

The Alton Estate, Roehampton

in the London Borough of Wandsworth

planning application no. 2019/2516

Strategic planning application stage 1 referral

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

The proposal

Mixed-use phased development ranging from 1-9 storeys above ground level comprising 1,103 residential units and up to 9,572 sq.m. of non-residential uses comprising new and replacement community facilities; flexible commercial floorspace, and community uses.

The applicant

The applicants are **Redrow Homes Limited** and the architects are **Hawkins\Brown, Barton Willmore, Tate Hindle & Gillespies**.

Strategic issues

Estate regeneration: The proposals do not comply with London Plan Policy 3.14 and draft London Plan Policy H10 or the GPGER as the development would not deliver like for like replacement of social rented units; there are shortcomings in the consultation process; the decant strategy is significantly lacking in detail and does not take account of the impact of CPO process. The principle of estate regeneration would only be accepted should these issues be addressed in full. (paragraphs 20-40)

Affordable housing: The affordable housing is segregated in single tenure blocks on the periphery of the site, which is unacceptable and must be better integrated throughout the scheme. The affordable housing offer itself is unclear. The intermediate offer includes shared equity which is not recognised by the GLA as a genuinely affordable housing product. The offer, excluding shared equity is 8% affordable housing on the uplift generated on site (64:36 split between social rent and shared ownership). However, no clear commitment to providing the additional 20 social rent units and shared ownership units within the estate/satellite sites has been indicated. The applicant's FVA is currently being robustly interrogated to ensure that the maximum reasonable affordable housing offer is secured. However, it is currently unclear what level of Council funding (and other government funding) has been relied upon to support the development. The applicant is required to model the impact of GLA grant funding. Early and late stage reviews must be secured in the s106. (paragraphs 47-54).

Community and commercial uses: The applicant must demonstrate that the retail units are fit for purpose and would meet retained tenant's needs; the affordable office space in relation to management and affordable terms; and confirmation that the proposed community floorspace improves upon the existing and would be managed. (paragraphs 58-66).

Other matters relating to **equalities** (67-74), **urban design** (75-83), **heritage** (84-86), **inclusive design** (87-91), **energy** (92-93), **sustainable drainage and flood risk** (94), **urban greening** (95-96) and **transport** (98-114) should also be addressed.

Recommendation

That Wandsworth Council be advised that the application does not yet comply with the London Plan and the draft London Plan, for the reasons set out in paragraph 118 of this report; but that the possible remedies set out in that paragraph could address these deficiencies.

Context

1 On 4 July 2019, the Mayor of London received documents from Wandsworth 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 to provide the Council with a statement setting out whether he considers that the application complies with the London Plan and the draft 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.

2 The application is referable under Categories 1A, 1B, 1C, and 3A(a) of the Schedule to the Order 2008:

- Category 1A *“Development which comprises or includes the provision of more than 150 houses, flats or houses and flats;”*
- Category 1B *“Development (other than development which only comprises the provision of houses, flats or houses and flats) which comprises or includes the erection of a building or buildings – outside Central London and with a total floorspace of more than 15,000 square metres;”*
- 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.”*
- Category 3A(a) *“Development which is likely to result in the loss of more than 200 houses, flats, or houses and flats (irrespective of whether the development would entail also the provision of new houses or flats).”*

3 Once Wandsworth 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.

4 The environmental information for the purposes of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 has been taken into account in the consideration of this case.

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

Site description

6 Constructed in the 1950's, the Alton Estate is one of the largest Council estates in the UK. The application site boundary covers approximately 12.5 hectares of the estate and 4.9 hectares of which is open space known as 'Downshire Field' to the north. The irregularly shaped site is located to the northeast of a golf course beyond which lies Richmond Park (covered by a Metropolitan Open Land designation), the edge of which marks Wandsworth Council's boundary with Richmond Upon Thames.

7 The application site contains 158 social rent units and 130 leasehold and freehold properties. Of the 158 social rent units, 102 are secure tenants. There is 2,668 sq.m. of existing retail, 426 sq.m. of offices and 6,083 sq.m. of community floorspace (including a library, doctors' surgeries, children's centre, youth clubs, advice centres and other community uses) on site. Buildings on site range in height from 1 to 10 storeys.

8 The northern half of the site is within the Alton Conservation Area and there are a number of designated heritage assets within and in close proximity to the application site boundary including:

- Grade II listed Bull sculpture located at the bottom of Downshire Fields;
- Richmond Park Grade I Registered Park and Garden;
- Grove House Grade I Registered Park and Garden and Grade II* Grove House to the north of the site;
- Grade I Listed Mount Clare House and Temple (Grade II*) in Minstead Gardens to the west of the site;
- Grade I Listed Parkstead House to the south of Danebury Avenue;
- Grade II* Listed Highcliffe slab blocks set within a retained Georgian landscape to the south of Clarence Lane adjacent to the application boundary to the north;
- Grade II* Listed Devonshire House and Gates to the north east of the site;
- Grade II Listed Alton West Bungalows (Nos 1-13) and Minstead Gardens (Nos 15-33) also to the west of the site;
- Grade II listed Danebury Avenue (Nos 245-261) to the south of Danebury Avenue, beyond the application site boundary; and
- Grade II Listed Roehampton House and Lodge to the north east of the site.

9 The site is located beyond an acceptable walking distance to rail and underground stations; however, there are six bus routes within an acceptable walking distance, with stops located on Roehampton Lane and Danebury Avenue. The site has a public transport accessibility level (PTAL) range of 2 to 3 with the majority of the regeneration site being 3, on a scale of 0 to 6b where 6b is the most accessible.

Details of the proposal

10 This is a hybrid application for the redevelopment of the site with all but the Danebury Avenue development in detail. The regeneration is a contractual partnership between Redrow Homes Limited and Wandsworth Council.

11 The development involves the phased demolition of all buildings and structures with the exception of the Alton Activity community centre. The proposed buildings would range in height from 1 – 9 storeys and provide up to 1,103 residential units and up to 9,572 sq.m. of non-residential uses comprising new and replacement community facilities (5,527 sq.m.) and flexible commercial floorspace (3,402 sq.m.), offices (643 sq.m.); landscaping; removal and replacement of trees; public realm improvements; access improvements; provision of energy centre; car and cycle parking and highways works.

12 The proposals involve the re-provision of all 158 existing social rent units, and the delivery of up to 30 additional social rent units on site. The affordable housing offer also includes the provision of 23 shared ownership homes this equates to 8% affordable housing by habitable room on the total uplift. Diagram 1, provided below, shows the location of the affordable housing within the scheme and outline/ detailed elements.

Diagram 1:



Case history

13 An application was submitted in October 2008 (LPA Ref. 2008/4552, GLA Ref.PDU/2209/01) for outline planning permission for the demolition of the existing buildings at Roehampton Centre and the erection of buildings up to 6 storeys high plus basements to provide 281 flats, supermarket, commercial units, library, health facility, leisure, offices, landscaping, public square and associated car parking spaces. The application was later withdrawn.

14 On 18 July 2017 a pre-application meeting was held with GLA officers to discuss the principle of redevelopment to provide 990 homes, affordable homes and non-residential floorspace. On 18 August, a pre-application meeting note was issued which noted that the proposals must comply with the Mayor's Guidance for Estate Regeneration, ensure re-provision of the existing affordable housing on a like for like basis with better quality accommodation and any uplift in residential proposed should provide the maximum level of affordable housing. An uplift in

community floorspace was supported. Other issues raised in relation to urban design, inclusive design and transport were also outlined in the note.

15 Subsequently, a separate meeting was set up to discuss viability matters on 10 April 2018 and a further pre-application meeting took place on 26 September 2018. More recently, another viability meeting took place on 23 January 2019.

16 Alongside the current proposals, a further 20 affordable homes on two satellite sites are proposed including 14 family sized affordable homes (10 net additional affordable homes, discounting the existing 4 X 1 bed social rent units to be replaced) on Fontley Way, which is circa 300 metres to the south of the site and 10 affordable homes on Bessborough Road and Petersfield Road, which is 400 metres to the south east. The associated unilateral undertaking (UU) for the Bessborough Road site states that the mix and affordable housing tenure can be social rent or intermediate. This scheme was approved in October 2018 (LPA Ref. 2017/6977). An application for the Fontley Way scheme is yet to be submitted to the Council. As part of the application proposals, the existing secure social rent tenants and resident homeowners on the estate would be given a choice to move into a new home either on one of the satellite decant sites or within the new affordable homes within the application site.

Strategic planning issues and relevant policies and guidance

17 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 Wandsworth Core Strategy (March 2016), Development Management Policies Document (March 2016), Site Specific Allocations Document (March 2016), the London Plan 2016 (the Spatial Development Strategy for London Consolidated with Alterations since 2011).

18 The following are also relevant material considerations:

- The National Planning Policy Framework 2019 and National Planning Practice Guidance.
- The draft London Plan Consolidated Changes Version (July 2019), 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*.
- The Mayor's Good Practice Guidance to Estate Regeneration (2018).
- Wandsworth Council Local Plan Issues Document (December 2018).
- Roehampton SPG (October 2015).

19 The relevant issues and corresponding policies are as follows:

- Estate regeneration *London Plan; GPGER*
- Housing *London Plan; Housing SPG; Housing Strategy; Shaping Neighbourhoods: Play and Informal Recreation SPG; Shaping Neighbourhoods: Character and Context SPG; Affordable Housing and Viability SPG*
- Urban design and heritage *London Plan; Shaping Neighbourhoods: Character and Context SPG; Housing SPG; Shaping Neighbourhoods: Play and Informal Recreation SPG*
- Inclusive design *London Plan; Accessible London: achieving an inclusive environment SPG*
- Transport *London Plan; Mayor's Transport Strategy.*

- Environment and water *London Plan; Sustainable Design and Construction SPG; Mayor's Environment Strategy*

Principle of estate regeneration

20 The strategic policies relating to the replacement of existing housing and estate regeneration are set out within London Plan Policy 3.14, draft London Plan Policy H10 and the Mayor's Affordable Housing and Viability SPG. In this regard, these policies seek to resist the loss of existing housing unless it is replaced at existing and higher densities with at least equivalent floorspace. Draft London Plan Policy H10 specifies that where schemes involving the loss of affordable housing, the redevelopment of affordable housing should be fully justified against alternative options. They should balance the potential benefits of demolition and rebuilding of homes against the wider social and environmental impacts and consider the availability of Mayoral funding and any conditions attached to that funding. More specifically, regeneration schemes should be replaced by an equivalent amount of affordable housing on a like for like basis where a right to return is being proposed. All estate regeneration schemes including the demolition and replacement of affordable housing are also required to follow the Viability Tested route and should seek to provide an uplift in affordable housing in addition to replacement affordable housing floorspace.

21 The Mayor's Good Practice Guide to Estate Regeneration (GPGER) supports these aims and provides additional practical advice to developers on how to deliver the best possible outcomes on regeneration schemes. The key principles being: full and transparent consultation and involvement; an increase in affordable housing; a full right to return or remain for social tenants and a fair deal for leaseholders or freeholders. The GPGER emphasises that extensive, responsive and transparent public consultation is fundamental to the success of regeneration schemes.

22 The following sections set how the development performs against these policies.

Replacement of existing housing and decant

23 The Alton Estate has been experiencing increasing levels of anti-social behaviour as a result of the physical decline of buildings and isolated nature of the site. Wandsworth Council commissioned a study into the estate which identified that the issues facing the estate was not uniform across the wider estate but localised within the application site. As a result of the study, and a public options consultation report, it was concluded that the maintenance of the buildings within the area refurbishment or targeted redevelopment would not be sufficient and that redevelopment would be the only long-term viable option.

24 As set out in tables 1 and 2 below, the scheme will result in an increase in an overall net increase in housing on site of 815 units, including a net increase in 53 affordable housing units (30 of which are proposed as affordable rent resulting in an overall uplift in social rent floorspace of 4,253 sq.m).

Table 1: existing units

tenure	1 bed	2 bed	3 bed	5 bed	total units	total hab rooms	floorspace (sq.m. GIA)
leasehold/freehold	4	8	118	0	130	504	10,592
social rent	20	34	103	1	158	560	11,158
Total	24	42	221	1	288	1064	21,750

Table 2: existing vs proposed housing mix

	Existing			Proposed				
	Social rent	Leasehold	Total	Social Rent	Shared Ownership	Shared Equity	Market	Total
Units	158	130	288	Up to 188	Up to 23	Up to 45	Up to 847	Up to 1,103
Hab rooms	560	504	1,064	Up to 670	Up to 62	Up to 174	Up to 2,380	Up to 3,286
Floor-space (sq.m) GIA	11,158	10,592	21,750	15,411	1,495	4,006	82,682	103,594

25 However, London Plan Policy 3.14, draft London Plan Policy H10, the GPGER and the Mayor's Affordable Housing and Viability SPG also make clear that in the redevelopment of sites any loss of affordable housing must also be replaced by better accommodation and at least an equivalent amount of floorspace on a like-for-like basis. In this regard, the applicant has only been able to confirm an increase in social rent floorspace in overall terms and no assurances that the social rent units to be replaced would be of equivalent size in terms of floorspace has been made as required. This information is critical in establishing the acceptability of the regeneration of the Alton Estate and therefore must be provided to the GLA as soon as possible.

26 The GPGER also seeks to ensure that social tenants who have to move from their existing home, have a full right to a property on the regenerated estate of a suitable size. As such, the applicant must demonstrate that the alternative accommodation is reasonable, in that it meets the needs of the household in terms of the number of bedrooms and any special requirements (such as wheelchair accessibility or adaptations). In this regard it is understood that housing needs surveys have been undertaken throughout the project to identify the needs of existing residents, however it is unclear how the results of these surveys have been carried through into the current proposals. The mix of social rent units proposed to be replaced based on housing need must be confirmed, this includes adequate provision for wheelchair accessible homes.

27 In terms of rent levels, the existing tenants of social rented units have been given a guarantee that the rent levels will be set in the same way as the existing units (i.e. if the tenant is to move to a property with the same number of bedrooms, they would pay the same rent). They would also have the same security of tenure. This approach is in accordance with the principles of draft London Plan Policy H10, and the GPGER and should be robustly secured within the s106 agreement. In accordance with draft London Plan Policy H10, the applicant must also confirm that where affordable rented housing is not facilitating a right of return, it would be rented at either social rent levels or London Affordable Rent (LAR).

28 The overriding objective of the Decant Strategy is to ensure that secure social tenants and resident homeowners can remain on the estate and move only once. The Strategy states that secure tenants and resident homeowners would be given an opportunity to move within the wider Alton Estate or within the new affordable homes constructed. However, very little detail is provided as to how this would be practically achieved and which residents would need to be relocated where and in which phase. Due to the lack of detail it is also unclear as to what role the satellite sites would have in the decant and whether the strategy is dependent on Fontley Way (as planning permission for this decant site has not yet been submitted). It would appear that, should enough residents wish to stay within the estate, a proportion may inevitably have to move twice, which would not comply with Council's move once policy.

29 The prospect of a Compulsory Purchase Order (CPO) adds an additional layer of uncertainty. It is unclear as to the extent of land required under the CPO and what impact this might have on the decant process. Further details must be provided in this regard, and what contingency/ compensatory measures would be put in place in the very high likelihood of consequential delays in programme.

Fair deal for leaseholders

30 Existing resident leaseholders and freeholders would be offered a purchase price for their property based on its open market value on a 'no scheme world' basis. Residents would also be supplied with a statutory Home Loss Payment and would be able to reclaim reasonable costs associated with moving. Resident home owners will also be offered the opportunity to buy a newly built home through the Council's shared equity arrangements where they are unable to buy using the equity from the 'buy back' of their existing home. No rent or interest would be charged on the loan and residents would have the option of obtaining greater equity over time and the equity share offer may be passed on through inheritance on one occasion.

31 If resident homeowners are unable to purchase a new home suitable for their needs, the Council would assist in finding alternative accommodation. Non-resident homeowners would be offered the market value of their property, plus an additional Basic Loss Payment. These residents would be able to reclaim reasonable costs associated with moving. The support for leaseholders is in the line with the GPGER and should be robustly secured within the s106 agreement.

Consultation

32 The Council developed a masterplan for the regeneration of the Alton Estate in 2013, following consultation on three potential development options. The resulting Alton Area Masterplan was then subsumed into the Roehampton SPD, which was adopted in October 2015. The Roehampton SPD identified 4 key areas for intervention, the Roehampton Local Centre, Portswood Place parade, Danebury Avenue housing, and Downsfield open space.

33 In addition, 9 strategic objectives were identified in terms of the redevelopment of the estate were to improve living conditions and housing choice, deliver better community and commercial facilities, invest in the local economy, jobs and training, placemaking, high quality

buildings, improve access and connections, attractive public realm, enhanced open spaces, and revealing heritage.

34 Public consultation on the proposals took place between July 2017 and March 2019 and included workshops, focus groups, targeted consultation events, stalls at local festivals and public exhibitions. The last consultation event on the wider proposals took place between June and September 2018.

35 According to the applicant's Statement of Community Involvement (SCI), key changes arising from public consultation were:

- The design of the u-shaped and courtyard blocks;
- The design of amenity areas has been influenced by residents;
- The provision of secure parking was important for residents - the scheme includes undercroft parking;
- The protection and enhancement of existing open space has resulted in the scaling back of interventions to Downshire Field in particular;
- Residents requested the provision of new retail facilities on Danebury Avenue and continued provision of retail facilities throughout construction;
- Increased active frontage along Danebury Avenue and concealment of servicing and refuse provision;
- The Portswood Place development should provide health and retail facilities for the immediate community who are unable to access the main community hub;
- The library should be more accessible and associated play area provided at ground floor;
- The provision of the village square at the junction of Danebury Avenue and Roehampton Lane was one of the major changes to the scheme following consultation feedback; and
- Reduction of on-street parking.

36 However, the SCI has highlighted a number of shortcomings with the consultation process. No further public exhibitions on the scheme were held post September 2018, therefore, no consultation on the wider proposals took place within the circa 10 month period prior to submission other than targeted workshops. Although the proposals do not vary significantly from those presented at the latest public exhibition, they do not reflect the submitted proposals which does not accord with best practice. The SCI does not specifically set out how the applicant sought to engage non -English speaking residents or those with disabilities who might not be able to physically attend events. Furthermore, confirmation is required that residents have been given an opportunity to select an independent tenant and leaseholder advisor to support their involvement in the development of the proposals for the estate.

Residents ballot

37 As set out in draft London Plan Policy H10, 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.

38 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. 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.

39 The applicant has confirmed that the ballot has not been undertaken as GLA grant funding is not being sought. This approach must be fully justified and GLA funding modelled in any event.

Conclusions

40 In summary, the scheme would not deliver like for like replacement of social rented units in terms of floorspace and does not reflect current housing need. The strategy for decant is extremely vague, does not clearly identify the impact of the CPO process on the strategy and consequently provides very little certainty for residents. No guarantee has been given that the temporary residents that would not have a right to rehousing on the estate would be rehoused in units provided at social rent or LAR levels. This approach therefore fundamentally conflicts with the principles of the GPGER, London Plan and draft London Plan policies and Affordable Housing and Viability SPG and is therefore unacceptable.

Housing

41 London Plan Policy 3.3 'Increasing Housing Supply' recognises the pressing need for new homes in London and Table 3.1 gives an annual monitoring target of 1,812 new homes per year in Wandsworth between 2015 and 2025. Policy H1 'Increasing Housing Supply' and Table 4.1 of the draft London Plan sets Wandsworth an increased annualised average housing completion target of 2,310 units per year between 2019/20 and 2028/29.

42 Table 3 below sets out the level of housing and affordable housing within proposed blocks.

Table 3: proposed housing mix (detailed element only)

tenure	studio	1 bed	2 bed	3 bed	4 bed	total units	total hab rooms	floorspace (sq.m. GIA)
private	2	142	342	12	0	498	1,382	48,643
intermediate	0	1	6	38	0	45	174	4,007
social rent	0	18	33	35	25	111	409	11,174
totals	2	161	381	85	25	654	1,965	

43 In addition to the above, a further 77 social rent units are to be provided within the outline phase, along with 191 intermediate units (including shared equity and shared ownership) and 349 private homes (617 in total). The mix is yet to be defined in the outline phase.

44 Table 4 below sets out the existing and proposed housing mix by units, habitable rooms and floorspace based on the combined maximum number of units proposed within the detailed and outline elements.

Table 4: proposed housing mix

affordable housing provision	units	habitable rooms	floorspace	Uplift in units (uplift in hab rooms)	Overall % by hab room (% by hab room on uplift)
proposed market units	Up to 847	Up to 2,380	82,682	+717 (1,876)	72% (84%)
proposed social rent housing	Up to 188	Up to 670	15,411	+30 (110)	20% (5%)
proposed shared ownership	Up to 23	Up to 62	1,495	+23 (62)	2% (3%)
proposed shared equity	Up to 45	Up to 174	4,006	+45 (174)	5% (8%)
total proposed affordable housing*	Up to 211	Up to 732	16,906	+53 (323)	22% (8%)
total proposed housing	Up to 1,103	Up to 3,286	103,594	+815 (2,222)	

*Genuinely affordable housing as defined by the draft London Plan and Mayor’s affordable Housing and Viability SPG (i.e. excluding shared equity).

45 In addition to the above, a total of 20 net additional units are to be provided at the Bessborough and Fontley Way sites to facilitate the decant strategy. The tenure of these units are currently (in respect of Bessborough at least) flexible but are intended to provide either social rent or shared equity units. The Decant Strategy states that the final tenure is dependent on rehousing requirements which would need to be allocated by the Council. However, where shared equity tenures are delivered on the satellite sites then the number of social rent homes in the main application would increase. Therefore, across the application site and satellite sites, there will be 212 social rent and 68 intermediate homes (with a net increase of 50 social rent homes).

46 Whilst acceptable in principle, this should be clearly be reflected in the proposed housing mix and robustly secured within the associated s106 agreement. The s106 agreement would also need to clearly link the extant permission and any planning permission at the Bessborough and Fontley Way sites. The maximum 30 social rent units stated to be delivered within the application documents should be clearly amended to reflect that the fact that the application site could accommodate up to 50 net additional social rent units accordingly.

Affordable housing

47 As set out in London Plan Policy 3.12, draft London Plan Policies H6 and H10, Mayor’s Affordable Housing & Viability SPG and the GGER in addition ensuring no net loss of affordable homes, estate regeneration schemes must provide as much additional affordable housing as possible. It is on this basis that 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. Furthermore, as set out above, the existing social rent floorspace would need to be

replaced on a like for like basis under the provisions of London Plan Policy 3.14 and draft London Plan Policy H10.

48 The affordable housing offer is 16% by habitable room on the uplift with a 32:68 split between social rent and intermediate units (including shared equity and shared ownership units). However, shared equity products would not qualify as genuinely affordable housing under the provisions of the draft London Plan and Mayor's Affordable Housing and Viability SPG. Therefore, the genuinely affordable housing offer is 22% by habitable room on the total (including replacement social rent units) with a 92:8 split in favour of social rent and 8% by habitable room on the uplift with 64:36 split between social rent and shared ownership. This offer will be subject to rigorous viability testing by the GLA to ensure that it reflects the maximum level of affordable housing as required by London Plan Policy 3.14 and draft London Plan Policy H10.

49 The delivery of shared equity homes is supported as fair deal for resident homeowners who would like to stay in the estate under the provisions of the GPGER. Without the option of shared equity units, resident homeowners would render the replacement units unaffordable and would therefore be forced to move elsewhere. It is understood that the shared equity homes that are not taken up by resident homeowners would instead revert to shared ownership units, which must be robustly secured.

50 The shared ownership units would be affordable to households on an income of up to £90,000 on a staircased basis depending on the size of the unit, which accords with the provisions of the Mayor's Affordable Housing and Viability SPG, and the current London Plan Annual Monitoring Report. Clarification of the social rent levels for non-decanted residents should also be provided. Affordability thresholds must be secured in the section 106 agreement attached to any permission and a draft of the section 106 agreement should be agreed with GLA officers prior to any Stage 2 referral.

51 The applicant's Financial Viability Assessment (FVA) is currently undergoing robust assessment by GLA officers working in partnership with the applicant, the Council and its independent assessors, to ensure that the maximum contribution is secured in accordance with Policies 3.11 and 3.12 of the London Plan, the Mayor's Affordable Housing and Viability SPG, and Policies H5 and H6 of the draft London Plan. As requested at pre-application stage, the applicant must confirm how much Council funding would be contributing towards affordable housing provision and details of any additional subsidy being utilised to fund the wider scheme (community facilities and health centre for example). The applicant is required to explore the opportunity to obtain grant funding in order to increase affordable housing provision. Evidence of this must be subsequently provided prior to Stage 2.

52 The Mayor's commitment to developments with a mix of tenures, including a mix of affordable tenures, and to tenure-blind development, is embedded in the London Plan and draft London Plan. In respect of estate regeneration schemes, London Plan Policy 3.9 and draft London Plan Policy H10 states that replacement affordable housing should be integrated into the development to ensure mixed and inclusive communities and London Plan Policies 3.5 and draft London Plan Policy D4 makes clear that the design of housing developments should not differentiate between housing tenures and equality of design quality must be delivered regardless of its tenure. The proposed affordable housing would be provided within two single tenure blocks, both located at the periphery of the application site (see diagram 1). This conflicts with both London Plan and draft London Plan policies and is not acceptable. Affordable housing must be better distributed evenly across the site. This applies to the replacement affordable housing as well as the additional affordable housing proposed.

53 Early, mid stage and late stage viability reviews will be required, in accordance with Policy H6 of the draft London Plan and the Mayor's Affordable Housing and Viability SPG.

54 The applicant's FVA has been published in line with the transparency provisions in the Affordable Housing & Viability SPG.

Children's play space

55 London Plan Policy 3.6 and Policy S4 of the draft London Plan seek to ensure that development proposals include suitable provision for play and recreation, and incorporate good-quality, accessible play provision for all ages, of at least 10 square metres per child, with further detail in the Mayor's 'Shaping Neighbourhoods: Play and Informal Recreation' SPG.

56 Based on the proposed housing mix, the development would yield approximately 344 children, requiring 3,444 sq.m. of play space. The proposed playspace provision should not include re-provision of the existing play areas on site in their calculation of proposed play space, which the GLA would expect to be re-provided in any event. The component areas attributed to the trim trails should be clarified, as an area of 1,800 sq.m. would appear to be excessive. Furthermore, Whitley Point MUGA should not be counted as on-site provision but would be accepted as contributing to off-site. On this basis, the on-site playspace provision should be recalculated. Confirmation is required that all existing play features would be re-provided is also required.

57 In addition, it must also be demonstrated that playspace and equipment within the development is not segregated by tenure, in accordance with Policy S4 of the draft London Plan.

Community use

58 The site currently contains a number of existing and well established community uses including a library, two doctors surgeries, a children's centre, youth clubs, advice centres and other community uses. The total existing floorspace in community use is 6,083 sq.m. The existing community floorspace is interspersed across the site within accommodation that is largely inefficient and outdated. Approximately 2,010 sq.m. of floorspace is currently vacant or unusable. The application proposes the re-provision of 5,527 sq.m. of community floorspace which equates to a net loss of 556 sq.m.

59 London Plan Policy 3.16 and draft London Plan Policy S1 states that in areas of major new development and regeneration, social infrastructure needs should be addressed via area based planning such as masterplanning. In this regard, the Roehampton SPD identifies the need for circa 5,500 sq.m. of community floorspace (including employment facilities) spread across Roehampton local centre and Portswood Place, which aligns with the proposed provision on a floorspace basis and delivery secured in the s106 agreement.

60 The new library, health services, youth facility and the Eastwood Nursery and Children's Centre would be developed in the first phase of the development so that they can move into their new facilities without a break in service provision. The replacement community hub should be fully fitted out and operational before the existing community facilities are closed.

61 Although there is a small overall loss of community floorspace as a result of the development, this may be acceptable on the basis that a large proportion of existing community floorspace is vacant and the development provides the required quantum of floorspace under the SPD. However, before this approach can be accepted, the applicant should robustly demonstrate that the replacement community facilities would improve on the existing, including confirmation that the proposed facilities would provide the same or enhanced functions as the existing facilities to be replaced. In addition, further information on how the community facilities would be managed (hours of operation, security etc.) and those responsible for the management of the buildings/ constituent facilities should be provided. Details of how the amenity of adjacent occupiers would be safeguarded should also be provided.

Retail and commercial

62 There is approximately 2,830 sq.m. of retail floorspace on site (A1-A3, A5 and sui generis), in the most part located within the Roehampton Local Centre, and 426 sq.m. of offices. It is proposed to re-provide the existing quantum of retail floorspace, plus an additional 572 sq.m. of flexible A1-3, A5/ B1 and D1 floorspace and 643 sq.m. of office floorspace. The proposed retail floorspace would be provided within Block O and N on Danebury Avenue under the detailed element and in Blocks B and C under the outline element, where the retail parade is currently.

63 London Plan Policy 4.7 and draft London Plan Policy SD7 identify a town centre first approach and discourage out of centre development of main town centre uses. Danebury Avenue is a designated Local Centre Core Frontage and the Roehampton Local Centre is a designated Important Local Parade in Wandsworth Council's Local Plan and therefore appropriate locations for retail development. The Roehampton SPD also identifies these locations for new retail and office uses. On this basis, the commercial aspect of the development is supported.

64 The supermarket and pharmacy are proposed to be re-provided in the initial phases of the redevelopment in Block O and the supermarket would be temporarily relocated elsewhere within the site so that there is no break in provision. The remaining commercial space will be delivered on a phased basis to allow the remaining tenants to move out of the current retail parade and straight into new accommodation. Retail tenants moving would be compensated and their rent frozen for the first three years of the lease.

65 Under draft London Plan Policy SD7, development proposals should ensure that retail floorspace is fit for purpose, with at least basic fit out and not compromised in terms of layout, street frontage, floor to ceiling heights and servicing. Limited information is provided on the quality of the proposed commercial units and whether they would satisfy the needs of the returning retail tenants. This should be confirmed.

66 The office floorspace would be provided at the first floor of Block O and provide accommodation for the Council Housing Office and the remainder would provide affordable workspace for the local community, which is supported. Further details as to how this space would be managed and promoted is necessary, particularly given the relatively small overall quantum of floorspace proposed. The affordable workspace offer should be clarified and secured within the s106.

Equalities

67 London Plan Policy 3.1 seeks to ensure that development proposals protect and enhance facilities and services that meet the need of particular groups and communities and resists their loss without adequate justification or re-provision. In addition, draft London Plan Policy CG1 seeks to support and promote the creation of an inclusive city where all Londoners, regardless of their age, disability, gender, gender identity, marital status, religion, sexual orientation, social class, or whether they are pregnant or have children can share in its prosperity, culture and community, minimising the barriers, challenges and inequalities.

68 More generally, the Equality Act 2010 places a duty on public bodies, including the GLA and the Mayor, in the exercise of their functions, to have due regard to the need to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it. This requirement includes removing or minimising disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic and taking steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it.

69 The application is supported by an Equalities Impact Needs Assessment. This report assesses the impacts of the proposals on protected characteristics as defined within the Equality Act 2010 and sets out both temporary and permanent impacts of the proposals.

70 The temporary impacts relate largely to the disruption experienced during the construction period and changes to the level of play space throughout the construction process. Mitigation is proposed in the form of a Construction and Environmental Management Plan and Construction Logistics Plan. In addition, a phasing strategy to ensure appropriate levels of play space are retained on site throughout the whole construction process is also required to ensure these negative temporary impacts are minimised.

71 In terms of permanent impacts, the report highlights 17 positive permanent impacts relating to the provision of new affordable housing, community facilities and improved open space and playspace. However, as highlighted elsewhere in this report, a number of the identified positive permanent impacts are questioned, most notably: improvements to access for disabled residents and visitors to the estate has not been demonstrated; it is not clear how the proposed community facilities represent an improvement on the existing; and proposed new affordable housing would be segregated into defined blocks on the periphery of the site which is unacceptable.

72 One negative permanent impact is identified which is the impact of the development on existing non-secure social tenants given that they would have no right of return to the estate. Temporary occupants from BAME backgrounds and women would be disproportionately impacted upon as a result of this issue, when compared to other groups. Wandsworth Council, having accepted a legal duty to re-house, is proposing to either make an offer of alternative temporary accommodation for residents or permanent accommodation into a secure council tenancy elsewhere in the borough. It is important to note that the applicant has not yet confirmed that the replacement housing would be social rent or LAR as required by draft London Plan Policy H10.

73 The negative temporary impacts should be able to be mitigated through robust phasing and construction management plans, however, as stated previously, the CPO adds further uncertainty. Considerably more detail must be provided to ensure that the construction and decant strategies are workable and adequate mitigation is proposed to demonstrate that the potential negative impacts have been adequately addressed. The applicant should demonstrate that the impact of this on protected characteristics has been fully considered in this regard.

74 Whilst it is acknowledged that the proposals would result in a number of positive, long-term impacts, a number of these identified impacts would not qualify as positive under the current scheme proposals without requiring significant revisions to the scheme. Furthermore, the disproportionate impact of the rehousing of non-secured social tenants on women and BAME occupants is also of concern and the applicant should provide further comfort that the rehousing of these residents would be managed to minimise harm including confirmation that replacement accommodation would be provided in the form of social rent or LAR. As such, the scheme would not comply with Policy 3.1 of the London Plan Policy and Policy CG1 of the draft London Plan.

Urban design

75 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.

76 In respect of estate regeneration schemes in particular, proposals must clearly demonstrate that they would deliver safe and better-quality homes and should seek to improve the quality of the local environment through improved public realm and provision of social infrastructure to ensure compliance with London Plan Policy 3.14, draft London Plan Policy H11 and the GPGER. It is on this basis that GLA officers have serious concerns about the proposal particularly with regards to the quality of affordable housing and principles of inclusive design.

Layout

77 The masterplan layout broadly responds to the existing street layout with proposed blocks arranged to be accessed from four primary east/west streets. The significant level changes, primarily running north/south across the site are utilised to contain car parking at part-basement level for blocks M, K, G, F, D, E and B. This approach is supported and allows the majority of street frontages to be activated with residential entrances.

78 The inclusion of a 'village square' to mark the key entrance to the site and link with the proposed community and commercial uses is welcomed. As commented at pre-app stage, the applicant is encouraged to ensure this space is integrated into the masterplan's wider public realm strategy and the inclusion of raised tables to create pedestrian-focussed links across Danebury Avenue and Holybourne Avenue is welcomed and helps to achieve this. A similar approach to traffic calming to improve the quality of crossings across Roehampton Lane to integrate the scheme with the wider community in the interests of good place-making is strongly encouraged. It is disappointing nonetheless, that the affordable tenures are located at the fringes of the masterplan area and it is not clear why opportunities for including affordable homes within the larger Blocks K and N have not been implemented.

79 The simple hierarchy of east/west streets with secondary north/south links is supported. There are however a number of instances of switch-back ramps that risk creating barriers to creating genuinely inclusive site-wide access. This is discussed further in the inclusive design section.

Residential quality

80 Residential and block layouts are generally well resolved across the masterplan, with a good number and distribution of cores creating efficient core to units ratios. Block M includes up to 10 units sharing the same core at each level and a number of north facing single aspect units facing onto Roehampton Lane. Options for adding another core at the north west corner of this block should be explored to alleviate these issues.

81 The footprint and massing of blocks has been designed to optimise the proportion of dual aspect which is welcomed. The applicant should confirm that as far as is feasible working with the site's level changes, opportunities for including ground floor units with direct front door street access to streets have been maximised to promote activity and a sense of ownership for residents. It is noted that this has been achieved for Block K and the inclusion of duplex units to address the north/south level change between street and shared amenity courtyards is welcomed.

82 The ground floor of the affordable block Q could be improved by infilling the western frontage with additional units to avoid blank/open car park frontage. Furthermore, the core of the southern block is accessed through the podium car park rather than the street. This should be amended to provide direct street access to the core.

Height/ massing

83 The heights and massing strategy is well conceived and in tandem with a simple architectural response to each block, creates an appropriate balance of character areas across the masterplan. The design coding draws on the detailed element and includes sufficient information to define and secure a consistent level of design quality overall. These blocks allow the ability to dedicate cores and associated shared amenity space to affordable tenures and integrate them with private tenures to create to achieve a mixed, balanced and tenure blind community. Officers would welcome further discussion on this point.

Heritage impact

84 The Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the statutory duties for dealing with heritage assets in planning decisions; which 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.' In relation to conservation areas, 'in the exercise of planning powers within a conservation area, the decision maker is required to pay special attention to the desirability of preserving or enhancing the character or appearance of that area'. In relation to listed buildings 'for development which affects a listed building or its setting, the decision maker shall 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'.

85 The NPPF states that when considering the impact of the proposal on the significance of a designated heritage asset, great weight should be given to the asset's conservation; significance can be harm or loss through alteration or destruction of the heritage asset or development within its setting. Policy HC1 of the draft London Plan, like London Plan Policy 7.8, states that development should conserve heritage assets and avoid harm. Having regard to the visual impact assessment it is considered that some harm would arise as a result of the demolition of original estate features within the Conservation Area but that this would be relatively limited as they are not listed and largely outside of the Conservation Area. The impact of the development on the setting of adjacent Conservation Areas would also be limited and certainly less than substantial. Some benefit would arise from the relocation of the bus turning circle to improve the quality of views across Downshire Fields.

86 No harm to significance of the listed slab blocks would arise as a result of the development. However, the scheme would result in less than substantial harm to the significance of the Minstead Garden bungalows by virtue of the demolition of the club room, shopping parade and 2A Minstead Gardens. The impact of the development of block Q on the setting of the listed Downshire House would be limited due to fact that the building is screened somewhat by an existing university building. The proposed buildings would be almost entirely obscured by existing vegetation with only the very tops of buildings appearing above the tree line in affected views. The change would be barely perceptible and therefore GLA officers consider that the setting of Richmond Park Registered Park and Garden would not be affected by the development. In all instances where harm arises, the degree of harm would be to the lower end of less than substantial and could be outweighed by the public benefits arising from the scheme including the regeneration of the estate, additional housing and affordable housing proposed and the high architectural quality of the replacement buildings, subject to resolution of the issues identified in this report.

Inclusive design

87 London Plan Policy 7.2 and Policy D3 of the draft London Plan seek to ensure that proposals achieve the highest standards of accessible and inclusive design (not just the minimum). They should be convenient and welcoming with no disabling barriers, providing independent access without additional undue effort, separation or special treatment. The existing site presents a

number of challenges with respect to access, most notably the significant level changes across the site. As a result of which, one of the key objectives for the development as identified in the Roehampton SPD is to improve access and connections. However, despite this and the clear challenges faced, very little detail is provided on access related matters. The minimal interventions that are proposed are considered to be unacceptable.

88 The submitted pedestrian access plan shows switch back ramped access in several locations across the site for wheelchair users. Switchback ramps of this scalar are not supported as they are considered very inefficient, particularly when compared to the existing single ramped access arrangement. The applicant should demonstrate how options for alternative block and street layouts to provide accessible and more gradual inclines running north/south across the masterplan have been investigated and considered as part of design development. The access strategy for the site must be substantially revised to demonstrate a very clear improvement on the existing access arrangements for all.

89 Policy 3.8 of the London Plan and Policy D5 require that at least 10% of new build dwellings meet Building Regulation requirement M4(3) 'wheelchair user dwellings' (designed to be wheelchair accessible or easily adaptable for residents who are wheelchair users); and all other new build dwellings must meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings'.

90 The application materials state that 10% of all new units would be provided as wheelchair accessible, spread across tenures and unit sizes, and across the site, with plans of units provided. As previously stated, the re-provided units should also be provided as wheelchair accessible units where the need exists. All remaining units, and not just 90% of new units should meet Building Regulation requirement M4(2). This should be confirmed. The Council should secure M4(2) and M4(3) requirements by condition as part of any permission.

Fire strategy

91 In accordance with draft London Plan Policy D11, a Fire Strategy has been produced. However, fire evacuation lifts are not proposed to be provided under the strategy. Under draft London Plan Policy D3 in all new developments where lifts are proposed, at least one lift per core (or more, subject to capacity) should be provided as a fire evacuation lift suitable for evacuation people who require level access from the building. Again, this must be confirmed and secured.

Environment

Energy

92 Based on the energy assessment submitted, compared to a 2013 Building Regulations compliant development, the domestic element of the proposals is estimated to achieve a 2% reduction in regulated carbon dioxide emissions per year. With the non-domestic elements achieving a 17% reduction. The applicant has investigated the feasibility of a range of renewable energy technologies and is proposing to install Photovoltaic (PV) panels and Heat Pumps. A reduction in regulated CO₂ emissions of 53 tonnes per annum (3%) will be achieved through this third element of the energy hierarchy.

93 Further information has been requested including completion of the GLA's Carbon Emission Reporting spreadsheet; justification for using the SAP 2012 emissions factors; original supporting documents; enhanced overheating assessments; amendments to the site wide network; phasing programme; alternatives to CHP; maximisation of PV; clarification of CO₂ savings, which must be provided before the proposals can be considered acceptable in accordance with Policy 5.2 of the London Plan and Policy SI2 of the draft London Plan, and the carbon dioxide savings verified.

Sustainable drainage and flood risk

94 The Flood Risk Assessment provided for the proposed development complies with London Plan Policy 5.12 and draft London Plan Policy SI.12. However, the surface water drainage strategy for the proposed development does not comply with London Plan Policy 5.13 and draft London Plan Policy SI.13 as it does not cover the full development site. Further details on how SuDs measures at the top of the drainage strategy will be included in the development should be provided. The applicant should also consider water harvesting and reuse to reduce consumption of wholesome water across the entire development site. This can be integrated with the surface water drainage system to provide a dual benefit.

Urban greening

95 A significant number of mature trees are to be removed as a result of the development. Under London Plan Policy 7.21 and draft London Plan Policy G7 wherever possible, trees of value should be retained. In this regard, it is not considered that the benefits of the relocation of the bus turning facility, which would result in the loss of a number of mature trees would outweigh the environmental and amenity impact of their loss. This approach should be reconsidered. Adequate replacement should be based on the existing value of the benefits of the trees removed.

96 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. Confirmation that the scheme would achieve an urban greening factor of 0.4 is required.

97 Full technical details of these requirements have been provided to the applicant and the Council.

Transport

Vehicular site access

98 Changes are proposed at the junction of Danebury Avenue and Roehampton Lane, the Kingsclere Close approach to Roehampton Lane and 166-168 Roehampton Lane. Further work is required before the principle of the changes proposed along with Stage 1 Road Safety Audits can be agreed. A Healthy Streets Check for Designers of the revised Danebury Avenue arrangement is required.

Healthy Streets

99 The proposed development will see an increase in pedestrian and cycle trips to/ from the site and the local area. A Healthy Streets Check (HSC) has been provided and concludes there have been improvements to the walking and cycling environment within the proposed development. Further work is required to demonstrate how the scores have been improved and how the scheme will contribute to the Mayor's Healthy streets agenda.

Vision Zero

100 Accident analysis has been provided but it fails to identify measures which can be used to eliminate accidents and should demonstrate how the scheme will contribute towards the Vision Zero approach.

Car parking

101 It is proposed to provide 544 car parking spaces for the proposed 1,103 residential dwellings which equates to a car parking ratio of 0.5 per unit. In addition, the Transport Assessment states that where demand exceeds supply, it is anticipated that cars would park on the surrounding streets.

102 The proposed on-street car parking provision is 589 daytime parking spaces and 652 overnight spaces. Therefore within the intervention area, the proposed 1,103 residential units will have access to 1,142 daytime parking spaces and 1,196 overnight spaces. As a result the car parking ratio available to the proposed dwellings is therefore 1.0 spaces daytime and 1.1 spaces overnight. On street car parking will remain uncontrolled and there are no proposals to introduce a controlled parking zone.

103 Based on the above, the development would not accord with the London Plan which would permit a maximum of up to 1 space per dwelling or draft London Plan Policy T6.1 which would only permit a maximum of 0.25 spaces per dwelling. Given the congested nature of the surrounding highway network and the Mayors Transport Strategy aspirations that by 2041 over 90% of trips in inner London will be made on foot, by cycle or using public transport and draft London Plan Policy T6.1, the car parking proposed should be significantly reduced.

104 The only way to reduce car use at this location is by restrained car parking provision and the implementation of a Controlled Parking Zone (CPZ) in the streets within the estate. It is therefore recommended that the Council implement a CPZ and should seek a financial contribution towards its implementation.

105 Disabled person parking and Electric Vehicle Charging Points (EVCPs) will be provided in accordance with draft London Plan standards.

106 Three years free car club membership should be secured for all new residents.

Buses

107 The proposed development is predicted to generate 246 two-way bus trips within the AM peak hour and 144 in the PM peak hour. There are currently two routes in proximity to the development site which are full or close to being full. A bus contribution of £650,000 is sought to enhance capacity.

108 The principle of the design of the relocated bus turnaround area to the Tunworth Crescent junction with Danebury Avenue has been agreed in principle however justification is required for moving the existing bus standing on Danebury Avenue in order to maintain views. The relocated bus turnaround is located next to residential properties which has the potential to generate noise and other impacts. It will also require bus drivers to have to walk 180 metres east to use the bus driver facilities at Portswood Place. Given the stand will be used by night bus route 74, this also raises security issues for drivers using the bus driver facility.

109 A Road Safety Audit should be undertaken and submitted for review prior to determination for the proposed turnaround facility.

110 The full costs to deliver the relocated bus turnaround facility, bus driver facility and any associated bus infrastructure will be met by the applicant.

Cycle parking

111 Further detail must be submitted to demonstrate that the cycle parking proposed accords with draft London Plan standards and of the London Cycling Design Standards (LCDS).

Highway impact and trip generation

112 Electronic copies of the highways models for review and will provide a more detailed response concerning the highways impact once this is complete.

113 The overall trip generation assessment is acceptable, but further work is required concerning service vehicle trip generation.

S106 and conditions

114 Full Travel Plan to be secured, monitored, reviewed, and enforced through the s106. A Delivery and Servicing Plan to be secured by condition. A Construction Management must also be secured by condition.

Local planning authority's position

115 Wandsworth Council planning officers have engaged in pre-application discussions with the applicant since May 2017. They are currently undertaking an independent review of the applicant's FVA. The committee date for the application is not known at this stage.

Legal considerations

116 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. 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

117 There are no financial considerations at this stage.

Conclusion

118 London Plan and draft London Plan policies on estate regeneration; housing; affordable housing; social infrastructure; commercial uses; equalities; urban design; heritage; inclusive design; transport; and climate change are relevant to this application. The application does not comply with the London Plan and the draft London Plan, and requires fundamental revisions and significantly more detail to address the substantive issues raised:

- **Estate regeneration:** The proposals do not meet London Plan Policy 3.14 and draft London Plan Policy H10 as the development does not deliver like for like replacement of social rented units; there are shortcomings in the consultation process; the decant strategy is significantly lacking in detail and does not take account of the impact of CPO process. The principle of estate regeneration would only be accepted should these issues be addressed in full.
- **Affordable housing:** The affordable housing is segregated in single tenure blocks on the periphery of the site, which is unacceptable and must be better integrated throughout the scheme. The affordable housing offer itself is unclear. The intermediate offer includes shared equity which is not recognised by the GLA as a genuinely affordable housing product. The offer, excluding shared equity is 8% affordable housing on the uplift generated on site (64:36 split between social rent and shared ownership). However, no clear commitment to providing the net additional 20 social rent units and shared ownership units within the estate/ satellite sites has been provided. The applicant's FVA is currently being robustly interrogated to ensure that the maximum reasonable affordable housing offer is secured. However, it is currently unclear what level of Council funding (and other government funding) has been relied upon to support the development. The applicant is required to model the impact of GLA grant funding. Early and late stage reviews must be secured in the s106.
- **Playspace:** The calculation of on-site playspace provision must be recalculated to exclude existing areas of on-site playspace and off-site playspace and a full explanation for the large area attributed to the trim trails provided. Any playspace proposed must be accessible to all, regardless of tenure, replace all existing play features on site as a minimum and any shortfall fully justified.
- **Community and commercial uses:** The applicant must demonstrate that the retail units are fit for purpose and would meet retained tenant's needs; the affordable office space in relation to management and affordable terms; and confirmation that the proposed community floorspace improves upon the existing and would be managed for the reduction in community floorspace to be considered acceptable.
- **Equalities:** The negative temporary impacts relating to construction and phasing have not been fully addressed. A number of the positive, long-term impacts identified would not qualify due to serious concerns raised over their adequacy. Furthermore, the disproportionate impact of the rehousing of non-secured social tenants on women and BAME occupants is also of concern and the applicant should provide further comfort that the rehousing of these residents would be managed to minimise harm including confirmation that replacement accommodation would be provided in the form of social rent or LAR.
- **Urban design:** Barriers to access must be addressed. The scheme must be tenure blind and fully integrate affordable housing throughout the application site. An additional core should be provided in block M. Direct front door access should be provided where possible. The entrance to the core of block Q should be provided from the street rather than the car park.
- **Heritage:** The impact of the scheme on designated heritage assets is limited and in all instances would not result in more than less than substantial harm. The public benefits arising from the scheme in terms of housing and affordable housing delivery and regeneration of the estate more generally could be considered as outweighing any identified harm subject to all issues raised in this report being resolved.

- **Inclusive access and fire safety:** The proposed access arrangements are generally poor and not inclusive. The access strategy should be fundamentally revised to demonstrate a clear improvement over the existing. The proportion of wheelchair units for the replacement units should be confirmed and the remaining units should comply with Building Regulations M4(3). Fire lifts should also be provided.
- **Energy:** Further information has been requested including the GLA's Carbon Emission Reporting spreadsheet; SAP 2012 emissions factors; original supporting documents; overheating; site wide network; phasing programme; alternatives to CHP; maximisation of PV; and clarification of CO₂ savings.
- **Sustainable drainage and flood risk:** Further details on how SuDs measures at the top of the drainage strategy will be included in the development should be provided. The applicant should also consider water harvesting and reuse to reduce consumption of wholesome water across the entire development site.
- **Urban greening:** The bus turning facility relocation should be reconsidered given the consequential loss of mature trees. Adequate replacement of trees must be committed to. Confirmation that the scheme would achieve an urban greening factor of 0.4 is also required.
- **Transport:** Car parking provision should be reduced and a Controlled Parking Zone should be implemented on the estate roads. The relocation of the bus turnaround facility should be fully justified. The impact on the highway network is still to be determined. A contribution will be sought for bus capacity improvements.

for further information, contact the GLA Planning Team:

Julietta McLoughlin, Chief Planner

020 7983 4271 email julietta.mcloughlin@london.gov.uk

John Finlayson, Head of Development Management

020 7084 2632 email john.finlayson@london.gov.uk

Allison Flight, Deputy Head of Development Management

020 7084 2820 email Alison.flight@london.gov.uk

Kate Randell, Team Leader

020 7983 4783 email kate.randell@london.gov.uk

Hannah Thomas, Principal Strategic Planner, Case Officer

020 7333 4281 email Hannah.thomas@london.gov.uk
