


GREATER **LONDON** AUTHORITY


33 Bowling Green Lane
Farringdon
London
EC1R 0BJ

Department: Planning
Our reference: GLA/5070/SW
Date: 22 May 2019

Dear 

Town & Country Planning Act 1990 (as amended); Greater London Authority Act 1999 & 2007; Town & Country Planning (Mayor of London) Order 2008

Site: Sydenham Hill Estate
Our reference: GLA/5070

Further to the pre-planning application meeting held on 27 March 2019, I enclose a copy of the GLA's assessment which sets out our advice and matters which will need to be fully addressed before the application is submitted to the local planning authority.

The advice given by officers does not constitute a formal response or decision by the Mayor with regard to future planning applications. Any views or opinions expressed are without prejudice to the Mayor's formal consideration of the application.

Yours sincerely,


Head of Development Management

Cc:  TfL

Sydenham Hill Estate

in the London Borough of Lewisham

The proposal

The demolition of Mais House, the Otto Close garage units and the ballcourt block to provide additional residential units across the Sydenham Hill Estate.

The applicant

The applicant is **The City of London Corporation** and the architect is **Hawkins\Brown**.

Context

1 A request was received on 22 February 2019 for a pre-planning application meeting with the Greater London Authority on a proposal to develop the above site for the above uses. On 27 March 2019, a pre-planning application meeting was held at City Hall with the following attendees:

GLA group

- [REDACTED], Senior Strategic Planner (case officer)
- [REDACTED], Team Leader
- [REDACTED], Principal Strategic Planner/Urban Design
- [REDACTED], Housing and Land
- [REDACTED], Transport for London

LPA

- [REDACTED], LB Lewisham

Applicant

- [REDACTED], City of London Corporation
- [REDACTED] Hawkins\Brown
- [REDACTED], TO Studio
- [REDACTED], Peter Brett Associates
- [REDACTED], Peter Brett Associates

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Site description

3 The Sydenham Hill Estate occupies a 2.67 hectare site to the east of Sydenham Hill, to the south of its junction with Kirkdale. King's Crescent Estate occupies a 4.16 hectare triangular site adjacent to Clissold Park. The surrounding area is predominantly residential in character with two storey terrace housing on Kirkdale to the east, a four storey locally listed nursing home to the north and Dulwich Wood (within the London Borough of Southwark) to the west which is designated as Metropolitan Open Land, a Local Nature Reserve of Metropolitan Importance and a Conservation Area.

4 The estate is comprised of three distinct parts; Mais House, a vacant part two, three and four storey block which previously provided 63 flats for elderly residents; Lammas Green, three Grade II listed 1950s residential terraces situated around a central green; and Otto Close, 30 three storey residential maisonettes. To the south east of Otto Close are 38 single storey residential garages, a number of which are dilapidated and no longer in use, and an elevated hardcourt play area which has garage unit's below. The proposed development relates to Mais House, the Otto Close garages and hardcourt play area.

5 Mais House and Lammas Green are located within the Sydenham Hill Conservation Area with the vast majority of Otto Close, including the garages, located outside of the conservation area. The site slopes steeply west to east and is home to a number of mature trees.

6 The site has a Public Transport Accessibility Level (PTAL) of 2 where PTAL 6b is the highest level of accessibility and PTAL 0 is the lowest. There are 13 car parking spaces for Mais House, 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.

Planning History

7 There is no relevant planning history for the site

Details of the proposal

8 The proposals would see the demolition of the Mais House building, the Otto Close garage units and the ballcourt in order to provide new residential additional accommodation across three blocks on the Mais House site and three storey residential units on the site of the existing garages and ballcourt area.

9 Two separate schemes were presented in relation to the proposals on the Mais House site. The first of which would see a total 150 new residential units across the entire site, with the highest element being 12 storeys at Mais House. The second option would provide a total of 135 units, reaching up to a maximum of 9 storeys at Mais House. However, it is understood that following further feedback from the Council, and as a result of wider consultation feedback, the scheme currently being considered by the applicant would provide a total 128 units.

10 The proposed scheme would be referable to the Mayor under Category 1C of the Schedule to the Order 2008:

- **Category 1C:** *"Development which comprises or includes the erection of a building of (c) more than 30 metres high and is outside the City of London."*

Strategic planning issues and relevant policies and guidance

11 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is the 2011 Lewisham Core Strategy; 2014 Lewisham Town Centre Local Plan; 2014 Lewisham Development Management Local Plan; 2015 Lewisham Polices Map; and the 2016 London Plan (Consolidated with Alterations since 2011).

12 The following are relevant material considerations:

- The National Planning Policy Framework 2019 and National Planning Practice Guidance;
- Lewisham Planning Obligations SPD 2015;
- Draft Lewisham Local Plan 2015 (Regulation 18 consultation stage); and,
- The draft London Plan 2017 and the Mayor's Minor Suggested Changes, which should be taken into account on the basis explained in the NPPF.
- In August 2017, the Mayor published his Affordable Housing and Viability Supplementary Planning Guidance. This must now be read subject to the decision in *R (McCarthy & Stone) v. Mayor of London*.

13 The relevant strategic issues and corresponding policies and guidance are as follows:

- Housing *London Plan; Housing SPG; Affordable Housing and Viability SPG; Housing Strategy; Shaping Neighbourhoods: Play and Informal Recreation SPG; Shaping Neighbourhoods: Character and Context SPG;*
- Affordable housing *London Plan; Affordable Housing and Viability SPG; Housing SPG;*
- Density *London Plan; Housing SPG;*
- Urban design *London Plan; Shaping Neighbourhoods: Character and Context SPG; Housing SPG; Shaping Neighbourhoods: Play and Informal Recreation SPG;*
- Inclusive access *London Plan; Accessible London: achieving an inclusive environment SPG;*
- Sustainable development *London Plan; Mayor's Environment Strategy;*
- Transport and parking *London Plan; Mayor's Transport Strategy;*

Summary of meeting discussion

14 Following a presentation of the proposed scheme by the applicant team, meeting discussions covered strategic issues with respect to: principle of development, estate regeneration, affordable housing, urban design, inclusive access and transport. GLA officer advice in respect of these matters is set out within the sections that follow.

Principle of development

15 London Plan Policy 3.3 provides explicit strategic support for the provision of housing within London and sets a target for the Council to deliver a minimum of 1,385 homes a year in the plan period 2015-2025. The 10 year target is proposed to increase to 2,117 homes per year through the draft London Plan. London Plan Policy 3.3 and Policy H1 of the draft London Plan seek to optimise potential housing delivery across London, particularly through higher density residential development on brownfield sites with good existing or planned access to public transport and within walking distance of stations and town centres, including through the sensitive intensification of existing residential areas.

16 While the affordable housing and estate regeneration implications of this increased quantum of housing are discussed in the relevant sections of this report, in land use terms, the

principle of intensifying the residential uses on this estate is supported and will assist in boosting housing supply in line with London Plan Policy 3.3 and draft London Plan Policy H1. The proposals would also contribute to meeting Lewisham's annual housing targets.

Estate regeneration

17 The Mayor's Good Practice Guide to Estate Regeneration: Better Homes for Local People sets out principles for undertaking estate regeneration schemes. The key principles are:

- an increase in affordable housing, comprising like-for-like replacement and the maximisation of additional genuinely affordable housing;
- full rights to return or remain for social tenants;
- a fair deal for leaseholders, including home loss payments, and independent valuation for residents (paid by applicant);
- full and transparent consultation, with identified direct engagement and consultation events; and,
- a ballot is required if the total number of new homes is greater than 150 units and the application benefits from GLA funding.

Like for like replacement

18 London Plan Policy 3.14, draft London Plan Policy H10, the GPGER and the Mayor's Affordable Housing and Viability SPG make clear that in the redevelopment of sites any loss of affordable housing must be replaced by better accommodation and at least an equivalent amount of floorspace on a like-for-like basis. Draft London Plan Policy H10 further states that loss of hostels, staff accommodation, and shared and supported accommodation that meet an identified housing need should be satisfactorily re-provided to an equivalent or better standard.

19 As noted above, Mais House is currently vacant following the decant of all previous residents which was completed in 2018. It is understood that the vast majority of existing units at Mais House are studio units and that there would formerly have been a number of communal rooms on site. All previous occupants were tenants of the City of London and were over 60 years of age. Given this, the proposals would be considered supported/sheltered accommodation and would be subject to the requirements of draft London Plan Policy H10 as above. Notwithstanding this, further information with respect to the previously existing format and operation of the residential accommodation should be provided in order to demonstrate level of additional care (if any) and the specific type of residential accommodation provided.

20 The two presented schemes would deliver either 150 or 135 residential units, all of which would be delivered as social rented units. Whilst this would result in an uplift in affordable housing on the estate, there would be a loss of the existing 63 units of sheltered/supported accommodation. In this regard, the applicant has provided information from the London Borough of Lewisham which states that this area of the borough (postcode SE26) is well served by provision for older residents, with 12 schemes containing 354 units of age exclusive, sheltered or extra care accommodation. Of these, 77 are managed by a registered provider, 179 units are owned by the Local Authority, 50 are almshouses and 48 are provided privately. It has also been stated by the City Corporation that Mais House was decanted following a review of sheltered housing and their own increasing difficulties in finding residents for such accommodation, the details of this review should therefore be provided at application stage.

21 Whilst the information provided by the applicant demonstrates a relatively strong supply of residential provision for elderly residents in this specific part of Lewisham, any future planning application should fully demonstrate the existing accommodation is not meeting a defined need for this specific type of residential accommodation, both within the London Borough of Lewisham and across the City of London's housing stock. Subject to demonstrating that the 63 units do not meet

and identified housing need, the provision of 135/150 social rented units at the site would be supported.

22 The GPGER also seeks to ensure that existing tenants who have to move from their existing home, have a full right to a property on the regenerated estate of a suitable size, at the same or similar level of rent, and with the same security of tenure. With respect to the decanting process, it is understood that of the 47 tenants still present on site as this process commenced, the majority have moved to other City Corporation housing in the borough of their choice. A breakdown of where residents were relocated is set out below:

- 6 x LB Lewisham Housing
- 18 x City of London estates
- 1 x Croydon Housing
- 1 x Greenwich Housing
- 21 x deported/death/left before decant/found own accommodation abroad/moved into care homes

23 It is understood that the City Corporation has provided a commitment that any previous resident who wishes to move back to the estate following the completion of the new development will be able to do so. Subject to clarifications regarding the level of support previously (and currently) provided to these residents in their residential accommodation, this is supported. The City Corporation should also confirm that these tenants will pay the same rent as previously charged for the same type of unit.

24 Given the lack of leaseholders within the application site, this part of the GPGER is not relevant.

Full and transparent consultation

25 The GPGER sets out the Mayor's aspirations for full and transparent consultation, and meaningful ongoing involvement with estate residents throughout the regeneration process, to ensure resident support. The City Corporation began consultation existing Sydenham Hill Estate residents and the local community and stakeholders in November 2018, with a residents' steering group set up the same month. Any forthcoming application should fully detail consultation process undertaken, the results from this consultation and how these have fed into the design and development process.

Residents' ballot

26 As set out in the draft London Plan, the Mayor expects any proposals for estate regeneration schemes to take account of the requirements of the GPGER. This guide, the draft London Plan, and this report all make clear the Mayor will use his planning powers to make sure that any homes demolished are replaced on a like-for-like basis, and that these schemes maximise the delivery of additional affordable homes wherever possible.

27 Where a scheme involves demolition of existing homes, the guide is also clear the Mayor will use his non-planning powers to support resident ballots by making his funding conditional on the proposed scheme winning a ballot. The details of this funding condition, and of transitional arrangements, have been subject to a public consultation, and their final versions will be published when responses have been considered. Whilst considerations around ballots and funding conditions are not planning issues, and will not affect the Mayor's planning decision in this case, the Mayor encourages landlords to use ballots as widely as possible in line with his Good Practice Guide.

Housing and affordable housing

28 As set out in the GPGER, in addition to ensuring no net loss of affordable homes, estate regeneration schemes must provide as much additional affordable housing as possible. London Plan Policy 3.12, draft London Plan Policies H6 and H10 and the Mayor's Affordable Housing & Viability SPG requires all estate regeneration schemes to proceed by the Viability Tested Route, to ensure that additional affordable housing delivery (beyond the replacement of existing) is maximised. Draft London Plan Policy H7 sets out the Mayor's preferred tenure split of at least 30% low cost rent, at least 30% as intermediate products and the remaining 40% to be determined by the Council.

29 Notwithstanding this, paragraph 4.7.13 of the draft London Plan and paragraph 2.42 of the Mayor's Affordable Housing and Viability SPG state that schemes which provide over 75% can achieve the Fast Track route, whatever the tenure mix, provided it is agreed with the Council and Mayor.

30 The proposals comprise 100% affordable housing (by habitable room) on-site, made up entirely of social rent provided at London Affordable Rent levels. This falls outside the Mayor's SPG tenure split requirement and the Council's expected target split outlined within Policy 15 of the Lewisham Core Strategy, which states that affordable housing that is provided should be provided as 70% social/affordable rented and 30% intermediate housing. However, it is recognised in all levels of policy that housing offers should respond to local need. In this instance the increased weight to social rent is considered an appropriate response to local need and is understood to be supported by the Council. As such the proposed tenure split is acceptable and full viability testing is not required.

31 Notwithstanding this, it was noted at the meeting that with the lower density scheme there is a possibility that a proportion of the new units would be provided as market units. Were this the case, then the scheme would have to follow the Viability Test Route and would be subject to early and late stage reviews in accordance with draft London Plan Policies H6 and H10 and the Mayor's Affordable Housing & Viability SPG. Having regard to above, along with the level of need for affordable housing and in particular social rented housing in Lewisham and London generally, the applicant is strongly encouraged to explore massing opportunities that maximise the level of social rented units on this site.

Unit mix

32 It is understood that the applicant is currently considered a proposed housing mix as follows:

Unit type	Total	City of London	Lewisham	%
1 bed (1p)	8	8	0	6
1 Bed (2p)	30	11	19	23
2 Bed (3p)	20	10	10	16
2 bed (4p)	38	19	19	30
3 bed (5p)	18	9	9	14
3 bed (6p)	2	1	1	2
4 bed (6p)	12	6	6	9

Total	128	64	64	100
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33 Policy H12 of the draft London Plan and London Plan Policy 3.8 require new developments to offer a range of housing choices, in terms of sizes and types. Policy H12 of the draft London Plan and London Plan Policy 3.11 give priority to family sized affordable housing. As noted in the table above, the new units are to be split 50:50 between LB Lewisham and the City Corporation. The above housing mix should therefore be agreed with both housing providers.

Children's play space

34 London Plan Policy 3.6 states that *"development proposals that include housing should make provision for play and informal recreation, based on the expected child population generated by the scheme and an assessment of future needs."* The scheme proposes to provide on-site children's play space within the area of green space located centrally within the site between Mais House and Otto Close. Whilst details of the play areas have not been finalised it is understood that this space would be designed to accommodate on site play space sufficient to meet the predicted child yield for the development. Nevertheless, as the proposals would see the removal of the existing ball court area, this play space should also be re-provided as part of the proposed child play space as to accord with the requirements of the Mayor's Shaping Neighbourhoods: Play and Informal Recreation Supplementary Planning Guidance.

Urban and inclusive design

35 Good design is central to all objectives of the London Plan, the objective to create a city of diverse, strong, secure and accessible neighbourhoods, to which Londoners feel attached whatever their origin, background, age or status. These objectives are mirrored in the draft London Plan, with the concept of Good Growth, growth that is socially and economically inclusive and environmentally sustainable, the bedrock of the plan. Policies contained within chapter seven of the London Plan, and chapter 3 of the draft London Plan, specifically look to promote development that reinforces or enhances the character, legibility, permeability and accessibility of neighbourhoods. It sets out a series of overarching principles and specific design policies related to site layout, scale, height and massing, internal layout and visual impact as ways of achieving this. It should be noted that Policy D11 of the draft London Plan introduces measures relating to fire safety that must be addressed via the planning process.

Site layout

36 The general site layout is supported. The proposed redevelopment of Mais House would be situated broadly within the curtilage of the existing building and the interventions at the south-eastern corner of the site, including the demolition of a ball court to provide an additional residential unit at the southern end of an existing row of terraces and the demolition of garages for the creation of family homes with frontages onto Otto Close, are well considered. The proposed layout would improve the quality of access to Lammas Green and passive surveillance onto Otto Close as the proposed residential units are accessed off the street.

Massing, scale and height

37 The proposal is situated in a generally low-density and suburban context. The proposal for a 4-9 storey development is broadly supported and is subject to a full TVIA and daylight/sunlight assessment. There is however understood to be some concerns with the impact of the 12 storey scheme on the local townscape, particularly given the relief of the site, which slopes steeply from west to east and would place further emphasis on the height of this tower when viewed from Kirkdale and Otto Close to the east. The applicant is advised to demonstrate the impact of the

development on the neighbouring listed estate and adjacent conservation area to ensure the development does not cause harm to their setting and character.

Architectural quality

38 The architectural approach is well-considered and the close integration between the design evolution of the proposed building and landscaping strategy is strongly encouraged. Further information on material choices and key details of the façade should be secured as part of the application.

Residential quality

39 Insufficient information was provided on internal layouts to provide comments on the residential quality. London Plan Policy 3.5 and Policy D4 of the draft London Plan promote quality in new housing provision, with further guidance provided in the Housing SPG. The scheme should be designed to meet and exceed London Plan and draft London Plan minimum residential space standards, and the proposal should seek to maximise the number of dual aspect units.

Urban Greening

40 In accordance with London Plan Policy 5.10 and Policy G5 of the draft London Plan, the proposals should contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage. The submitted information demonstrates that the proposals have been developed with a focus on high-quality green landscaping and as such a high greening factor should be achievable. Full details of greening measures, along with calculations of the urban greening factor should be provided with any forthcoming application.

Inclusive design

41 The aim of London Plan Policy 7.2 and draft London Plan Policy D5 is to ensure that proposals achieve the highest standards of accessibility and inclusion. Inclusive design principles if embedded into the development and design process from the outset help to ensure that people, including older people, disabled and Deaf people, children and young people can use the places and spaces proposed comfortably, safely and with dignity. Further information is available in the Mayor's Accessible London: Achieving an Inclusive Environment SPG.

42 The applicant is reminded to ensure that 90% of the units meet Building Regulation requirement M4 (2) 'accessible and adaptable dwellings' and 10% meet Building Regulation requirement M4 (3) 'wheelchair user dwellings' in accordance with London Plan Policy 3.8 and draft London Plan Policy D5. Additionally, any shared surfaces, routes to waste disposal and recycling, links to adjacent public transport and local services and facilities should be designed to be accessible, safe and convenient for everyone, particularly the disabled and older people. The proposed children's play space should also be safe and inclusive.

Heritage

43 The Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the tests for dealing with heritage assets in planning decisions. In relation to listed buildings, all planning decisions should "have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses" and in relation to conservation areas, special attention must be paid to "the desirability of preserving or enhancing the character or appearance of that area". The NPPF states that when considering the impact of a proposal on the significance of a designated heritage asset, great weight should be given to the asset's conservation, and the more important the asset, the greater the weight should be.

44 The proposed residential blocks on the Mais House site would be located within the Sydenham Hill Conservation Area and would also be visible in the setting of the Grade II listed terraces of Lammas Green, particularly in views looking north from the central yard of Lammas Green. As noted above, the applicant should provide a full visual impact assessment demonstrating the impact of the proposals on these designate heritage assets.

45 Should any harm be identified to these heritage assets, then this harm be weighed against the public benefits of the proposal as per paragraph 198 of the NPPF. In this regard, it is noted that whilst the proposed level of affordable housing has not been fully clarified, it would likely constitute a significant public benefit.

Transport

46 The proposed development should support the Mayor's aims for all Londoners to do 20 minutes of active travel each day and for at least 80% of trips across London to be made by active, efficient, and sustainable modes, i.e. walking, cycling and public transport by 2041.

47 The Draft London Plan states that sites in an Inner London OA should be car free and only provide disabled persons car parking. Further to this, applications should deliver 3% of all residential units with a blue badge parking space from the outset and should show through plans how blue badge parking up to 10% could be accommodated on-site if demand arises.

48 Cycle parking should meet the Draft London Plan standards and the facilities should be designed in accordance with the London Cycle Design Standards (LCDS), including consideration of stand style and layout and access arrangements to ensure that they are easily accessible.

49 Details of construction logistics should be provided with the application and secured to any approval. Further additional transport comments will be provided under separate cover.

Climate Change

Energy strategy

50 The applicant must follow the energy hierarchy, in accordance with London Plan Policy 5.9 and draft London Plan Policy S12. Guidance on energy assessments is available on the GLA website, dated October 2018 and provides information on revised targets, taking into account Part L of the Building Regulations and to provide details of the information required within the energy statement.

Conclusion

51 GLA officers welcome the opportunity to engage with the applicant on the proposals for the redevelopment of the site. The proposals should address the requirements to Mayor's Guide Good Practice Guide to Estate Regeneration. Any future planning application will need to address the issues raised in this report regarding affordable housing, urban design, inclusive access, children's play space, climate change mitigation as part of the application submission to ensure that the development complies with the London Plan.

for further information, contact GLA Planning Team:
[REDACTED], **Head of Development Management**

[REDACTED] [REDACTED]

[REDACTED], **Team Leader**

[REDACTED] [REDACTED]

[REDACTED], **Case Officer**

[REDACTED] [REDACTED]
