

Kender Triangle, New Cross

in the London Borough of Lewisham

planning application no. DC/12/79828

Strategic planning application stage II referral (new powers)

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

The proposal

The construction of one part 6/ part 9 storey building, two 4 storey buildings and a number of two to three storey blocks to provide residential development of 204 units in the form of 164 flats and 40 houses, with associated private and communal amenity space, car parking, cycle storage, landscaping, vehicular access and refuse storage.

The applicant

The applicant is **Lewisham Council and Hyde Housing Association** and the architect is **HTA Architecture and Landscape**.

Strategic issues

The principle of this residential redevelopment and the overall **regeneration** to be gained is supported. The **affordable housing** provision has been justified. The Council is content with the tenure split and the move against the existing mono-tenure housing, which will help to address local housing need.

Further information requested from the applicant on **playspace provision and type, design, climate change, noise** and **transport** has been provided and these matters now satisfactorily meet strategic guidance. The use of relevant planning conditions/informatives and financial provisions have been secured to deliver the various elements of the scheme.

The Council's decision

In this instance Lewisham Council has resolved to grant permission.

Recommendation

That Lewisham Council be advised that the Mayor is content for it to determine the case itself, subject to any action that the Secretary of State may take, and does not therefore wish to direct refusal or direct that he is to be the local planning authority.

Context

1 On 18 May 2012 the Mayor of London received documents from Lewisham Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. This was referred to the Mayor under Categories 1A and 1C of the Schedule to the Order 2008:

Category 1A

1. "Development which comprises or includes the provision of more than 150 houses, flats, or houses and flats."

Category 1C

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

2 On 25 June 2012 the Mayor considered planning report PDU/1617/01, and subsequently advised Lewisham Council that the application did not comply with the London Plan, for the reasons set out in paragraph 108 of the above-mentioned report; but that the possible remedies set out in paragraph 110 of that report could address these deficiencies.

3 A copy of the above-mentioned report is attached. The essentials of the case with regard to the proposal, the site, case history, strategic planning issues and relevant policies and guidance are as set out therein, unless otherwise stated in this report. Since then, the application has been revised in response to the Mayor's concerns (see below). On 27 September 2012 Lewisham Council decided that it was minded to grant planning permission, and on 8 October 2012 it advised the Mayor of this decision. Under the provisions of Article 5 of the Town & Country Planning (Mayor of London) Order 2008 the Mayor may allow the draft decision to proceed unchanged, direct Lewisham Council under Article 6 to refuse the application or issue a direction to Lewisham Council under Article 7 that he is to act as the Local Planning Authority for the purposes of determining the application. The Mayor has until 21 October 2012 to notify the Council of his decision and to issue any direction.

4 The decision on this case, and the reasons will be made available on the GLA's website www.london.gov.uk.

Update

5 At the consultation stage Lewisham Council was advised that the application did not comply with the London Plan, for the reasons set out in paragraph 108 of the above-mentioned report; but that the possible remedies set out in paragraph 110 of that report could address these deficiencies:

Affordable housing: The applicant's financial viability appraisal should be submitted and the Council should verify that the split of affordable housing to be provided is matched to the local needs identified for the Borough.

Children's play space: The applicant should confirm the child yield and demonstrate on plan how this play space will be provided to comply with policy 3.6 of the London Plan.

Urban design: Some matters in relation to the site's layout and legibility need to be addressed so ensure that the proposal is consistent with London Plan policies on design.

Climate change: Further revisions and information is required before the proposals can be considered acceptable and the carbon dioxide savings verified.

Noise: Appropriate internal and external noise environments could be achieved within the proposed development. However, further clarifications are required in terms of the following items: survey periods and validity of results, building services plant noise emission limits and assessment criteria, acoustic performance of glazing and ventilation systems and noise mitigation measures for balconies.

Transport: TfL has no significant objections to the principle of the proposed development, however further work is required by the applicant in order to comply with the transport policies of the London Plan detailed in chapter six.

Affordable housing

6 Further to the queries raised at stage 1, the applicant provided verification from the Council to justify the proposed tenure split of 70/30 in favour of social rented accommodation. The scheme will provide 150 affordable housing units, including 120 affordable rent units and 30 shared ownership units. The remaining 54 units, which total the overall provision of 204 units, will be private units. The Council’s letter to The Hyde Group states that this proposal will secure good quality affordable housing with an element of mixed tenure in an area that was almost entirely mono-tenure originally. An element of private sale housing is necessary in this scheme to achieve financial viability.

7 The applicant provided a viability assessment which satisfactorily demonstrated that the maximum reasonable amount of affordable housing was being delivered.

8 The affordable housing issues have therefore been adequately addressed.

Children’s playspace

9 The applicant is proposing to provide 3467.4 sq.m of amenity space, which exceeds the results of the GLA child yield standards, which calculated the requirement/provision to be 2059.5 sq.m for this development proposal.

10 The applicant is proposing to include playable landscape features in the central square, which is welcomed. It was recommended that the applicant consider the provision of interesting play features as part of the landscaping proposed in the semi private court yards (blocks 1 and 3) as well, so that there is a dedicated safe and personal area for 0-5 year olds to play in closer proximity to their home. The applicant has responded positively to this and proposed scattered timber cubes and or other appropriate features within the landscape to be developed at the detailed design stage to replicate the informal play area proposed for the central square.

11 As such, the children’s play space provision has been suitably addressed.



Courtyards, GLA Update, 4th September 2012)

(Source: Private and Communal Amenity Space –

Urban design

12 The applicant has provided further justification for the chosen alignment of the new north south route, noting that it follows a key desire line and takes account of existing and proposed buildings. The route is therefore accepted.

13 Concern was expressed regarding the diagonal and set back building line of block 6 fronting New Cross Road. The applicant has provided further justification for this noting the need to avoid roots of existing mature trees and prevent overshadowing of the lower floor of the existing Hatfield Towers. The alignment is therefore accepted.

14 The applicant was also asked to give further consideration to the introduction of individual entrances to the ground floor units fronting New Cross Road. The applicant has responded to this highlighting the level change between these units and the street and therefore the difficulty in achieving lifetime homes standard and the potential tensions with nearby uses. While GLA officers maintain the view that provision of front entrances to streets is a key urban design principle that should be pursued it is accepted that overall this is a well designed scheme that responds positively to its context and will provide a good standard of accommodation.

Climate change

15 The proposal originally incorporated individual gas boilers for the flats, which was not supported. The applicant is now proposing communal heating from an energy centre which is supported. The revisions now meet the future proofing requirements for later connection to area wide district heating.

16 The concerns raised by the applicant regarding communal heating, particularly heat loss have been addressed through the use of super insulated pipe work and a low temperature supply arrangement.

17 The heat network will also be metered to provide data for a future case study on district heating design in the UK. Compliance with the energy issues raised are unlikely to generate any concerns for air quality, which are being mitigated through relevant conditions in the decision notice. As a result, the climate change elements have been suitably addressed.

Noise

18 The various matters relating to noise and vibration raised in the stage 1 report were addressed by the applicant and a revised report was provided. This additional information was assessed by the GLA's noise consultants and it is considered that the noise and vibration matters have been adequately addressed.

Transport for London's comments

19 At stage 1 TfL had no significant objections to the principle of the proposed development but considered that further work was required with respect to electric vehicle charging points, car club, disabled and cycle parking provision, the Travel Plan, and in auditing the accessibility of the site to the surrounding area, public transport and local facilities. The applicant has subsequently satisfactorily addressed these points and suitable conditions/section 106 obligations have been resolved to be imposed by the Council.

Other comments

20 The draft Section 106 details the following contributions to be provided by the applicant:

- 150 affordable housing units;

- 1 to 2 car club spaces;
- 20 wheelchair housing units;
- Controlled parking zone permit within the immediate vicinity of the site. Permits will need to be applied for by occupants;
- An education contribution of £732,548;
- An employment and training contribution of £20,455;
- A health services and facilities contribution of £78,000;
- An open space contribution of £57,896;
- A leisure contribution of £48,807;
- A community facilities contribution of £18,844, including community space and libraries;
- A transport and environmental improvement contribution of £125,675;
- Meeting the Council's legal, professional and monitoring costs associated with the agreement;
- Reasonable endeavours to secure 50% of the construction workers from the local labour market; and
- Landscaping provision to the south of block 6 if it is owned by the Council. If this land is owned by TfL then the applicant will enter into a Section 278 agreement with TfL to secure details for landscaping. These proposals will be submitted to the Council prior to the occupation of block 6.

Response to consultation

21 This proposal is the final phase of the redevelopment of the wider Kender Triangle redevelopment proposals and therefore consultation discussions between Lewisham Council, Hyde Housing Association and occupants (to whom the site will be transferred), began in 2007.

22 A public exhibition event took place in July 2011 and 9 people attended, after earlier forum meetings that were held with the then tenants to get their opinions on how to design the scheme. The design of the scheme was 'on the whole, welcomed' by the residents.

23 Three local residents objected to the scheme on grounds of level of parking and drainage. A local business also objected on grounds of parking. These matters have been addressed in the Council committee report.

24 The following statutory consultees responded:

- **Thames Water:** raised no objection subject to the use of conditions and informatives relating to surface water drainage, impact piling and discharging into a ground water sewer. These have been imposed

- **Environment Agency:** raised no objection subject to the use of planning conditions relating to provisions being made for surface water drainage and contamination in line with the submitted flood risk assessment. These have been imposed.
- **English Heritage (Archaeology):** Recommended standard archaeological investigation conditions, which have been imposed.

Article 7: Direction that the Mayor is to be the local planning authority

25 Under Article 7 of the Order the Mayor could take over this application provided the policy tests set out in that Article are met. In this instance the Council has resolved to grant permission with conditions and a planning obligation, which satisfactorily addresses the matters raised at stage I, therefore there is no sound planning reason for the Mayor to take over this application.

Legal considerations

26 Under the arrangements set out in Article 5 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor has the power under Article 6 to direct the local planning authority to refuse permission for a planning application referred to him under Article 4 of the Order. He also has the power to issue a direction under Article 7 that he is to act as the local planning authority for the purpose of determining the application and any connected application. The Mayor may also leave the decision to the local authority. In directing refusal the Mayor must have regard to the matters set out in Article 6(2) of the Order, including the principal purposes of the Greater London Authority, the effect on health and sustainable development, national policies and international obligations, regional planning guidance, and the use of the River Thames. The Mayor may direct refusal if he considers that to grant permission would be contrary to good strategic planning in Greater London. If he decides to direct refusal, the Mayor must set out his reasons, and the local planning authority must issue these with the refusal notice. If the Mayor decides to direct that he is to be the local planning authority, he must have regard to the matters set out in Article 7(3) and set out his reasons in the direction.

Financial considerations

27 Should the Mayor direct refusal, he would be the principal party at any subsequent appeal hearing or public inquiry. Government guidance in Circular 03/2009 (*Costs Awards in Appeals and Other Planning Proceedings*) emphasises that parties usually pay their own expenses arising from an appeal.

28 Following an inquiry caused by a direction to refuse, costs may be awarded against the Mayor if he has either directed refusal unreasonably; handled a referral from a planning authority unreasonably; or behaved unreasonably during the appeal. A major factor in deciding whether the Mayor has acted unreasonably will be the extent to which he has taken account of established planning policy.

29 Should the Mayor take over the application he would be responsible for holding a representation hearing and negotiating any planning obligation. He would also be responsible for determining any reserved matters applications (unless he directs the council to do so) and determining any approval of details (unless the council agrees to do so).

Conclusion

30 The principle of developing this site to complete the final stages of urban estate renewal in an area of regeneration is supported. Further information has been provided to support the proposed affordable housing offer and the tenure split/unit mix. Further information has also been provided on the children's play space, design, climate change, noise and transport matters.

Planning conditions, informatives and provisions within decision notice and the draft section 106 agreement have been applied to address climate change and mitigation matters (noise vibration, air quality, flood risk management, ground water discharge).

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Kender Triangle

in the London Borough of Lewisham

planning application no. DC/12/79828

Strategic planning application stage 1 referral (new powers)

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

The proposal

The construction of one part 6/ part 9 storey building, two 4 storey buildings and a number of two to three storey blocks to provide residential development of 204 units in the form of 164 flats and 40 houses, with associated private and communal amenity space, car parking, cycle storage, landscaping, vehicular access and refuse storage.

The applicant

The applicant is **Lewisham Council and Hyde Housing Association** and the architect is **HTA Architecture and Landscape**.

Strategic issues

The principle of this residential redevelopment and the overall **regeneration** to be gained is acceptable. The percentage of **affordable housing** provision exceeds current London Plan targets and has not been the subject of a viability assessment. The Council will need to justify the affordability split against local housing need. The scheme proposes **family housing** on the site which is welcomed.

Further information is also requested from the applicant in order to ensure compliance with strategic planning policy on **playspace provision and type, inclusive design, climate change-energy, noise and transport** proposals. The use of relevant planning conditions/agreements is also required to secure the **affordable housing, playspace, renewable energy, noise and transport** elements of the scheme.

Recommendation

That Lewisham Council be advised that while the application is generally acceptable in strategic planning terms the application does not fully comply with the London Plan, for the reasons set out in paragraph 108 of this report; but that the possible remedies set out in paragraph 110 of this report could address these deficiencies.

Context

On 18 May 2012 the Mayor of London received documents from Lewisham Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008 the Mayor has until 28 June 2012 to provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.

The application is referable under Categories 1A and 1C of the Schedule to the Order 2008:

Category 1A

1. Development which comprises or includes the provision of more than 150 houses, flats, or houses and flats.

Category 1C

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

Once Lewisham Council has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; take it over for his own determination; or allow the Council to determine it itself.

The Mayor of London's statement on this case will be made available on the GLA website www.london.gov.uk.

Site description

The application site is 1.504 hectares, which has been cleared of the 144 run down dwellings that occupied the site. The site is bounded by New Cross Road to the south, Avonley Road to the west, Barlborough Street to the north and Monson Road to the east. The surrounding area is predominantly residential in character and includes the previous completed phases of the Kender Triangle residential regeneration programme.

The A2 New Cross Road is part of the Transport for London Road Network (TLRN). Following the removal of the Kender Triangle gyratory system in 2010, New Cross Road is now two way as is Queen's Road (A202) to the south which is also part of the TLRN. Kender Street itself is still one way northbound towards New Cross Road. The gyratory removal scheme was designed to take account of the regeneration proposals for the Kender Triangle housing and included improvements to pedestrian crossings and footways and traffic calming. No part of the Strategic Road Network (SRN) is nearby.

Thirteen bus routes (including two with 24 hour services) can be accessed within an acceptable walking distance of some or all of the site, including four which stop adjoining the New Cross Road boundary of the site. New Cross Gate London Overground and national railway station is located just under 900m away to the east of the nearest part of the site, whilst Queen's Road Peckham railway station is a similar distance to the west but again only from the nearest part of the site. The site is stated as recording a public transport accessibility level (PTAL) of between 3 and 4 on a scale of 1 to 6 where 6 is considered as excellent, although close to New Cross Road the PTAL is 6a and furthest away it drops to 2.

Cycle Super Highway Route 5 (CS5) between Lewisham and Victoria will go along Queens Road about 400m south of the nearest part of the site. CS5 is due to be launched next year.

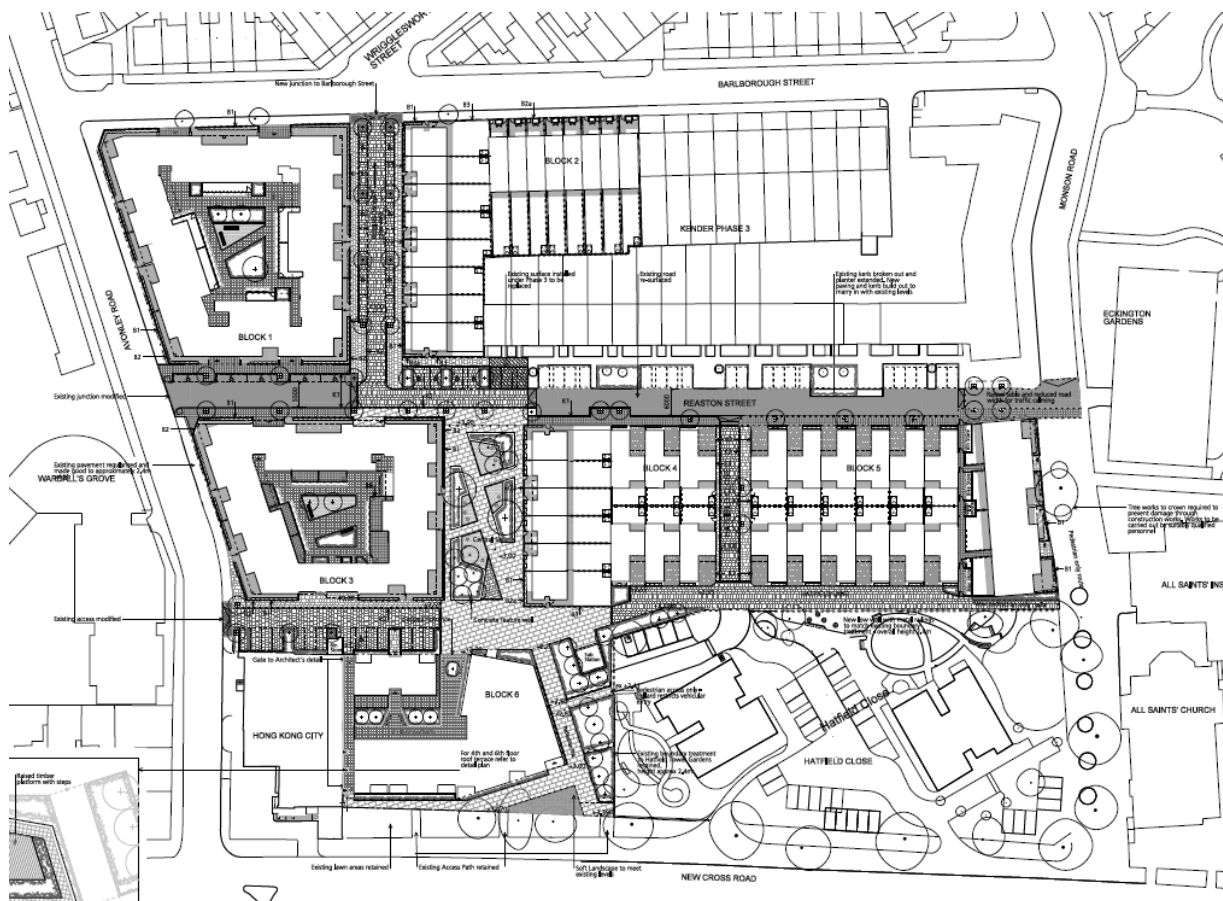
The site is situated 2km north-west of New Cross Town Centre, with a few commercial properties fronting onto the New Cross Road.

The north of the site is characterised by two-storey terraced properties on Barlborough Road and Wigglesworth Road. The former New Cross Hospital site on Wardalls Grove is located to the west of the site, which is directly opposite proposed block 3-see figure 1 below. This site was recently granted planning permission for the development of 127 residential units.

The site also falls within the Lewisham-Catford-New Cross Opportunity Area as defined by London Plan policy 2.13, and also lies within flood zone 3.

Details of the proposal

Figure 1: The proposed scheme (source: Drawing no. KEN AL 9200)



This application is for phase 4 of the residential renewal programme, which would complete the regeneration of the estate. The proposal is for six blocks of residential units comprising a mix of three blocks of flats (blocks 1, 3 and 6) delivering 164 units, and three block areas of houses (blocks 2, 4 and 5) delivering 40 houses. The building heights will range from two to nine storeys in height.

The proposal aims to regenerate the former 4-5 storey declining residential estate. The scheme will provide a range of residential units of varying sizes and tenures and seeks to deliver a high element of affordable housing, provision of family sized accommodation and enhance public realm and landscape through the provision of private and communal open spaces and active frontages, thereby reducing the antisocial character of the area.

The proposed blocks will be sited as shown above and provide the following:

- The tallest building block (block 6) will front onto New Cross Road. It will be part 6 and part 9 storeys in height and will provide 1 and 2 bedroom market sale units.
- The blocks fronting onto Avonley Road and to the rear of block 6 will be two 4-storey buildings, which will provide a mixture of social and intermediate flatted accommodation.
- Terraced town houses are proposed at the northern end of the site to reflect the Victorian neighbourhood they will front. These will be between 2 and 3 storeys and will provide large family sized units for rent.
- The far south eastern corner will provide 2 bedroom flats for shared ownership.

Case history

The planning site surrounded by redevelopment plots which are part of the Kender Estate regeneration programme. The Mayor considered an application on 11 June 2008 reference PDU 2165/01 and Lewisham case reference 13509 for the Kender New Deal Community Centre. This application proposed the development of a mixed use development covering an area of approximately 1 hectare, which delivered one to ten storey blocks, comprising 173 residential units, 3389 sq.m. commercial and community uses (including doctor's surgery, library, gym, cafe, creche), up to 47 car parking spaces and associated pedestrian and vehicular access, landscaping and associated works. This site is located opposite this proposal site, south of New Cross Road.

In 2003 the Kender Triangle phase 2A, Barlborough Street application was granted permission (reference: DC/02/52359/X), which is on the adjacent site to Palm Tree House (part of the subject site). Permission was granted here for the redevelopment to provide a 2 storey terrace, plus roof space comprising 6 three bedroom houses and 4 four bedroom houses. This development has been completed.

The Wardalls Grove site (part of the former New Cross hospital site) to the west of this proposal site was also granted planning permission in February 2011 to be redeveloped to provide 127 residential units in 2 blocks, ranging from 2-6 storeys in height. The Lewisham case reference for this is DC/10/75036 and the site is in the process of being constructed.

Strategic planning issues and relevant policies and guidance

The relevant issues and corresponding policies are as follows:

- Land use principle London Plan; the Mayor's Economic Development Strategy
- Housing London Plan; Housing SPG; Providing for Children and Young People's Play and Informal Recreation SPG, Housing Strategy; Interim Housing SPG; Housing SPG consultation draft 2012
- Affordable housing London Plan; Housing SPG, Housing Strategy; Interim Housing SPG; Housing SPG consultation draft 2012

- Children’s play space *London Plan*
- Inclusive design *London Plan; Accessible London: achieving an inclusive environment SPG; Planning and Access for Disabled People: a good practice guide (ODPM)*
- Urban design *London Plan*
- Climate change *London Plan; Sustainable Design and Construction SPG; Mayor’s Climate Change Adaptation Strategy; Mayor’s Climate Change Mitigation and Energy Strategy; Mayor’s Water Strategy*
- Air quality *London Plan; draft Early Minor Alteration to the London Plan; the Mayor’s Air Quality Strategy;*
- Ambient noise *London Plan; the Mayor’s Ambient Noise Strategy;*
- Transport *London Plan; the Mayor’s Transport Strategy; Land for Transport Functions SPG*
- Crossrail *London Plan; Mayoral Community Infrastructure Levy; Crossrail SPG*

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 Lewisham Core Strategy 2011 and the 2011 London Plan.

The following are also relevant material considerations:

- The Lewisham Site Allocations and Generic Development Control Policies Development Plan Document (Preferred Options) were consulted on in June 2007 and have some weight as a material consideration.
- The National Planning Policy Framework and Technical Guide to the National Planning Policy Framework
- The Draft Revised Early Minor Alteration to the London Plan

Land use principle (regeneration)

Given the context of ongoing residential regeneration in the immediate vicinity of this site as part of a multiphase project, which began 10 years ago, the principle of this residential proposal (known as Kender Triangle) is acceptable. It complies with the aims of London Plan policy 2.13, since the site falls within the Lewisham–Catford–New Cross Opportunity Area.

Affordable housing

London Plan Policy 3.12 requires borough councils to seek the maximum reasonable amount of affordable housing when negotiating on individual private residential and mixed-use schemes. In doing so each council should have regard to it’s own overall target for the amount of affordable housing provision. This target should take account of the requirements of London Plan Policy 3.11, which include the strategic target that 60% of new affordable housing should be for social rent and 40% for intermediate rent or sale. The Mayor has published an early minor alteration to the London Plan to address the introduction of affordable rent, with further guidance set out in a draft Affordable Rent SPG. With regard to tenure split the Mayor’s position is that both social rent and affordable rent should be included within the 60%.

While the Mayor has set a strategic investment benchmark that across the affordable rent programme as a whole rents should average 65% of market rents, this is an average investment

output benchmark for this spending round and not a planning policy target to be applied to negotiations on individual schemes.

Policy 3.12 is supported by paragraph 3.71, which urges borough councils to take account of economic viability when estimating the appropriate amount of affordable provision. The ‘Three Dragons’ development control toolkit or other recognised appraisal methodology is recommended for this purpose. The results of a toolkit appraisal might need to be independently verified. Paragraph 3.75 highlights the potential need for re-appraising the viability of schemes prior to implementation.

In accordance with the Lewisham Council Core Strategy (June 2011) Policy 1 seeks the maximum provision of affordable housing on sites capable of providing 10 or more dwellings, with 50% provision as the starting point for negotiations. Whilst the London wide target is a 60/40 split for social rented and intermediate housing, the Council’s affordable provision split is 70/30 in favour of social rented accommodation.

A breakdown of the residential units is shown below (tenure split and unit mix proposed):

Dwelling size	Private	Social rented	Intermediate	Total units
1 bed	18	22	4	44
2 bed	36	32	22	90
3 bed	0	47	4	51
4 bed	0	19	0	19
Total	54	120	30	204
Total %	26%	59%	15%	

The proposal includes 204 units of which 164 will be flats and 40 houses. The application proposes a mix of 74% social rented housing and 26% intermediate housing which is higher than the Council's target and the Mayor's own targets. Justification of the proposed tenure split should be provided and discussions with Lewisham Council should be undertaken to ensure the proposal meets the needs of its residents.

Acknowledging that the scheme proposes an increase in units and affordable housing, it is important to note that the intermediate component of housing delivery is also important and therefore the Council will need to verify whether this provision is reflective of the needs of the Borough.

The applicant has not submitted a financial viability assessment and it is understood from the agent that this was not considered necessary since the scheme proposes 74% affordable housing (by unit). The level and split of affordable housing was discussed at length with the Council before the submission of the application due to the land being owned by the Council, and from discussion with the agent it is known that the figures arrived at are based in part on what was previously on the site as well as taking into account the other phases of the Kender Regeneration project. It is also known that Hyde Housing Association will be the Registered Social Landlord for this scheme.

While it is acknowledged that the proportion of affordable housing is high, this is in part driven by the need to replace existing units. The London policy is to seek the maximum reasonable amount, and does not set a fixed or upper limit. As described in paragraph 34, where cross-subsidy is required to fund estate renewal. Private development need not provide the ‘normal’ level of

additional affordable housing. However, to test the maximum reasonable amount is being provided a financial appraisal is required.

It is acknowledged that at present national policy in respect of affordable housing/affordable rent is changing. The applicant should provide justification based on local specific evidence and also with reference to recent changes in the Government's approach to the provision of affordable housing and definition of affordable rent to support the proposed affordable housing tenure split.

Housing choice

London Plan Policy 3.8 and the associated supplementary planning guidance promote housing choice and seek a balanced mix of unit sizes in new developments. The London Housing Strategy sets out strategic housing requirements and Policy 1.1C of the Strategy includes a target for 42% of social rented homes to have three or more bedrooms.

This proposal exceeds that target providing 63% social units with 3-bedrooms or more.

Estate renewal

Policy 3.14 of the London Plan resists the loss of housing, including affordable housing, unless it is replaced at existing or higher density with equivalent floorspace. Paragraph 3.82 of the London Plan gives further advice on the Mayor's approach to estate renewal. More detailed guidance is set out in Section 20 of the Housing SPG. This clarifies that there should be no net loss of affordable housing, which can be calculated on a habitable room basis and should exclude right to buy properties. Replacement affordable housing can be of a different tenure mix where this achieves a better mix of provision.

Private housing that forms part of estate renewal schemes need not provide the normal level of additional affordable provision, where this is necessary to cross subsidise redevelopment. This would need to be justified through a financial appraisal.

In this instance there is a gain of 6 units (150 affordable units against the original 144 units) and 723 habitable rooms against the pre-demolished 410 habitable rooms. Overall there are now 204 units proposed on the site, 150 of which are affordable. Further, the proposed scheme provides 579 affordable habitable rooms (out of a total of 723 habitable rooms), which is an increase of 169 affordable habitable rooms over that which was existing.

The table below shows the number of units previously on the Kender 4 site, which have now been demolished:

	Bedsit	1-bed	2-bed	3-bed	Total
No. of units demolished	28	38	42	36	144

Based on the number of units specified, it can be calculated that the total number of habitable rooms demolished to be 410 (all of which were affordable). This is based on the following:

- Bedsit = 1 habitable room
- 1-bed unit = 2 habitable rooms
- 2-bed unit = 3 habitable rooms
- 3-bed unit = 5 habitable rooms

The scheme complies with policy 3.14.

Density

London Plan Policy 3.4 seeks to optimise the potential of sites having regard to local context, design principles and public transport accessibility. The site has a public transport accessibility level of 6a close to New Cross Road and furthest away it drops to 2. The London Plan density matrix therefore suggests a residential density of between 200 and 700 habitable rooms per hectare for sites with a PTAL of four to six. This requirement is inclusive of sites with a PTAL of two also.

The applicant sets out that the application has a density of 723 habitable rooms in total, however the site area is 1.504ha, therefore the density figure for the proposal has been calculated as 479 habitable rooms per hectare.

Children's play space

Policy 3.6 of the London Plan sets out 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 applicant has not provided an estimate of child yield. However, using the methodology within the Mayor's supplementary planning guidance 'Providing for Children and Young People's Play and Informal Recreation' it is anticipated that there will be approximately 206 children within the development. The guidance sets a benchmark of 10 sq.m. of useable child playspace to be provided per child, with under-5 child playspace provided on-site. As such the development should make provision for 2059.5 sq.m. of playspace.

This play space requirement has been calculated by the child yield spreadsheet from inserting the figures provided in the tables on page 2 of the Design and Access Statement. The proportion of children in age categories has been calculated as follows:

Age	No. of children	%
Under 5	71	34
5-11	77	37
12+	59	28
Total	206	100

In order to comply with policy 3.6 the applicant should confirm the yield, and make appropriate provision. Where there is reliance on existing provision details of accessibility and quality should be provided. Contribution may be required to upgrade provision.

Inclusive design

London Plan Policy 7.2 'An inclusive environment' seeks to ensure that proposals aim for the highest standards of accessibility and inclusion (not just the minimum), and that the design process has considered how everyone, including disabled and deaf people, older people, children and young people, will be able to use the places and spaces that are proposed.

The scheme proposes to deliver 100% of housing to life time homes standards and 10% of homes to wheelchair accessible housing standard, or be 'easily adaptable'. It is known that dedicated wheelchair units will be located in blocks 1 and 3 on the ground floor, with some stacked above and served by two lifts. These units will be rented and will be fitted out for specific tenants from

date of occupation. Adaptable units will be located at the ground floor of block 3 or stacked on the south side of block 6. These will be available for shared ownership or outright sale.

The accessibility drawings indicate that the room sizes, dimensions and door widths, passage ways etc are to the necessary requirements and it is stated in the design and access statement that the provision has considered the local needs specified by the Lewisham Strategic Housing Team. Further, it is stated that dedicated units may be refined to match the needs of future occupiers as their needs become known.

Urban design

Good design is central to all objectives of the London Plan, in particular 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. Policies contained within chapter seven 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.

The proposed development is well designed, maximising the site and creating a simple permeable and legible urban structure which is welcomed. However, there are a few aspect of the scheme that require further consideration with relation to the overall layout as well as the arrangement of individual residential elements. Theses concerns are expressed in more detail below, as are aspects of the scheme that are particularly welcomed.

Layout

Of particular relevance to this proposal are London Plan Policy 7.1, that sets out the requirement for developments to reinforce or enhance the permeability and legibility of neighbourhoods, so that communities can easily access community infrastructure, commercial services and public transport; and London Plan Policy 7.3 that sets out a series of overarching principals to ensure that the design of a development should look to reduce the opportunities for criminal behaviour by maximising activity throughout the day and night, clearly articulating public and private spaces, enabling passive surveillance over public spaces and promoting a sense of ownership and respect.

The overall layout of development on the site is welcomed. The use of perimeter block typologies is strongly supported as they create clear front and backs to buildings, creating the opportunity for active frontages on all public facing aspects of the development, providing good enclosure of surrounding spaces and creating a clear threshold between the public and the private realm.

The aspiration of creating a new route from New Cross Road to Balborough Street and linking up to Wigglesworth Street is welcomed, however the alignment of the street between Block 1 and Block 2 undermines the continuity and legibility of this route. Consideration needs to be given to how this route can be made more legible and whether the diagonal building line along the east of Block 6 is appropriate.

There is also concern with the southern building line of Block 6. Existing buildings along New Cross Road to the west set up a strong building line which is already significantly set back from the carriageway. The proposed building line diverts this further towards the site and away from New Cross Road. This undermines the existing building line and puts significant emphasis on the two towers which are not considered to be of enough civic importance to be articulated in this way. Further justification or consideration of this is required.

Housing

Policy 3.5 of the London Plan introduces a new policy on the quality and design of housing developments. Part A of the policy states that housing developments should be of the highest quality internally, externally and in relation to the wider environment. Part C of the policy states that new dwellings should generally conform with the dwelling space standards set out in Table 3.3, have adequately sized rooms and convenient and efficient room layouts. Part E of the policy states that the Mayor will provide guidance on implementation of this policy including on housing design for all tenures. The reasoned justification provides further guidance and explanation. In particular, paragraph 3.32 makes clear that “Securing new housing of the highest quality and protecting and enhancing residential neighbourhoods are key Mayoral priorities”. The London Housing Design Guide (LHDG) and the draft replacement Housing SPG, provides further guidance on the implementation of these policies.

Of particular relevance to this proposal is the need to increase the levels of animation on the public realm and provide as many residents with their own identifiable front entrances. This can be achieved by ensuring that each circulation core has its own access directly from the public realm and all ground floor units are accessed directly from the street and is expected in all new buildings as set out in section 3.1 of the London Housing Design Guide. It is unclear as to whether the main entrances to every ground floor unit is accessed directly from the street, and this needs to be clarified. If this is not the case further consideration is required.

The LHDG sets out that no more than eight units should be served by any single core on each floor. This ensures residents feel a strong sense of ownership over communal spaces minimising the amount of maintenance required. All apartment blocks in the scheme are well designed, minimising the number of units per core on each floor, which is welcomed.

Also relevant to this proposal is that the LHDG sets out that single aspect units should be avoided as they are more difficult to naturally ventilate, are more likely to overheat, will usually have rooms with no daylight and are less adaptable. No north facing single aspect units will be accepted. Officers are satisfied that the number of single aspect units have been minimised and that there are no north facing single aspect units which is welcomed.

All the units meet or exceed the minimum space standard, which is welcomed.

Scale, height and massing

The scale, height and massing of a development will have an impact on the legibility, character and adaptability of its surrounding urban area. London Plan Policy 7.4B sets out the requirement for buildings to provide a contemporary architectural response to the site whilst having regard to the pattern and grain of development in the wider area and being human in scale. London Plan Policy 7.6B sets out the requirement for development to be of a proportion, composition, scale and orientation that enhances activates and appropriately encloses the public realm. London Plan Policy 7.7 sets out additional design requirements for tall and large-scale buildings, which are defined as buildings that are significantly taller than their surroundings and/or have a significant impact on the skyline. The policy includes requirements for buildings to emphasize points of civic or visual significance and have ground floor activities that provide a positive relationship to surrounding streets and to incorporate the highest standards of architecture.

The proposed scheme varies in height between two to nine storeys in height, with the majority of it being approximately four storeys. The nine storey element sits on the entrance to the site from New Cross Road and adjacent to the two tower blocks. This is a welcomed strategy as it provides a good mix of typologies, at an appropriate density and is in keeping with the wider character of the surrounding area.

Appearance

Whilst the appearance of this development is not considered to be a strategic issue, its subdued aesthetic and use of brick as the main material creates a familiar and friendly appearance appropriate for a housing development which is welcomed.

Climate change/energy

This section of the report addresses the energy measures proposed for the development against the Mayor Energy hierarchy detailed in policy 5.2 (minimising carbon dioxide emissions) of the London Plan.

BE LEAN

Energy efficiency standards

A range of passive design features and demand reduction measures are proposed to reduce the carbon emissions of the proposed development. Both air permeability and heat loss parameters will be improved beyond the minimum backstop values required by building regulations. Other features include energy efficiency and mechanical ventilation with heat recovery.

Based on the information provided in Figure 10, the development appears to achieve a reduction of 12 tonnes per annum (4%) in regulated CO₂ emissions compared to a 2010 Building Regulations compliant development through energy efficiency alone. This should be confirmed as the 'Be Lean' savings is currently amalgamated with the 'Be Clean' figures.

BE CLEAN

District heating

The applicant has carried out an investigation and there are currently no suitable district heat networks within close proximity to the site. The South East London Combined Heat and Power station (SELCHP) is over 1km away so connection is not viable.

The applicant is however required to provide a firm commitment to ensuring that the development is designed to allow future connection to a district heating network should one become available.

The applicant has rejected installing a site heat network. Instead individual boilers are proposed. This approach is contrary to London Plan policy and should not be adopted.

A site wide heat network linking all apartments from a communal gas boiler served from a single energy centre should be adopted. Given the higher distribution losses, connection to the houses is not required.

A drawing showing the route of the heat network linking all apartments on the site must be provided. The location and size of the energy centre sq.m should be provided.

Combined Heat and Power

The applicant has investigated the feasibility of CHP. However, due to the scale of the development and the intermittent nature of the heat load, CHP is not proposed. This is accepted in this instance.

Individual gas boilers are proposed to meet the site's domestic hot water and space heating requirements. This approach is not acceptable for the apartments. See comments in District heating section above.

The use of gas fired boilers does not contribute to CO2 reductions under this tier of the energy hierarchy.

BE GREEN

Renewable energy technologies

The applicant has investigated the feasibility of a range of renewable energy technologies and is proposing to install 1050sq.m, of roof mounted PV. A roof plan showing the proposed PV locations has been provided.

This area of PV must be secured via condition as the whole strategy hangs on the use of PV.

For clarity the applicant should confirm the reduction in regulated CO2 emissions from PV alone, in tonnes per annum and in percentage terms, compared to a 2010 Building Regulations compliant development.

OVERALL CARBON SAVINGS

Taking into account the comments above and using Table 1 & 2 in the GLA energy assessment guidance, September 2011 the applicant should confirm the overall regulated CO2 savings as well as savings at each tier of the energy hierarchy expressed in tonnes of CO2 per annum and in percentage terms for both buildings. Savings should not be cumulative.

Conclusion

The applicant has broadly followed the energy hierarchy. Sufficient information has been provided to understand the proposals as a whole. However, further revisions and information is required before the proposals can be considered acceptable and the carbon dioxide savings verified.

Air Quality

Overall this application is policy compliant. The GLA is currently updating the Best Practice Guidance on the control of dust and emissions from construction and demolition and this will be published at the end of the year. All new relevant conditions/requirements included in this guidance document must be followed by the developer. Individual gas boilers have been proposed. These are not acceptable as detailed in the energy section of the report. It is important that a communal boiler be placed and that this should be specified to be low NOx as well as energy efficient.

60 parking spaces have been proposed. Overall the development gives priority to walking, cycling, public transport and low emission transport (electric vehicles) as detailed in the transport section of the report and therefore there are no significant issues to raise.

Noise

The noise assessment produced for the applicant has been assessed by the Mayor's Noise Consultants and it is considered that further work is required in terms of ambient noise and vibration levels which may arise from the demolition and construction phase of the development. An assessment of noise associated with the proposed development; including noise arising from building services and road traffic noise arising from the additional traffic generated by the development should be undertaken.

The report provided does not provide sufficient information for assessing these matters. Clarification is sought in relation to noise levels used in the assessment. Note has been made of the times that the noise survey results were taken and the locations, however, there are no concurrent measurements between the sites and thus noise levels across the site cannot be determined. A synchronised concurrent survey is recommended or further clarification of the results should be provided.

There is insufficient information presented by the applicant and further work is required to ensure that future residents are not affected by insufficient survey analysis, mitigation, as well as the busy road.

The applicant's noise strategy table 4.2 summarises facade insulation requirements for glazing and ventilation. The recommendations are based on achieving daytime and night time internal noise levels. LAF max noise levels due to individual noise events should be included in the assessment so that acoustic performance of glazing and ventilation systems can be determined. Noise levels recorded and presented in table 3.1 and Appendix A show maximum hourly levels. A finer measurement period is recommended.

Mitigation measures for balconies should also be considered before the detailed design stage as additional mitigation such as enclosed balconies may be required if they are proposed on the facades overlooking the New Cross Road and Avonley Road.

It is also recommended that reference should also be made to London wide policies such as the London Plan, The Mayor's Ambient Noise Strategy 2004 and Supplementary Planning Guidance - Sustainable Design and Construction. Nevertheless, the recommended indoor ambient noise levels are in accordance with the Mayor's preferred standard as stated in the SPD document. Other noise related aspects may require updating.

Transport

Trip generation and highway impact

Avonley Road and Hunsdon Road are the only two vehicular routes into the area as the other roads within or bounding the site connect with them. The southern end of Avonley Road is a junction with New Cross Road, part of the TLRN, whereas Hunsdon Road links with other borough roads. Hunsdon Road is one way and thus Avonley Road is the only vehicular route out.

The applicant has assessed the gross (i.e. without allowance for the 144 units previously on the site) effect of the additional levels of traffic generated by the development upon the Avonley Road/New Cross Road junction. The impact of the expected trip rate from this development on the TLRN is considered acceptable to TfL and further junction analysis is not needed at this stage. If however any highway works are required further modelling work may be necessary under the Traffic Management Act.

Car parking

The applicant states that the level of car parking seeks to generally discourage use of the private car. A lower parking ratio of around 0.30 on site space per dwelling is proposed compared to previous Kender Triangle phases (0.38 – 0.46 per unit) albeit that demand from some of the new residents would need be met on street outside the site. The applicant justifies the proposed ratio because survey results show that in the earlier Kender Triangle phases up to half the off street spaces are not used. The surveys have also indicated that there are a significant number of available spaces on street.

The proposed level of parking provision is in accordance with London Plan policy 6.13 and well below the maximum standards detailed in Table 6.2. Given the moderate public transport accessibility of the site, it is considered that a reasonable balance has been struck between encouraging use of more sustainable modes and avoiding on street parking stress. Consideration should be given to a further reduction of the overall availability of parking as the Travel Plan takes effect by preventing residents from applying for residential parking permits should a Controlled Parking Zone be introduced.

It is proposed that each of the wheelchair adaptable homes included in the scheme would have a disabled parking space. TfL would recommend additional disabled parking is provided to support disabled visitors.

The applicant has stated that should demand for car club use dictate, a parking bay (or bays) could be allocated closer to the site than the nearest existing space about 400m away. In line with London Plan policy 6.13, consideration should be given to such provision being made from the outset either on site or adjoining it.

Also in line with London Plan policy 6.13, 20 per cent of all car parking spaces should be fitted with electric vehicle charging points, with an additional 20 per cent having passive provision. The car club, disabled and EVCP parking should be secured by condition.

Walking

In line with London Plan policy 6.10, TfL supports the proposed shared surface design and layout of the scheme and the limiting of access to some areas to emergency, delivery and refuse vehicles. The proposals should improve safety and access to amenity space within the site as well as promoting active travel.

In accordance with London Plan policies 6.7, 6.10 and 7.1, the existing pedestrian (and cycle) permeability of the site would be improved through providing more and better defined routes through the site whilst preventing 'rat running'. These routes include links with the bus stops on New Cross Road. These proposals are welcomed although as mentioned in the Urban Design section, the main north south pedestrian route through the site and the links onto New Cross Road should be reconsidered to see if further improvements are possible.

Under London Plan policies 6.7, 6.10 and 7.2, it is important that the site is accessible for all. Therefore, TfL recommends a Pedestrian Environment Review System (PERS) audit is carried out in respect of the routes not already improved as part of the gyratory removal works such as those going north from the site towards the Surrey Canal Triangle area. This audit would identify where accessibility improvements to the footway and bus stops are necessary. These improvements should be funded by the applicant as part of the Section 106 or Section 278 agreement with LB Lewisham.

Consideration should be given to seeking an appropriate contribution from the applicant towards the costs of implementing the Legible London wayfinding system in the area to help promote active travel and walking as a viable alternative to the car.

Cycling

The provision of cycle parking complies with London Plan Policy 6.9 and Table 6.3. Whilst it is welcomed that cycle parking would be within the development blocks and thus in safe and secure locations, adequate provision for visitors also needs to be made. Cycle parking should be sited so as to connect to the most convenient, safe and direct routes to the local cycle network.

Public transport

The use of local bus and train services should be encouraged in accord with London Plan policy 6.1. TfL is satisfied that the trips generated by the proposed development are unlikely to affect the capacity of the local public transport network. The PERS audit mentioned above should also include consideration of the need for any improvements at local bus stops.

Travel plan

TfL welcomes the submission of a generic travel plan which it is proposed will form the basis of an evolving document to be issued to residents and which promotes sustainable travel to and from the site. However, the submitted plan has failed the ATTrBuTE assessment used by TfL to assess the content and TfL has requested further work be carried out in order for it to comply with London Plan policies 6.3 and 6.11. The travel plan should be secured, enforced, funded, monitored and reviewed as part of the s106 agreement.

Management plans

TfL supports the commitment to submit and agree a construction logistics plan (CLP), which is in line with London Plan policies 6.3 and 6.14. The CLP will need to identify safe, efficient and sustainable transport measures that will be applied during construction of the development. Also to comply with these policies arrangements for refuse collection, servicing and delivery to residents should also be submitted and agreed either as part of the above mentioned travel plan or as a separate document. Both plans should be secured by condition and should comply with relevant TfL guidance.

Given the relatively limited amount of car parking included in the scheme and the shared surface design and layout, it is recommended that a management plan is put in place which would allocate, control and monitor use of the on site parking, shared surfaces and other vehicle routes which would not be adopted. This plan should also be secured by condition. TfL recommends that the allocation of parking spaces should primarily support the family housing in addition to ensuring adequate provision for disabled residents and visitors and the car club.

Summary

Overall, TfL has no significant objections to the principle of the proposed development. However, to comply with the transport policies of the London Plan, further work is required with respect to electric vehicle charging points, car club, disabled and cycle parking provision, the Travel Plan, and in auditing the accessibility of the site to the surrounding area, public transport and local facilities.

The following should be secured by condition and/or in the Section 106 agreement as appropriate:

1. Cycle, disabled and car club parking, EVCP's and CPZ permit restrictions
2. Travel Plan (including delivery and servicing), site management plan, and construction logistics plan.
3. Measures to promote walking, cycling and use of public transport identified in the audit.

Community Infrastructure Levy

In accordance with London Plan *policy 8.3*, the Mayor has introduced a London-wide Community Infrastructure Levy (CIL) that will be paid by most new development in Greater London. Any development that receives planning permission after the 1 April 2012 will have to pay, including:

- Cases where a planning application was submitted before 1 April 2012, but not approved by then.
- Cases where a borough makes a resolution to grant planning permission before 1 April 2012 but does not formally issue the decision notice until after that date (to allow a section 106 agreement to be signed or referral to the Secretary of State or the Mayor, for example),.

The Mayor has arranged boroughs into three charging bands with rates of £50 / £35 / £20 per square metre of net increase in floor space respectively (see table, below). The proposed development is within the London Borough of Lewisham where the proposed Mayoral charge is £35 per square metre. More details are available via the GLA website <http://london.gov.uk/> .

Within London both the Mayor and boroughs are able to introduce CIL charges and therefore two distinct CIL charges may be applied to development in future. At the present time, borough CIL charges for Redbridge and Wandsworth are the most advanced. The Mayor's CIL will contribute towards the funding of Crossrail.

Mayoral CIL charging zones	London boroughs	Rates (£/sq. m.)
1	Camden, City of London, City of Westminster, Hammersmith and Fulham, Islington, Kensington and Chelsea, Richmond-upon-Thames, Wandsworth	£50
2	Barnet, Brent, Bromley, Ealing, Greenwich, Hackney, Haringey, Harrow, Hillingdon, Hounslow, Kingston upon Thames, Lambeth, Lewisham, Merton, Redbridge, Southwark, Tower Hamlets	£35
3	Barking and Dagenham, Bexley, Croydon, Enfield, Havering, Newham, Sutton, Waltham Forest	£20

Local planning authority's position

The applicant has worked closely with Council officers to meet the needs of the Borough. The Council is still awaiting consultation responses.

Legal considerations

Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged, or direct the Council under Article 6 of the Order to refuse the application, or issue a direction under Article 7 of the Order that he is to act as the local planning authority for the purpose of determining the application and any connected application. There is no obligation at this present stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments.

Financial considerations

There are no financial considerations at this stage.

Conclusion

London Plan policies on affordable housing, children's play space, inclusive design, urban design, climate change, noise, air quality, transport and CIL are relevant to this application. The application complies with some of these policies but not with others, for the following reasons:

- **Land use principle:** This residential regeneration proposal within the Lewisham-Catford-New Cross Opportunity Area complies with the aims of London Plan policy 2.13.
- **Affordable housing:** The applicant's financial viability appraisal should be submitted and the Council should verify that the split of affordable housing to be provided is matched to the local needs identified for the Borough.
- **Children's play space:** The applicant should confirm the child yield and demonstrate on plan how this play space will be provided to comply with policy 3.6 of the London Plan.
- **Inclusive design:** in general the proposal has a high standard of accessibility and complies with policy 7.2 of the London Plan as well as meeting the locally specified standards by Lewisham access officer.
- **Urban design:** Some matters in relation to the site's layout and legibility need to be addressed so ensure that the proposal is consistent with London Plan policies on design.
- **Climate design:** Further revisions and information is required before the proposals can be considered acceptable and the carbon dioxide savings verified.
- **Air quality:** Compliance with energy issues raised are unlikely to generate any concerns for air quality. The GLA guidance mentioned in the air quality section of the report should be referred to.
- **Noise:** Appropriate internal and external noise environments could be achieved within the proposed development. However, further clarifications are required in terms of the following items: survey periods and validity of results, building services plant noise

emission limits and assessment criteria, acoustic performance of glazing and ventilation systems and noise mitigation measures for balconies.

- **Transport:** TfL has no significant objections to the principle of the proposed development, however further work is required by the applicant in order to comply with the transport policies of the London Plan detailed in chapter six.

Whilst the application is broadly acceptable in strategic planning terms, the application does not comply with the London Plan.

The following changes might, however, remedy the above-mentioned deficiencies, and could possibly lead to the application becoming compliant with the London Plan:

- **Affordable housing:** The applicant's financial viability appraisal should be submitted and or the Council should verify that the split of affordable housing to be provided is matched to the local needs identified for the Borough before the application is referred back to the Mayor.
- **Children's play space:** The applicant should demonstrate on plan how the play space calculated in the report will be provided to comply with policy 3.6 of the London Plan.
- **Urban design:** The matters raised in paragraphs 50-53 in particular in relation to the site's layout, legibility of routes and access into the building blocks need to be addressed so ensure that the proposal is consistent with London Plan policies on design.
- **Climate design:** Various elements of this proposal need to be reworked. The baseline and regulated CO2 savings relative to 2010 for each tier (not cumulative savings) need to be clarified. The Strategy still references to 2006 baseline. All references to 2006 should be removed for clarity. The implementation of individual boilers is contrary to London Plan energy policies and must not be adopted. A site wide network linking apartments to a single boiler in one energy centre, serving the whole site should be adopted. A commitment to future proofing the development in line with London Plan energy policies must be secured. It also appears that there are a large amount of photovoltaics suggested which would need to be need to be conditioned as a reduction would lead to a shortfall in meeting targets.
- **Noise:** It is recommended that suitable conditions are included to ensure reasonable or good internal acoustic conditions for residents and to ensure a reasonable or good standard of protection for the local environment due to noise arising from the development itself.
- **Transport:** To comply with London Plan policies further work is required with respect to electric vehicle charging points, car club, disabled and cycle parking provision, the travel plan, and in auditing the accessibility of the site to the surrounding area, public transport and local facilities. Confirmation is also required on the acceptance of cycle, disabled and car club parking, EVCP's and CPZ permit restrictions; travel plan (including delivery and servicing), site management plan, and construction logistics plan; and measures to promote walking, cycling and use of public transport being secured by condition and/or in the Section 106 agreement as appropriate.

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