelling within Otto Close sits outside it. In 1998, Lammas Green was listed Grade II as being of special architectural and historic interest in its own right. The Sydenham Hill Community Hall and Retaining Walls were also listed Grade II at the same time. Additionally, Lammas Green is located within an Area of Special Character.

The site is located within a predominantly residential area. To the east, on Kirkdale, is a row of two storey terraced houses, with relatively long rear gardens. To the north is a four storey nursing home, Castlebar, converted from an Edwardian detached house which is locally listed. To west is Dulwich Wood (within the London Borough of Southwark) which is designated as Metropolitan Open Land, a Local Nature Reserve of Metropolitan Importance and Conservation Area.

The site has no special site allocation on the LDF Proposals Map or within the Site Allocations DPD. It has a PTAL of 2, indicating low public transport accessibility.

Planning History

The planning history of the site is relatively short, comprising of minor alterations and tree works in a Conservation Area. The most recent is an application (DC/10/75419) granted in 2010 for the conversion of part of the kitchen to form a 1bed self-contained unit.

PRE/16/02389- A previous pre-application response relating to Mais House concluded that *“Officers are of the view that the site has potential for redevelopment to provide replacement accommodation for older people together with new general needs housing, subject to no net loss of dwellings, affordable housing provision in line with policy requirements, appropriate housing mix and standards and the delivery of high quality design.”*

PRE/17/101468 – A further pre-application response was issued stating that *“Officers are of the view that the site has potential for redevelopment to provide an intensification in residential use, subject to satisfactory resolution of the issues highlighted above in respect of re-provision of older person’s housing, amenity and play space and delivering high quality design. The mix of accommodation proposed should reflect demand for specialist housing for older people in this location and details of any alternative provision for existing residents will be required. The provision of the balance of new units at the site as general needs housing is accepted, in a mix of dwelling sizes including family units. Equivalent replacement affordable housing will be required, and any uplift in units will be expected to provide affordable housing in line with policy requirements.”* It was recommended that the applicant engage with the council through entering into a Planning Performance Agreement.

Your Proposal

No new documentation was submitted for review by officers in addition to that already submitted under pre-application response PRE/17/101468. This pre-application presented the following options for redevelopment:

Scenario 1: Demolition of the existing 63 units within Mais House and the erection of 176 units within an 8 storey building fronting on to Sydenham Hill and connected by a deck with car parking beneath to a further 8 storey block (Site A); the redevelopment of the play space above the garages into 2 units (Site B); the demolition and redevelopment of the existing garages (Site C) into 11 terraced house and the development of the eastern green area adjacent to the existing Mais House (Site D) into 3 houses. This scenario proposes a total of 192 new units (65 x 1-bed, 87 x 2-bed and 40 x 3-bed).

Scenario 3: Demolition of the existing 63 units within Mais House and the erection of 160 units within an 8 storey building fronting on to Sydenham Hill and two further 8 storey blocks within the green area behind it (Site A); the redevelopment of the play space above the garages into 2 units (Site B); the demolition and redevelopment of the existing garages (Site C) into 11 terraced houses and the development of the eastern green area adjacent to the existing Mais House (Site D) into 2 houses. This scenario proposes a total of 175 new units (25 x 1-bed, 95 x 2-bed and 55 x 3-bed)

A third option (Scenario 2) fell outside the scope of the pre-application enquiry.

The applicant indicated during the meeting that it was still their intention to pursue a redevelopment of a nature as per scenarios outlined above. Officers would advise that the previous pre-application response issued under pre-application reference number PRE/17/101468 on 20 November 2017 is still relevant and future iterations of such a redevelopment should continue to refer to the advice within this response.

During the meeting the applicant also indicated during the meeting that it was their intention to submit a separate application for the demolition of Mais House, potentially as soon as Q3/Q4 2018. The considerations with such an application are discussed below.

Demolition of Mais House

The Development Plan Policies relevant to the demolition of Mais House are DM Policy 5 (Specialist Accommodation for Older People) and DM Policy 36 (New development, changes of use and alterations affecting designated heritage assets and their setting: conservation areas, listed buildings, schedule of ancient monuments and registered parks and gardens).

DM Policy 5 (3 and 4) states the following:

3. The Council will resist development that involves the net loss of floorspace in specialist accommodation unless:
 - a. adequate replacement specialist accommodation will be provided
 - b. it can be demonstrated that there is a surplus of that particular type of specialist accommodation in the area, and
 - c. it can be demonstrated that the existing specialist accommodation is incapable of meeting relevant industry standards for suitable accommodation.
4. Where the Council is satisfied that a development involving the loss of specialist accommodation is appropriate, it will expect re-provision of an equivalent amount of floorspace, or of permanent housing in C3 Use Class, including an appropriate amount of affordable housing, having regard to Core Strategy Policy 1.

DM Policy 36, general principles (A.2) states that:

“Where the significance of an asset may be harmed or lost through physical alteration or destruction, or development within its setting, the Council will require clear and convincing justification. The Council will consider the wider public benefits which may flow from the development where these are fully justified in the impact assessment.”

DM Policy 36, conservation areas (4) states that:

4. The Council, having paid special attention to the special interest of its Conservation Areas, and the desirability of preserving or enhancing their character or appearance, will not grant planning permission where:
 - a. new development or alterations and extensions to existing buildings is incompatible with the special characteristics of the area, its buildings, spaces, settings and plot coverage, scale, form and materials
 - b. development, which in isolation would lead to less than substantial harm to the building or area, but cumulatively would adversely affect the character and appearance of the conservation area
 - c. development adjacent to a Conservation Area would have a negative impact on the significance of that area.

Any future application for the demolition of Mais House must satisfy the criteria of DM Policy 5 and DM Policy 36 as outlined above. If an application for the demolition of Mais House is submitted separately to, or precedes an application for the wider redevelopment of the Sydenham Hill Estate, an objection would be raised by officers due to conflict with these policies.

Where loss of specialist accommodation is proposed, DM Policy 5 requires the re-provision of an equivalent amount of floorspace, or of permanent housing in C3 Use Class, including an appropriate amount of affordable housing. An application solely for the demolition of Mais House would fail to comply with this criterion.

DM Policy 36 states that planning permission will not be granted for development, which would adversely affect the character and appearance of the Conservation Area. An application solely for the demolition of Mais House must demonstrate that this would not have such an effect on the Conservation Area. Officers have concerns that the demolition of this building would leave a considerable gap in the townscape of the Conservation Area, tangibly altering the character, appearance and setting of the Conservation Area for the worse – any future application for such development must demonstrate that this is not the case.

As outlined above, the proposed demolition of Mais House if either submitted separately to, or preceding an application for the wider redevelopment of the Sydenham Hill Estate would be considered contrary to the Development Plan and thus would not be supported.

The applicant outlined during the meeting that the building is structurally unsound and that there also concerns regarding the security of the site given that the building is now vacant. The applicant is advised that in the absence of a proposal for the wider redevelopment of the Sydenham Hill Estate, a robust and comprehensive argument must be compiled to justify the demolition of the existing building contrary to the aforementioned policies.

Notwithstanding the above, if the applicant wishes to submit an application for the demolition of Mais House, the following deliverables would be required for validation:

- Application fee
- Application form
- Site location plan
- Drawings: existing and proposed plans, elevations (including context) and site sections
- Air Quality Impact Assessment
- Biodiversity Survey and Report
- CIL form
- Demolition Method Statement
- Heritage Statement
- Land Contamination Assessment
- Lighting Assessment
- Planning Statement
- Statement of Community Involvement
- Structural Survey
- Sustainability Statement
- Tree survey and Arboricultural Impact Assessment


Conclusion

With regard to the redevelopment of the wider Sydenham Hill Estate, Officers remain of the view that the site has potential for redevelopment to provide an intensification in residential use, subject to satisfactory resolution of the issues highlighted in the previous pre-application response dated 20 November 2017. As the proposals develop, the applicant is encouraged to refer to this advice and ensure that any future iterations address the points raised in the response.

With regard to the demolition of the existing Mais House, officers would reiterate that such proposals in the absence of a proposed redevelopment are contrary to policies outlined above and as such would not be supported by officers. No evidence or justification has been submitted by the application to warrant the approval of such a development contrary to Development Plan policy.

Officers welcome the opportunity to discuss your proposals at this stage of the process and that the applicant has now engaged with the council through a Planning Performance Agreement. The applicant is reminded that prior to the second PPA meeting which has been organised for 18 September, material must be submitted at least 5 working days in advance.

Yours sincerely

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Major and Strategic Projects Manager - Development Management
Planning Service, London Borough of Lewisham
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City of London Corporation
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Planning Services
2nd Floor, Civic Suite
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London SE6 4RU

Date: 17/10/2018
PRE/18/107786

Dear [REDACTED],

TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED)
SYDENHAM HILL ESTATE, SYDENHAM HILL, LONDON, SE26

I refer to the pre-application submission and meeting held on the 26th September 2018. The officers present at this meeting were [REDACTED] (Senior Planning Officer), [REDACTED] (Principal Urban Design Officer) and [REDACTED] (Principal Highways Officer).

Site Description

The Sydenham Hill Estate is located on the eastern side of Sydenham Hill, to the south of its junction with Kirkdale. The estate has a site area of 2.67ha and includes three distinctive elements: Mais House (an apartment block of 63 sheltered housing units for the elderly), Lammas Green (a 1950s housing scheme, comprising three terraces set around a village green) and Otto Close (a terrace of two storey maisonettes). It was clarified during previous pre-application meetings that the pre-application enquiry does not relate to Lammas Green. The area for consideration includes Mais House, its associated parking area, the amenity space between Mais House and Otto Close, a row of garages on the south side of Otto Close and an existing elevated hardcourt play area on Otto Close.

Mais House comprises a part two/part three/part four storey block of 63 flats designed for older people over 60 years old. Previously, it was understood that all 63 units were studios, however information submitted with the most recent pre-application request in 2017, indicates a mix of studios, one bed and two bed flats. Mais House also provides on-site support and social facilities associated with the flats. Mais House is a free form block, set within landscaped amenity space that is shared with two storey maisonettes on Otto Close.

Otto Close comprises approximately 30 two storey residential units. At the north east of the Site, set between Otto Close and Rose Court, are 38 single storey residential garages. The garages are split across 7 rows.

There are three vehicular access points to the site. Two of these are from Sydenham Hill and serve Mais House. Of these, the northernmost access appears to be the primary access, leading to a parking area and servicing route through the site. The other access serves only the site frontage and appears to be used infrequently. Otto Close is a private road accessed from Kirkdale. In addition, there is a pedestrian access to the site from Kirkdale.

The site slopes steeply west to east. There are a number of mature trees within the site, concentrated on the site frontage and amenity spaces, though none are subject to a Tree Preservation Order.

Mais House and Lammas Green are located within the Sydenham Hill Conservation Area, while all but one dwelling within Otto Close sits outside it. In 1998, Lammas Green was listed Grade II as being of special architectural and historic interest in its own right. The Sydenham Hill Community Hall and Retaining Walls were also listed Grade II at the same time. Additionally, Lammas Green is located within an Area of Special Character.

The site is located within a predominantly residential area. To the east, on Kirkdale, is a row of two storey terraced houses, with relatively long rear gardens. To the north is a four storey nursing home, Castlebar, converted from an Edwardian detached house which is locally listed. To west is Dulwich Wood (within the London Borough of Southwark) which is designated as Metropolitan Open Land, a Local Nature Reserve of Metropolitan Importance and Conservation Area.

The site has no special site allocation on the LDF Proposals Map or within the Site Allocations DPD. It has a PTAL of 2, indicating low public transport accessibility.

Planning History

The planning history of the site is relatively short, comprising of minor alterations and tree works in a Conservation Area. The most recent is an application (DC/10/75419) granted in 2010 for the conversion of part of the kitchen to form a 1bed self-contained unit.

PRE/16/02389- A previous pre-application response relating to Mais House concluded that *“Officers are of the view that the site has potential for redevelopment to provide replacement accommodation for older people together with new general needs housing, subject to no net loss of dwellings, affordable housing provision in line with policy requirements, appropriate housing mix and standards and the delivery of high quality design.”*

PRE/17/101468 – A further pre-application response was issued stating that *“Officers are of the view that the site has potential for redevelopment to provide an intensification in residential use, subject to satisfactory resolution of the issues highlighted above in respect of re-provision of older person’s housing, amenity and play space and delivering high quality design. The mix of accommodation proposed should reflect demand for specialist housing for older people in this location and details of any alternative provision for existing residents will be required. The provision of the balance of new units at the site as general needs housing is accepted, in a mix of dwelling sizes including family units. Equivalent replacement affordable housing will be required, and any uplift in units will be expected to provide affordable housing in line with policy requirements.”* It was recommended that the applicant engage with the council through entering into a Planning Performance Agreement.

Planning Considerations

The following advice is given in relation to the current adopted London Plan and Lewisham Local Plan. However, the applicant is advised that On 18 August 2018 the Mayor of London published a version of the Draft New London Plan including his minor suggested changes following public consultation, ahead of Examination in Public. These suggested changes have been prepared following a review of consultation responses, and consist of clarifications, corrections and factual updates to the draft Plan.

Whilst the new plan is still a “draft”, it has progressed considerably towards adoption and the applicant should be mindful of the policies within the Draft New London Plan as the scheme progresses.

Principle of Development

Mais House

Mais House is not considered to be of architectural or historical merit and therefore there is no objection to its demolition.

The proposal involves the loss of existing sheltered housing. Development Management Local Plan (DMLP) Policy DM5 'Specialist accommodation for older people' states that:

"3. The Council will resist development that involves the net loss of floorspace in specialist accommodation unless:

- a) adequate replacement specialist accommodation will be provided;*
- b) it can be demonstrated that there is a surplus of that particular type of specialist accommodation in the area; and*
- c) it can be demonstrated that the existing specialist accommodation is incapable of meeting relevant industry standards for suitable accommodation.*

4. Where the Council is satisfied that a development involving the loss of specialist accommodation is appropriate, it will expect re-provision of an equivalent amount of floorspace, or of permanent housing in Use Class C3, including an appropriate amount of affordable housing, having regard to Core Strategy Policy 1."

The applicant has confirmed that all units have now been decanted. In any future planning application, the demand for specialist housing for older people on the site and the approach to re-provision would need to be set out in a supporting Planning Statement. Subject to satisfying DM Policy 5, the provision of additional general needs housing on the site would be welcomed in principle, as a contribution to meeting local housing need.

Garages

In respect of the garages, at the meeting it was stated that approximately a third are used for parking, a third for storage and a third are not in use. Evidence relating to the present and recent use of each garage will be required. As some are still in use for parking, the impact of the loss of that parking together with the demand arising from new housing units would need to be assessed as part of any forthcoming application and addressed in the scheme proposals. Otherwise, the principle of redevelopment would be acceptable.

Amenity space

The proposals would also involve the development of new residential blocks on the area of amenity space situated between Mais House and Otto Close, allocated for use by existing residents. Development Management Local Plan Policy 33 "Infill, backland, back garden and amenity area development" is therefore relevant to the principle of development.

In respect of amenity space, the policy states that:

"Proposals for new residential development on amenity areas of landscaped open space attached to existing residential development will only be permitted where they:

- a) repair or re-provide active street frontages*
- b) increase natural surveillance*
- c) retain existing private rear gardens where they are provided*
- d) retain adequate amenity space for the existing development according to the requirements of DM Policy 32 (Housing design, layout and space standards)*
- e) provide no significant loss of privacy and amenity, and no loss of security for adjoining residential development and private back gardens and*
- f) provide adequate privacy for the new development."*

It may be possible to retain adequate amenity space to serve the existing Otto Close residents as well as future residents; however, concern is raised with the amount of amenity space that would be lost. If any amenity space is to be lost to development, details of qualitative improvements to remaining space and/or provision of new amenity space would be required in order to offset the reduction in the amount of amenity space overall.

Play space

The proposals include demolition and redevelopment of an existing hard court on Otto Close, which sits at 1st floor level over a single storey structure. The use of the ground floor of this structure is unclear, though it has vehicular access gates so is assumed to provide parking. Further details are required as to the use of this space - if it is in use for parking, the comments above in relation to the garages apply.

Core Strategy Policy 15 states that the Council will apply the London Plan policies relating to community and recreational facilities to ensure: there is no net loss of facilities and the needs of current and future populations arising from development are sufficiently provided for. London Plan Policy 3.19 (Sports facilities) aims to increase participation in and tackle inequality of access to sport and physical activity in London, particularly amongst groups/areas with low levels of participation. Proposals that result in a net loss of sports and recreation facilities should be resisted. Therefore, the Council would expect equivalent replacement provision for the existing play space/sports court on site as part of the proposals.

In summary, the principle of a more intensive residential use of the site is accepted subject to the reservations identified above and provided that any proposal adequately addresses housing, design, amenity, highways and sustainability policies. These matters are considered in turn below.

Housing

Tenure Mix

Core Strategy Policy 1 states that contributions to affordable housing will be sought on sites capable of providing 10 or more dwellings. Core Strategy Policy 1 confirms that the maximum level of affordable housing would be sought by the Council, with a strategic target of 50%, as a starting point for negotiations and subject to an assessment of viability. The policy seeks provision at 70% social rented and 30% intermediate housing (based on total unit numbers) and family housing (three+ bedrooms) in development of more than 10 units. Whereas existing areas have a high concentration of social rented housing, different proportions of affordable housing could be sought.

Whilst the proposed development would provide 100% social rented units and would not achieve the 70% social rented and 30% intermediate housing split as specified above; officers consider this mix to be acceptable in this instance given there is not an existing overprovision of social rented housing in the area and as there is an overriding and urgent need for units within a social rented tenure in the borough. As such, officers consider that the proposed development therefore would meet the requirements of Core Strategy Policy 1 with regard to tenure mix.

Housing Mix

Core Strategy Policy 1 states that the Council will seek an appropriate mix of dwellings within a development, having regard to the following criteria:

- a) the physical character of the site or building and its setting
- b) the previous or existing use of the site or building
- c) access to private gardens or communal garden areas for family dwellings
- d) the likely effect on demand for car parking within the area
- e) the surrounding housing mix and density of population
- f) the location of schools, shops, open space and other infrastructure requirements.

For affordable housing, the Council will seek a mix of 42% as family dwellings (3+ bedrooms) and will have regard to the criteria listed above.

The pre-application document states that the development would propose 24% 3+ bedrooms, 58% 2 bed, 14% 1 bed and 4% studio apartments.

It is recommended that the percentage of family units be increased in accordance with CS Policy 1. It is understood that 42% may not be attainable on this site, and that to an extent, the provision will be derived from the housing need outlined by Lewisham and City of London Housing departments. However, any future application must justify the proposed housing mix in accordance with CS Policy 1, as well as the identified need.

It is noted that 4% of the proposed units would be studio apartments. Officers advise that DM Policy 32 states that *“single person dwellings will not be supported other than in exceptional circumstances. Developments will be required to have an exceptional design quality and be in highly accessible locations”*. Given the low PTAL of the pre-application site, it is unlikely that the provision of studio apartments in this location would be considered acceptable in accordance with DM Policy 32.

Wheelchair Accessible Units

Core Strategy Policy 1 and London Plan Policy 3.8 state that all new housing should be built to Lifetime Homes standards and that 10% of the new housing is designed to be wheelchair accessible or easily adaptable for residents who are wheelchair users.

The pre-application document indicates a policy compliant wheelchair unit mix of 10% of dwellings meeting Part M4(3) with the remaining 90% meeting Part M4(2).

Design and Conservation

Core Strategy Policy 15 ‘High quality design for Lewisham’ states that the Council will apply national and regional policy and guidance to ensure the highest quality design and the protection or enhancement of the historic and natural environment, which is sustainable, accessible to all, optimises the potential of sites and is sensitive to the local context and responds to local character. The application site is within an Area of Stability and Managed Change, as defined by Spatial Policy 1, wherein “the scale and type of development will generally be smaller scale than other parts of the borough respecting conservation areas, listed buildings and the scale of surrounding residential character.”

This is echoed in DM Policy 30 ‘Urban design and local character’, while DM 36 ‘New development affecting designated heritage assets’ provides guidance relevant to development affecting listed buildings, locally listed buildings and conservation areas.

The level of information submitted for this enquiry expands on that submitted previously, though is still at a ‘concept level’, comprising of schematic layout and massing / capacity diagrams. This is sufficient to establish the principle of redevelopment, but it is difficult for officers to provide detailed comment on the appropriateness of the proposed layout, scale and massing at this early stage. As such, the following advice is commensurate to the level of detail currently provided.

Officers would stress that the opportunities and challenges offered by both the site and the proposed programme, mean that it is vital that architectural and landscape design inform one another, *and are progressed in parallel from initial analysis stage*. The indicative scale of development will require planting of a comparable scale i.e. tall trees and verdant planting complementing taller buildings.

The building heights as proposed are towards maximum acceptable levels for this site. Notwithstanding this, officers would note that there is less concern with regard to setting maximum heights, than with regard to quality of accommodation and overall coherence and quality of the scheme. As such, officers are therefore willing to review alternative massing strategies that originate more from analysis of the site and programme, than solely from planning constraints (adjacencies, historic designations etc.)

The extruded blocks shown in both options currently appear overwhelming in their scale – by reviewing the qualities of the site / programme (with many different housing sizes and types) this mass could be redistributed to better effect around the site, which may ultimately mean maximum

height in some point may be slightly taller than options shown, albeit in more refined blocks that create homes of an exceptional quality. Officers would encourage that the applicant doesn't just try and conceal the scheme, but design with confidence.

The attention and assessment of surrounding building typologies is appreciated – however, the adjacent Victorian buildings are can appear somewhat overblown or exaggerated and may not represent optimal direction for new homes on this site. A calmer scheme that responds to its landscape and presents a contemporary programme is a more important consideration. It is noted, however, that the idea of incorporating some elements such as distinctive semi-octagonal bays may have merit.

Materials that relate to a mixed domestic programme and significant landscaping need to be considered. This is likely to be a brick led scheme but officers are open minded in this respect. Consideration should be given to what can be done to emphasise 'human-scale' and communal spaces. Officers note that careful consideration should also be given to the proposed roof forms.

With regard to layout, the idea of continuing 'rhythm' of Victorian villas along Sydenham Hill Road is supported, and officers consider that both the approaches outlined in Options 1 and 2 could be successful. However, reviewing the layout to better reflect the site rather than solely planning constraints may mean that these options change significantly.

The site is constrained by heritage and conservation considerations with all the following designations to be conscious of:

- Grade II listed Lammas Green
- Sydenham Hill / Kirkdale Conservation Area
- Sydenham Hill community hall Grade II listed walls
- Area of Special Local Character
- Visual and historic link with Sydenham Hill Wood and the former Great North Wood

The primary concern with regard to the above is the impact on the adjacent listed estate at Lammas Green, which forms an important part of the immediate context. Views from within this estate should inform the arrangement of height and mass in the proposed scheme. Furthermore, the proposed Otto Close block will likely need to be reviewed as the current proposals would have a significant impact on Lammas Green.

The applicant should also be mindful of short and long views towards the site. Officers note that the majority of the more proximate important views towards the site have been identified. Further work should be done to identify longer views towards the site and fully understand the impact of any future iteration of the scheme on a wider context.

Transport and Access

As a suburban location with a PTAL of 2, the London Plan indicates that a maximum of 1.5 spaces per unit should be provided. Core Strategy Policy 14 adopts a managed and restrained approach to car parking provision in order to contribute to the objectives of traffic reduction. In line with this approach, car parking should be limited and informed by a survey of parking on the site and in nearby streets, undertaken at an early stage in the design process so that it can inform the emerging scheme. The survey should cover the whole of the Mais House/Otto Close site and any other streets within 200 metres of the site entrance.

The level of parking provision should ensure no adverse impact on existing residents. A Transport Assessment, including parking surveys, would be required in support of any forthcoming planning application and to inform the level of parking provision required for the proposed scheme. This should be scoped with Lewisham Highway Department prior to undertaking. Furthermore, disabled parking would be expected for each wheelchair unit.

It is noted that there is an existing bus stop on the site frontage, in close proximity to the southernmost vehicular access. Consideration will need to be given to any impact on this bus stop as a result of amendment to, or intensification of, the existing site access arrangements. Transport for London should be consulted on the proposals as they are developed.

The London Plan Housing SPG Standard 20 and London Plan Policy 6.9 state that all developments should provide dedicated storage space for cycles at the following level:

- 1 per studio and one bed
- 2 per all other dwellings

Cycle parking should be provided within the building envelope so that it provides a secure and easily accessible option for occupants. In addition, one short stay cycle parking space should be provided per 40 units.

A Draft Travel Plan for the whole site should be submitted with any future planning application. Refuse for collection by the Council must be stored no more than 10 metres from the highway. Details of the proposed refuse strategy would be required as part of any future planning application.

Trees and Ecology

Trees

Core Strategy Policy 12 (Open Space and Environmental Assets) recognises the importance of trees and details the arboricultural considerations required during the planning process. It states that the Council's targets to conserve nature and green the public realm will be achieved by "protecting trees, including street trees, and preventing the loss of trees of amenity value, and replacing trees where loss does occur".

DM Policy 25 (Landscaping and Trees) states that Development schemes should not result in an unacceptable loss of trees, especially those that make a significant contribution to the character or appearance of an area, unless they are considered dangerous to the public by an approved Arboricultural Survey. Where trees are removed as part of new development, replacement planting will normally be required. New or replacement species should be selected to avoid the risk of decline or death arising from increases in non-native pests and diseases.

There are many mature trees on the site, which exist as both individuals and in groups. These provide a positive contribution to the character and setting of the area and should be retained insofar as possible. A managed approach to the removal of trees is required – this should identify the individual trees and groups which are of the highest quality and contribute the most to the character of the area and seek their retention.

The layout of any proposed scheme for the site should be developed having regard to the value of existing trees, informed by a tree survey and it is acknowledged that the applicant has made effort to do so in the current iteration of the proposal. It is expected that high quality replacement planting scheme, as part of a wider landscaping scheme, is provided to mitigate any loss proposed.

A Tree Survey and Arboricultural Implications Assessment should be provided in support of any forthcoming planning application. The requirements of both are as follows:

A tree survey will require information prepared by a qualified arboriculturist and shall include the following:

- details of the existing species, spread, roots and position of trees
- details of any trees that will be felled as part of the proposed development
- details of trees that will be affected by the proposed development (including those located on adjacent sites) and what measures will be taken to protect them during construction and

- plans and documents outlined in accordance with the British Standards 5837 (2012) including, a tree survey, a tree constraints plan, an Arboricultural Implications Assessment and an Arboricultural Method Statement including a Tree Protection Plan.

An Arboricultural Implications Assessment will need to:

- consider the tree/building relationships that will be produced at the end of the project.
- identify issues that will be faced during demolition of the existing buildings and construction of the new ones.
- identify where tree protection measures are needed and what operations are likely to pose threats to retained trees, including any special foundations or methods of work that may be needed if structures are proposed within tree root protection areas, where materials will be stored and where worker facilities will be located.
- show clearly all the trees to be retained and those to be felled.
- show where all tree protective fencing is to be erected and all ground protection where important tree roots are at risk of damage.
- Show any areas of landscaping that can be identified, where practicable, be protected by fencing to avoid soil compaction.

The reports should be undertaken by a competent person, in line with BS5837.

Ecology

Where an ecological report is required to accompany a planning application, the appropriate report is an Ecological Impact Assessment (EclA) Report (or an Ecology/Biodiversity Chapter of an Environmental Impact Assessment Report for an EIA project).

Under normal circumstances it is not appropriate to submit a Preliminary Ecological Appraisal Report (PEAR) as part of a planning application, because the scope of a PEAR is unlikely to fully meet planning authority requirements in respect of biodiversity policy and implications for protected species.

Given the nature of the application site, the appropriate report to be submitted with any future application in this case is an EclA report. The scope of the EclA report submitted in these circumstances should be proportionate to the scale of the likely ecological effects.

The submitted report must comply with:

- BS 42020: 2013 Biodiversity – Code of Practice for Planning and Development
- The Chartered Institute of Ecology and Environmental Management (CIEEM) Guidelines for Ecological Report Writing and Competencies for Species Survey
<https://www.cieem.net/publications-info>
- Lewisham Biodiversity Planning Guidance
<https://natureconservationlewisham.co.uk/lewisham-biodiversity-group/>

Sustainability

Policy 5.3 Sustainable Design and Construction of the London Plan states that the highest standards of sustainable design and construction should be achieved in London to improve the environmental performance of new developments and to adapt to the effects of climate change over their lifetime.

Policy 5.2 Minimising Carbon Dioxide Emissions of the London Plan states that development should make the fullest contribution to minimising carbon dioxide emissions in accordance with the following energy hierarchy:

1. Be lean: use less energy
2. Be clean: supply energy efficiently
3. Be green: use renewable energy

Achieving more sustainable patterns of development and environmentally sustainable buildings is a key objective of national, regional and local planning policy. London Plan and Core Strategy Policies advocate the need for sustainable development. All new development should address climate change and reduce carbon emissions. Core Strategy Policies advocate the need for sustainable development. All new development should address climate change and reduce carbon emissions.

A scheme for development of this site would be expected to minimise CO2 emissions in line with the Mayor's energy hierarchy in Policy 5.2 of the London Plan and would need to include a detailed energy assessment.

A Sustainability Statement would also be necessary to accompany an application for a scheme of this scale in order to demonstrate the steps that have been taken to maximise sustainable measures.

Air Quality

In determining a planning application, the Council will determine the development's likely effect, not only in terms of the air pollution it may cause directly, but also in terms of any increase or decrease in traffic it generates. Development proposals will be considered for their effect on air quality and the exposure of people to air pollutants.

The specific location and building design can be used to minimise the adverse effects of air pollution. The adoption of mitigation measures will be essential for developments located in areas of elevated pollution concentrations, in to order reduce exposure of new residents and workers to the negative impacts of poor air quality.

The London Plan and Lewisham Local Plan place great emphasis on improving air quality. London Plan Policy 7.14 "Improving air quality" states that all new development be at least 'air quality neutral' and not lead to further deterioration of existing poor air quality.

DM Policy 23 "Air Quality" states that the Council will require all major developments that have the potential to impact on air quality to submit an Air Quality Impact Assessment (AQIA) considering the potential impacts of pollution from individual and cumulative development on the site and on neighbouring areas and detailing any appropriate mitigation measures that would reduce exposure to acceptable levels.

The Air Quality Impact Assessment (AQIA) should include:

- an assessment of the current air quality in the area
- details of potential pollutant sources as a result of the proposed development during both construction and operational phases
- details of the pollutants that may be emitted and which objectives they may impinge on.
- an assessment of the impact of these, including likely emissions and the effect on the existing air quality. The concentrations of the various pollutants should be predicted at suitable receptor locations. This should include a comparison of with and without development scenarios for the first year of the proposed occupation of the development.
- an identification of measures to mitigate and minimise any impacts with reference to the Mayor's Air Quality Strategy objective that all new developments should be air quality neutral and commitment to maintain an inventory of all Non Road Mobile Machinery (NRMM) during construction.

The impact on air quality of the construction and demolition phases of a development should be taken into account in planning applications and also covered in construction management plans. Controlling dust emissions is important both in terms of preventing nuisance complaints by local residence, and reducing the impact of dust emissions on local PM10 concentrations (Particulate Matter 10 µg diameter or less).

Consultation

During the pre-application meeting, you advised that consultation with residents of the Estate is ongoing. A scheme of the scale proposed would also be expected to undertake wider consultation with local residents and amenity societies in line with the Council's Statement of Community Involvement. Officers advise that local ward councillors and the Sydenham Society are included in public consultation to be undertaken in advance of a planning application.

S106 contributions and CIL

This development will be subject to Mayoral and local CIL. At this early stage, it is not possible to identify detailed Heads of Terms for the scheme. Obligations may be required to mitigate the specific impacts of the development – the level of contributions sought would depend on the range of impacts, the level of inherent mitigation and in kind contributions provided. The Council's approach to planning obligations is set out in the Planning Obligations SPD 2015.

Conclusion

With regard to the redevelopment of the wider Sydenham Hill Estate, Officers remain of the view that the site has potential for redevelopment to provide an intensification in residential use, subject to satisfactory resolution of the issues above. Subject to appropriate evidence being submitted in compliance with DM Policy 5, officers are comfortable with the redevelopment of the estate and are keen to achieve optimal levels of affordable housing on the site.

As stated above, the site presents a great development opportunity yet also many challenges, given the change in gradient across the site, existing mature trees and multiple heritage and conservation considerations.

As such it is vital that architectural and landscape design inform one another and are progressed in parallel from initial analysis stage, and that the team explore various alternative massing strategies which originate from a deeper analysis of the site and programme in order to realise the optimal scheme.

Officers welcome the opportunity to discuss your proposals at this stage of the process and that the applicant has now engaged with the council through a Planning Performance Agreement.

Yours sincerely,



Major and Strategic Projects Manager - Development Management
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[REDACTED]
Planning Services
2nd Floor, Civic Suite
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London SE6 4RU

Date: 23/01/2019
PRE/18/107786

Dear [REDACTED],

TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED)
SYDENHAM HILL ESTATE, SYDENHAM HILL, LONDON, SE26

I refer to the pre-application submission and meeting held on the 6th December 2018. The officers present at this meeting were [REDACTED] (Senior Planning Officer), [REDACTED] (Principal Urban Design Officer) and [REDACTED] (Principal Highways Officer).

The advice previously issued by officers following previous PPA meetings remains relevant. This response pertains solely to matters discussed or raised at the meeting held on 6th December.

Planning Considerations

Height and Massing

- The overall reductions in building height are welcomed and demonstrate an improvement over previous iterations.
- Some concerns remain about views (east and west) along Sydenham Hill Road, and in particular the flank/side elevations of the 9 storey block – this needs to be reviewed. This block will have a significant impact on views from the street and overall character of the conservation area as this will be largest building in immediate area.
- The DRP raised concerns about retaining the pattern of building/trees at this location. Officers are yet to be convinced that this has been addressed sufficiently.
- Officers would suggest that testing a single slender taller block in order to address concerns in relation to the 'width' of the 9 storey block.
- It is important to remain aware of the potential consequences for views from Horniman Museum, and longer strategic views as identified in the Character Study and Core Strategy/Development Management Local Plan – officers to review and advise further in this respect.
- The applicant is advised that the Otto Close block as now proposed seems at upper limit of what would be acceptable at this location.

Layout

- The revised layout for main block is interesting and seems to resolve many of the issues arising from earlier iterations in terms of aspect and spaces created by and around buildings.
- The prospect of a new two-sided 'street' at Otto Close is exciting but officers will need to be satisfied there will not be negative impact on the new street that is created .
- The applicant is encouraged to test shifting the southern addition to the existing Otto Close housing to the west to create a wider, more generous entrance/route through.

Elevations

- An enclosed but 'permeable' entrance space is preferable to an undercroft. The development will require an easily maintained space will help a relatively large building mass meet the ground successfully, whilst retaining transparency (i.e. views through) as well as framing views of internal courtyard.
- The applicant is advised that materiality and solid/void ratio will have to be carefully thought through as part of consideration of overall elevation onto Sydenham Hill Road
- Articulation of facades of largest block will be key to breaking down the proposed mass.
- Proposed rear south facing elevations of new Otto Place terrace should be provided in future pre-application requests

Landscape Design:

- The use of differing materials to define public/private space to new homes on Otto Close could be effective. The applicant is encouraged to consider if this will be effective in itself to accommodate bins/related storage.
- Future pre-application requests should demonstrate the proposed materiality of communal courtyard, and any opportunity for additional planting that may exist – this would benefit views from flats on lower floors.
- The landscaping plans indicated boulders and rocks in close proximity to the rear of existing flats. The applicant is encouraged to consider if these boulders/rocks proposed for play space make for a positive view for those lower floor flats which look out onto them.
- The proposed defensible space towards Otto Close should have appropriate drainage capabilities.
- Planting should be added to the entrance to the courtyard and future images should demonstrate people inhabiting the space. The applicant should consider whether some shared communal storage for garden tools etc. could be provided to encourage community interaction and ownership.

Playspace

It is preferable to the Council for developers to, wherever possible, directly provide well designed children's play space on-site in accordance with the policy requirements. Where the Council deems that there are exceptional circumstances and it is not possible for a development to meet children's play space requirements on-site, a financial contribution will be necessary.

The financial contribution will be based on the policy requirement (10 m² per child) minus any space delivered on-site. The undelivered play space will then be multiplied by £300 per m², which represents the estimated cost for the Council to deliver off-site children's play space on behalf of the developer.

Highways and Transport

The parking survey submitted is generally considered acceptable however; the results of such should be broken down by street. The applicant has indicated a preference to provide 0.3 spaces per unit, this could be considered acceptable in principle but this should be evidenced with information from the parking surveys, census/ car ownership levels as well as information on proposed unit mix. Additionally, the following information should be provided:

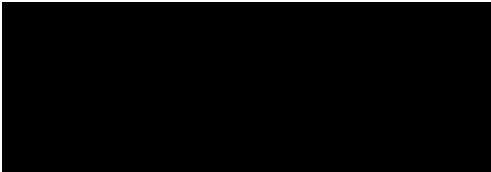
- How the site is currently serviced and whether refuse vehicles can fully access site or if access is constrained. Tracking of existing roads and garage sites should be undertaken (based upon a 11.2m refuse vehicle).
- Tracking of proposed site layout should be undertaken for servicing and emergency services access as this may affect layout, parking provision and whether, for example a turning circle is needed on Otto Close.
- Distances to refuse stores and collection need to be considered.

- Minimum cycle parking standards should be provided.
- Minimum disabled parking should be provided as part of any future development.
- A Transport Assessment / Statement should be submitted with the application, LBL Highways should be consulted prior to agree the scope of the document

Consultation

The consultation undertaken by COL to-date is encouraging. This should continue as the scheme is developed further. The applicant should be demonstrating how comments and feedback from the consultation thus far has fed into future iterations of the development.

Yours sincerely,



[Redacted Name]

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