MAYOR OF LONDONLONDON ASSEMBLY

Letter to the Mayor about Stage 2 referral for Lesnes Estate

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Key information

Publication type: General

Publication date: Wednesday 18 October 2023

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Dear Sadiq,

Re: Stage 2 decision for GLA 2021/0853/S2 and LPA ref 21/01948/OUTEA – Lesnes Estate and Coralline Walk

Concerned constituents have been contacting me regularly regarding permission granted by Bexley Council on 13 October 2022 for Planning Application 21/01948/OUTEA, which has been referred to you for a Stage 2 decision:

"Outline application (all matters reserved) for the demolition of existing structures and the phased redevelopment to provide; up to 1,950 residential units (35% affordable housing), up to 3,225 sq.m. of non-residential floorspace (including a 400 sq.m. public house), enhancements to the Abbey Way public open space, and provision of car and cycle parking; public realm, open space, hard and soft landscape, highways, and other ancillary works."

A large group of residents came to City Hall on 12 October 2023 to present you with a letter requesting that you have public hearing for this application.

I support this call, and I urge you to direct to become the local planning authority for the application for the following reasons.

1. Resident ballot

In 2020, Peabody held a residents' ballot on Lesnes Estate, which asked eligible residents:

"Are you in favour of Peabody's proposal to include Lesnes Estate in their regeneration plans for South Thamesmead?"

Of the 65.4 per cent of residents that took part in the ballot, 70.2 per cent voted 'yes'.

However, while the landlord offer that was part of the engagement for the resident ballot says that residents will be provided with new homes, nowhere in the document are the words 'demolish' or 'demolition' used.

This is not transparent, nor is the form of the question that made up the ballot. Therefore, I maintain that this resident ballot and engagement do not meet guidance as set out in your guidance document, Better Homes for Local People: The Mayor's Good Practice Guide to Estate Regeneration.

2. Lack of affordable housing and principle of estate regeneration

In the Stage 1 report to Bexley Council, your officers advise them that the application does not yet comply with the London Plan, for the reasons set out in paragraph 216:[1]

"Though the proposals will re-provide the existing low-cost rented affordable housing floorspace, they will result in a loss of affordable housing when assessed on a per unit and per habitable room basis, and further information is required to explain this loss. Subject to the provision of a satisfactory explanation in respect of this loss, the scheme could accord with the requirements and key principles for estate regeneration. The applicant should demonstrate that ongoing involvement will take place with residents throughout the regeneration process, and how replacement affordable housing will be integrated into the development to ensure mixed and inclusive communities."

Further clarification is given in paragraph 81, where it states:

"Noting that 411 low-cost rented homes must be re-provided in accordance with Policy H8 of the London Plan, the indicative housing proposals demonstrate an overall loss of low-cost rented affordable housing when considered on a per unit and per habitable room basis, and a limited uplift when considered on a floorspace basis. It is disappointing that, given the significant uplift in housing across the site, the uplift in low cost rented floorspace as shown by the indicative masterplan proposals is just 113 sq.m."

3. Viability assessment

In paragraph 91 of the same report, it says: "There are a number of inputs to the viability assessment that require review and/or could improve viability if they were adjusted," specifically:

• "The proposed residential values seem conservative compared with Peabody's scheme at Southmere Village where Molior reports average asking prices of £542 per square foot.

And:

- "Although no benchmark land value has been included, the decant/buy back costs amount to £70.5 million which equates to approximately £38,000 for each new unit and is impacting on the overall viability of the scheme. The figure includes historic costs for Coralline Walk although only the affordable housing which forms part of current Lesnes Estate will be re-provided this is not a reasonable approach. A detailed schedule of these costs should be provided."
- 4. Whole life-cycle carbon (WLC) emissions

London Plan? Policy SI 2? sets out a requirement for development proposals to calculate and reduce WLC emissions as part of a WLC assessment. The Stage 1 officers report contains no mention of its view of WLC assessment of the proposals.

As this application is for a demolition and rebuild of an 11.07 hectare site, this lack of scrutiny of the WLC assessment is not acceptable.

5. Sustainable and green measures

It is disappointing that a scheme of this size, by a housing association such as Peabody, which is has a long and august history of providing long-lasting, well-designed social homes, should bring forward a design that is lacking in so many areas with regard to green and sustainable construction. I refer again to the conclusion in paragraph 216, which picks out:

- "Flood risk: The FRA provided for the proposed development does not comply with Policy SI.12 of the London Plan as it does not provide sufficient detail regarding the resilience and emergency planning measures to mitigate against the risk of breach flooding.
- "Sustainable drainage: The surface water drainage strategy for the proposed development does not comply with Policy SI.13 of the London Plan, as it does not provide sufficient information regarding the proposed discharge rate and attenuation volume for the Coralline Walk catchment. The drainage strategy plan should provide further detail with regards to the proposed SuDS, and rainwater harvesting needs to be included.
- "Water efficiency: Insufficient information has been provided in order to demonstrate that the development meets the requirements of Policy SI.5 of the London Plan. The Applicant should also include water harvesting and reuse to reduce consumption of water across the site. This can be integrated with the surface water drainage system to provide a dual benefit.
- "Transport: The proposed development should support the creation of a high quality, easy to navigate and accessible pedestrian and cycle network. An updated Active Travel Zone assessment, a revised multimodal trip generation assessment, a Road Safety Audit and further highway modelling is required. Discussions on necessary mitigation must continue, and financial contributions towards bus service enhancements may be required, and appropriate mitigation secured. Car parking should be reduced in line with objectives of the OAPF. A number of conditions are required, including in relation to cycle parking, construction logistics and travel plans."

On the basis of these points – and as requested by residents – I strongly urge you to direct to be the local planning authority for this application and hold a public hearing into it.

Yours sincerely,

Sian Berry

Green Party Member of the London Assembly

[1] Planning report GLA/0692/S1/01, 10 August 2021, Lesnes Estate and Coralline Walk, accessed 11/10/23,

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