

<b>Item No.</b> 5.1	<b>Classification:</b> Open	<b>Date:</b> 23 April 2015	<b>Meeting Name:</b> Planning Committee
<b>Report title:</b>	<b>Development Management planning application:</b> Application 14/AP/3843 for: Full Planning Permission  <b>Address:</b> AYLESBURY ESTATE, LAND BOUNDED BY ALBANY ROAD, PORTLAND STREET, WESTMORELAND ROAD AND BRADENHAM CLOSE, LONDON SE17  <b>Proposal:</b> Full planning application for demolition of existing buildings and redevelopment to provide a mixed use development comprising a number of buildings ranging between 2 to 20 storeys in height (9.45m - 72.2m AOD), providing 830 residential dwellings (Class C3); flexible community use, early years facility (Class D1) or gym (Class D2); public and private open space; formation of new accesses and alterations to existing accesses; energy centre; gas pressure reduction station; associated car and cycle parking and associated works.		
<b>Ward(s) or groups affected:</b>	Faraday		
<b>From:</b>	HEAD OF DEVELOPMENT MANAGEMENT		
<b>Application Start Date</b> 21/11/2014		<b>Application Expiry Date</b> 13/03/2015	
<b>Earliest Decision Date</b> 30/01/2015		<b>PPA Date</b> 31/07/2015	

## RECOMMENDATION

1. That planning permission is GRANTED subject to conditions and the applicant entering into an appropriate legal agreement by no later than 31 July 2015, and subject to referral to the Mayor of London;
2. If it is resolved to grant planning permission, that it is confirmed that the environmental information has been taken into account as required by Regulation 3(4) of the Town and Country Planning (Environmental Impact Assessments) Regulations 2011;
3. That it is confirmed that, following issue of the decision, the Head of Development Management should place a statement on the Statutory Register pursuant to Regulation 24 of the Town and Country Planning (Environmental Impact Assessments) Regulations 2011 which contains the information required by Regulation 21 and that for the purposes of Regulation 24(1)(c) the main reasons and considerations on which the Planning Committee's decision was based shall be set out as in this report;
4. In the event that the requirements of (a) are not met by 31 July 2015, the Head of Development Management be authorised to refuse planning permission, if appropriate, for the reasons set out under paragraph 351.

## BACKGROUND INFORMATION

### Introduction

5. Constructed between 1966 and 1977, the Aylesbury Estate covers an area of 28.5 hectares containing approximately 2700 dwellings. At the time it was built, the plans for the estate were considered innovative and aspirational – elevated walkways linking the blocks would enable people to walk from the Peckham ‘Five Estates’ through Aylesbury and the Heygate to the Elephant and Castle. The walkways would separate pedestrians from the traffic, with parking garages at ground floor, and the decks becoming social spaces for the residents. On completion, the Aylesbury was one of the largest housing estates in western Europe.
6. However, over the following 30 years the estate became one of the most deprived areas in south London, with a high incidence of crime, ill health and low levels of employment and educational achievement.
7. In 2002 the council embarked upon plans for refurbishing the estate. However, structural surveys highlighted the extent of works needed to the fabric and it was concluded that the cost of refurbishing the estate to an acceptable standard would be prohibitive. Work to the individual blocks could not overcome the fundamental shortcomings of the layout of the estate, with its lack of active frontages, confusing and difficult pedestrian routes, and hostile architecture, and would limit opportunities for inward investment to support the regeneration. It was decided that in order to secure a long term sustainable future for the area, a more comprehensive programme would be needed, and in 2005 the council took the decision to redevelop the estate.
8. Preparation of the Aylesbury Area Action Plan (AAP) began in March 2007. The council worked with the NDC and masterplanners Urban Initiatives on options, and carried out public consultation and background studies. Following an Examination in Public in 2009, and receipt of the report from the appointed Inspector, the council formally adopted the AAP in January 2010. The policies in the AAP should be afforded significant weight as they comprise part of the statutory development plan and deal directly with the redevelopment of the Aylesbury Estate. More detail on the AAP is given at paragraph 50.
9. During the AAP preparation period, two early phases of redevelopment came forward. Phase 1A in the south west corner of the estate has delivered 261 new homes, plus shops and a community centre (the Aylesbury Resource Centre). Site 7, in the north east corner of the estate is currently under construction, and will provide 147 new homes. Both were developed by L&Q Housing, and Phase 1A was recently awarded a Civic Trust commendation.
10. In 2012 the council began the process of selecting its development partner to deliver the Aylesbury masterplan. Following a lengthy and rigorous procurement process, the council selected Notting Hill Housing Trust (NHHT). In April 2014 a development partnership agreement and business plan were agreed by the partners to secure the comprehensive regeneration of the Aylesbury estate by 2032. NHHT will be working with Barratt London to deliver this comprehensive scheme.
11. The guiding objective of the AAP is to deliver a new neighbourhood, better integrated with the wider area, with a mix of housing types and tenures. It aims to replace the 2700 properties with around 4,200 new houses and flats, together with new shops, community facilities, workspaces, open spaces and other infrastructure.

12. The estate bounds Burgess Park, where a £6 million programme of investment, including a new competition-standard BMX track, playground and lake improvements has recently been undertaken. Consultation on Phase 3 works was recently carried out, which could include further sports and youth provision.
13. The future phases of the Aylesbury redevelopment would be delivered through two applications – a full application for the first development site (FDS) and an Outline application for Phases 2, 3 and 4. Together, these developments have the potential to transform the area, achieving the AAAP objective for an attractive, mixed neighbourhood where people would chose to live.
14. This report provides a detailed assessment of the detailed planning proposals for the First Development Site (FDS). This is the site identified in the AAAP as Site 1b/c. The Outline Planning Application, which covers Phases 2, 3 and 4 in the AAAP, will be fully considered in the planning report that accompanies application 13/AP/3844. The two sites are entirely separate, with the FDS west of Portland Street, and the Outline application area to the east.

### **Format of applications**

15. As detailed above the applicant has submitted two applications, one to cover the FDS and the other to cover the Outline Scheme. One Environmental Impact Assessment has been submitted that covers both applications. The remaining documents are split between those that are relevant only to the FDS and those that are shared between both applications. If approved, both applications would be linked by a single S106 Agreement. A list of the stand alone and shared application documents is given below.

FDS Planning Documents	
Stand-alone Documents	Shared Documents
Arboricultural Impact Assessment	Affordable Housing Statement
Design and Access Statement and Addendum	Energy Assessment and District Heating Study Planning Statement
Landscape Statement and Addendum	Environmental Statement and Appendices/Addendum
Planning Drawings	Flood Risk Assessment
Tree Strategy Addendum	Planning Statement
	Statement of Community Involvement
	Sustainability Assessment
	Transport Assessment and Addendum
	Waste Management Strategy and Addendum

### **Site location and description**

16. The FDS measures approximately 4.4 hectares (3.7 hectares net) and currently accommodates 566 homes and ancillary garage accommodation spread over eight predominantly residential blocks that range in height between four and 14 storeys. It is bounded by Westmoreland Road to the north, Portland Street to the east, Albany Road to the south and Bradenham Close to the west. The existing buildings are generally long linear housing blocks with surrounding open space and on street car parking. Chiltern (10 storeys) and Bradenham (14 storeys) provide the east and west bookends

to the site respectively. Both of these blocks are residential with vacant office space (formerly council offices) on the lower floors.

17. The centre of the FDS accommodates the five block interconnected Chartridge (five to six storeys) which is residential with ancillary garage accommodation on the ground floor of three of the blocks. South of Chartridge lies the five storey high residential block named Arklow House which is built in red brick. In the south west of the FDS and connected to Bradenham is Ellison House which provides specialised residential accommodation. A multi-use games area (MUGA) is located between Ellison House and Arklow House along the boundary with Albany Road.
18. Chiltern, Bradenham and Chartridge are built in the Jespersen architectural style which is characterised by pre-fabricated construction techniques, specifically a frame of pre-cast concrete wall panels which bear the load of the pre-cast concrete floor and ceiling slabs. This type of construction method and design is itself typical of the Aylesbury Estate.
19. Westmoreland Road  
On the Westmoreland Road boundary to the north, the FDS is bounded by dwellings located on Westmoreland Road and Phelp Street. These are generally two storey terraced homes with a number of ancillary garages and storage units. There are also a number of flatted blocks such as the part three/part seven storey St Matthews House towards the eastern end of Westmoreland Road; the three storey high Lady Margaret House and five storey high St Stephens House located towards the western end of Westmoreland Road. There is an additional five storey high block on the corner of Westmoreland Road and Queens Row. Westmoreland Road itself contains several mature trees to the south side of the existing footpath.
20. Portland Street  
On the Portland Street boundary to the east the FDS is bounded by the adjacent residential complex of Gayhurst which is formed of four blocks ranging in height between four and five storeys. Gayhurst is linked to Chiltern by way of an elevated walkway across Portland Street and surrounds an open space and a multi-use games area (MUGA) which faces the FDS across Portland Street. Michael Faraday Primary School lies to the north east of the site on the opposite side of Portland Street. Immediately to the north on Portland Street lies the Liverpool Grove Conservation Area, the Grade II listed, two storey dwellings at 1-23 Portland Street and the Grade II listed three storey residential block of Aycliffe House which is located on the corner of Westmoreland Road and Portland Street. The west side of Portland Street contains several mature trees.
21. Albany Road  
For the entire length of the Albany Road frontage the FDS is bounded to the south by Burgess Park, an area of Metropolitan Open Land.
22. Bradenham Close  
On the Bradenham Close boundary the FDS is bounded by the newly completed Site 1A development with buildings up to 10 storeys in height. Site 1A has been completed and is now fully occupied.
23. Trees  
There are 118 existing trees on the FDS, none of which are subject to a Tree Preservation Order.

## Details of proposal

24. Planning consent is sought for the demolition of all the existing buildings on the FDS followed by redevelopment to provide a mixed use development comprising buildings ranging between 2 to 20 storeys in height (9.45m-72.2m AOD) spread over six development blocks. The new accommodation would provide 830 residential units (Class C3) which includes 50 Extra Care units and seven units specifically designed for adults with learning difficulties. Block 1 also includes a flexible community facility of approximately 263sqm comprising a community space that may also be used as either an early years facility (Class D1) or gym (Class D2). The regeneration of the FDS includes the creation of public and private open space; formation of new accesses and alterations to existing accesses; energy centre; gas pressure reduction station; and associated car and cycle parking.
25. New Streets
- As detailed above, the redevelopment of the FDS creates a network of new streets. The one new east-west Street and two new north-south streets will in effect split the FDS into a 3x2 grid creating the six plots. These new streets improve linkages to the surrounding street network, including pedestrian access to Burgess Park.
26. Public Open Space
- Three new areas of public open space will be created;
27. Westmoreland Square – This space is located in the north west corner of the FDS where Westmoreland Road and Bradenham Close meet and is an extension to the square created adjacent to the Aylesbury Resource Centre as part of Site 1A.
28. Westmoreland Park – A new public park adjacent to Westmoreland Road between Block 1 and Block 2.
29. Portland Park – A new public space located on Portland Street to the east of Block 4 based around a group of retained mature trees.
30. Schedule of Accommodation
- The proposed development will provide a range of housing types and tenures as detailed in Table 1 below.

Table 1

	Private	Social Rent	Affordable Rent	Intermediate	Total
Flats	368	209	27	79	683
Maisonette /Duplex	44	33	0	23	100
Houses	12	35	0	0	47
Habitable Rooms (HR)	1327	1014	54	326	2721
Total	424 51.1% of units 48.7% HR	277 33.4% of units 37.3% HR	27 3.2% of units 2% HR	102 12.3% of units 12% HR	830

31. The tenures within each housing type are outlined in Tables 2-5 below.

**Table 2**

	Flats				
	Private	Social Rent	Affordable Rent	Intermediate	Total
1 Bed	199	108	27	37	371
2 Bed	162	60	0	42	264
3 Bed	7	41	0	0	48
4 Bed	0	0	0	0	0
5 Bed	0	0	0	0	0
Sub Total	368	209	27	79	683

**Table 3**

	Maisonettes/Duplex				
	Private	Social Rent	Affordable Rent	Intermediate	Total
1 Bed	0	0	0	0	0
2 Bed	21	8	0	6	35
3 Bed	23	22	0	15	60
4 Bed	0	3	0	2	5
5 Bed	0	0	0	0	0
Sub Total	44	33	0	23	100

**Table 4**

	Houses				
	Private	Social Rent	Affordable Rent	Intermediate	Total
1 Bed	0	0	0	0	0
2 Bed	0	0	0	0	0
3 Bed	0	0	0	0	0
4 Bed	10	17	0	0	27
5 Bed	2	18	0	0	20
Sub Total	12	35	0	0	47

**Table 5**

Unit type	FDS Schedule of Accommodation				
	Social Rent	Affordable Rent	Intermediate	Private market	Totals
1 Bed	108	27	37	199	371
2 Bed	68	0	48	183	299
3 Bed	63	0	15	30	108
4 Bed	20	0	2	10	32
5 Bed	18	0	0	2	20
Total Units	277	27	102	424	830
Total habitable rooms	1014	54	326	1327	2721

32. As previously stated, the redevelopment of the FDS would create six blocks as detailed in turn below:

33. Block 1

Block 1 would be located in the north west corner of the FDS. It would comprise 50 Extra Care flats, 59 general needs flats, six maisonettes and a community centre and would be formed by four buildings arranged around a courtyard which would be open to the south. Block 1 ranges in height from five storeys to 10 storeys with the taller elements being located at the open southern end and the lower buildings at the northern end where the building meets Westmoreland Square and Westmoreland Park. Amenity space is provided in the form of a landscaped courtyard, balconies/terraces and a rooftop amenity space. The general needs schedule of accommodation for Block 1 is outlined in Table 6 with the Extra Care schedule of accommodation detailed in Table 7 below;

Table 6

	Block 1 Schedule of Accommodation (excluding Extra Care)				
	Social Rent	Affordable Rent	Intermediate	Private	Total
1 Bed Flat	32	0	3	0	35
2 Bed Flat	0	0	19	0	19
3 Bed Flat	5	0	0	0	5
3 Bed Mais	2	0	0	0	2
4 Bed Mais	2	0	2	0	4
Total Hab Rooms	111	0	73	0	184
Total Units	41	0	24	0	65

Table 7

	Extra Care Units			
	Social Rent	Shared Ownership	Affordable Rent	Total
1 Bed Flat	20	7	20	47
2 Bed Flat	0	3	0	3
Total Hab Rooms	40	23	40	103
Total Units	20	10	20	50

34. Blocks 2 and 3

Block 2 would be located in the central north section of the FDS adjacent to Westmoreland Road, Phelps Gardens, the East-West Street and Westmoreland Park. This block would be formed of two rows of terraced housing aligned along Westmoreland Road and the East-West Street as well as accommodation designed specifically for adults with learning difficulties on the Westmoreland Gardens frontage. The Learning Difficulties flats would be four storeys high whilst the terraced dwellings would be part three/part four storeys in height with both front and rear gardens.

35. Block 3 would be located in the north western section of the FDS. Seen as a mirror image to Block 2, Block 3 would provide part three/part four storey dwellings with front and rear gardens. The terraced dwellings would be aligned along Westmoreland Road and the East-West Street with a six storey block of flats fronting Portland Street. The

schedule of accommodation for Blocks 2 and 3 are set out in Tables 8 and 9 below with the Learning Difficulties units schedule detailed in Table 10.

**Table 8**

Block 2 Schedule of Accommodation (excluding LD)					
	Social Rent	Affordable Rent	Intermediate	Private	Total
4 Bed House	9	0	0	5	14
5 Bed House	13	0	0	0	13
Total Hab Rooms	145	0	0	30	175
Total Units	22	0	0	5	27

**Table 9**

Block 3 Schedule of Accommodation					
	Social Rent	Affordable Rent	Intermediate	Private	Total
1 Bed Flat	0	0	11	0	11
2 Bed Flat	0	0	2	0	2
2 Bed Mais	0	0	3	0	3
3 Bed Mais	0	0	4	0	4
4 Bed House	8	0	0	5	13
5 Bed House	5	0	0	2	7
Total Hab Rooms	83	0	60	44	187
Total Units	13	0	20	7	40

**Table 10**

Block 2 Learning Difficulties					
	Social Rent	Affordable Rent	Intermediate	Private	Total
1 Bed Flat	0	7	0	0	7
Total Hab Rooms	0	21	0	0	21
Total Units	0	7	0	0	7

36. **Block 4**

Block 4 is a perimeter block made up of five buildings, four mansion blocks and a tower, and is located on the corner of Albany Road and Portland Street. The buildings are arranged around a raised podium courtyard garden located above ground floor parking. Block 4 contains 221 dwellings, 53 undercroft car parking spaces and the building heights range from six storeys to 20 storeys with the tallest building being on the corner of Albany Road and Portland Street. Amenity space would be provided in the form of a courtyard communal garden, rear gardens, balconies and roof terraces. The 20 storey tower represents the tallest element within the FDS. The schedule of accommodation for Block 4 is outlined in Table 11 below.



Table 11

Block 4 Schedule of Accommodation					
	Social Rent	Affordable Rent	Intermediate	Private	Total
1 Bed Flat	0	0	12	64	76
2 Bed Flat	51	0	10	45	106
3 Bed Flat	15	0	0	0	15
2 Bed Mais	13	0	2	0	15
3 Bed Mais	5	0	2	2	9
Total Hab Rooms	338	0	79	318	735
Total Units	84	0	26	111	221

37. Block 5

Block 5 is similar in layout to Block 4 with the tallest element again being in the south east corner and rising to 18 storeys, with the remaining buildings that make up Block 5 ranging in height from six to 10 storeys. Undercroft parking for 65 cars is provided and the amenity space will be made up of podium level communal courtyard garden and private gardens, balconies and roof terraces. A total of 237 units will be provided with the schedule of accommodation outlined in Table 12 below.

Table 12

Block 5 Schedule of Accommodation					
	Social Rent	Affordable Rent	Intermediate	Private	Total
1 Bed Flat	23	0	4	85	112
2 Bed Flat	11	0	8	54	73
3 Bed Flat	14	0	0	0	14
2 Bed Mais	4	0	0	4	8
3 Bed Mais	13	0	2	15	30
Total Hab Rooms	238	0	50	455	743
Total Units	65	0	14	158	237

38. Block 6

Block 6 is a similar layout to Blocks 4 and 5 with the exception of there being no on site car parking, resulting in the communal courtyard garden and private gardens being provided at ground level. Made up of four buildings, the tallest element is again located in the south east corner and will rise to 14 storeys whilst the remaining buildings range between five and 10 storeys. Block 6 will accommodate 183 units with the schedule of accommodation being detailed in Table 13 below.

**Table 13**

Block 6 Schedule of Accommodation					
	Social Rent	Affordable Rent	Intermediate	Private	Total
1 Bed Flat	33	0	0	50	83
2 Bed Flat	29	0	0	32	61
3 Bed Flat	10	0	0	4	14
2 Bed Mais	2	0	1	6	9
3 Bed Mais	5	0	7	3	15
4 Bed Mais	1	0	0	0	1
Total Hab Rooms	253	0	39	287	579
Total Units	80	0	8	95	183

39. **Car Parking and Cycle Parking**

Across the FDS a total of 287 on site car parking spaces and 1292 cycle spaces will be provided as detailed in Tables 14 and 15 below. These are in addition to the car and cycle spaces provided on street, which are detailed below.

**Table 14**

FDS Car Parking								
	On street	Block 1	Block 2	Block 3	Block 4	Block 5	Block 6	Total
Car Parking Spaces	157	7	4	0	53	65	1	287

**Table 15**

FDS Cycle Parking								
	On street	Block 1	Block 2	Block 3	Block 4	Block 5	Block 6	Total
Total	108	91	40	83	368	334	268	1292

**Planning history**

40. There is no significant planning history for the FDS since the estate was built save for various change of use applications and minor works to repair playgrounds and other forms of minor development. However, as detailed in the Introduction to this report, the Aylesbury Estate regeneration has already begun with the redevelopment of Site 1A and Site 7 as well as the Outline Scheme which concerns the regeneration of the remainder of the Aylesbury Estate. These applications are detailed below;

41. FDS Planning History

04/CO/0126 – Garages 51 and 52 Chartridge – Conversion of garages into a temporary information centre for exhibition and meetings over estate regeneration proposals.

APPROVED – 10/02/2005

**Planning history of adjoining sites**

42. Site 1A

Site 1A			
Reference	Location	Description	Decision
05/CO/0161	OPEN LAND EAST OF RED LION ROW & NORTH OF BOYSON ROAD, 1-41 BRADENHAM, 1-12 RED LION CLOSE & THE AYLESBURY DAY CENTRE LONDON SE17 2ES	Demolition of existing garages and out buildings, erection of 45 new dwellings, 10 new garages and a new day centre north of Boyson Road. Demolition of the existing day centre and the erection of 75 new dwellings west of Bradenham Close and public realm improvement works along Bradenham Close and Boyson Road. (Siting Only) (Not implemented)	Approved 18/01/2006
07/CO/0046	OPEN LAND EAST OF RED LION ROW & NORTH OF BOYSON ROAD, 1-41 BRADENHAM, 1-12 RED LION CLOSE & THE AYLESBURY DAY CENTRE LONDON SE17 2ES	Outline Planning Application for the demolition of 1-41 Bradenham, 1-12 Red Lion Close, the Aylesbury Day Centre, the elevated pedestrian link across Bradenham Close and the single storey garages on Red Lion Close, and the erection of a series of buildings ranging in height from 1 (c.4.5m) to 10 storeys (29.9m) in height comprising around 260 dwellings, 404m <sup>2</sup> of retail floorspace, a new day centre and provision of public open space and public realm improvement work. (Reserved matters later approved and now complete)	Approved 11/06/2007

43. Site 7

Site 7 lies within the north east section of the Aylesbury Estate and is currently under construction following the approval of application 12/AP/2332 detailed below;

Site 7			
Reference	Location	Description	Decision
12/AP/2332	1-27 AND 28-59 WOLVERTON, SEDAN WAY, (SITE 7 AYLESBURY ESTATE REGENERATI ON) LONDON, SE17 2AA	Demolition of existing buildings and redevelopment of the site to provide 147 residential units including flats, maisonettes and houses (30 x 1 bed, 71 x 2 bed, 13 x 3 bed, 28 x 4 bed, 5 x 5 bed) of which 58% would be affordable housing. The proposed residential blocks range between 3 and 10 storeys in height (10 Storeys at Thurlow Street) with a basement car park together with new vehicle access, plant, landscaping, cycle storage and refuse/recycling facilities.	Approved 19/02/2013

44. The Outline Scheme has been submitted as the sister application to the FDS and details the masterplan proposals for the regeneration of the remainder of the Aylesbury Estate not covered by the FDS or Sites 1A and 7.

Outline Scheme			
Reference	Location	Description	Decision
14/AP/3844	AYLESBURY ESTATE, LAND BOUNDED BY ALBANY ROAD, PORTLAND STREET, BAGSHOT STREET, ALVEY STREET, EAST STREET AND DAWES STREET, LONDON SE1	Outline application for: demolition of existing buildings and redevelopment to provide a mixed use development over 18 development plots comprising a number of buildings ranging between 2 to 20 storeys in height (12.45m - 68.85m AOD) with capacity for up to 2,745 residential units (Class C3), up to 2,500sqm of employment use (Class B1); up to 500sqm of retail space (Class A1); 3,100 to 4,750sqm of community use; medical centre and early years facility (Class D1); in addition to up to 3,000sqm flexible retail use (Class A1/A3/A4) or workspace use (Class B1); new landscaping; parks, public realm; energy centre; gas pressure reduction	Recommended for Approval

		station; up to 1,070 car parking spaces; cycle parking; landscaping and associated works.	
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## KEY ISSUES FOR CONSIDERATION

### Summary of main issues

45. The main issues to be considered in respect of this application are:
- Principle of the proposed development in terms of land use and conformity with strategic policies and the Aylesbury Area Action Plan
  - Environmental impact assessment
  - Affordable Housing
  - Density and dwelling mix
  - Quality of accommodation
  - Non-residential land uses
  - Urban design, including layout, height and massing and open space
  - Impact on strategic and local views and the setting adjacent listed buildings and conservation areas
  - Transportation & Highways including cycling
  - Impact on trees
  - Impact on the amenities of occupiers of neighbouring properties
  - Impact of adjoining uses on occupiers of the proposed development
  - Energy
  - Flood risk
  - Site contamination
  - Archaeological matters
  - Equalities implications
  - Planning Obligations and Community Infrastructure Levy (CIL)

### Planning policy

46. The statutory development plan for the borough comprises The London Plan consolidated with further alterations (March 2015); The Core Strategy (2011) and saved policies from the Southwark Plan (2007). The Aylesbury Area Action Plan was adopted in January 2010 and represents the primary policy document for determining planning applications within the Aylesbury Action Area. The policies in the Aylesbury Area Action Plan (the AAAP) should be afforded significant weight as they comprise part of the statutory development plan and deal directly with the redevelopment of the Aylesbury Estate. The National Planning Policy Framework 2012 provides national planning guidance.
47. The site is located within the:
- Air Quality Management Area;
  - Urban Density Zone;
  - Aylesbury Action Area Core
48. It has a Public Transport Accessibility Level (PTAL) of 4 where 1 is the lowest level and 6b the highest.

49. The site is located adjacent to the southern arm of the Liverpool Grove Conservation Area. The Addington Square Conservation area lies to the south of the site across Burgess Park. The following listed buildings are within close proximity to the site;
- 1,1A and 3-11 Portland Street (Grade II);
  - 13-23 Portland Street (Grade II); and
  - Aycliffe House (Grade II).

50. Aylesbury Area Action Plan 2010

The Aylesbury Area Action Plan (AAP) sits within the council's Local Development Framework, and is the key material consideration in the determination of all applications in its area. It provides locally-specific policies and guidance. It is consistent with the policies in the Core Strategy and saved Southwark Plan, adjusting some of the overarching borough-wide policies to reflect the issues as they specifically affect the estate. The AAP is also in general conformity with the London Plan, as confirmed by the GLA.

51. Preparation of the AAP began in 2007. The Plan was subject to public and statutory consultation at each stage of its preparation, and the responses to consultation were summarised in the Consultation Report dated May 2009. The council facilitated the setting up of a Neighbourhood Team of residents to lead residents involvement in the consultation process. The plan was subject to an Equalities Impact Assessment and a Sustainability Assessment.

52. Following an Examination in Public, the Inspectors report was published in November 2009. He concluded that the estate "shows clear signs of stress, and there is evidence that the built fabric would be expensive to retain in the long term and would in any event be unlikely to achieve a satisfactory residential environment."

53. He required changes to the affordable housing mix in Phases 1 and 4 to provide more affordable housing in the first phase, balanced by a higher proportion of private housing in the last phase. With this proviso, he was satisfied that the tenure mix was the only one that was reasonably practicable. The policies in the AAP are key material considerations and the AAP sets out expectations regarding the redevelopment of the estate. The AAP requires developments to be in general compliance with the masterplan. It contains a target of 4,200 new homes across the AAP area, as well as targets for housing types, mix, density and affordable housing. Whilst the AAP sets out clear parameters for development, there was always intended to be some flexibility in terms of the precise location/form of development and the precise numbers of units provided.

54. The plan was amended to respond to the Inspectors binding report, and the AAP was formally adopted by the council in January 2010. It contains the following policy provisions:

BH1 – Number of homes

BH2 – Density and distribution of homes

BH3 – Tenure mix

BH4 – Size of homes

BH5 – Type of homes

BH6 – Energy

PL1 – Street layout

PL2 – Design principles

PL3 – Building block types and layout  
PL4 – Building heights  
PL5 – Public open space  
PL6 – Children’s play spaces  
PL7 – Private amenity space  
TP1 – Designing streets  
TP2 – Public transport  
TP3 – Parking standards: Residential  
COM1 – Location of social and community facilities  
COM2 – Opportunities for new business  
COM3 – Health and social care  
COM4 – Education and learning  
COM5 – Community space and arts and culture  
COM6 – Shopping and retail  
D1 – Phasing  
D2 – Infrastructure funding

55. National Planning Policy Framework (2012)

Section 1: Building a strong, competitive economy  
Section 2: Ensuring the vitality of town centres  
Section 4: Promoting sustainable development  
Section 6: Delivering a wide choice of high quality homes  
Section 7: Requiring good design  
Section 8: Promoting healthy communities  
Section 10: Meeting the challenge of climate change, flooding and coastal change  
Section 11: Conserving and enhancing the natural environment  
Section 12: Conserving and enhancing the historic environment

56. The London Plan (2011) consolidated with further alterations (March 2015)

Policy 1.1 Delivering the strategic vision and objectives for London  
Policy 2.5 Sub-regions  
Policy 2.9 Inner London  
Policy 2.13 Opportunity areas and intensification areas  
Policy 2.18 Green infrastructure and the network of open and green spaces  
Policy 3.1 Ensuring equal life chances for all  
Policy 3.2 Health and addressing health inequalities  
Policy 3.3 Increasing housing supply  
Policy 3.4 Optimising housing potential  
Policy 3.5 Quality and design of housing developments  
Policy 3.6 Children and young people’s play and informal recreation facilities  
Policy 3.7 Large residential developments  
Policy 3.8 Housing choice  
Policy 3.9 Mixed and balanced communities  
Policy 3.10 Definition of affordable housing  
Policy 3.11 Affordable housing targets  
Policy 3.12 Negotiating affordable housing on individual private residential and mixed use schemes  
Policy 3.13 Affordable housing thresholds  
Policy 3.14 Existing housing  
Policy 3.15 Coordination of housing development and investment  
Policy 3.16 Protection and enhancement of social infrastructure  
Policy 3.17 Health and social care facilities  
Policy 4.1 Developing London’s economy

Policy 4.2 Offices  
Policy 4.3 Mixed use development and offices  
Policy 4.6 Support for enhancement of arts, culture, sport and entertainment provision  
Policy 4.7 Retail and town centre development  
Policy 4.8 Supporting a successful and diverse retail sector  
Policy 4.9 Small shops  
Policy 4.10 New and emerging economic sectors  
Policy 4.11 Encouraging a connected economy  
Policy 4.12 Improving opportunities for all  
Policy 5.1 Climate change mitigation  
Policy 5.2 Minimising carbon dioxide emissions  
Policy 5.3 Sustainable design and construction  
Policy 5.5 Decentralised energy networks  
Policy 5.6 Decentralised energy in development proposals  
Policy 5.7 Renewable energy  
Policy 5.8 Innovative energy technologies  
Policy 5.9 Overheating and cooling  
Policy 5.10 Urban greening  
Policy 5.11 Green roofs and development site environs  
Policy 5.12 Flood risk management  
Policy 5.13 Sustainable drainage  
Policy 5.14 Water quality and waste water infrastructure  
Policy 5.15 Water use and supplies  
Policy 5.16 Waste self-sufficiency  
Policy 6.1 Strategic approach  
Policy 6.3 Assessing effects of development on transport capacity  
Policy 6.4 Enhancing London's transport connectivity  
Policy 6.5 Funding Crossrail and other strategically important transport infrastructure  
Policy 6.7 Better streets and surface transport  
Policy 6.9 Cycling  
Policy 6.10 Walking  
Policy 6.11 Smoothing traffic flow and tackling congestion  
Policy 6.12 Road network capacity  
Policy 6.13 Parking  
Policy 7.1 Building London's neighbourhoods and communities  
Policy 7.2 An inclusive environment  
Policy 7.3 Designing out crime  
Policy 7.4 Local character  
Policy 7.5 Public realm  
Policy 7.6 Architecture  
Policy 7.7 Location and design of tall and large buildings  
Policy 7.8 Heritage assets and archaeology  
Policy 7.9 Heritage-led regeneration  
Policy 7.11 London View Management Framework  
Policy 7.12 Implementing the London View Management Framework  
Policy 7.14 Improving air quality  
Policy 7.15 Reducing noise and enhancing soundscapes  
Policy 7.18 Protecting local open space and addressing local deficiency  
Policy 7.19 Biodiversity and access to nature  
Policy 7.21 Trees and woodlands  
Policy 8.2 Planning obligations  
Policy 8.3 Community Infrastructure Levy



57. Core Strategy 2011

Strategic Policy 1 – Sustainable development  
Strategic Policy 2 – Sustainable transport  
Strategic Policy 3 – Shopping, leisure and entertainment  
Strategic Policy 4 – Places to learn and enjoy  
Strategic Policy 5 – Providing new homes  
Strategic Policy 6 – Homes for people on different incomes  
Strategic Policy 7 – Family homes  
Strategic Policy 10 – Jobs and businesses  
Strategic Policy 11 – Open spaces and wildlife  
Strategic Policy 12 – Design and conservation  
Strategic Policy 13 – High environmental standards  
Strategic Policy 14 – Implementation and delivery

58. Southwark Plan 2007 (July) - saved policies

The council's cabinet on 19 March 2013, as required by paragraph 215 of the NPPF, considered the issue of compliance of Southwark Planning Policy with the National Planning Policy Framework. All policies and proposals were reviewed and the council satisfied itself that the policies and proposals in use were in conformity with the NPPF. The resolution was that with the exception of Policy 1.8 (location of retail outside town centres) in the Southwark Plan all Southwark Plan policies are saved. Therefore due weight should be given to relevant policies in existing plans in accordance to their degree of consistency with the NPPF.

- Policy 1.1 Access to employment opportunities
- Policy 1.7 Development within town and local centres
- Policy 2.2 Provision of new community facilities
- Policy 2.5 Planning obligations
- Policy 3.1 Environmental effects
- Policy 3.2 Protection of amenity
- Policy 3.3 Sustainability assessment
- Policy 3.4 Energy efficiency
- Policy 3.6 Air quality
- Policy 3.7 Waste reduction
- Policy 3.9 Water
- Policy 3.11 Efficient use of land
- Policy 3.12 Quality in design
- Policy 3.13 Urban design
- Policy 3.14 Designing out crime
- Policy 3.18 Setting of listed buildings, conservation areas and world heritage sites
- Policy 3.19 Archaeology
- Policy 3.20 Tall buildings
- Policy 3.22 Important local views
- Policy 3.28 Biodiversity
- Policy 4.1 Density of residential development
- Policy 4.2 Quality of residential accommodation
- Policy 4.3 Mix of dwellings
- Policy 4.4 Affordable housing
- Policy 4.5 Wheelchair affordable housing
- Policy 4.6 Loss of residential accommodation
- Policy 5.1 Locating developments

- Policy 5.2 Transport impacts
- Policy 5.3 Walking and cycling
- Policy 5.4 Public transport improvements
- Policy 5.6 Car parking
- Policy 5.7 Parking standards for disabled and the mobility impaired
- Policy 5.8 Other parking

59. Regional Supplementary Planning Documents (SPDs) and guidance  
 Providing for Children and Young People's Play and Informal Recreation (2012)  
 Sustainable Design and Construction (2006)  
 The Mayor's Energy Strategy (2010)  
 The Mayor's Transport Strategy (2010)  
 The Mayor's Economic Development Strategy (2010)  
 Housing (2012)  
 Planning for Equality & Diversity in London (2007)  
 The Mayor's Climate Change Mitigation and Energy Strategy (2011)

60. Southwark Supplementary Planning Documents (SPDs)  
 Sustainability Assessment (2009)  
 Design and Access Statements (2007)  
 Section 106 Planning Obligations (2015)  
 Residential Design Standards (2011)  
 Affordable Housing (2008)  
 Sustainable Transport (2008)  
 Sustainable Design and Construction (2009)  
 Draft Affordable Housing (2011)

#### **Environmental Impact Assessment**

61. Applications where an Environmental Impact Assessment (EIA) is required will either be mandatory or discretionary, depending on whether they are found in Schedule 1 (mandatory) or Schedule 2 (discretionary) of the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 2011 (the 'EIA Regulations').
62. In this case, the proposal falls within Section 10(b) of Schedule 2 of the Regulations. At the time the application was submitted, the threshold for 'urban development projects' was a site area exceeding 0.5ha; this was increased to 5 ha in April 2015. The site is 4.4 hectares and the development is likely to generate significant environmental effects by virtue of its size, based on a review of the Schedule 3 selection criteria for screening Schedule 2 Development.
63. Prior to the submission of the planning application, the applicant requested a 'Scoping Opinion' under Regulation 10 of the EIA Regulations to ascertain what information the Local Planning Authority considered an Environmental Statement (ES) should include (ref: 14/AP/1034).
64. Regulation 3 of the EIA Regulations precludes the granting of planning permission unless the council has first taken the 'environmental information' into consideration. The 'environmental information' means the ES, including any further information, any representations made by consultation bodies, and any other person, about the environmental effects of the development.

65. In accordance with the EIA Regulations, an Environmental Statement (ES) comprising a Non-Technical Summary, Environmental Statement and Technical Appendices accompanies the application. One Environmental Statement has been prepared to cover both the FDS (this application) and the Outline Scheme (application reference 14/AP/3844). Two development proposals have been assessed, namely the FDS alone, and the Site Wide Development Option (SWDO) which includes the FDS and Outline Scheme. The Environmental Statement (ES) details the results of the EIA and provides a detailed verification of potential beneficial and adverse environmental impacts in relation to the proposed development.
66. The structure of the ES broadly follows the council's formal scoping opinion which identified key areas where there are likely to be significant environmental effects. These are:
- Demolition and Construction
  - Ecology and Nature Conservation
  - Climate change
  - Socio-economics and Population Effects
  - Telecommunications
  - Wind
  - Daylight, Sunlight and Overshadowing
  - Transportation and Access
  - Noise
  - Air Quality
  - Archaeology
  - Ground Conditions, Hydrogeology and Contamination
  - Water Resources, Water Quality, Flood Risk and Drainage
  - Townscape, Visual and Cultural Heritage Effects
67. Reference to cumulative effects includes the combined effects of different types of impact, for example, noise, dust and visual impacts, impact interactions and impacts from several developments, which individually might be insignificant, but when considered together, could amount to a cumulative impact. Potential positive and negative residual effects remaining after mitigation measures have been identified and incorporated are also included in the ES in order to assess their significance and acceptability.
68. Additional environmental information was received during the course of the application; in accordance with Regulation 22 of the EIA Regulations 2011, all consultees and neighbours were re-consulted and a press notice was re-issued. This additional information, in terms of the FDS, referred to updated plans to show the uplift in units that resulted from internal reconfiguration and the associated updates to both the stand alone and shared planning documents.
- Cumulative impacts
69. The applicants have also completed an assessment of the cumulative environmental impacts that could be experienced if other schemes are implemented as well as the FDS. These cumulative effects can be 'in-combination effects' which is the interaction and combination of environmental effects of a proposed development with other schemes and activities affecting the same receptor. These impacts can also be in the form of 'effect interactions' which is the interaction and combination of environmental effects, and indirect effects of a proposed development affecting the same receptor either within the site or in the local area. Only developments that can reasonably be

presumed to proceed (those schemes that are approved but not completed or implemented) and for which sufficient information is available have been taken into account in the cumulative effects assessment. These schemes are;

- Site 7 Aylesbury Estate (LPA Ref. 12/AP/2332);
- Eileen House (LPA Ref. 09/AP/0343);
- Elmington (LPA Ref. 11/AP/4309);
- Heygate (LPA Ref. 12/AP/1092);
- Leisure Centre (LPA Ref. 12/AP/2570);
- Former London Park Hotel (LPA Ref. 07/AP/0760);
- Newington Causeway (LPA Ref. 09/AP/1940);
- One the Elephant (LPA Ref. 12/AP/2239);
- Elephant One (LPA Ref. 08/AP/2403);
- Trafalgar Place (LPA Ref. 12/AP/1455);
- Walworth Road 1 (LPA Ref. 14/AP/0833); and
- Walworth Road 2 (LPA Ref. 14/AP/0830).

70. The potential effects of the FDS and Comprehensive Development together with the committed developments have been assessed. The construction works may result in short to medium term negative effects if the committed developments are constructed at the same time as the Comprehensive Development, resulting in an increase in disturbance noise and dust from construction activities, and a change in townscape character. During site preparation and construction of the Comprehensive Development, the majority of potential effect interactions relate to nearby residents where temporary effects are expected in terms of noise and vibration, dust generation, townscape views and character of the Site. It is important to note that these effects will be temporary and intermittent during the construction works. The Construction and Environmental Management Plan for the Comprehensive Development will reduce and control any negative effects on the existing environment, including effects on residential properties near the Site. Once the Comprehensive Development is complete, long-term in-combination effects (negative and positive) of the Comprehensive Development on existing and future residents are expected to arise from changes in road traffic, changes in views, an increase in housing numbers and local facilities.

#### **Principle of development**

71. The National Planning Policy Framework (NPPF) was published on 27 March 2012. At the heart of the NPPF is a presumption in favour of sustainable development. The framework sets out a number of key principles, including a focus on driving and supporting sustainable economic development to deliver homes. This is the principal theme underpinning both London-wide and Southwark Core Strategy policies where the regeneration of areas such as the Aylesbury Estate is a high priority.
72. The NPPF promotes the delivery of a wide choice of high quality homes, seeks to widen opportunities for home ownership and create sustainable, inclusive and mixed communities. It encourages the effective use of land by reusing land that has been previously developed. The NPPF also states that permission should be granted for proposals unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework as a whole.

73. In 2005 Southwark Council made a corporate decision to comprehensively redevelop the Aylesbury Estate due to the prohibitive cost of refurbishing the existing buildings to an appropriate standard. Furthermore refurbishment would not overcome the inherent shortcomings of the existing estate in terms of its design, legibility, access and permeability. This decision was informed by the findings of a structural survey which determined that many of the existing buildings were in a poor state of repair and were environmentally inefficient. It was also recognised that the existing estate presented several design challenges and that the built fabric was becoming increasingly difficult and expensive to maintain. The layout and form of several of the buildings on the estate presented anti-social behaviour challenges, due to the large parking courts dominating the ground floors, a lack of surveillance of streets, unclear definition between public and private space as well as too many units being accessed from a single communal entrance.
74. The Aylesbury Area Action Plan (AAP) establishes the vision for the area and its comprehensive redevelopment to provide housing, shops, meeting places, work places, recreation, green spaces and transport. In terms of policy designations, the application site is located within the Aylesbury Action Area Core and the FDS comprises Sites 1B/1C which, together with Site 1A and Site 7 forms part of Phase 1 of the Aylesbury Estate Regeneration. As such, the principle of redevelopment for new housing is established subject to the need to evaluate the proposal against the policies for the area which are detailed in this report.
75. Aylesbury Area Action Plan (AAP)  
The Aylesbury Area Action Plan (AAP) aims to deliver the following objectives;
- A successful neighbourhood incorporating the highest design standards;
  - A good mix of uses and a layout that will meet the needs of current and future generations;
  - High quality social rented and private homes that address a variety of local needs, including those of the elderly and vulnerable;
  - Create an outstanding environment with excellent parks and great streets which are accessible for all;
  - Improve quality of schools and community facilities;
  - Create a place with a strong sense of community;
  - Improve access and transport;
  - Create well designed streets, squares and parks;
  - Improve social and community facilities;
  - Build homes that meet Code for Sustainable Homes Level 4; and
  - Implement a Combined Heat and Power scheme for power generation.
76. Land Use  
The land use requirements for the FDS are detailed in Appendix 5 of the AAP. The two land uses designated for the FDS are housing (880 units) and retail (250sqm).
77. The delivery of a range of high quality homes is a strategic objective of the AAP. London Plan Policy 3.3 Increasing Housing Supply sets a minimum target of 20,050 additional homes to be provided in Southwark over a period from 2011-2021. Strategic Policy 5 of the Core Strategy seeks high quality new homes in attractive environments. The policy sets a target of 24,450 net new homes between 2011 and 2026. As previously mentioned the Aylesbury regeneration is a plan led redevelopment of the entire estate and the AAP seeks to provide 4200 homes with the FDS expected to generate 880 of these new homes, although the Plan makes it clear that this is an

approximate figure. The approximate housing quantum for the FDS are set out in table A5.1 of Appendix 5 of the AAP and are summarised in Table 16 below;

Table 16

	AAP Indicative Housing Targets						
	Studio	1Bed	2 Bed	3 Bed	4 Bed	5 Bed	Total
Site 1B	13	132	170	69	18	6	408
Site 1C	15	153	196	80	20	8	472
Total	28	285	266	149	38	14	880

78. The current application for the FDS would provide a total of 830 dwellings as detailed in Table 17 below;

Table 17

Unit type	FDS Schedule of Accommodation				Totals
	Social Rent	Affordable Rent	Intermediate	Private market	
One-bedroom	108	27	37	199	371
Two-bedroom	68	0	48	183	299
Three-bedroom	63	0	15	30	108
Four-bedroom	20	0	2	10	32
Five-bedroom	18	0	0	2	20
Total Units	277	27	102	424	830
Total habitable rooms	1014	54	326	1327	2721

79. The housing types and tenures will be discussed further in the housing section of this report however in terms of land use and the expected 880 dwellings as specified in the AAP there is a 50 unit shortfall. The current proposal has been through a detailed pre-application process and very early on in the negotiations it was recognised that the FDS could not accommodate 880 units, including larger family units, without compromising the quality of the accommodation and the character of the area. As such it was agreed that a reduction in the total number of units would be required in order to meet the broader quality objectives of the AAP. In its current form the FDS is considered to strike an appropriate balance between optimising housing numbers and safeguarding quality and townscape, and minimising potential impacts on neighbouring residents. Provision of more housing on this site in order to meet the 880 dwellings expected by the AAP would compromise the design and increase adverse amenity impacts. Furthermore there is an opportunity to capture a portion of the housing shortfall from the FDS at a later phase on the Outline Scheme. Given that the AAP housing figures are noted to be approximate, it is considered that the quantum of housing proposed is the optimum for this site and will meet the general aspirations of the AAP.
80. Appendix 5 of the AAP also specifies that the FDS should deliver up to 250sqm of retail floorspace. The FDS application does not include provision for any retail floorspace. Site 1A delivered in excess of 400sqm of retail space, on Westmorland

Road, and much of this retail space has proven difficult to let and remains vacant. As such, during the course of the pre-application discussions with the applicant, it was agreed that delivery of further retail floorspace on the FDS would be inappropriate and could lead to further vacant units. The application instead includes a 263sqm community space fronting Westmorland Square. This space will be made available to the council as a multi-use space, and would also have the flexibility to be used as an Early Years facility or a gym subject to need and demand. As such a flexible consent is sought to permit this range of uses and this is also considered to be a suitable response to the requirements of the AAAP.

81. The proposal includes the provision of 50 Extra Care units and seven flats designed for adults with learning difficulties. Extra Care is a form of supported housing which offers flexibility in meeting the care, support and housing needs of older people to allow them to live more independently. The Extra Care units are being provided as part of a council led initiative and will be used to home Southwark residents requiring this type of housing. The Learning Difficulties accommodation is also part of a council led initiative and is a pilot scheme to provide a facility that is designed to allow full disability access and to meet the requirements of those with complex needs, challenging behaviour and autism. Both the Extra Care and Learning Difficulties accommodation are being provided as affordable housing with the Learning Difficulties accommodation being affordable rent and the Extra Care units being a mixture of affordable rent and social rent. These housing types support the AAAP vision to meet the needs of the elderly and vulnerable, and as such are welcomed.

82. Conclusions on land use

The provision of housing meets the requirements of the AAAP; the noted shortfall of 50 units against the illustrative target is justified by the design parameters of the FDS and is discussed further in the housing section below. Whilst the FDS does not provide a retail space as required by the AAAP it is considered that a community space will help support a community in transition and bring activity to Westmorland Square. The request for a flexible use of this space to permit either an Early Years facility or a gym is considered to be a suitable response to both the aspirations of the AAAP and the needs of this evolving area. The provision of specialised accommodation in the form of the Extra Care Units and the Learning Difficulties to meet an identified need will enhance the range of housing choices and support a diverse community. The proposed land uses are considered to be in compliance with the needs and requirements of the AAAP and are therefore satisfactory.

Re-provision of housing

83. The Aylesbury Estate regeneration programme proposes the demolition of 2,758 homes in total. The FDS accounts for 566 of these units with a planned replacement of 830 units. The redevelopment of the FDS will provide an uplift of 264 units and 1146 habitable rooms compared to the existing housing provision. This is in compliance with London Plan Policy 3.14 and Core Strategy policy SP5 in terms of there being an uplift in overall housing numbers and as such the re-provision of housing is supported.

The overriding objective of the AAAP is to deliver high quality housing over a range of tenures. Policy BH.1: Number of homes, seeks the provision of 4200 new homes across the Aylesbury Estate. This figure is inclusive of the FDS, Site 1A, Site 7 and the Outline Scheme. Although the FDS contains less units than estimated for Site 1B/1C in the AAAP, it still increases the number of units beyond the existing, and makes an appropriate contribution to the overall AAAP target.

84. When built, the existing units on the FDS provided 100% social rented housing. 55 units within the FDS have since become leasehold housing as a result of the 'Right to Buy' programme. The Mayor's Housing SPG clarifies that the 'right to buy' properties should not be included within the affordable housing baseline for the estate. Based on the information available, the housing baseline for the FDS (dated February 2008) is set out in Table 18 below. This baseline formed the basis for the AAAP, and pre-dates the redevelopment of sites 1A and 7.

**Table 18**

Unit type	Baseline Housing - FDS		
	Social Rent	Private market	Totals
One-bedroom	278	14	292
Two-bedroom	129	20	149
Three-bedroom	72	16	88
Four-bedroom	26	4	30
Total Units	511	55	566
Total habitable rooms	1397	178	1575

85. The proposed housing re-provision for the FDS is outlined in Table 19 below.

**Table 19**

Unit type	FDS Schedule of Accommodation				
	Social Rent	Affordable Rent	Intermediate	Private market	Totals
One-bedroom	108	27	37	199	371
Two-bedroom	68	0	48	183	299
Three-bedroom	63	0	15	30	108
Four-bedroom	20	0	2	10	32
Five-bedroom	18	0	0	2	20
Total Units	277 (-234)	27 (+27)	102 (+102)	424 (+369)	830 (+264)
Total habitable rooms	1014 (-383)	54 (+54)	326 (+326)	1327 (+1149)	2721 (+1146)

86. It is noted that there will be 105 fewer affordable units or three fewer affordable habitable rooms than at present. This will be discussed further below.

### **Affordable housing**

87. The Aylesbury Estate was originally constructed to provide 100% social rented accommodation. Since completion a number of homes have been acquired by tenants under the 'Right to Buy' programme and are now held on leaseholds occupied either by the original tenants, subsequent private purchasers or private market renters.
88. One of the main objectives of the AAAP is to provide a socially sustainable neighbourhood with a range of tenures providing greater housing choice and helping to



create a mixed and balanced community whilst supporting the viability of the overall development.

89. AAAP Policy BH3: 'Tenure mix' seeks a minimum of 50% affordable housing within the Action Area Core and goes further to specify a split of 41% private housing and 59% affordable housing within Phase 1 with a split of 75:25 between social rented/intermediate housing.
90. London Plan Policies 3.8 – 'Housing choice' and 3.9 – 'Mixed and balanced communities' aims to provide Londoners with a choice of homes they can afford within communities that have a mixed tenure and household income.
91. Policy 3.11 – 'Affordable housing targets' and 3.12 – 'Negotiating affordable housing on individual private residential and mixed use schemes' of the London Plan seek to maximise the provision of affordable housing whilst recognising the need to provide mixed and balanced communities.
92. London Plan Policy 3.14 'Existing Housing' resists the loss of housing, including affordable housing, without suitable equivalent replacement. This policy states that, at least, equivalent floorspace should be provided in housing developments. Guidance within the Mayor's Housing SPG makes clear that the re-provision of housing may be considered in terms of units numbers and/or habitable rooms.
93. The FDS is located within the Action Area Core and makes up Phase 1 together with Site 1A and Site 7. The cumulative schedule of accommodation for these sites is detailed in Table 20 below.

Table 20

	Site 1A and Site 7 Schedule of Accommodation			
Unit type	Social Rent	Intermediate	Private market	Totals
One-bedroom	43	18	69	130
Two-bedroom	57	44	107	208
Three-bedroom	19	0	11	30
Four-bedroom	25	0	10	35
Five-bedroom	4	0	1	5
<b>Total Units</b>	<b>148</b>	<b>62</b>	<b>198</b>	<b>408</b>
<b>Total habitable rooms</b>	<b>541 (41.8%)</b>	<b>162 (12.5%)</b>	<b>591 (45.7%)</b>	<b>1,294</b>

94. The proposed schedule of accommodation for the FDS is outlined in Table 21 below.

**Table 21**

Unit type	FDS Schedule of Accommodation				Totals
	Social Rent	Affordable Rent	Intermediate	Private market	
One-bedroom	108	27	37	199	371
Two-bedroom	68	0	48	183	299
Three-bedroom	63	0	15	30	108
Four-bedroom	20	0	2	10	32
Five-bedroom	18	0	0	2	20
<b>Total Units</b>	<b>277</b>	<b>27</b>	<b>102</b>	<b>424</b>	<b>830</b>
<b>Total habitable rooms</b>	<b>1014 (37%)</b>	<b>54 (2%)</b>	<b>326 (12%)</b>	<b>1327 (49%)</b>	<b>2721</b>

95. As the AAAP affordable housing requirements specified under Policy BH5: 'Tenure mix' are allocated on a phased basis, the provision of affordable housing on the FDS needs to be looked in combination with Site 1A and 7. The combined schedule of accommodation is therefore provided in Table 22 below.

**Table 22**

Unit type	Total Phase 1 Schedule of Accommodation				Totals
	Social Rent	Affordable Rent	Intermediate	Private market	
One-bedroom	151	27	55	268	501
Two-bedroom	125	0	92	290	507
Three-bedroom	82	0	15	41	138
Four-bedroom	45	0	2	20	67
Five-bedroom	22	0	0	3	25
<b>Total Units</b>	<b>425</b>	<b>27</b>	<b>164</b>	<b>622</b>	<b>1238</b>
<b>Total habitable rooms</b>	<b>1555 (38.7%)</b>	<b>54 (1.3%)</b>	<b>488 (12.1%)</b>	<b>1918 (47.7%)</b>	<b>4015</b>

96. Affordable housing is being provided in three tenures: social rent; affordable rent and intermediate. Social rent accommodation is accommodation provided by a registered provider at rents significantly below market levels. Affordable rent is accommodation that can be charged at up to 80% of market rent (although actual rents can be much lower). Intermediate housing is homes for sale and rent provided at a cost above social rent, but below market levels. Tenants typically purchase a share of the equity of the housing (usually between 25%-75%) and pay rent to the registered provider on the outstanding portion. Within the FDS, the vast majority of the rented homes are being

provided as social rent units; only 2% of the total units are provided as affordable rent, and these are within the specialist extra care and learning difficulties units. This provision of social rented housing is a very positive aspect of the development.

97. On a habitable rooms basis, the FDS, together with the remaining elements of Phase 1, will deliver 52.1% affordable housing with a split of 76% social rented/affordable rent and 24% intermediate. The FDS itself will provide 51.2% affordable housing by habitable room. Whilst the rented/intermediate split is policy compliant it is noted that the total level of affordable housing is less than the 59% requirement for Phase 1 as set out in Policy BH3 of the AAAP. Policy BH sets out the overall target for 50% affordable housing across the programme, and introduced the differential splits in Phases 1 and 4 in order to assist in the rehousing programme and deliverability. Although the FDS application is a stand alone application which must be considered on its own merits, it will, if both are approved, be bound to the outline application within a single S106 agreement to create the overall masterplan. It is therefore reasonable to consider the FDS application in the context of the overall masterplan, and whether this as a whole would achieve the 50% requirement set by the AAAP. The outline application has not sought to reduce the amount of affordable housing in Phase 4, and therefore the taking both applications together, the masterplan would deliver 50% affordable housing (measured in terms of habitable rooms). Given that the developer would be obliged under the S106 agreement to deliver 50% affordable housing overall, and to monitor progress in relation to that overall figure at each phase of delivery, it is considered that the requirements of AAAP policy BH3 are met.

#### Re-provision of affordable housing

98. As referenced above in paragraph 97 there will be a net reduction in the number of affordable units, and a very small reduction in affordable habitable rooms when compared with the current provision on the site. This is detailed in Tables 18 and 19 above and equates to 105 fewer affordable units than are currently provided on the FDS. On a habitable rooms basis this equates to three fewer habitable rooms than current provision.
99. The AAAP recognises that there will be a loss of affordable units as a result of the regeneration of the estate and estimates this to be in the region of 150 units. The FDS contains two of the largest housing blocks on the estate, at Chiltern and Bradenham. These blocks contain many smaller units. The application scheme includes a higher number of larger family affordable units, including houses. As such, the loss of affordable housing is not significant when calculated in habitable rooms.
100. Consequently, re-provision of high quality affordable housing to provide 1394 affordable habitable rooms compared to an existing provision of 1397 habitable rooms results in a very small net reduction of just three habitable rooms which is considered acceptable given the scale, ambition and complexity of the wider regeneration programme. It is noted that the overall masterplan will include full re-provision of all affordable housing, in terms of habitable rooms.

#### Maximum reasonable amount of affordable housing

101. London Plan Policy 3.12 seeks the maximum reasonable amount of affordable housing on residential schemes whilst having regard to local and regional guidelines and the need to provide mixed and balanced communities. The applicants have submitted a viability statement in response to a request from the GLA, and the GLA have confirmed that they accept that the proposed level of affordable housing is the maximum reasonable amount in accordance with policy 3.12.

102. The AAAP was subject to viability testing which concluded that 50% affordable housing was an appropriate level of affordable housing provision for the regeneration of the estate. The overall redevelopment programme is itself only deliverable when public funding is taken into account.
103. As such it is considered that the 51.2% affordable housing being provided on the FDS is the maximum reasonable amount of affordable housing that can be provided. This would also provide an appropriate tenure split offering a wider range of housing options in the local area, and complies with the requirements of the AAAP.

#### Conclusions on affordable housing

104. The affordable housing provision on the FDS will exceed the Masterplan-wide target of 50% affordable housing. Whilst it is noted that the 51.2% affordable provision on the FDS is slightly below the site specific aim of 59% affordable housing for Phase 1, the council's development partnership with Notting Hill Housing Trust to deliver the wider masterplan can ensure that the overall target of 50% can be achieved.
105. The scheme provides a wider range of affordable housing types than at present, with a significant number of family homes, including 35 large social rented family houses. The design of the housing is 'tenure blind', with high quality affordable housing fully integrated into every block.
106. It is noted that there are a small number of affordable rent units comprising 20 of the Extra Care units and all seven of the learning difficulties units. These will be capped at Local Housing Allowance to ensure they will be affordable to Southwark residents. Normal 'social rent' specialist supported housing is at risk of becoming unaffordable because of the service charges residents have to pay on top of their rent. The service charges cover the various extra staff and maintenance costs associated with supported housing. Service charges are included within the rent figure of 'affordable rents', which can make the affordable rent supported housing properties more attractive to residents on restricted incomes as the prices are fully inclusive of all charges. The remainder of the Extra Care accommodation will be also be affordable but under the Social Rent tenure.
107. In terms of providing the maximum reasonable amount of affordable housing, the GLA has acknowledged the AAAP target of 50% and accept that the current provision is the maximum the scheme can support. This recognises that the development can only be delivered with support from public funds.
108. The affordable housing provision on the FDS will deliver the AAAP aspiration for a more mixed community with a broader range of housing choices. The AAAP assumed that the redevelopment would result in a small loss of affordable housing when measured in habitable rooms; the FDS, based on a lower than expected total number of units, results in a very marginal loss of only 3 habitable rooms of affordable housing. When considered in the context of the delivery of affordable housing across the wider masterplan, this is not considered to be significant. Taking into account the quality, range and size of the affordable housing being provided, and the inclusion of a high number of social rented family units, the affordable housing provision is considered to be a very positive aspect of the development, which should be accorded significant weight in determining the application.

#### Housing mix and type

109. AAAP Policy BH4: 'Size of homes' and BH5: 'Type of homes' detail the mix and type of homes that will be required within the redeveloped Aylesbury Estate

110. London Plan Policy 3.8 – ‘Housing choice’, reiterates the need for new developments to provide a genuine range of homes of different sizes and types in the highest quality environments.
111. The AAAP sets out under Policy BH4 and BH5 the overall size and types of homes expected to be achieved as an outcome of the redevelopment of the estate. However, it also gives, at table A5.1, more detailed figures for the individual sites and phases within the masterplan area. This recognised that not all sites will contain the same form of development, and creating a range of character areas will mean some plots being more intensively developed than others. The figures given in Table A5.1 are stated as approximate, and in the case of the FDS (listed in the table as 1b and 1c) the figures are based on an assumed capacity of 880 units.
112. In terms of housing mix and type the AAAP requirements and the proposals of the FDS are outlined in Tables 23 and 24 below;

**Table 23**

Unit Mix			
AAAP FDS Minimum Unit Mix and Outline Requirement (*)	FDS Unit Mix	Outline Scheme Indicative Unit Mix	Total
Max 2% Studios (3%)	0	0	0
64% two or more bedrooms (70%)	459 (55.3%)	2081 (75.8%)	2540 (71%)
17% three bedrooms (20%)	108 (13%)	538 (19.6%)	646 (18.1%)
4.3% four bedrooms (7%)	32 (3.9%)	389 (14.2%)	421 (11.8%)
1.6% five bedrooms (3%)	20 (2.4%)	188 (6.8%)	208 (5.8%)

**Table 24**

FDS Housing Type			
AAAP FDS Requirement and Outline Requirement (*)	FDS	Outline Scheme	Total
Flats 67% (60%)	683 (82.3%)	1707 (62.2%)	2390 (66.8%)
Maisonettes/Duplex 27% (17%)	100 (12.0%)	500 (18.2%)	600 (16.8%)
Houses 6% (23%)	47 (5.7%)	538 (19.6%)	585 (16.4%)
<b>Total</b>	<b>830</b>	<b>2745</b>	<b>3575</b>

113. In terms of unit mix it is noted that the FDS exceeds the target for five bed units which is welcomed. The proposed unit mix falls slightly short of the required number of two bed plus units as well as three and four bed units. The shortfall in four bed units is 0.4% which is minor. The shortfall in three bed and two bed units is more significant at 4% and 8.7% respectively, however given the constraints of this higher density site and the loss of some proposed dwellings as a result of the need to provide a Gas Pressure Reduction Station the proposed mix is considered acceptable on balance and would still lead to a meaningful housing choice. It is worth noting that, when combined with the indicative mix for the outline scheme, the overall provision of larger units, above the AAAP requirement, is a very positive aspect of the masterplan. The

mix of dwellings on the FDS would contribute to a genuine choice in size of homes and is broadly compliant with AAAP Policy BH4: 'Size of homes', London Plan Policy 3.8 – 'Housing choice', Core Strategy Policy SP7 – 'Family homes' and Southwark Plan Policy 4.3 – 'Mix of Dwellings'.

114. In terms of housing type the AAAP recognised that as one of the higher density sites, the FDS would have less opportunity to provide houses. It did however, have a very high requirement for maisonettes/duplex flats. The FDS application has a higher number of flats than anticipated in the AAAP, and consequently a smaller proportion of both houses and maisonettes. This is in part because of the Extra Care and Learning Difficulties flats within this site. Two of the six parcels are predominately laid out as houses; at pre-application stage the layout did provide the full 6% houses, but the requirement of Southern Gas Networks for a Gas Pressure Reduction building resulted in the loss of three houses. In the current layout, all units at ground floor level are either houses or maisonettes, and it is considered that the scheme is making effective use of the site.
115. It is considered that the FDS offers a good choice of homes on a site which will have one of the highest densities anywhere in the masterplan. It also provides for two specialist forms of housing which have been identified as a priority need by the council but which were not included when the AAAP was drawn up. This is a particular benefit of the scheme. Given the constraints of the site the scheme is considered acceptable by offering a range of housing types across all tenures and is therefore considered to be in broad compliance with the AAAP as well as London Plan Policy 3.8 'Housing choice' and Core Strategy Strategic Policy 7 'Family homes'.

#### Density

116. AAAP Policy BH2: 'Density and distribution of homes' specifies the density ranges for development blocks.
117. The London Plan Policy 3.4 recommends a residential density of 650-875 habitable rooms per hectare in this location. Core Strategy Strategic Policy 5 'Providing new homes' recommends a density of between 200 and 700 habitable rooms per hectare in the Urban Zone within which the FDS is located, however it acknowledges that higher densities may be acceptable within Action Area Cores.
118. The buildings currently on the FDS provide a residential density of approximately 340 habitable rooms per hectare. The redevelopment of the FDS will create a total of 2721 habitable rooms resulting in a residential density of 618 habitable rooms per hectare when using the gross site area figure of 4.4 hectares and a density of 735 habitable rooms per hectare when applying the net site area of 3.7 hectares.
119. AAAP Policy BH2: 'Density and distribution of homes' aims for higher densities along Albany Road and sites fronting Burgess Park. This is relevant to the FDS and the AAAP indicates that the western portion of the FDS should achieve a density of between 601-700 habitable rooms per hectare whilst the eastern portion should achieve a density of between 701-1000 habitable rooms per hectare. The overall density for the FDS lies within this range by providing 735 habitable rooms per hectare and as such is in compliance with Policy BH2 of the AAAP, as well as broader London Plan and Southwark Plan policies.

#### **Quality of accommodation**

120. The AAAP sets out specific accommodation requirements and design guidance within

Appendix 6 which seeks to ensure homes are of a suitable size and to secure amenity standards with regards to dual aspect units, overlooking and amenity spaces. The AAAP reflects the NPPF expectation for high quality homes and in many cases imposes more stringent requirements for quality of accommodation than those outlined in the London Plan, Core Strategy and Southwark Plan.

121. NPPF Section 6 – ‘Delivery of a wide choice of high quality homes’ seeks a meaningful choice of homes delivered to a high standard.
122. London Plan policies 3.5 – ‘Quality and design of housing developments’ and 3.6 – ‘Children and young peoples play and informal recreation facilities’ require developments to provide well designed homes that will contribute to high quality living spaces and recreational facilities. The Mayors Housing SPD (2012) sets out the minimum internal space standards for all new dwellings.
123. Core Strategy Strategic Policy 5 – ‘Family homes’ aims to provide more and better homes throughout the Borough with a particular reference to the Aylesbury Action Area.
124. Saved Policy 4.2 of The Southwark Plan sets out the council’s vision for high quality homes which is reinforced by the Residential Design Standards Supplementary Planning Document (2011) which sets out the minimum room, unit and amenity space standards that all new developments must meet.

Unit and room size

125. Appendix 6 of the AAAP details the minimum unit sizes that must be provided for each unit type and tenure. The AAAP sets different minimum flat sizes for social rented, intermediate and private flats. It states that the existing flats were built to exceed ‘Parker Morris’ floorspace standards. Following consultation with existing residents, it was decided that the rented flats should be built to similar large dimensions, and that intermediate flats should also have enhanced floor areas. In terms of private accommodation (and some types of intermediate accommodation) the minimum space standards given in the AAAP have since been overtaken by the more recently adopted borough-wide Residential design standards SPD. Table 25 below specifies the minimum unit sizes required across the FDS in terms of both the SPD and the AAAP. The expectation is that the higher unit size will always be the minimum requirement regardless of which policy document it comes from.

Table 25

Internal Floor Area sqm					
Unit Size	Unit Type	SPD	Private (AAAP)	Intermediate (AAAP)	Social Rented (AAAP)
Studio	Flat	36	32.5	N/A	N/A
1 b/2p	Flat	50	47.5	49.9	52.3
2b/3p	Flat	61	60	63	66
2b/4p	Flat	70	73.5	77.2	80.9
3b/5p	Flat	86	82.5	86.6	90.8
4b/6p	Flat	99	90	94.5	99
5b/7p	Flat	105	105	110.3	115.5
2b/4p	Maisonette	70	75.5	79.3	83.1
3b/5p	Maisonette	86	85.5	89.8	94.1

	e				
4b/6p	Maisonette	99	96	100.8	105.6
5b/6p	Maisonette	N/A	111.5	117.1	122.7
2b/4p	House	83	79	83	86.9
3b/5p	House	96-102	89.5	94	98.5
4b/6p	House	107-113	97	101.9	106.7
5b/7p	House	117-123	114.5	120.2	126

126. In terms of unit sizes 99% of units meet the relevant minimum requirements outlined in the SPD and AAAP. A total of seven two bed/four person private flats fall below the AAP minimum requirement of 73.5sqm by 0.5sqm. The shortfall in this case is very minor and the units will still exceed the requirements of the SPD. Additionally there are two two bed/three person flats that fail to meet the AAAP minimum requirement of 66sqm for social rent tenure by a total of 1sqm. Again this shortfall is minor and the units will still exceed the minimum SPD requirement. It is considered that the proposed accommodation will meet the expectations of the AAAP, and will provide generous flat sizes.

127. In terms of layout the proposed units are considered to be of a high standard across the FDS with a mix of open plan living/kitchen/diners and units with separate kitchen/diners and living rooms to offer choice to potential occupiers. In terms of core access most blocks have an upper limit of five/six flats per core with the exception of building B on Block 4 which has deck access duplex units on every second floor. This results in nine units sharing access from a single core however this is considered acceptable given that duplex units will be provided. The ceiling heights will be generous with heights in excess of 2.6 metres.

#### Dual Aspect accommodation

128. There is an expectation in the AAAP that a minimum of 75% of apartments will be dual aspect with cross ventilation. The current proposal will provide 70% of apartments and maisonettes/duplex units as dual aspect with cross ventilation whilst 100% of the houses will be dual aspect. Whilst this falls slightly short of the AAAP expectation this is recognised as one of the challenges of providing a dense perimeter block style development and the shortfall is not considered to result in poor quality living accommodation. On balance the level of dual aspect is acceptable.

#### Wheelchair housing

129. London Plan Policy 3.8 – ‘Housing Choice’ requires at least 10% of new housing to be wheelchair accessible or easily adaptable for wheelchair users.

130. Saved Policy 4.3 of the Southwark Plan also seeks to secure 10% of new housing as being suitable for wheelchair users.

131. A total of 97 units suitable for wheelchair users will be provided throughout the FDS which equates to 11.6% of all units. The wheelchair housing is being provided as a mix of fully fitted units adapted for wheelchair use, units which are wheelchair adaptable and the Extra Care units within the following blocks:

- Extra Care (Block 1) – 50 wheelchair units
- Learning Disabilities (Block 2) – 7 wheelchair units
- Other residential (Blocks 3-6) - 40 wheelchair units



132. Given that more than 10% of all units are being provided as wheelchair accommodation it is considered that the FDS is policy compliant with regards to accessible housing. Details of the Marketing Strategy for the private market wheelchair units will be secured in the S106 Agreement as will the scheme of adaptation and agreed level of fit out.

Daylight and sunlight

133. Residential developments should maximise sunlight and daylight within the new dwellings. A lack of daylight can have negative impacts on health as well as making the development gloomy and uninviting. Maximising sunlight and daylight also helps to make a building energy efficient by reducing the need for electric light and meeting some of the heating requirements through solar gain. Single aspect north facing dwellings should always be avoided. Developments should meet site layout requirements set out in the Building Research Establishment (BRE) Site Layout for Daylight and Sunlight – A Guide to Good Practice (1991).
134. Daylight provision in new homes may be measured using the Average Daylight Factor which is the measure of the overall amount of daylight in a space with a recommendation of 5% ADF for a well daylit space and 2% for a partly daylit space. In rooms attaining less than 2% ADF electric lighting is likely to be needed. The BRE recommend that the following minimum values should be attained.

Table 26

ADF Requirements	
Room Type	Minimum ADF
Kitchen	2%
Living Room	1.5%
Bedroom	1%

135. The applicants have undertaken a detailed daylight and sunlight study to quantify the levels of daylight that will be received by the new dwellings. The results of the study are detailed in Table 27 below;

Table 27

	Average Daylight Factor Results				
	No. of rooms tested	Pass	% of passes	No. of rooms failing	% of failures
Block 1	280	192	67%	88	33%
Block 2	191	182	95%	9	5%
Block 3	177	167	94%	10	6%
Block 4	638	561	88%	77	12%
Block 5	701	531	76%	170	24%
Block 6	542	412	76%	130	24%
Total	2529	2045	81%	484	19%

136. A total of 81% of rooms across the FDS will achieve ADF levels that either meet or exceed the minimum requirements of the BRE. Given the highly urbanised environment and the form of development required by the AAAP, achieving full compliance of ADF is a challenge and in order to have a fully compliant scheme it is likely that building heights and footprints would need to be much reduced which in turn would significantly reduce the level of housing that could be provided.

137. It is noted that Block 1 has the lowest results with 88 rooms failing to meet the BRE ADF targets. It is worth noting that 69 of these rooms relate to bedrooms and many of these failures can be attributed to the fact that the Extra Care units are accessed from a glazed corridor that the bedroom windows look out onto and this will have reduced ADF's accordingly. These bedrooms are within dual aspect flats which will have access to good light levels to the kitchen/living rooms and the glazed corridors have a much wider purpose than simply providing access to the flats as they are envisaged as a communal amenity space where residents can sit with views out onto the private courtyard gardens and will be a benefit to future occupiers of these units.
138. Blocks 5 and 6 also have low overall ADF levels at 76% compliance on both blocks. Block 5 has 170 rooms that do not meet the BRE ADF target and 46 of these rooms are bedrooms. Likewise Block 6 has 130 rooms that fall short of the target with 33 of these rooms being bedrooms.
139. It is acknowledged that failure to achieve full compliance with BRE guidance for minimum ADF levels is a less positive aspect of the proposal, however this needs to be considered in the context of the wider quality of accommodation in terms of size, mix, layout and affordable housing, which are all important material considerations. Overall, the light levels will not compromise the enjoyment of these generous flats to any significant extent.

#### Privacy and overlooking

140. Appendix 6 of the AAAP expects proposals to ensure that the privacy of occupants is protected without compromising the ability to create a compact urban neighbourhood. This issue will inevitably be most challenging on the plots which are developed to the higher densities. It does not set out specific requirements for separation distances, but references the Residential Design Standards SPD. In terms of privacy and overlooking it is considered that the FDS will provide a high standard of living accommodation. The minimum building face separation distances on the East-West Street (12m), north-south street/green links (15-18m) and community spine (12m) all meet the SPD requirements for buildings fronting the street. The separation distances within the four perimeter blocks (Blocks 1, 4, 5 and 6) is acceptable with Blocks 4, 5 and 6 exceeding the 21m minimum rear-rear separation distance outlined in the SPD, with distances across the courtyards of up to 38m which will create open and pleasant amenity spaces that will contribute significantly to the quality of accommodation and are welcomed. Block 1 includes the Extra Care flats, as well as a number of general needs flats in the southern wings. The Extra care flats are accessed via wide glazed walkways along the inner face of the courtyard. These act effectively as 'streets' linking the extra care flats. The bedrooms of each unit face onto these walkways. The distance between the bedroom windows across the courtyard is 20 metres. There is one point at which the distance between habitable windows for the general needs flats reduces to 14 metres, but generally the distance is between 17m and 20m. In this context, this is considered acceptable and will maintain a reasonable level of privacy.
141. At its closest point the separation distance between the rear faces of the terraced dwellings is 12m. However, this is limited to the ground floor level, and at upper levels the buildings are set back, and the internal layout on the upper floors has been configured to place the main habitable rooms (i.e. the bedrooms and living spaces) on the street frontages and the stairs and bathrooms to the rear. This has enabled the privacy to be maintained, even with the inclusion of first floor terraces at the rear of the houses. It is acknowledged that there will be some unavoidable overlooking from the flatted building at Block 3 to the rear gardens of the terraced dwellings however this is

not considered to be a significant threat to the enjoyment of these spaces or the overall amenity of these dwellings, and is typical in urban areas.

#### Amenity space

142. AAAP Policies PL5: 'Public open space', PL6: 'Children's play space' and PL7: 'Private amenity space' of the AAAP all seek to provide high quality and meaningful public and private space that includes provision for childrens' play. Appendix 6 – Design guidance also sets out the minimum space standards for all residential accommodation and private/communal amenity space.

#### Private amenity space

143. The AAAP Appendix 6 requires at least 6sqm private amenity space for one and two bedroom flats with the remaining units being required to meet the minimum private amenity space standards set out in the SPD Residential Design Standards.
144. The SPD requires flats with three or more bedrooms have a minimum requirement of 10sqm. With regards to houses, the SPD seeks private gardens that are at least the width of the house, extend at least 10 metres in depth and provide 50sqm of garden space. This requirement also applies to ground floor maisonettes. Any shortfall in the provision of private space should, under the SPD, be provided as part of an enhanced communal amenity space provision.
145. In the FDS scheme, all houses have private rear gardens plus first floor terraces, and all flats and mainsonettes have either a private rear garden or a balcony, and all additionally have access to a communal courtyard within their block.
146. Block 1 – Of the 50 Extra Care units, three have balconies in excess of 10sqm with the remaining 47 having balconies measuring 5sqm. The remaining units within Block 1 are social rented flats and maisonettes. Of the flats, a total of 32 units have balconies measuring 7sqm, four have balconies measuring in excess of 10sqm whilst the four maisonettes have private rear gardens of 15sqm backing onto a communal courtyard. No general needs flat has less than the 6sqm minimum required by the AAAP for 1 and 2 bedroom units. The provision of private amenity space within Block 1 is considered acceptable and the overall private amenity space shortfall of 386sqm is added to the minimum 50sqm communal amenity space requirement.
147. Block 2 – In terms of private amenity space the seven Learning Difficulties units each have a private amenity space provision of 6sqm which meets the AAAP requirement. In terms of the terraced dwellings all but eight have in excess of 50sqm private amenity space made up of rear gardens and first floor terraces and those that fall below the 50sqm requirement only fall slightly below with areas all in excess of 40sqm. Only 1 of the houses has a garden in excess of 10 metres in depth however this is acceptable with the overall level of amenity space being provided a positive aspect of the dwellings. The overall shortfall in private amenity space for Block 2 is 28sqm which is negligible given the nature of the block as predominantly terraced housing.
148. Block 3 – As with the terraced dwellings in Block 2, all have private amenity space in excess of 40sqm with five exceeding the 50sqm requirement. Again, none of the dwellings meet the minimum depth of 10sqm however this is recognised as a significant challenge in a highly urbanised area and the overall private amenity space areas being provided are welcomed. In terms of the flatted block only one unit falls short of the minimum 6sqm and the shortfall is marginal at 0.5sqm. The overall shortfall in private amenity space for Block 3 is 24sqm which is negligible given the nature of the block as predominantly terraced housing.

149. Block 4 – All of the ground floor maisonettes have private amenity space in the form of front or rear gardens. The remaining flatted units and duplex units all benefit from balconies or terraces. Several of the one bedroom units fall below the minimum 6sqm requirement but the shortfall is in the range of 1-0.3sqm which is not significant and is added to the communal amenity space. All of the units with more than two bedrooms have at least 10sqm private amenity space and this contributes to a high standard of living accommodation. The overall private amenity shortfall for Block 4 is 638sqm and this is added to the communal amenity space requirement.
150. Block 5 – Like Block 4 all of the maisonettes at ground and first floor have either front or rear private amenity space and all upper level units benefit from private amenity space with the majority of one and two bedroom units achieving at least 6sqm although it is recognised that some will only benefit from 5sqm. Of those units with more than two bedrooms several fall short of the 10sqm requirement but not significantly, with shortfalls in the region of 1-2sqm. As before the private amenity space shortfall is added to the communal amenity space requirement and in this case the shortfall is 651sqm.
151. Block 6 – Front and/or rear gardens are provided to all ground floor units with all flatted/duplex units achieving at least 5sqm of private amenity space. Several of the units with more than two bedrooms fall short of the 10sqm private amenity space, but achieve at least 7sqm. The private amenity space provision for Block 6 is considered acceptable and the shortfall of private amenity space which is 471sqm is provided as part of the communal amenity space.
152. The private amenity space is acceptable across the blocks, and Blocks 1, 4, 5 and 6 benefit from generous communal courtyards with high amenity value, as discussed below.

Communal amenity space

153. The AAP makes no specific requirement in terms of the quantum of communal space, but sets out guidance about the design and layout of the spaces. The Residential Design Standards SPD states that each development (and in this case it would be reasonable that this should apply to each block) should provide a minimum of 50sqm of communal space, in addition to any space required as a result of shortfalls in private amenity space. The communal amenity space requirements and provisions are set out in Table 28 below.

Table 28

	Communal Amenity Space			
	Minimum Requirement (sqm)	Private Amenity Shortfall	Combined Requirement	Total Provision
Block 1	50	386	436	964
Block 2	50	28	78	71
Block 3	50	24	74	0
Block 4	50	638	578	1326
Block 5	50	651	701	1216
Block 6	50	471	521	1018
Total	300	2088	2388	4595

154. It is noted that Block 2 and 3 do not provide any communal amenity space for the terraced dwellings which have private front and rear gardens. New houses do not have a requirement to provide communal amenity space and the space requirement for Blocks 2 and 3 in Table 28 above relates to the flats in those blocks. The position of the Learning Difficulties building and the flatted block fronting Portland Street as bookends to the terraced housing precludes them from providing meaningful communal amenity spaces, although both blocks benefit from nearby public park spaces. Overall, the scheme delivers almost twice the required level of amenity spaces. The small number of flats that fall short benefit from new public spaces close by, and overall the amenity space provision is a very positive aspect of the proposal, meeting the AAAP requirement to provide residents with high quality living environments with places to relax, play and enjoy.

#### Public open space

155. The AAAP envisaged that new development in the action area core must provide a high quality network of public open spaces of different sizes and functions which link well together and contain good pedestrian and cycling routes.
156. One of the aims of the AAAP was the provision of three green fingers, one of which was located within the FDS. The current proposal for the FDS includes a new public park at Westmoreland Park, linking to the civic space of Westmoreland Square. A further area of public open space is provided at Portland Park as well as landscaped areas on Albany Road to the south of Block 5 and the tree lined north south streets through the site. This provides a well linked network of open spaces in place of a formalised Green Finger and allows for a more proportionate dispersal of open space throughout the site which in turn has allowed more trees to be retained. The overall quantum of public open space being provided on the FDS equates to 3975 sqm. Public open space will be considered in further detail in the design section below.

#### Sunlight to amenity spaces

157. BRE guidance recommends that for outdoor amenity areas to be adequately sunlit throughout the year at least half of a garden or amenity area should receive at least 2 hours of sunlight on 21 March.
158. In terms of the communal courtyards within Blocks 1, 4, 5 and 6 only the courtyards within Blocks 4 and 5 achieve the minimum requirement of at least 50% of the space receiving at least 2 hours sunlight on the 21<sup>st</sup> March.
159. The courtyards of Block 1 and 6 will achieve 2 hours of sunlight on the 21<sup>st</sup> March across 39.6% and 26.7% of their respective areas and as such fall below the 50% target. Whilst this does not mean the amenity space is of poor value it does mean that the greater proportion of the courtyards will be in the shade and as such careful consideration will need to be given to the type and form of landscaping that will be provided within these communal areas to allow them to be used effectively throughout the year.
160. Blocks 2 and 3 both contain a significant amount of terraced housing with private rear gardens. These gardens are located between the rear facades of the blocks of terraced dwellings which face north and south away from each other. Of these 49 private amenity spaces only three meet the March target with the rest of the gardens in the shade as a result of shadows cast by the taller elements of Blocks 4 and 5. During the summertime, when amenity spaces will be more intensively used, all but two will be well lit in terms of having in excess of 50% of the area receiving at least two hours of sunlight.

161. Of the amenity spaces that fail to meet the March target, there are 26 spaces that do not receive any sunlight on the 21<sup>st</sup> March and will be completely in the shade. As is the case with the courtyards of Block 1 and 6, this does not mean that the amenity space is unusable for this part of the year subject to careful landscaping considerations.
162. Achieving compliant sunlight levels within the private and communal amenity spaces on the FDS has been a challenge largely due to the need to provide a significant uplift in housing units and density whilst meeting the townscape objectives of the AAAP which sought taller development along the park edge, perimeter blocks and then lower density housing towards the north of the site to manage the transition between high and low density areas. Having the taller buildings to the south of the site results in long shadows being cast which has resulted in many amenity spaces being in the shade. The FDS is providing high quality housing within the design specifications of the AAAP and it is considered that amenity space sunlight is acceptable on balance when acknowledging the design requirements of the AAAP and the benefits of the scheme in terms of high quality housing.
163. Westmoreland Park and Westmoreland Square both meet the BRE sunlight targets for March and as such will be well lit public spaces.
164. Child play space provision  
Policy 3.6 of the London Plan requires development proposals to make provision for play and informal recreation based on the expected child population generated by the scheme. Further detail is provided in the Mayor's Play and Informal Recreation SPG (2012). Southwark's Residential Design Standards SPD states that a minimum of 10 sqm of play space per child bed space should be provided. This requirement is echoed in AAAP Policy PL6: Children's play space.
165. Based on the methodology contained within the Mayor's Play and Informal Recreation SPD, the FDS could support a child population of 422 generating a total playspace requirement of 4,220sqm. This is shown in additional detail in Table 29 below.

Table 29

Play Space and Informal Recreation				
Age Group	Child Yield	Requirement (sqm)	Proposed on-site provision	Identified Areas
Under 5's	160	1,600	2,210	Communal gardens, doorstep play areas and private gardens
5-11	150	1,500	1,494	Westmoreland Square and Portland Street Park
12+	113	1,130	Off-site	Burgess Park
Total	422	4,223.5	3,704	

166. As it stands the FDS is policy compliant in terms of on-site play space provision for the under 5's age group. For the 5-11 age group there is a negligible shortfall of 6sqm and as such this is considered to be acceptable. It is noted that recreation space for the 12+ age group will need to be provided off-site as there is a 519.5sqm shortfall on total on-site provision. The shortfall of 519.5sqm is considered to be acceptable given the location of the development alongside Burgess Park and given the opportunities that Burgess Park presents in terms of playspace for this older age group. The shortfall is acceptable in this instance subject to a financial contribution of £78,369 being made towards additional or improved play facilities in Burgess Park.

## **Design**

167. The AAAP contains a series of design policies which seek to create the vibrant and attractive neighbourhood aspired to under the overarching objective for the area. Development proposals are expected to be in general compliance with the AAAP masterplan. In terms of the FDS, this would include:
- Albany Road as a calmed route alongside the park;
  - An east-west community spine, envisaged as a pedestrian and cyclist focused street linking many of the facilities in the area;
  - Westmorland Square, a new plaza to provide a setting for new community facilities and shops; and
  - One of the three 'Green Fingers' providing high quality open space linking Burgess Park with the rest of the area.
168. Appendix 6 of the AAAP provides more detailed guidance on design, including matters such as street design, tall buildings, and elevational treatment.
169. These detailed policies for the Aylesbury area can be read in the context of the broader requirement for high quality design in the NPPF, the London Plan, the Core Strategy, and the Southwark Plan.

### Immediate context

170. The FDS sits between the recently completed 'Site 1A' development by L&Q on Bradenham Close, and Portland Street, beyond which will eventually lie the redeveloped Phase 4 buildings. In the short term, the new buildings here will need to have a satisfactory relationship with the existing flats on Portland Street. To the north lie the lower rise buildings on Westmoreland Road and Phelps Street. Fronting Portland Street are the listed terraces within the Liverpool Grove Conservation Area.

### Urban structure and site layout

171. The masterplan at Figure 5 of the AAAP shows the FDS laid out as a simple grid containing three plots, with one Green Finger running north-south through the centre of the site. Policy PL2 'Design Principles' expects that development should follow the layout shown in the masterplan, as well as conforming to the design guidance in Appendix 6.
172. The submitted layout deviates from the AAAP masterplan layout in several respects. Firstly, it lays out the site as six rather than four plots. Earlier iterations of the scheme assessed different layouts, but it was concluded that the submitted layout gave better permeability, larger courtyard sizes on the taller blocks to the south, and more opportunities for good quality open space. Secondly, the layout retains the Community Spine on the existing alignment of Westmorland Road. This improves pedestrian links

towards the shopping centre at Walworth Road, creates a better layout for Westmorland Square, directs pedestrians past the new shops built as part of Site 1A, and enables trees on Westmorland Road to be retained on the new street. Thirdly, the layout does not include a Green Finger in the format envisaged by the AAAP. Instead, it includes two main green open spaces (known as Westmorland Park and Portland Park), and creates links to Burgess Park along tree-lined streets. This approach of using more defined open spaces, rather than the linear Green Fingers, is also taken across the Outline application, where the remaining two Green Fingers have not been included in the layouts.

173. A comprehensive review of the AAAP masterplan was carried out by the architects early in the design process. This concluded that whilst the masterplan had strengths in terms of creating a clear and well-ordered grid layout, and placed due emphasis on integration with the surrounding area, it could appear overly rigid. Each Green Finger was designed similarly in terms of the role and proportions, and there may be better ways of distributing open space to serve the new residents, particularly in locations further from Burgess Park.
174. The proposed layout for the FDS maintains the key objectives of the AAAP masterplan in terms of creating wide and attractive streets, and well-defined building blocks. However, it is considered that the adaptations improve linkages into surrounding streets and the open spaces will have clear and differentiated roles. The location of Portland Park also has the key advantage of retaining a group of high value trees, as well as providing an open setting for the tallest building on the site. The alignment of the Community Spine gives a clear demarcation to the enlarged Westmorland Square and better links to shops and bus stops.
175. The layout includes small off-sets at the junctions to deter rat-running and create interesting vistas, and clearly distinguishes public and private space. It is considered to meet the objectives of the AAAP, and the variations from the masterplan have positive benefits for the scheme.
176. The AAAP also seeks a variety of building heights across the FDS with taller elements along the park edge as well as two taller 'Local Landmark' buildings fronting Albany Road with heights reducing incrementally northwards to provide a shift in density from higher to lower density housing.

#### Building types and heights

177. AAAP Policy PL:3 Building block types and layout expects buildings to conform to one of the following building types:
  - Perimeter block
  - Mews block
  - Special building – a unique design containing a landmark building or special community use.
178. The FDS contains three true perimeter blocks (Blocks 4-6); Block 1 also follows a perimeter typology although it is open on its southern side. The AAAP had no typology for terraced housing, instead describing terraces as mews. The four terraces of houses on Blocks 2 and 3 provide the lower rise, lower density housing expected to be accommodated in the Mews, but are more open to the street. With regards to 'special buildings' the FDS demonstrates how these may take several forms. Firstly Block 1 which contains a community use and addresses the two new public spaces which it intersects (Westmoreland Square and Westmoreland Park). It has a distinctive façade



with shallow arches. This creates a landmark on the public space. The three taller buildings on the Park frontages would each be described as 'special' buildings under the AAAP, and each would need to be of the highest design quality given their visibility across the Park. These buildings are discussed further below.

179. The AAAP Policy PL4 'Building Heights' states that heights towards the north of the sites should generally be between 2 and 4 storeys in order to respect the setting of the Conservation Area and the heights would rise towards the south with heights here and along Albany Road of between 7 and 10 storeys. Figure 10 shows two local landmark buildings on the Albany Road frontage, between 10 and 15 storeys high. The submitted plans show three tall buildings along the Albany Road frontage, ranging from 14 to 20 storeys. Therefore, whilst the general distribution of height is in line within the AAAP, the number of tall buildings, and the height of the taller two, exceeds that which was envisaged.
180. The taller buildings are placed at the south-eastern corners of Blocks 4, 5 and 6, with the tallest building on the corner of Albany Road and Portland Street, within Block 4. The outline application then indicates another tall building on the opposite side of Portland Street, within Phase 4. It is considered that this arrangement of tall buildings would create an interesting and distinctive edge to Burgess Park, with the tall elements being viewed as individual and elegant features on the skyline. The height of the intervening blocks, between the towers, is lower than the 7-10 storeys suggested in the AAAP, and as a result the composition is more dramatic, with the towers reading as singular elements along a more moderate frontage. It is noted that the FDS contains two of the existing taller blocks within the Aylesbury, namely Chiltern and Bradenham. These are long, linear blocks which, whilst lower than the proposed towers, have a more imposing presence due to their sheer bulk. In views along Albany Road the current blocks dominate views because of their mass; the proposed buildings sit on much smaller footprints creating a more slender profile. In the submitted views analysis within the ES, the impact of the buildings is described as minor beneficial. The inclusion of the taller buildings has enabled the FDS to get closer to the AAAP target for the site of 880 units, without placing undue pressure on the sites closer to the more sensitive northern context. Subject to high quality design, it is concluded that the higher number of tall buildings is acceptable as part of the site layout.
181. The principal features of each block are described below.
182. Block 1  
Block 1 is located at the north east corner of the first development site and will be a principal entry point for this part of the redeveloped Aylesbury. This building will be prominent when viewed approaching from east or west along Westmorland Road and from the north along Queens Row. It contains the community use, which has a prominent frontage to the enlarged Westmorland Square. The Extra care flats are accessed from a glazed link on each floor, which also serves as a social space. This gives a very open and active façade to the courtyard. The block is open to its southern side, improving light penetration.
183. Blocks 2 and 3  
The houses and flats on Block 2 and 3 front onto Westmorland Road and the new east-west street, with their rear gardens sitting between the terraces. This traditional layout references the historic road plan of the original 19<sup>th</sup> century streets to the north.
184. The terraced housing ranges from three to four storeys in height with the four storey block of flats for adults with Learning Difficulties forming the western bookend to Block

2 and a six storey flatted block forming the eastern bookend to Block 3. The Learning Difficulties block is consistent in height with the adjacent terraced housing. The eastern flatted block steps up considerably from the three storey terraced housing to five storeys with a sixth set back however this increase in height is managed successfully as a result of a 6m separation from the terraced housing (on Westmoreland Road). This flatted block is considered to be a suitable termination of the terraced housing and will provide a transition to the higher density developments to the south on Portland Street (Block 4) and to the likely scale of development that will be located adjacent on the east side of Portland Street as part of the Outline Scheme

185. Also adjacent to this six storey flatted block are the listed buildings and wider Liverpool Grove Conservation Area. The relationship between the old and the new is effectively managed, and the setting of the Listed buildings is improved by comparison with the existing Chiltern block.
186. Blocks 4 and 5  
Blocks 4 and 5 are perimeter blocks that contain undercroft parking surrounded by ground floor maisonettes and entrance lobbies. The appearance of the buildings from the street is open and positive as a result of the maisonettes/duplex units which look onto the street giving these larger blocks a more human scale. These maisonettes have private rear gardens within the podium courtyard at first floor level.
187. Block 5 contains the CHP energy centre that will serve the FDS and concerns were raised with the applicants regarding the energy centre facades that were previously treated with perforated brickwork. Following further discussion with the applicant this was amended to a decorative metal screen which balances the need for ventilation and maintenance of the energy centre plant with the need to provide a suitable design response to the street and the surrounding buildings.
188. In both blocks a break in the building facades on Albany Road gives the opportunity to bring the courtyard garden forward to the building face, and double height entrance lobbies for the towers provide views up through the lobby to the garden for those entering the building but also as glimpsed views for passers-by.
189. Block 4 is set back from Albany Road and Portland Street in order to retain high value trees on both frontages, which are then set in landscaped areas to enhance the setting of these buildings.
190. Block 6  
Block 6 is arranged around a ground level central courtyard with views into the courtyard from Albany Road and the new east-west street. As well as flats and maisonettes it accommodates the Gas Pressure Reduction Station, and care has been taken with the design to integrate this utilitarian structure into the street scene through landscaping and materials.
191. Elevational design and appearance  
The buildings on the FDS have been designed by three firms of architects coordinated by one lead architect. This collaboration has the advantage of creating architectural diversity and interest whilst avoiding any strident clashes of form or approach. It also means that some consistency can be maintained between blocks facing each other across new streets; the streets are treated as unified places.
192. There are a number of overarching design principles which unify the buildings. These support the 'normative' approach explained in the AAAP – that the area have a

consistent rhythm, order and harmony founded on shared design principles, into which special buildings would act as visual focal points.

193. All buildings are outward looking, with a clear relationship with the street. All residential buildings have a two storey 'base' level; these are maisonettes rather than ground floor flats. Each has a front garden setback to ensure privacy, with low walls and railings or hedges. All ground floor units have their own front door onto the street, increasing the level of activity and natural surveillance. Each building within the block has its own clear identity, distinguished in terms of its brick type, balcony arrangement and detailing; each of these blocks has a generous entrance door and lobby for the upper level flats, giving the block a clear street address. Brick is used as the primary facing material, varied in colour and tones across the blocks but also used to create texture and decoration. The shifts in block heights and roof lines add interest in the long views down the streets and across spaces, as well as reinforcing the experience of a series of distinct buildings.
194. Block 1, which contains the community use, appropriately has a more distinctive and decorated façade, identifying as a public building facing the Square. The shallow arches and colonnaded effect add depth and variety, pleasing as one of the first buildings to be seen in approaches to the area from Camberwell Road.
195. These design features are used in a restrained manner, but give sufficient interest to ensure a clear identity can be created. They are consistent with the guidance in the Design Code for the Outline application, so give an indication of the level of design quality which can be achieved across the wider neighbourhood, although differentiated to respond to the various character areas.
196. The overall design complies with the design policies and guidance in the AAAP and is a positive aspect of the application. It is also consistent with the broader design policies in the London Plan and the Core Strategy. It achieves the NPPF aim of ensuring that good design should contribute positively to making places better for people.

#### Tall buildings

197. There are three tall buildings, at 14, 18 and 20 storeys, on the FDS fronting Albany Road. There are other buildings within Blocks 4, 5 and 6 which stand just above 30 metres high, and so could be defined as tall buildings under the Southwark Plan Policy 3.20.
198. As set out above, the three tall buildings on the Park Edge fronting Albany Road are considered to be well-positioned in relation to the overall site layout, and to make a positive contribution to the townscape. AAAP Policy PL4 'Building Heights' sets out specific guidance for the design of tall buildings in the Aylesbury area. The key considerations are that they should be:
  - Slender, and attractive from all angles;
  - Have visual separation from adjacent development;
  - Sit in generously proportioned public realm;
  - Have a sculpted and visually interesting top to provide a vibrant skyline;
  - Use high quality materials;
  - Be mindful of microclimate effects.

199. The two taller buildings sit perpendicular to each other on adjoining sides of a new green space on Albany Road. It is envisaged that they will eventually be joined by a third tower on the eastern side of Portland Street, once Phase 4 is developed.
200. The two buildings on the FDS have a clear visual relationship but each has a distinct identity. Each has a similar footprint, with a simple rectangular form, and a double height base containing a generous double height lobby with views to the courtyard gardens. Each has a space to its west where the courtyard garden is allowed to project forwards to the edge of the block, overlooking Burgess Park. Each has a façade based on a layered grid, with inset balconies. The distinctive identities emerge in the detail of the façade materials and proportions.
201. The Block 4 tower is the taller, at 20 storeys. It is the more decorative of the towers, using a distinctive motif on the lower levels; the architects have sought local references to ensure this motif is meaningful and has longevity. It has a lighter appearance with a highly glazed facade and a relatively slimline framing system. It also has an open framed roof garden, which lightens the top of the building in long views, giving the top a more recessive appearance.
202. The Block 5 tower is slightly lower at 18 storeys, but has a similar language in terms of the layered grid façade. However, in this building the framing elements are stronger, giving a more ‘carved’ appearance; the degree of contrast creates a satisfying sense of difference without risking incoherence.
203. The 14 storey building on Block 6 sits on the corner of a ground level courtyard garden, rather than a podium, but still includes a two storey base level and a tall entrance lobby. In other respects this building reads simply as a part of the perimeter block rather than a separate building.
204. The other taller elements, although slightly over 30 metres high, are not significantly taller than their surroundings, and so may not be considered ‘tall’ under Policy 3.20. They act to emphasise key corners/junctions in the townscape, but would not be perceived as tall buildings in their own right. Their proportions, design quality and locations are appropriate in terms of guidance for tall buildings, and they make a positive contribution to the variety of forms across the FDS.
205. The tall buildings are considered to meet the requirements of Policy PL4, and the design guidance in Appendix 6. They will make a positive contribution to identifying key junctions and act as focal points in views around the area. In views across Burgess Park, where the tree cover will often shield views of the lower level buildings, each tower will be seen as an individual element, but part of a clearly identifiable linear cluster. The design quality and choice of materials, and key elements such as the framed roof gardens and double height lobbies ensure that they will be distinctive and interesting contributors to the townscape.
206. In terms of their location, design quality, and contribution to the public realm they would also comply with the broader design requirements of Policy 7.7 of the London Plan and 3.20 of the Southwark Plan.

#### Public open space and landscaping

207. The FDS application would expand and complete the Westmorland Square plaza, the first part of which was laid out within Phase 1A. It is a hard surfaced civic space, able to accommodate community events and activities. This is consistent with the vision in the AAAP. Westmorland Park is linked to the Square, but is a green space,

incorporating play facilities and seating beneath trees. It sits on one of the tree-lined streets which link the area to the north with Burgess Park. It serves a purpose similar to those envisaged for the Green Fingers, and although of a smaller scale, it is considered successful in providing for relaxation or play in a more intimate scale than Burgess Park.

208. Portland Park is a more open space facing onto Portland Street. It enables the retention of a group of high quality trees which stand in front of Chiltern, and could provide an opportunity for active play as well as greening this 'Quietway' route. Setting back the building line at this point safeguards options for junction improvements on Albany Road/Portland Street if these are needed to improve cycle safety.

#### Heritage impacts

209. The FDS is not located within a Conservation Area. It is however, immediately south of the Liverpool Grove Conservation Area. The Addington Square and Cobourg Road Conservation Areas are also within view of the site. Within the Addington Square Conservation Area is a designated London Square; Addington Square. Further to this, English Heritage requested an assessment of the impact of the development proposals on the Grosvenor Park Conservation Area.
210. While section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 does not strictly apply here, because no development is proposed within a conservation area, it nonetheless sets a useful test for judging the impacts of the proposed development on the neighbouring Liverpool Grove Conservation Area, as well as the Addington Square, Coburg Road and Grosvenor Park Conservation Areas. Section 72 indicates that, 'special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area'. The analysis within this section of the report considers whether the application pays special attention to the desirability of preserving or enhancing the character or appearance of these conservation areas.
211. Furthermore, Saved Policy 3.18 of the Southwark plan (2007), 'Setting of Listed Buildings, Conservation Areas and World Heritage sites' seeks to effectively manage development to ensure that it will not have a detrimental impact on the *setting* of heritage assets, including conservation areas.

#### Liverpool Grove Conservation Area

212. The majority of this conservation area was built between 1903 and 1908. The urban form of the area is relatively dense, but generally low rise with flats fronting onto courts and quite broad streets of houses and maisonettes - many with their own gardens. The external appearance of the buildings is varied, designed as such in order to avoid the monotony of repetitive terraces. It is also characterised by mature tree planting in many of the streets.
213. The existing slab-block buildings of the Aylesbury Estate are visible from a number of vantage points within the Conservation Area. By virtue of their monolithic and unbroken appearance, strong horizontal emphasis, insensitive scale and unrelieved use of grey concrete they are considered to create a harmful backdrop to the conservation area that does not respond sensitively to the heritage asset and its setting. It is therefore considered that the replacement of the existing slab-blocks with more sensitively designed brick buildings, featuring greater variety and interest in their built form would result in an enhancement to the setting of the conservation area. This is particularly considered to be the case at the boundary between the conservation area and the existing estate, for example on Portland Street.

#### Addington Square Conservation Area

214. The Addington Square Conservation Area comprises an eclectic mix of 19<sup>th</sup> and early 20<sup>th</sup> Century buildings. Addington Square itself is a designated, formal London Square enclosed on three sides by terraces and semi detached housing with Burgess Park on the fourth side. Of the buildings enclosing the square, nos 7-11, 13-16, 33-42, 47 and 48 Addington Square are all Grade II listed and have substantial group heritage value. Bradenham is visible from most parts of Addington Square itself, but it is not visible elsewhere in the wider conservation area. The redevelopment of the estate and the replacement of the concrete slab of Bradenham are considered beneficial to the setting of the conservation area. The proposed development would represent a more sensitive backdrop to the conservation area, with a combination of buildings that would vary in size. Furthermore, finished predominantly in brick, the proposed development would have a warmer appearance than the grey concrete of Bradenham and would represent a more recognisable 'London' townscape typology. This is demonstrated in View 13 as assessed in the Visual Impact Assessment.
215. From the other listed buildings in the Addington Square Conservation Area, the FDS proposals would not be visible.

#### Cobourg Road Conservation Area

216. This small conservation area is found on the far side of Burgess Park, connected to Old Kent Road. Within the conservation area, Nos 29, 31, 47, 51, 53, 55, 61, and 63 Cobourg Road, Hanover House and Rosetta Place are all Grade II listed. The existing Aylesbury Estate, particularly the long, slab like Wendover Building (outside the FDS boundary) is visible from the conservation area, with the Burgess Park Lake dominating the foreground. The FDS proposals would be visible in the distance in views from this conservation area, partially screened by mature planting. Although the proposed development would appear taller than the existing Aylesbury Estate blocks, it would also be of reduced depth and appear more slender and more appropriate in terms of materiality, proportions and fenestration. As such, it is considered that the proposals would have a minor beneficial impact on views out of the conservation area and its setting. This beneficial impact is demonstrated in View 5, as assessed in the Visual Impact Assessment.

#### Grosvenor Park Conservation Area

217. This small conservation area to the west of Burgess Park and the south west of the existing Aylesbury Estate contains a mix of 19<sup>th</sup> Century buildings. Within the conservation area, Nos 21-36 Urlwin Street are Grade II listed. The conservation area is separated from the proposed development site not only by distance, but also by the physical barriers of the railway line and Camberwell Road. None of the existing buildings of the Aylesbury Estate within the outline application boundary or the proposed buildings are visible within the Conservation Area. As such, the impacts of the development on these heritage assets would be negligible and would not cause any harm to its significance.

#### Listed Buildings

218. In addition to the Conservation Areas, the development proposals also have the potential to impact upon the settings of a number of listed buildings. Of closest proximity to the FDS are Aycliffe House and attached railings, and the adjacent terrace of Grade II listed houses on Portland Street (nos 1-23 odd).
219. The impact of the proposals on the setting of this listed terrace has been assessed in the Townscape, Built Heritage and Visual Impact Assessment submitted in support of

the application. Both Aycliffe House and the terraced housing date from 1903-1914 and are finished in brick with stone dressings. The houses are two storeys in height, whilst Aycliffe House is three storeys. They are of heritage value not only for their physical appearance and built fabric, but their group value as part of the Brandon Estate, an example of “homely” working class housing erected by the Ecclesiastical Commissioners under the guidance of Octavia Hill. The existing concrete slab buildings of the Aylesbury Estate represent a stark contrast to the traditional domestic scale and materiality of these buildings, and from certain vantage points are considered to dominate their settings. The existing estate is therefore considered to have a significant, harmful impact on their heritage value. It is therefore considered that replacement with more sympathetically scaled, designed and detailed buildings, finished predominantly in brick, would represent an enhancement to the setting of these heritage assets. This beneficial impact is demonstrated in View 15, as assessed in the Visual Impact Assessment, taken from the eastern footpath of Portland Street, with the foreground of the view enclosed by the listed houses. The illustrative view of the FDS proposals show the built form stepping up sensitively from that of the listed buildings to the slender, and vertically proportioned 20 storey tower in the distance. As such, the proposals create a varied and layered backdrop to the listed buildings and wider conservation area, finished in appropriate and complimentary materials. They also allow the vast majority of the listed buildings’ roof profile to be read against the sky, rather than the grey concrete of Chiltern as in the current condition.

220. In the wider context, its potential impact on the setting of a number of other listed buildings has also been assessed. Those upon which the FDS would impact are discussed below.

#### Grade I

221. Church of St. Peter, West gates and Gate Piers, Liverpool Grove : This heritage asset, a fine example of the work of renowned architect Sir John Soane is some distance from the FDS, on the western side of the Liverpool Grove Conservation Area. It is considered to be of very high heritage value, as denoted by its Grade I listed status. However, the material submitted in support of the application demonstrates that the proposals would not be visible from this asset or its setting. The impact is therefore considered negligible. This is the same for the terrace of Grade II listed housing at nos 28 to 58 Liverpool Grove to the south of the church.

#### Grade II

222. Lime Kiln, Burgess Park: This is the only surviving structure from the Lime Works that once occupied this part of the Burgess Park Site. The concrete slab blocks of the Aylesbury Estate currently form an intrusive and insensitive backdrop to this important historic structure. Their redevelopment and replacement with more sensitively designed buildings would be considered an enhancement to the setting of this heritage asset.
223. Harker’s Studio, Queen’s Row: This three storey brick building was originally built as a workshop for theatrical scenery painting. It is to the north of the FDS, near the late 1920’s Ecclesiastical Commissioner’s Estate flats. The existing slab-block of Bradenham dominates the view south down Queens Row. Accordingly, the FDS redevelopment would result in an enhancement to the setting of this heritage asset. The more appropriately designed and scaled replacement buildings would enhance the setting through the greater degree of articulation and variety in built form proposed and the use of warmer, more traditional brick as the predominant facing material. As such, the proposed redevelopment would result in a more recognisable ‘London’ townscape typology forming the backdrop to the setting of this heritage asset.

### Local Views

224. The impact of the proposed development on a number of local views (agreed with Officers through pre application discussions) has also been tested. Those in which the FDS would be visible are discussed below.
225. View 04; Eastern End of Albany Road: This view is taken from the eastern end of Albany Road, within the setting of an attractive terrace of cottages. The southern edge of the view is framed by mature planting along the edge of Burgess Park. A small amount of the FDS proposals would be visible in the distance, much of it screened by trees. The impact is considered minimal. Once the rest of the outline masterplan is developed, the FDS would be obscured.
226. View 05; Cobourg Road Looking West Over the Lake in Burgess Park and View 07; Burgess Park Bridge Looking West: View 05 is taken from Cobourg Road outside nos 61-63. View 07 is taken from the southern end of the bridge across the lake in Burgess Park. The FDS would be visible in the distance in both views, although much of it would be screened by mature planting, particularly at lower levels. The landmark tower at the junction of Albany Road and Portland Street would be visible, thus enhancing the legibility of the area. The removal of the slab like blocks of Chiltern and Bradenham would also enhance these views. The impacts are therefore considered beneficial.
227. View 09; East of the Almshouses in Burgess Park: This view is taken from a position to the east of the north wing of the Grade II listed Almshouses, looking west. The FDS proposals would be visible in the centre of the view, effectively creating a new backdrop to the scene. The landmark tower at the junction of Albany Road and Portland Street would be visible, thus enhancing the legibility of the area. The removal of the slab like Chiltern, would be beneficial, as would the use of brick as the predominant facing material. The FDS would create a warmer backdrop to the view that is more recognisable as a 'London' townscape typology. This would result in a reduced visual impact on the listed Almshouses.
228. View 11; Southwest of the lime Kiln on Burgess Park: This view is taken at the junction of paths within the park, southwest of the Grade II listed lime kiln, looking north towards Portland Street. The FDS proposals would become the focus of the view, with the landmark tower proposed at the junction of Albany Road and Portland Street terminating the pathway. Although this would be significantly taller than Chiltern that currently terminates the view, it would also be designed more sensitively with a greater degree of articulation and more appropriate use of materials. Given that it would demark an important junction and 'gateway' into the new development, it would also enhance the legibility of the area.
229. View 12; Burgess Park Looking North Towards the FDS: This view is taken from the junction of paths near the western end of Burgess Park, looking north. The FDS proposals would become the main focus of the view, providing greater enclosure to the park edge and defining the alignment of Albany Road. The design of the new buildings would be more appropriate to the context than the existing slab buildings of Bradenham and Chiltern, with a greater degree of articulation and more appropriate use of materials. As such, the FDS proposals would result in an enhancement to this view and the setting of the park.



230. View 13; Addington Square: This view is taken from within Addington Square looking north. The FDS proposals are visible on the other side of the park, but they are heavily screened by mature planting. As discussed above in relation to the wider impact of the proposals on the Addington Square Conservation Area, the replacement of the concrete slab of Bradenham is considered beneficial to this view. The proposed development would represent a more sensitive backdrop, with a combination of buildings that would step down in size. Furthermore, finished predominantly in brick, the proposed development would have a warmer appearance than the grey concrete of Bradenham and would represent a more recognisable 'London' townscape typology.
231. View 14; Western End of Albany Road: This view is taken from the western end of Albany Road, looking east. The majority of the view is dominated by the completed Phase 1A of the Aylesbury redevelopment. The FDS proposals would appear as a natural extension of this new built form, providing further definition to Albany Road and definition to the park.
232. View 15; Portland Street at northern edge of Michael Faraday School: This view is taken from the eastern footpath of Portland Street, looking south. The illustrative view of the FDS proposals show the built form stepping up sensitively from that of the listed buildings to the slender, and vertically proportioned 20 storey tower in the distance. As such, the proposals create a varied and layered backdrop to the listed buildings and wider conservation area, finished in appropriate and complimentary materials. They also allow the vast majority of the listed buildings' roof profile to be read against the sky, rather than the grey concrete of Chiltern as in the current condition.

#### Conclusion on heritage

233. Paragraph 128 of the NPPF requires applicants to describe the significance of any heritage assets affected by their proposals, including any contribution made by their setting. It states that "*the level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary.*" It is considered that the assessment set out in the 'Townscape, Built Heritage a Visual Impact Assessment' submitted in support of the application is sufficient to meet the terms of that paragraph. In general, this material demonstrates that the proposed development would not result in any harmful impacts on the significance of the surrounding heritage assets and their settings. Indeed, it is considered that the removal of the insensitive, monolithic, concrete slab-block buildings on the existing estate and the proposals to introduce more sensitively designed, well articulated buildings, predominantly finished in more contextual brick would be beneficial to both listed buildings and conservation areas. The edges of the Liverpool Grove Conservation Area in particular would benefit from redevelopment of the estate.
234. As such, it is considered that the proposals comply with paragraph 137 of the NPPF which states that "*Local planning authorities should look for opportunities for new development ... within the setting of heritage assets to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to or better reveal the significance of the asset should be treated favourably.*" It is also considered that the proposals comply with Saved Policy 3.18 (Setting of Listed Buildings, Conservation Areas and World Heritage Sites) of the Southwark Plan (2007) as it would preserve or enhance the immediate or wider setting of listed buildings; any important view(s) of listed buildings; the settings of any conservation areas; or views into or out of any conservation areas.

### Design Review Panel

235. The FDS proposals were previously assessed by the Southwark Design Review Panel. Both the FDS and Outline proposals have been presented to the DRP on three occasions with the last presentation being on 7<sup>th</sup> August 2014. The Panel noted that there were many aspects of the FDS which were positive, such as:
- A considered analysis of the immediate context;
  - Roof gardens to Towers;
  - Brick/cladding strategy for each phase;
  - Articulation intentions of the facades (formality/symmetry/ordering);
  - Encourage use of patterns and decoration – provided they have meaning;
  - Stepping up locally to respond to a place or pick up a view;
  - Deeper facades on taller buildings – a proportionate approach to façade depth;
  - The concept of a ‘family’ of buildings in a phase;
  - Giving Burgess Park a sense of enclosure – allowing it to expand across Albany Road;
  - Double-height entrances, particularly for larger buildings/blocks;
  - Maisonettes around the perimeter of blocks; and
  - Proportionality and order – blocks having an order that relates to their scale.
236. The DRP did raise concerns that the elevations of the FDS were similar in character and didn’t express the individuality that would have come from being designed independently. Additionally there were concerns that the towers were too similar to one another. The Panel felt that more could be done to the design of each urban block to ensure that it was well integrated into the public realm. Overall however, the DRP endorsed the proposals for the FDS.
237. Subsequently the applicants have refined the design of both the urban blocks and the towers, particularly in terms of material finishes in order to give them a higher degree of individuality within their groups. In terms of integration into the public realm all of the ground floor frontages have small front gardens that will allow for additional planting and individuality that should complement the wider public realm, particularly the green links.

### Conclusion on design

238. The redevelopment of the FDS is considered to meet the aspirations of the AAAP in terms of creating an attractive new neighbourhood, well connected with both the earlier housing to the north, and the previous phase of new development to the west. Where the layout has deviated from the AAAP masterplan, this is considered to have brought positive benefits in terms of connectivity and permeability.
239. In terms of building types the FDS will bring the AAAP vision to life through the provision of perimeter blocks, mews style terraced housing and landmark buildings. Each block is made up of a series of distinct and identifiable buildings, creating an interesting and dynamic streetscene as well as giving residents a clear street address. The use of the double height base and the front garden setbacks assist in giving the buildings a human scale, and the frequent front doors will improve surveillance and security. The material palette is robust and high quality, and is used to add further interest in terms of colour and texture.
240. The number and height of the landmark tall buildings is above that envisaged in the AAAP masterplan, but the buildings are considered to make a positive contribution to

the views from Burgess Park, the designs are distinctive and high quality, and no harmful microclimate effects have been identified. In the context of the wider scheme for Albany Road the distribution of height is appropriate, and the slender profile avoids the overbearing impact of existing buildings such as Bradenham.

241. The substitution of individual landscaped spaces and tree-lined streets for the Green Fingers is considered positive in terms of creating a variety of types of spaces, and more options to link pedestrians and cyclists into the neighbouring areas. It also reduces the number of trees lost through the redevelopment. The new landscape is of a high quality, including soft and civic spaces.
242. The collaboration of three teams of architects has produced a scheme which balances the 'normative' approach with the creation of a distinctive and liveable new neighbourhood. The overall design quality is a positive aspect of the application, and meets the expectations of policies within the AAAP, the London Plan, Southwark Plan and Core Strategy.

### **Archaeology**

243. Based on a review of the baseline evidence there is a very low potential within the Site boundary for currently unknown archaeological remains to exist dating between the Prehistoric and Medieval periods. Where such buried archaeological remains are identified they are likely to provide more information on the nature and extent of settlement and activity within the wider area during these periods, contributing towards regional and local research goals. There is a moderate to high potential within the Site boundary for currently unknown archaeological remains to exist dating between the Post-medieval and Modern periods. Where such buried archaeological remains are identified they are likely to provide more information on the domestic, social and economic activity within the local area during these periods, contributing towards local research goals. During the demolition and construction phase, the assessment considered that the residual effects on any potential buried/surface archaeological remains are likely to be of minor negative significance where remains date between the Prehistoric and Medieval periods and negligible negative significance where remains date between the Post-medieval and Modern periods, following the implementation of mitigation measures which will include further archaeological works to be agreed by condition. The council's Archaeology Officer has been consulted and is satisfied that the proposals will have no adverse impact and as such no further planning conditions are required.

### **Impact on trees**

244. London Plan policy 7.5 'Public realm' seeks opportunities for greening of the urban area, and policy 7.21 'Trees and Woodlands' expects existing trees of value to be retained and any loss replaced under a 'right tree, right place' approach. Core Strategy policy SP11 'Open spaces and wildlife' seeks to protect trees, and improve the overall greenness of places, and recognises that trees make areas more pleasant and attractive. The AAAP makes no specific mention of tree protection or retention. Appendix 6 expects trees to be selected for shade and outlook and biodiversity, and the use of semi-mature species to enhance the environment.

245. The applicant has submitted a tree survey dated September 2014, carried out by Tamla Trees based on the methodology in BS 5837. The council's Urban Forester has confirmed that the methodology and assumptions underpinning this survey are sound. The survey details the location, species, size, health and expected lifespan of each tree within the FDS. The trees are categorised under the standard classifications for grades, namely:
- Grade A – trees of a high quality and value, which make a substantial contribution to amenity. Usually have an assumed life expectancy of over 40 years;
  - Grade B – trees of a moderate quality and value, which make a significant contribution to amenity. Usually have an assumed life expectancy of over 20 years;
  - Grade C – trees of a lower quality and value, making an adequate contribution to amenity and with an assumed life expectancy of over 10 years;
  - Grade U – the condition of these trees means any existing value would usually be lost within 10 years – these would not be expected to be retained in redevelopments, so would not be a constraint.
246. The majority of trees on the FDS are relatively mature, and consist of a mix of street trees, trees in communal gardens, and a small number of trees in private gardens. The report notes that the soil quality around the estate is poor, containing spoil from the previous site clearance. This has impacted on the growth of the existing trees, which are smaller than would be typical for their age and species.
247. Officers have carried out several 'walkabouts' on the estate with the applicants' arboriculturist and landscape architect. Each tree was assessed, including its location, and the kind of ground it was rooted into. The conclusions informed the submitted Tree Strategy, which took account of the quality of the trees, their visual contribution, based on the location of trees within the site, and their ability to make a long term contribution based on their life expectancy. The FDS contains a total of 118 trees, as set out in table 30 below.

Table 30

	FDS Tree Strategy				
	Category A	Category B	Category C	Category U	Total
Trees Retained	1	11	5	0	17
Trees Removed	2	15	32	52	101
Total	3	26	37	52	118

248. The three Grade A trees consist of two London Planes, and one Lime tree. One Plane, on Albany Road, would be retained in a green space adjacent to Block 4. The other two Grade A trees would need to be removed to facilitate the construction of Block 5. The Grade B trees include a range of species including London Planes, elms, ash and limes; the retained trees are mainly on Portland Street, Albany Road and Westmorland Road where they are part of established groups and have the greatest visual impact. The removed Grade B trees mainly sit within the proposed building footprints, or in the areas covered by car parks and podium gardens. Despite efforts to adjust building footprints to retain key trees, the new street layout and increased density of the FDS has resulted in the loss of 101 trees. 52 of these trees are Category U trees (which would not be expected to be retained within a new development).

249. The applicants propose to plant replacement trees in streets and public open spaces, as well as in communal gardens and private rear gardens. A total of 215 new trees would be planted, in addition to the 17 retained trees, giving a total of 232 trees across the FDS. This is a net gain of 114 trees, although it must be recognised that the new specimens will be smaller than those they will replace. The applicants have provided an assessment of how this replanting would relate to current tree cover, taking into account both stem girth and canopy cover. The assessment demonstrates that, excluding the Category U trees, the planting strategy would result in a significant increase in stem girth, but a small shortfall (-4.5%) in projected canopy cover, although the growth of canopies in the long term may ensure eventual full replacement. This does not meet the London Plan expectation for an increase of 5% in canopy cover, and so it is important to consider the quality and amenity impacts of the proposed replacement trees, as well as the wider benefits of the development scheme.
250. The redevelopment will raise the opportunity to improve soil conditions for the trees, improving their long term health. The planting strategy uses trees to support the identity and character of individual areas, using trees appropriate to the new locations (the 'right tree/right place' approach). The landscape architect has made reference to the council's Streetscape Design Manual in selecting trees for the new streets, reinforcing the street hierarchy, and enhancing views. Suggested species for the new streets include Sweet Gum, Black Locust, Maples, Silver Birch and Beech. The open spaces include larger feature trees such as Tulip trees and Copper beech, whilst the communal gardens include birch, magnolia and fruiting trees. Many were chosen for their biodiversity value, and well as seasonal interest and colour. This meets the policy expectations to enhance the environment. Whilst details of the proposed trees have been provided it is reasonable to impose a landscaping condition in order to secure the final species selection and planting regime, and this will also allow for additional input from the council's Highways Team to ensure that street trees meet the requirements of the Southwark Street Design Manual.
251. The redevelopment of the Aylesbury estate aims to give the area a long term sustainable future. This applies equally to the trees on the site. Although the redevelopment involves the loss of a significant number of trees, many of these trees would have a limited future, or have poor form or signs of earlier damage. Some are planted in raised ground which would be difficult to incorporate into the new public realm. The planting of new trees to define the new streets and spaces, making a careful choice of species to add interest and support wildlife, will ensure that the trees grow with the new population, and will thrive in the new environment. This will achieve the overall aim of the AAAP to create a more attractive neighbourhood.

## **Transport**

252. The AAAP sets out the various aspirations for the Aylesbury estate in terms of site layout and new street networks and these have been discussed in the design section above. The proposed new network of streets on the FDS is considered to improve legibility and connectivity. AAAP Policy TP3: 'Parking standards' (residential) states that the amount of car parking in development proposals should not exceed a maximum of 0.4 spaces per home averaged over the whole masterplan. This must take into account: the public transport accessibility level, consideration of transport for families and whether there is a negative impact on overspill car parking on the public highway and the availability of controlled parking zones.

253. London Plan Policy 6.13 intends to strike a balance between promoting new development and preventing excessive car parking provision whilst policy 6.9 aims to promote cycling.
254. Core Strategy Strategic Policy 2 'Sustainable Transport' aims to encourage walking, cycling and use of public transport to create safe, vibrant, attractive and healthy places for people to live.
255. Saved policy 5.1 of the Southwark Plan seeks to ensure that development is located near transport nodes, or where they are not it must be demonstrated that sustainable transport options are available to site users, and sustainable transport is promoted. In addition, saved policy 5.6 of the Southwark Plan requires development to minimise the number of car parking spaces provided and include justification for the amount of car parking sought taking into account the site Public Transport Accessibility Level (PTAL), the impact on overspill car parking, and the demand for parking within the controlled parking zones.

#### Site context

256. The FDS lies in the south west corner of the wider Masterplan area, bounded by Portland Street, Westmoreland Road, Bradenham Close and Albany Road, all of which are borough roads. The closest part of the Transport for London Road Network (TLRN) lies around 1km away, whilst Walworth Road, part of the Strategic Road Network (SRN) is 300m distant. Portland Street forms part of the London Cycle Network.
257. The site is directly served by one bus route (the no. 42); however additional routes lie within walking distance, on Walworth Road, and Albany Road east of Wells Way. The closest rail and Underground services are at Elephant and Castle. The PTAL is 4, on a scale of 1 to 6, where 1 is poor and 6 excellent. This is at the higher PTAL range in the Masterplan area and fits in with the desire of the AAAP to create higher density development within areas of higher public transport accessibility.

#### Site Layout

258. The AAAP sought a grid layout for the FDS with new north-south and east-west connections as well as a Community Spine to provide linkages to the wider masterplan area. Two new north-south routes are being provided and a new east-west route will be provided through the FDS. Westmoreland Road to the north will become the Community Spine which differs slightly from the location envisaged by the AAAP but is nonetheless acceptable. The new network of streets improves legibility, access, connectivity and meets the aim of the AAAP in terms of creating a grid layout for the FDS. Whilst it does not include the Green Fingers, it does include a series of tree-lined, traffic-calmed streets which provide safe and attractive pedestrian and cycling routes through the site.

#### Car Parking

259. Car parking for existing residents is currently provided as a mix of on street parallel parking bays, and off street garages and parking courts. Most of the off-street parking is managed by the Housing Department under the estate parking permit regime and garage leases. The parking on the public highway (for example on Portland Street) is managed by the Highways Team (Parking Shop) and is also available as metered parking for non-residents.
260. The FDS sits within a Controlled Parking Zone (CPZ) with additional pay and display parking on Portland Street and Albany Road.

261. The AAAP seeks a maximum of 0.4 parking spaces per unit across the whole of the action area core and this includes the FDS. The FDS provides a total of 287 car parking spaces which equates to a provision of 0.35 spaces per unit and is therefore in accordance with the AAAP target. Car parking will be provided as a combination of five off-street bays, 118 undercroft parking spaces within Blocks 4 and 5 and 157 on-street parking spaces. The on-street parking will include three car club parking bays. A total of 40 accessible parking spaces will be provided as part of the undercroft parking within Blocks 4 and 5 to serve the wheelchair housing (with the exception of the Extra Care and Learning Difficulties units).
262. An additional seven on-street bays will be provided for the Extra Care units and the Learning Difficulties facility. Whilst being on-street these bays will not be for general use as they will have a defined role and this will be set out in the Traffic Management Order. Five of these spaces have been allocated to the Extra Care units. Of these spaces, two will be used for drop-off, two will be parking for Doctors and one will be an ambulance bay. The additional two bays for the Learning Difficulties facility will be drop-off bays. The required amendments to the Traffic Management Order will be secured in the S106 Agreement.

#### Car Parking Allocations and Management

263. The applicant has explained that off street parking spaces in undercroft car parks will be privately managed and restricted to the residents in those buildings. All wheelchair units will be allocated an accessible undercroft car parking space. It is proposed that Blocks 1, 2, 3 and 6 will largely be reliant on on-street parking spaces. In this case demand is likely to outstrip supply based on the proposed numbers. As such strategy needs to be put in place to manage the demand for spaces as well as a mechanism to ensure any new parking stress does not disadvantage existing residents in neighbouring streets.
264. To manage the impact of overspill parking on adjoining residential streets it is proposed that a new Controlled Park Zone (CPZ) will be created that covers the entire regenerated Aylesbury Estate. This would ensure that all on-street parking generated as a result of these developments is contained within the new streets and within the existing estate boundaries. This would give reassurance to surrounding residents that their ability to park a reasonable distance from their own homes will not be adversely affected by any parking from these new developments. This is consistent with the approach in TP3 which expects parking levels to take into account the availability of capacity in nearby controlled parking zones.
265. The level of parking provided on the estate will in practice be contingent on the proposal of other street elements including the special bays for the Extra Care Facility and Learning Difficulties facility, servicing bays and pedestrian and cycle facilities. Future car ownership levels are likely to be affected by the new tenures and dwelling types and continuing trends towards increased public transport and cycle use. Nonetheless, in terms of the on-street parking bays, it is reasonable to assume that there will need to be a system to ration the allocation of spaces. For instance, if every new household across the FDS applied for a permit, then this would result in 5.4 cars per available on-street space. This may lead to conflict between residents, and complaints to the Highways Team. It is therefore recommended that the legal agreement secures a Parking Delivery Plan.
266. As the Parking Delivery Plan will be an estate wide strategy it will need to be agreed in the first instance for the FDS and would then be agreed for each phase brought forward

under the outline application. The following principles will underpin the detailed strategy which will be reviewed on a phase by phase basis with the FDS representing the first phase.

267. Firstly, no household would be entitled to more than one permit. In most parts of Southwark, households can apply for more than one permit, however, due to the limited availability of on-street parking within the estate, it is proposed that this would be an equitable means of distributing the permits.
268. Secondly, existing Aylesbury residents with a permit will be given priority, particularly as many will be rehoused in new homes on the estate and some of these residents will own cars, and may be reliant on them for work or family reasons. It is therefore proposed that, to avoid these residents being disadvantaged by the move, any relocating residents, who already have an estate permit or garage, should be able to apply for a permit under the new CPZ regime.
269. Parking provision should take into consideration transport for families in accordance with AAAP Policy TP3 'Parking Standards: Residential'. Therefore it will be necessary to restrict the quantity of permits available across the new CPZ by prioritising family units. Regular reviews of permit allocations and parking stress will be undertaken on a phase by phase basis and upon completion of the estate regeneration and will inform any future adjustments to the permit allocation policy.
270. The Parking Delivery Plan will detail the phasing of the new CPZ. The parking density will be regularly monitored and if parking levels are able to cope with a greater allocation this will be decided and amended at the appropriate time. Those residential addresses that are not allocated a permit will be designated car free and unable to receive a council on-street permit.
271. In addition to permit allocation, the Parking Delivery Plan will also detail:
  - The location and design of all on-street car parking spaces;
  - The location and design of loading bays;
  - The location and number of car club bays;
  - Provision of ambulance, doctor and drop off bays;
  - The requirement for any pay and display parking;
  - The design and layout of off-street parking bays;
  - The allocation of off-street parking bays; and
  - The location and timings of the new CPZ including permit allocation.

#### Cycle Parking

272. The level of cycle parking provision within the FDS is outlined in Table 32 below;

Table 32

	FDS Cycle Parking							
	On street	Block 1	Block 2	Block 3	Block 4	Block 5	Block 6	Total
Two-tier cycle stand	0	70	0	0	206	154	12	542



Sheffield cycle stand	40	9	0	21	126	144	156	496
Private cycle parking	68	12	40	62	36	36	0	254
Total	108	91	40	83	368	334	268	1292

273. The cycle parking as proposed will include 40 on street Sheffield Stands for use by visitors. The remaining cycle parking is for use by residents and is provided as a combination of cycle spaces in front gardens (68 spaces) and cycle parking within communal cycle stores which will be split between two tiered cycle parking and Sheffield Stands. Private cycle parking is also provided for each block as cycle stores within the individual ground floor maisonettes.
274. The London Plan cycle standards have been increased since the original submission of the application and now require two cycle parking spaces per two bedroom or larger unit. The FDS was always envisaged by the AAAP as being the densest development site within the Action Area Core and upon initial submission the cycle parking provision was fully policy compliant with both the AAAP and The London Plan. The original cycle parking provision was 1086 spaces and meeting the increased cycle parking standards has been a particular challenge as an additional 264 cycle parking spaces would need to be provided. Following some internal revisions and using a combination of both two tiered and Sheffield Stand cycle parking, an additional 206 cycle parking spaces have been provided and as such the shortfall from the updated London Plan standards equates to 58 spaces which is considered acceptable.

#### Cycle hire

275. Transport for London recommend that a cycle hire docking station should be provided on the FDS with capacity for 30 cycle hire spaces. The applicant is proposing to reserve land on the FDS for the docking station and the final location of this facility will be agreed by condition. Issues in terms of funding for the cycle hire station and wayfinding are still under negotiation between the applicant and Transport for London and will be covered by the S106 Agreement.

#### Cycle strategy

276. As well as providing linkages through the FDS both north/south and east/west, Portland Street is defined as a 'Quietway' by both the council and TfL. A 'Quietway' is a cycle route that links key destinations allowing cyclists to follow backstreet routes, through parks, along waterways or tree-lined streets. These routes are seen as a safer alternative to using main roads and assist in overcoming barriers to cycling by targeting less confident cyclists who want to use low-traffic routes whilst also providing for existing cyclists who want to travel at a gentler pace.
277. The Quietway is proposed to link to the FDS from Burgess Park just to the west of the Portland Street Junction. The Quietway and the junction of Albany Road and Portland Street will be designed by the council in conjunction with the applicant and implemented as part of the development works. This will be secured under the S.278 works that will be outlined in the S106 Agreement.
278. The provision of a 'Quietway' along Portland Street will help encourage cycling as a transport method for future residents as well as existing cyclists travelling through the

area and meets the AAAP and development plan aspirations towards sustainable methods of transport.

#### Car club

279. A total of three car club parking bays will be provided within the FDS. These bays will be on-street and their final location will be agreed by condition. Provision will be made within the S106 agreement to provide three years car club membership for all eligible residents.

#### Public transport

280. Transport for London have requested contributions towards the improvement of public transport routes that will be used by future residents of the FDS. Many bus routes operate between Camberwell Green and Elephant and Castle along Walworth Road which is a short distance from the FDS westwards along Westmoreland Road. Additionally the Number 42 and 343 bus services operate closer to the FDS along Wells Way and Albany Road respectively. Transport for London has indicated that increased capacity will be required on these routes as well as the possibility of the introduction of a new linkage to Elephant and Castle along Portland Street. A sum of £1.25 million has been requested by TfL for this purpose, and this sum remains under negotiation between TfL and the applicant. An update may be provided in the Addendum report, and will need to be agreed under the Mayors Stage 2 referral.

#### Servicing and Waste Management

281. In terms of waste and recycling storage volumes, the FDS will be well served and the details of the waste storage facilities will be secured by planning condition. Loading bays are provided to enable waste collection and servicing to take place without hindering vehicle movements on highways. Some adjustment may be required to the location of some bin stores to ensure they comply with maximum drag distances, and this would be required by condition.

#### Impacts of Demolition and Construction

282. Demolition works are set to commence in Summer 2015 and are expected to take approximately 74 weeks. The build programme for the FDS envisages construction work starting on a phased basis with the initial phase starting in June 2016 and the final phase ending in April 2021.
283. The core working hours have been given as 8am to 6pm Monday to Friday and 8am to 1pm on Saturdays. The demolition and construction works would need to be carried out within these periods at all times. A Framework Construction Environmental Management Plan (FCEMP) has been prepared as has a Construction Logistics Plan (CLP). The structure and scope of the FCEMP is broadly acceptable and a full Construction Environmental Management Plan will be required as a condition and should also include the following mitigation measures;
- procedures for keeping residents informed about demolition and construction activity and the formulation of a complaints procedure;
  - production of a plan for the phasing of the works;
  - informing residents of activities likely to result in disturbance;
  - traffic management, such as details of proposed routes for HGV's travelling to and from the site;
  - the setting of noise, vibration and dust controls;
  - protection of ecological, archaeological and water resources including protection of trees; and
  - the preparation of a site waste management plan, detailing how demolition and

construction waste would be managed, recycled or disposed of.

284. Discussions are ongoing regarding what temporary works will be required during the construction period, in particular works to the junction of Portland Street and Albany Road. This applicant is working with the council and TfL to ensure an adequate temporary solution is delivered prior to the implementation of demolition and construction works so safeguard pedestrians and cyclists using this junction and key junctions in the immediate area. Whilst the Framework Construction Logistics Plan outlined above is acceptable in scope and purpose independent Demolition and Construction Plans will be required by condition.

#### Conclusion on transport

285. The development of the transport aspects of the FDS have been led by the policies of the AAAP which seek to prioritise walking and cycling. This results in an overall improvement in the public realm, improvements to pedestrian and cycling amenity and improvements to safety. The proposal will provide a significant amount of cycle parking, including visitor cycle parking and whilst this falls marginally short of the updated London Plan standards it is considered that the level of cycle parking provision will assist in prioritising cycling as a transport method for future residents of the estate.
286. The level of car parking being provided is within the 0.4 space per unit threshold set out in the AAAP. Policy compliant levels of accessible parking are being provided as well as three car club bays and specialist parking for the Extra Care and Learning Difficulties units. It is acknowledged that on-street parking is unlikely to meet unregulated demand and as such a Parking Delivery Plan will be secured as part of the S106 Agreement that will manage and control permit allocation to ensure adequate relationship between supply and demand. Additionally a new Aylesbury CPZ will be created to ensure that the regeneration of the estate will not have an impact on adjacent occupiers in terms of parking availability as residents parking permits will only be valid within the new estate CPZ.
287. The delivery of a Quietway along Portland Street is a benefit of the proposal and discussions are on-going to ensure that the design of the Quietway and the Portland Street/Albany Road junction, led by the council, will create a safe environment for cyclists. This will be secured as part of the S.278 works in the S106 Agreement along with the TfL contributions and requests that are also still under negotiation.
288. The proposed transport aspects of the FDS meet the aims and aspirations of the AAAP and will create a safe, legible, well connected and welcoming living environment that will seek to minimise the use of cars and prioritise walking, cycling and use of public transport.

#### **Amenity impacts on surrounding occupiers**

289. Saved Southwark Plan Policy 3.2 'Protection of Amenity' seeks to manage development effectively, to ensure amenity impacts on existing and adjoining residents is minimised. Further guidance is contained within the Residential Design Standards SPD.
290. The AAAP also seeks to minimise the impact of the Aylesbury regeneration on adjoining and nearby residents through the detailed design guidance contained within Appendix 6

### Privacy and overlooking

291. In order to prevent harmful overlooking, the Residential Design Standards SPD 2011 requires developments to achieve a distance of 12m at the front of the building and any elevation that fronts a highway and a minimum of 21m at the rear. This requirement is echoed within Appendix 6 of the AAAP.
292. There are three areas where privacy needs to be assessed, namely Bradenham Close, Westmoreland Road and Portland Street. On all of the boundaries of the FDS a minimum 12m distance between any elevation that fronts a highway is being comfortably met. On Westmoreland Road the rear of the dwellings on Phelps Street face onto the FDS however the minimum separation distance here is 24m and as such is policy compliant. Given the design of the FDS and the separation distances at the site boundaries it is considered that there will be no impact on the amenity of any adjoining occupiers in terms of a loss of privacy or overlooking.

### Outlook

293. On the Bradenham Close and Portland Street boundaries the FDS will see the removal of high and long linear blocks and replacement with lower, articulated perimeter blocks that will result in an improvement in terms of outlook as the relentless massing of Bradenham and Chiltern would be removed. On the Westmoreland Road boundary the significant massing of Chartridge House would be removed in favour of lower, terraced housing which again will result in a significant improvement in terms of outlook for adjacent properties. It is therefore considered that there will be no adverse impact on any adjacent occupiers in terms of the creation of a sense of enclosure or loss of outlook.

### Daylight and sunlight

294. The methodology used to carry out the assessment is in accordance with the BRE Guidance (2011) for daylight and sunlight. The assessment has focused on analysis of Vertical Sky Component which considers the potential for daylight at the centre of a residential window. The BRE target is for a window to achieve a VSC of 27% or for it to be not less than 80% of its former value. Any loss above this level (i.e. 20% or more) would mean that there is a noticeable reduction in the amount of daylight received at a given window.
295. As part of the daylight and sunlight assessment the applicants have identified 17 adjacent development plots/buildings that have been assessed using the 25 degree line test and Vertical Sky component.

### 17-21 Westmoreland Road

296. All of the windows within this development plot fail the 25 degree line test. In terms of VSC, the assessment shows that there will be no change from the current levels of VSC achieved at each assessed window. As such, all windows within this block are considered to pass the VSC test.

### 21A-31 Westmoreland Road

297. Of the 24 windows tested on this block, six pass the 25 degree line test. Of the remaining 18 windows tested for VSC there will be an improvement in terms of proposed VSC for each window. As such all windows within this block are considered to pass the VSC test.

### 33 Westmoreland Road

298. On this block of 9 flatted dwellings all of the assessed windows fail the 25 degree line test however there all windows will experience an improved VSC compared to the

existing VSC with the FDS development in place.

Lady Margaret House and 35-49 Westmoreland Road

299. All of the windows assessed fail the 25 degree line test however with the FDS development in place there will be an improvement on all VSC levels compared to the existing situation.

51-61 Westmoreland Road

300. Of the 30 windows assessed a total of 10 fail the 25 degree line tests however, with the FDS development in place, all of these windows will experience improved VSC levels.

St Matthew's House

301. All 78 assessed windows fail the 25 degree line test however, as with the other dwellings along Westmoreland Road, all windows will see an uplift in VSC levels with the FDS development in place and all windows will have a VSC in excess of 27%.

16-29 Westmoreland Road

302. A total of 65 windows have been tested of which 13 pass the 25 degree line test. Of the remaining 52 windows assessed for VSC it is noted that, upon completion of the FDS development there will be a general uplift in VSC levels for all of these windows.

Aycliffe House, Westmoreland Road

303. All 12 of the assessed windows fail the 25 degree line test however the FDS development will result in improved VSC levels for all assessed windows.

2 Bradenham Close

304. A total of 26 windows in this building have been assessed, all of which fail the 25 degree line test. With the FDS development in place, all 26 windows will experience an improvement on their existing VSC levels.

3-4 John Crane Street

305. All four windows assessed fail the 25 degree line test however they will all experience an improved VSC once the FDS development is in place.

Roffo Court, Bradenham Close

306. All 32 assessed windows fail the 25 degree line test. In terms of VSC, two windows will experience no change and 32 will experience an improved VSC once the FDS development is in place.

Hitard Court/Southwark Resource Centre and Totters Court, Bradenham Close

307. Of the 15 windows assessed none pass the 25 degree line test whilst all windows will experience an improved VSC as a result of the FDS development.

62-79 Gayhurst (Portland Street/Westmoreland Walk)

308. All windows pass the 25 degree line test.

1-13 Gayhurst (Hopwood Road/Westmoreland Walk)

309. 24 windows have been assessed and whilst none of them pass the 25 degree line test 16 will have no change in VSC whilst eight will experience a minor improvement in VSC with the FDS completed.

80-94 Gayhurst(Albany Road/Westmoreland Walk)

310. Of the 16 windows assessed, none will pass the 25 degree line test however all of them will see improved VSC levels upon completion of the FDS.

Conclusions on daylight

311. None of the windows assessed on any properties adjacent to the FDS will experience a loss of VSC and, indeed most windows will have an improved VSC once the existing buildings on the FDS have been demolished and the new buildings are completed. As such the FDS is considered to comply with BRE guidance in terms of daylight.

Sunlight

312. In considering the impact of the completed development on sunlight, an assessment of Annual Probable Sunlight Hours (APSH) has been undertaken. This takes into account the amount of sun available across the year and during the winter months for each window that faces 90 degrees of due south. The guidance states that at least one window to a main living room should receive at least 25% of annual probable sunlight hours and at least 5% of sunlight hours during the winter. If a room has two windows on opposite walls the annual probably sunshine hours can be added together.
313. Of 335 windows, tested, 17 windows fail to meet the minimum APSH requirement. Of these 17 windows, one will experience no change from the existing situation whilst the remaining 16 will see an overall improvement in APSH. In terms of sunlight impacts, the proposed development is considered acceptable.

Disturbance

314. Demolition works are estimated to last for 74 weeks with construction taking place on a phased basis with the end phase completing in mid 2021.
315. The core working hours have been given to be 8am to 6pm Monday to Friday and 8am to 1pm on Saturdays. The demolition and construction works would need to be carried out within these periods at all times. A Framework Construction Environmental Management Plan (FCEMP) has been prepared as has a Construction Logistics Plan (CLP). The structure and scope of the FCEMP is broadly acceptable and a full Construction Environmental Management Plan will be a conditioned requirement of any consent issued and should also include the following mitigation measures;
- procedures for keeping residents informed about demolition and construction activity and the formulation of a complaints procedure;
  - production of a plan for the phasing of the works;
  - informing residents of activities likely to result in disturbance;
  - traffic management, such as details of proposed routes for HGV's travelling to and from the site;
  - the setting of noise, vibration and dust controls;
  - protection of ecological, archaeological and water resources including protection of trees; and
  - the preparation of a site waste management plan, detailing how demolition and construction waste would be managed, recycled or disposed of.
316. With these mitigation measures in place it is considered that there would be no long term impacts for neighbouring occupiers in terms of disturbance as a result of the proposed development.

### Lighting

317. Details of any external lighting should be submitted by condition. This is to ensure that any of the surrounding residential properties, especially those located to the west of the site on Bradenham Close do not experience any light pollution as well as light pollution within the access streets. Careful consideration should be given to the type of lighting along the access streets to avoid street clutter and interference with retained and proposed trees.

### Air quality

318. The application site falls within an Air Quality Management Area. The main air quality pollutants of concern are nitrogen dioxide (NO<sub>2</sub>) and particulate matter (PM<sub>10</sub> and PM<sub>2.5</sub>) which arise through road traffic emissions associated with changes in the traffic volume, vehicle speed, and fleet composition at the road network in the local area, and from emissions arising from the proposed energy centres (NO<sub>2</sub> only). The demolition and construction have the potential for the release of dust and particulate matter.
319. The air quality assessment undertaken as part of the ES detailed that there would be a potential impact on air quality during the demolition and construction phases however this could be reduced through good site practice and implementation of mitigation measures. The overall impact of the FDS on air quality in terms of demolition, construction, operation and traffic was assessed to be of negligible significance.

### Telecommunications

320. A combination of a desk study and site visits identified that the FDS and surrounding area receive adequate broadcasts from the Crystal Palace Transmitter which is located to the south. During the construction phase there may be temporary interference due to the use of tower cranes. Once complete, properties to the north of the FDS may continue to experience some interference although mitigation measures should restore signals. The impact on radio signals is expected to be negligible and satellite signals will remain unaffected.

### Wind

321. The FDS development includes several tall buildings which can result in significant micro-climatic impacts particularly in terms of wind. The pedestrian comfort and safety of the FDS has been assessed using the Lawson Criteria which details thresholds for everyday activities and the wind levels beyond which conditions may be described as unacceptable for a particular activity. The criteria set out that less active pursuits require more benign wind conditions. Unacceptable results require mitigation and remedial action to ensure the safety of pedestrians.
322. A qualitative assessment of the likely impacts during the demolition and construction phases has been undertaken. Wind microclimate impacts are typically highly localised and therefore the impact is likely to be negligible or, if negative, temporary. In terms of the completed FDS development the pedestrian comfort and safety at ground level is expected to be suitable for all intended uses with the same good conditions expected on roof areas and balconies. In terms of public realm and private amenity spaces surrounding the FDS there are no significant impacts expected and as such no mitigation measures are required.

### Noise and vibration

323. Temporary noise and vibration effects during demolition and construction have been assessed and impacts of mostly minor negative significance are anticipated following the implementation of mitigation measures. Occasional effects of moderate to major

negative significance are likely to occur during some activities when works are at their closest to sensitive receptors although vibration is likely to be of mostly minor negative significance. The increase in road traffic during the demolition and construction phase is considered to be negligible and there would be no change in road traffic noise during the operational phase of the development.

324. Noise impacts from plant on the completed development are anticipated to be negligible provided that care is taken in the selection, location, installation and attenuation of the fixed plant in order to ensure that noise emission criteria are achieved.

### **Ecology and nature conservation**

325. An Ecological Desk Study was completed to collate the baseline data and an Ecological Impact Assessment was carried out comprising the results of the baseline surveys used in conjunction with the Scoping Opinion Consultee Responses, information on scheme design to assess the likely ecological effects of both the FDS and the Site Wide Development Option (SWDO) during both the construction and operational phases. Extended Phase 1 Habitat Surveys were undertaken between 23rd June and 2nd July 2014.
326. The site does not fall within the boundaries of any designated statutory or non statutory sites however Burgess Park is located less than 10m away from the southern boundary of the FDS and is considered to be a Grade II Site of Borough Importance for Nature Conservation (SBINC). Surrey Square Park is considered to be a Site of Local Importance for Nature Conservation (SLINC) and whilst this will be relevant in the assessment of the SWDO it is considered to be located a sufficient distance from the FDS to ensure there will be no impact.
327. The FDS is a highly urbanised site with limited habitat of nature conservation value. The existing buildings on site have low-negligible potential to support roosting bats however Arklow house has features assessed to have moderate potential to support roosting bats. Automated detectors recorded bat activity (common pipistrelle) close to Arklow House consistently over a period of four days in August 2014 suggesting bats were roosting very nearby. However, manual surveys completed in September 2014 recorded very low bat activity with no bats returning to roost in the building. This indicates the absence of a roost at Arklow House with reasonable confidence.
328. Given the automated survey results, the presence of a small, non breeding roost used sporadically was assumed. The removal of a habitat could have a significant impact on bats due to a reduction in potential roost resource and temporary reduction in foraging and commuting habitat. As such a combination of seasonal timing of works, appropriate working methods and replacement of roosting opportunities is proposed to avoid negative impacts on this species group. It is therefore considered that the impact of the FDS (demolition and construction) on bats will be of negligible significance.
329. Habitat removal in the absence of mitigation during the breeding bird season could have direct, negative effects upon nesting birds of significance at the site. In order to avoid this appropriate seasonal timing of works and methods is proposed and as such the potential impacts are considered negligible.
330. Once the development has been completed, new landscaping would be laid, including new amenity areas, new planting (both native and non native) and green roofs would be planted. The proposed landscape strategy could have a residual impact of minor



positive significance.

331. The council's Ecology Officer has reviewed the application and considers the proposals to be acceptable, subject to conditions.

### **Socio Economics and Population Effects**

332. The demolition and construction phases are expected to generate approximately 184 full time jobs which would be expected, in part, to be filled by workers from the local area. There would be additional benefits generated as a result of these workers being employed in the area through the increase in spending which in turn may result in the creation of further jobs. The construction phase of the development would therefore have an overall short-term temporary minor to moderate positive effect at Borough level.
333. Child yield can be used to gain an understanding of the likely effects on school capacity. The anticipated child yield is expected to be similar to the number of children currently living on the FDS. As part of the AAAP there are already planned increases in school capacity to meet the increased demand for school places so the overall effect is considered to be negligible.
334. The local area is well served by GPs and dentists however as a result of the increase in the number of people living in the FDS, the impact on the availability of local healthcare is considered to be negligible to minor negative. It is noted that a new healthcare facility would be provided on the Outline Scheme, providing mitigation to the SWDO.
335. The FDS will provide for 830 dwellings across a range of housing types and tenures and will therefore provide a range of housing and the effects of this will be direct, long term, permanent and minor positive at borough level.

### **Ground Conditions, Hydrogeology and Contamination**

336. The FDS site currently comprises residential flats with some garages and courtyard parking areas. The FDS is considered to be of moderate environmental sensitivity due to underlying aquifers (both secondary and principal).
337. Environmentally sensitive land uses in and around the site include adjacent residential properties and park land. The nearest surface water feature is a lake within Burgess Park. Some existing sources of contamination have been identified onsite relating to the former and current redevelopment of the site, the potential presence for unexploded ordnance, numerous electricity sub-stations and former historical land uses. Asbestos is present in the district heating network and may also be present in the Made Ground that resulted from previous demolition works.
338. The main effects identified relate to the impacted Made Ground, generation of elevated ground gas concentrations and potential for impacted perched groundwater which may impact upon controlled waters and human health receptors as well as the previously identified asbestos. During construction works the potential impacts include fuel and chemical storage and use of plant with the potential for fuels and oils to enter the areas of perched and shallow groundwater.
339. Further assessment will be undertaken and appropriate gas mitigation measures will be incorporated in the building design and construction. A monitoring and maintenance

plan will be undertaken prior to redevelopment to confirm levels of ground gas beneath the FDS and any contamination within the groundwater. Adoption of the recommended mitigation measures will prevent pollution and promote sustainable development through the improvement of contaminated land. Long-term residual effects on ground conditions could arise from ground gas migration to residential properties from the remaining Made Ground however, providing the appropriate mitigation measures are installed as part of the building design there will be a limited effect to future residents. New potential contaminant pathways may be created resulting in the risk of impacted perched water to migrate into the Secondary (A) Aquifers although, this is considered a limited risk and further site investigation and monitoring will be undertaken to confirm this is not the case. This is considered to be of negligible significance following the implementation of mitigation measures.

### **Water Resources, Water Quality, Flood Risk and Drainage**

340. This assessment has been undertaken to determine the potential effects of the FDS development on hydrology, drainage and Flood Risk. The potential effects can be summarised as:
- Potential increased surface runoff;
  - Potential increase of flood risk; and
  - Potential contamination of water resources.
341. A Construction and Environmental Management Plan will be put in place and will control all demolition and construction activities, including surface water management. This will detail the procedures and methods that must be followed to minimise potential environmental effects.
342. Currently the majority of the FDS Application site surface water runoff off coveys either directly or indirectly into existing combined sewers. The FDS will be designed to emulate the existing drainage arrangement. Betterment will be built into the proposed drainage by limiting the discharge to a minimum of 65% less existing brownfield discharge rates.
343. The FDS will incorporate SUDS techniques in order to attenuate surface water at source, regulate flows and volumes and provide water quality and biodiversity enhancement. The SUDS devices will also be supplemented with traditional pollution control measures to prevent detriment in terms of water quality to receiving receptors.
344. Existing surface water flow routes currently routed through the FDS from offsite third parties will be maintained. Following the implementation of the recommended mitigation measures, no significant residual effects in terms of hydrology, drainage or flood risk are anticipated during demolition, construction or operation.
345. Whilst located within a flood risk zone, the Environment Agency is satisfied with the FDS proposals subject to conditions. Various other conditions will also be imposed regarding drainage, SUDS and groundwater contamination.

### **Planning obligations and S106 Agreements**

346. Saved Policy 2.5 of the Southwark Plan and Policy 8.2 of the London Plan advise that planning obligations can be secured to overcome the negative impacts of a generally acceptable proposal. Saved Policy 2.5 of the Southwark Plan is reinforced by the recently adopted Section 106 Planning Obligations 2015 SPD, which sets out in detail

the type of development that qualifies for planning obligations. Strategic Policy 14 'Implementation and delivery' of the Core Strategy states that planning obligations will be sought to reduce or mitigate the impact of developments The NPPF which echoes the Community Infrastructure Levy Regulation 122 which requires obligations be:

- necessary to make the development acceptable in planning terms;
- directly related to the development; and
- fairly and reasonably related in scale and kind to the development

347. Following the adoption of Southwark's Community Infrastructure Levy (SCIL) on the 1<sup>st</sup> of April 2015, much of the historical toolkit obligations such as Education and Strategic Transport have been replaced by SCIL. The Infrastructure Tariff identified in the Aylesbury Area Action Plan, is also replaced by SCIL and the where appropriate the remaining S106. Only defined site specific mitigation that meets the tests in Regulation 122 can be given weight.

348. After detailed evaluation, the following table sets out the required site specific mitigation and the applicant's position with regard to each point.

Planning Obligations		
Planning Obligation	Mitigation	Applicant position
Employment during construction	Target of: 49 apprentices, 146 unemployed Southwark residents supported into 26-week jobs and 81 Southwark residents receiving pre/post employment training.	Agreed
Child Play equipment	Delivery on site of new open spaces including play facilities. An additional contribution of £78,369 towards play for older children in Burgess Park is required due to the shortfall in play space for this age group..	Agreed
Transport site specific	The applicant will be delivering improvements to Albany Road, new footways including crossing points and street furniture, new streets around all blocks as well as Quietway along Portland Street.	Agreed
Transport for London	Transport for London has requested contributions of £35,000 towards wayfinding and £1.25m for bus improvements.	Sum remains under negotiation
Public Realm	Delivery of Westmoreland Square, Westmoreland Park and Portland Park as well as the landscaped streets and improvements to Portland Street and Albany Road.	Agreed
Health	The wider Outline scheme will deliver a new Health Centre which will also serve the FDS. The S106 Agreement will secure this and allow for the payment to be made if the facility is not delivered.	Agreed
Cycle Hire	Provision of 1 station with 30 docking bays. The reservation of land for the cycle hire station has been accepted. The required financial contribution of £100,000 for implementation and maintenance still under discussion with the	Financial contribution remains under negotiation

	applicant and TfL.	
Car Club	Provision of 3 car club bays and 3 year membership for each eligible resident.	Agreed
Trees	Not specifically required for the FDS unless highways issues prevent some of the proposed re-planting in which case contribution will be sought for new trees in Burgess Park or Camberwell Road to mitigate the lost canopy cover within the FDS.	TBC
Community facilities	On site provision of 263sqm of community space.	Agreed
Administration charge (2% of financial contributions)	£1,567.	Agreed

#### S106 provisions

349. The S106 Agreement will also secure the affordable housing units as well as the standard of fit out and marketing period for the wheelchair accessible homes and an Estate Management Plan. The contributions and in lieu works detailed in the table above will also be secured under the S106 Agreement alongside any S.278 Highways works and amendments to the traffic management order. The Parking Delivery Plan will be included as an obligation within the S106 and will need to be formally approved by the council.
350. In the event that an agreement has not been completed by 31 July 2015, the Committee is asked to authorise the Head of Development management to refuse permission, if appropriate, for the following reason:
351. “In the absence of a signed Section 106 Agreement, there is no mechanism in place to avoid or mitigate the impact of the proposed development on affordable housing, public realm, health, children’s play, transport network, community facilities or employment and the proposal would therefore be contrary to Saved Policy 2.5 'Planning Obligations' of the Southwark Plan and Policy 14 - 'Implementation and delivery' of the Southwark Core Strategy, the Southwark Supplementary Planning Document 'Section 106 Planning Obligations' 2015, and Policy 8.2 Planning obligations of the London Plan.”

#### Community Infrastructure Levy (CIL)

352. S143 of the Localism Act 2011 states that any financial sum that an authority has received, will, or could receive in the payment of CIL is a material “local financial consideration” in planning decisions. The requirement for Mayoral and Southwark CIL is a material consideration. However, the weight to be attached to a local finance consideration remains a matter for the decision-maker.
353. Mayoral CIL is to be used for strategic transport improvements in London, primarily Crossrail. The levy is applied to all developments at a rate of £35 (plus indexation) per square metre in Southwark. Southwark CIL in this location has a residential rate of £50 per square metre, £125 for retail and zero for other proposed uses. SCIL is to be used for infrastructure that supports growth with a Southwark commitment to spend at least 25% locally.

#### Southwark Community Infrastructure Levy (SCIL)

The total existing floorspace on the FDS equates to approximately 54,747sqm. The

total proposed floorspace is 81,432sqm. Provided that the existing buildings on the FDS remain in use for at least 6 months within the 36 months prior to implementation, the existing floorspace can be deducted from that proposed to give a figure of 26,685sqm. It is also necessary to remove the D Class floorspace as this is not chargeable floorspace on either Mayoral or Southwark CIL, as such the estimated chargeable uplift in floorspace is 26,410sqm. This would incur a charge of £1,320,500.

354. Mayoral Community Infrastructure Levy

In accordance with London Plan Policy 8.3 the Mayoral Infrastructure Levy (MCIL) came into effect on 1 April 2012. All new developments that create 100sqm or more additional floorspace are liable to pay MCIL which is charged at £35 per sqm (indexed at current £40.02 per sqm). Based on the uplift in floorspace, a Mayoral CIL payment of approximately £1,056,928.

**Sustainable development implications**

355. AAAP BH6: 'Energy' sets out the requirement for energy supply to be generated by a District Combined Heat and Power Network. Policy BH6 states that the energy supply for the action area core should be generated by combined heat and power (CHP). The CHP plant should be part of an energy centre located immediately south of the junction of Thurlow Street and Inville Road and appropriately sized to accommodate plant required to deliver services to the development including the FDS. The redevelopment of the action area core should result in zero carbon growth. All developments within the action area core, including the FDS must connect to the CHP system. Developments completed prior to the implementation of CHP should be designed so that they can switch to the CHP once it is available.
356. The AAAP also expects all homes within the Action Area Core to achieve Code for Sustainable Homes Level 4 as detailed in policy BH7: 'Sustainable design and construction'. Code for Sustainable Homes has recently been rescinded as the environmental performance of new homes will now be covered by Building Regulations.
357. The AAAP also specifies that developments should meet the London Plan target of a 20% reduction in CO2 emissions through the use of renewable technologies. Until such time as the CHP is fuelled by renewable energy sources and is capable of meeting the London Plan target, the AAAP requires developments to use their own CHP compatible on-site renewable energy technologies.
358. The Core Strategy and the London Plan also state that there is a presumption that all major development proposals will seek to reduce carbon dioxide emissions by at least 20% through the use of on-site renewable energy generation wherever feasible. In addition, the London Plan expects developments to achieve a total reduction in carbon dioxide emissions of at least 35% against Part L of the 2013 Building Regulations. Strategy Policy 13 also requires developments to achieve a minimum Code for Sustainable Homes standard of 'Level 4' and a BREEAM standard of 'Excellent' (or 'Very Good' for community facilities).
359. The Estate is currently served by a central community heating network which provides heating and hot water to existing dwellings. The boilers and pipework which serve the network are in need of replacement owing to their age and general condition and the need to meet more stringent energy standards.

360. The average energy use in the Aylesbury Estate is greater than neighbouring houses and flats in surrounding estates. The SAP rating is lower for the estate and the average flat produces more carbon dioxide annually. The Estate itself draws heating from a gas (with oil back-up) district heating system with a single energy centre at the junction of Thurlow Street and Inville Road. The heating system has become more reliable recently due to upgrades to pipework and other pieces of equipment. Electricity is provided from the grid via aging electricity substations distributed around the site.
361. A combined heat and power plant (CHP) is proposed that would replace the existing communal system for the entire Aylesbury FDS and Outline Scheme. Whilst the AAAP envisaged a single energy centre being provided, the proposal is for an Energy Centre within Block 5 of the FDS with another energy centre being located close to the Albany Road/Thurlow Street junction as part of the Outline Scheme.
362. The provision of a CHP led district heating network (DHN) is compliant with policy BH6 and will significantly reduce carbon emissions associated with the development and contribute to the aspiration to deliver zero carbon growth. The CHP system will prove the most cost effective way to reduce energy consumption. The use of a CHP will deliver 32% carbon dioxide savings.
363. The applicant is also employing a 'Be Lean, Be Clean, Be Green' energy strategy in line with the London Plan. As part of the Be Lean measures the development will employ high performance building fabric, high performance glazing, 100% low energy lighting, improved air tightness, green roofs and recessed fenestration that will help to deliver an additional 3.44% carbon dioxide savings.

#### Renewable energy

364. As stated above, there is an expectation in the London Plan and Core Strategy that developments will achieve at least 20% of the carbon savings through the use of renewable energy technologies. This is echoed in BH6: 'Energy' of the AAAP.
365. Photovoltaic panels are proposed for the areas of roof that will achieve enough sunshine to make them viable. Currently this stands at 697sqm. It is acknowledged that this represents a small proportion of the available roof space across the FDS however, as a result of the townscape requirements that sought taller buildings on the park edge with heights reducing incrementally northwards, much of the remaining roof space is overshadowed by the taller elements to the south. The proposed photovoltaic panels will achieve a 3.72% carbon dioxide saving and whilst it is accepted that this falls far short of the 20% target it is accepted that this is an ambitious target to meet in a highly urbanised area.
366. Taken together the Be Lean design principles, the district CHP and the photovoltaic panels will result in a combined saving of 36.81% over the 2013 Building Regulations and this is considered to be a positive aspect of the scheme. Whilst Code for Sustainable homes has been rescinded it is worth noting that all homes within the Action Area Core would have achieved level 4 which indicates a good level of environmental performance. A condition will be imposed to secure a 'Very Good' BREEAM level for the community centre.

#### **Conclusion on planning issues**

367. This planning application, together with the wider Outline application, is a major milestone in the regeneration of the Aylesbury estate. The fundamental failings of the estate design, with its monolithic blocks and poor pedestrian environment, the limited

range of housing types and lack of integration with the surrounding area, meant that refurbishment could never secure an acceptable long term sustainable future for the area. The AAAP aims to create a mixed tenure area, with a range of good quality housing types, open spaces and community and work spaces, all clearly linked into the surrounding streets: a neighbourhood rather than an estate. The FDS would be the first parcel delivered by NHHT as the council's development partner, and would act as a demonstration of the aspirations for the wider masterplan.

368. The adopted AAAP is the key planning policy document for the area and has very significant weight in determining applications. Any application which complies with the AAAP, and provides a sustainable form of development, would under the NPPF be presumed to be acceptable, unless any significant adverse effects of the proposal were identified.
369. The FDS site was always envisaged as one of the highest density parcels within the AAAP core area, with an estimated capacity in the Plan of 880 new dwellings, together with retail shops. It was clear early in the design process that it would not be possible to achieve this number of units without compromising either the quality of the accommodation or the attractiveness of the townscape. The council also added a new requirement to provide Extra Care flats, and flats specifically tailored to the needs of adults with learning difficulties. These are priority needs for the council, and including them within the Aylesbury development ensures that the area can cater for a wide range of housing needs, including more vulnerable people, creating a diverse community. The application does not provide the retail space expected under the AAAP, but given the vacant units on the Phase 1A site on Westmorland Road, and the need to support the shopping centre on Walworth Road, this is acceptable, and there is sufficient flexibility in the wider masterplan to cater for any additional retail demand. With these special considerations taken into account, the land use mix and quantum is considered to comply with the objectives of the AAAP.
370. The layout provides a clear structure, with a grid of streets onto which the new dwellings face. This allows for good permeability, and a safe and legible pedestrian and cycling environment. The layout adjusts the position of the Westmorland Road portion of the 'Community Spine' to improve the link to Walworth Road and maintain broadly the existing alignment; this retains existing trees and is considered a positive adjustment to the AAAP illustrative masterplan. It does not include the 'Green Finger' suggested by the AAAP; instead the application includes three separate public spaces, each with a clear function. A similar approach was taken elsewhere on the masterplan. The location of the spaces was selected to enhance key routes, provide places for community interaction, and to retain key trees. As such, the layout is considered to comply with policies MP1 'The masterplan' and PL1 'Street layout' of the AAAP, and the adjustments to the AAAP masterplan have been beneficial.
371. The distribution of density on the site complies with the requirements of policy BH2 'Density and distribution of homes' in that it places the higher densities along Albany Road fronting Burgess Park, with lower densities near to the surrounding residential areas. The overall density is within the range expected under policy BH2, and is considered to optimise the use the land.
372. AAAP policy PL4 'Building heights' expects buildings along Albany Road, Portland Street and their hinterlands to be mostly between 7 and 10 storeys, with two local landmark buildings of 10-15 storeys on this frontage. The scheme includes 3 taller buildings on the Albany Road, two of which exceed the height specified in the AAAP.

However, these buildings have been tested in local and strategic views, and are seen in the context of the open space of Burgess Park to the south. Their slim footprint means that they are more positive on the skyline than the existing Bradenham and Chiltern blocks, and their detailed design is high quality. The intervening mansion blocks fronting Albany Road are lower than envisaged in the AAAP (being mainly 6 storeys) and this creates more contrast and distinctiveness for the taller buildings. As such, the distribution of building heights, and the number, height, and design quality of the tall buildings is considered to be acceptable notwithstanding the deviation from policy PL4.

373. The layout provides perimeter blocks and terraces of houses, which directly face the new streets with frequent entrance doors to provide an active street frontage. Brick is the predominant facing material, and the buildings are arranged as a series of distinct blocks to create a varied street scene, and use traditional proportions and a range of balcony types to add interest to the facades. All units have small front garden areas to provide some privacy, and the community building has a clear entrance and entrance to clearly identify it as a public building. The design meets the requirements of policies PL2 'Design principles and PL3 'Building block types and layout'.
374. The development will provide a wide range of housing types and sizes, although the proportions do not accord precisely with the mix set out in the AAAP. There is a small shortfall in the number of houses, and a larger shortfall in the number of maisonettes. There is also a shortfall in the number of 3 bedroom units. Given the changed brief for the site, namely the requirement for extra care flats, and the fact that all ground floor frontages are lined with maisonettes or houses, this is considered acceptable. The number of very large houses, including houses at social rents, is a positive aspect of the application. On balance, the application is considered to accord with the requirement for a mix of housing types, and given that this is one of the highest density plots in the masterplan, the mix is acceptable, having regard to policies BH4 'Size of homes' and BH5 'Type of homes'.
375. There is a small net loss of affordable housing when measured in habitable rooms or units. However, if both the FDS and outline application were to be approved and implemented, then there would be full re-provision of affordable housing as measured in habitable rooms. Given the nature of the partnership agreement, this is considered acceptable, and the GLA have confirmed that this satisfies their requirements. 51.3% of the new housing of the FDS (measured in habitable rooms) would be affordable, and of this, 75% would be provided as social rented (or in the case of 27 units, affordable rented) housing. This is slightly below the 59% affordable housing expected in Phase 1 under the AAAP, but this will in due course be balanced by higher proportions of affordable housing in later phases, providing 50% affordable housing overall. As part of a comprehensive restate regeneration programme, this approach is considered acceptable, and in line with the overarching expectation in policy BH3 'Tenure Mix'. Importantly, the majority of the affordable housing is provided at social rent levels, thus ensuring they are genuinely affordable to those in housing need, and includes a range of types and sizes, including a high number of larger family houses, and wheelchair houses. The remaining 25% affordable housing will be provided as intermediate tenures, including shared equity homes, as required by the AAAP to diversify the range of housing tenures available locally. This is a major benefit of the scheme, as is the distribution of the affordable housing, across blocks and designed to be 'tenure blind'.
376. The social rented units are larger than London Plan and general Southwark-wide standards, in line with the AAAP requirement that rented units should reflect the larger



flats sizes that the current tenants enjoy. The intermediate units are also generous, and all units meet the space requirements of the RDS where this exceeds the AAAP space standards. The proportion of dual aspect flats is just below the AAAP target of 75% but all have attractive outlooks with most having a view of a green space. All units have balconies, terraces or private gardens at sizes consistent with the AAAP requirement. The flatted blocks also benefit from generous communal courtyard gardens.

377. The scheme provides on site parking in two courtyard blocks, with on street parking integrated into the tree-lined streets. The availability of parking permits for the on street spaces will need to be managed to avoid parking stress, but the level of parking is consistent with the AAAP maximum of 0.4, and the objective of creating streets which prioritise the pedestrian and cyclist. Car club bays have been included for those who do not own a private car.
378. The development would necessitate the loss of a number of trees; whilst none are subject to Tree Preservation Orders, a number do have amenity value, including 2 Grade A specimens. The location of the existing trees would preclude the ability to create streets with well defined frontages, and a number of trees are at raised root levels which means they could not be retained whilst creating a easy public routes. On balance, the scheme is considered to maximise the possible tree retention, and design changes were made to retain additional trees. The proposed new tree planting, including street and garden streets, has been selected for its biodiversity value and year round interest, and includes native species. This will ensure negligible loss of canopy cover, which is acceptable in line with London Plan Policy 7.21 'Trees and Woodlands', and ensure trees with prospect of being vigorous and long-lived, adding to the overall sustainability of the development.
379. The CIL and s106 contributions would support the infrastructure needs of the development. These are in line with the expectations in the AAAP, updated in line with more recent legislation and policy.
380. The ES identified no significant adverse impacts which could not be mitigated through detailed design or conditions. The development would not harm the amenities of neighbouring occupiers in terms of daylight or privacy, and would protect and enhance the setting of nearby heritage assets.
381. In conclusion, the scheme is considered to be a positive response to the AAAP objectives and will provide a range of types and sizes of new homes to expand housing choice. It will provide both specialist and general needs housing, and the design and space standards mean that these will be attractive homes. The affordable housing, whilst marginally short of full re-provision of the existing, comprises over half of the new stock, and most are at social rents ensuring they are truly affordable. The mix and quality of the new affordable housing significantly exceeds the existing, with a much larger number of attractive family housing. The tenure split complies with the AAP and the introduction of intermediate housing brings units to the reach of families aspiring to home ownership.
382. The scheme provides a sustainable form of development, in line with NPPF. It is therefore recommended that planning permission be granted, subject to conditions, and the mitigation provided through the s106 agreement.

## Community impact statement and equalities considerations

383. In line with the council's Community Impact Statement the impact of this application has been assessed as part of the application process with regard to local people in respect of their age, disability, faith/religion, gender, race and ethnicity and sexual orientation. Consultation with the community has been undertaken as part of the application process and the main impacts have been assessed in the main body of the report.
384. As well as the comprehensive consultation process that took place as part of the AAAP preparation, the applicants have also undertaken a detailed and varied consultation process in prior to the submission of the detailed and outline planning applications.
385. This consultation, publication and feedback process took place between March 2014 and August 2014 and comprised a mixture of public exhibitions, public workshops, presentations outreach and education programmes and Notting Hill Housing Trust development visits. Publicity was varied, using press adverts, flyers, posters and internet.
386. Section 149 of the Equality Act 2010 states that the council must, in the exercise of its functions, have due regard to the need to—  
(a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;  
(b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;  
(c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
387. An Equalities Impact Assessment was carried out of the as part of the preparation of the AAAP and this assessment has been a material consideration in the assessment of this application.
388. Redevelopment of an estate the size of the Aylesbury with residents in-situ, will have substantial direct and indirect, long term implications for a large number of residents and small local businesses as well as short and medium term effects during the construction of estate. The estate's proximity to Burgess Park and the proposal to provide a network of parks, social infrastructure as well as cycling infrastructure and improved bus reliability has the potential to provide opportunities for improved leisure facilities, health facilities, transport access and access to the employment opportunities available in the north of the borough. Implementation of the AAAP through phased development therefore has the potential to impact on individuals or groups at different parts of the project, the considerations of which have been detailed within the assessment of this report.
389. Consideration has been given to both the FDS and outline application and the proposed programme of implementation and whether not it will discriminate against any particular individuals or groups. The ES has informed this assessment as well as the supporting documents submitted in connection with this application.
390. The key equalities issues identified in the AAAP EQIA can be summarised as:
391. Development phasing: In particular the re-housing of existing residents and relocation of other non-residential use and services within the estate. It was concluded that it

would be beneficial if the phasing of development minimises the disruption of social groupings and localised communities for existing residents on the estate.

392. The phasing has been structured to reflect considerations set out in the AAAP and is seeking to:
- Minimise the number of moves for residents;
  - Minimise the number of residents that move off site;
  - Allow those residents who move off site to have the right to move back into the estate at a future date should they want to, where possible;
  - Provide a range of housing types within each phase including low-rise houses and medium and high-rise flats.
  - Protect the health and well-being of existing and new residents by minimising disruption, maintaining security and ensuring that all redeveloped sites adhere to good place making principle during construction;
  - Try to keep the community together as much as possible;
  - Parcel up sites so that new development will form complete urban blocks to create a higher quality living environment and minimise disruption to the community associated with construction;
  - Seek to bring forward as early as possible sites where there is potential for a large uplift in the numbers of new homes provided;
  - Provide good access to community facilities throughout the regeneration process by delivering early community facilities and then phasing more facilities, shops and employment space over the course of the redevelopment.
393. Both the FDS and outline scheme are consistent with the phasing the development established in the AAAP and will provide a range of housing types and tenures aimed at existing Aylesbury residents and is seeking to provide community facilities early within the development programme ensure the necessary social infrastructure is in place to support the new neighbourhood. Officers note that a community resource centre has been delivered on Site 1A and community provision has also been made within the new Michael Faraday School. Additionally a community space will be provided as part of the FDS development that will assist a community in transition. The overall equalities impact is therefore broadly considered likely to be positive across all groups in terms of the approach to the delivering development.
394. Housing referencing - The process by which the housing needs and preferences of each tenant and leaseholder household on the Aylesbury Estate are discussed and assessed.
395. This will remain a key consideration over the lifetime of the regeneration programme and the applicant is working with the council to ensure decisions are fair and will not discriminate against individuals or groups. The applicant has made provision for both existing social rented tenants and leaseholders as part of a rehousing strategy which is supported. The overall equalities impact is therefore broadly considered likely to be positive across all groups and will be regularly reviewed as the regeneration programme progresses.
396. Maintaining effective housing management - As parts of the area are being rebuilt there will be a particular need to ensure that public and private services are delivered well to maintain a high quality of life. This will include basic environmental services – including keeping the area clean, ensuring community safety, and enabling community facilities including schools to function well.

397. An effective housing management strategy co-ordinated with a maintenance plan, a comprehensive community safety strategy and a health plan will be required to ensure the key considerations associated with maintaining effective housing management is addressed as the regeneration moves into the development phase. Strategies will be required to be provided with each phase of redevelopment as the regeneration programme advances. The applicant is committed to regular liaison with local groups as part of the demolition and construction programme providing regular updates about how the development will impact on local residents and what mitigation will be in place to minimise environmental effects. Arrangements to ensure coordinated and effective area management will be secured as part of the legal agreement which takes account of all groups.
398. Housing/density– Residents are highly diverse in terms of ethnic composition with 67% of them belonging to a minority ethnic group. Around 21% of them are over 60 years of age (compared with 14% across Southwark). There is also a relatively high proportion of lone parent households.
399. Very high standards for all new housing is proposed delivered as part of the FDS application. All new homes will be designed to Lifetime Homes Standards and will be flexible enough to meet the changing lifetime needs of residents. This will prevent residents from having to move as their housing requirements change and will help to ensure that a sense of community is maintained amongst a long-term resident population.
400. There will be a range of housing types on the FDS with at least 10% of all new homes being designed to meet the needs of vulnerable groups such as wheelchair users and the elderly including specialised supported housing for people with learning difficulties. New homes will also be tenure blind with no visible difference between affordable and private housing. All tenures will be of the same high standards of design which will help to eliminate discrimination and promote community cohesion and good relations between different groups. The overall equalities impacts are therefore broadly considered likely to be positive across all groups.
401. Transport- Temporary diversions, particularly along Albany Road may impact on public transport and could lead to an increase in private car journeys, particularly for vulnerable groups.
402. Minimising severance and the impact of construction works is an important aspect of the regeneration programme. Demolition and Construction Environmental Management Plans will be secured in order to minimise transport impacts.
403. Community Facilities and other socio-economic infrastructure - The increase in population will increase the need for provision of community facilities in the area. A community space is being provided as part of the FDS which will assist the transition of the later phases of the regeneration and will help to build community cohesion. The development will lead to new high quality homes across a range of tenures with employment opportunities during the construction phase of the FDS and wider employment opportunities during the construction and operational phase of the Outline Scheme.

### **Consultations**

404. Informal Member presentation  
The applicants made two separate presentations to Planning Committee and Ward

Members. The first, on 1 December 2014 was attended by Cllrs Nick Dolezal, Darren Merrill, Adele Morris, Maisie Anderson, Martin Seaton, Paul Fleming and Sarah King.

The second, on 2 March 2015, was attended by Cllrs Nick Dolezal, Adele Morris, Dan Garfield, Sarah King and Michael Mitchell.

These presentations are for information only, and do not form part of the decision making process.

405. Public and Statutory consultation

Details of consultation are set out in Appendix 1. This included formal consultation via individual letter, press notices and site notices. Over 6,000 letters were sent to existing occupiers on the estate and those living in the surrounding streets, and site notices were displayed around the estate. This consultation was repeated following receipt of revised plans in early March. In addition, all those who had made a representation were sent an email notification in early April following receipt of a letter from the applicant providing further clarifications on the detail of the affordable housing.

**Consultation replies**

406. Details of consultation responses received are set out in Appendix 2.

407. Summary of consultation responses

All comments received in response to the proposed development have been summarised and addressed below.

408. Environment Agency – No objections subject to conditions. The required conditions relate to site contamination and remediation, piling and penetrative ground works and Sustainable Urban Drainage Systems (SUDS).

409. English Heritage – On the basis of the information provided in the submitted Townscape, Built Heritage & Visual Impact Assessment, English Heritage are satisfied that the proposed development would not have a significant impact on the setting of any heritage assets in the vicinity, particularly given the range of existing building heights in the wider area. English Heritage also recognises that the demolition of the slab blocks of the Aylesbury Estates provides opportunity for enhanced views from various heritage assets.

410. Greater London Authority – The Mayor considers that the scheme is strongly supported in principle however issues are raised regarding the net loss of affordable housing, parking for non residential uses (including disabled bays), on street parking permit allocation and the increased cycle parking standards for two bed units. Further concerns are raised regarding the impact of the increased peak waiting times at the Albany Road/Portland Street Junction on public transport. The GLA also encourage the provision of segregated cycle lanes on both sides of Albany Road and various contributions are sought regarding cycle hire, wayfinding and improvements to local public transport. A robust Travel Plan should be secured as should a Construction Logistics Plan.

411. London Underground – No comment.

412. Metropolitan Police - The area suffers from above average levels of crime, specifically burglary, anti-social behaviour and violent crime. The proposal should be able to attain

Secured by Design accreditation for design and layout as well as physical security and as such a 'Secure by Design' condition should be attached to any consent issued to ensure these standards are implemented.

413. Natural England – Pleased to see references to open space, green links and parks in the Design and Access Statement and that green roofs are to be provided. Natural England is supportive of the provision of green roofs and would recommend incorporating more green roofs into the development of the estate. Natural England would also encourage the incorporation of Green Infrastructure into the redevelopment of the estate.
414. Network Rail – No objections.
415. Thames Water – Recommends a 'Grampian Condition' to secure a drainage strategy. Further conditions are recommended concerning impact piling and SUDS. Access to Thames Water infrastructure must be maintained at all times and it is recommended that petrol/oil interceptors are fitted in all car parking facilities and non return valves fitted within all dwellings
416. Transport for London – Clarification should be sought on the management of 'dedicated' on-street car parking and residents permits within the existing CPZ and clarification of non-residential parking provision. Further issues that need clarification include the provision of electric vehicle charging infrastructure, increased FALP cycle parking and a requirement in any subsequent planning permission for TfL to be consulted upon and agree changes to the local road network that may affect bus journey times and/or the wider road network. TfL also seeks improved provision for cyclists, with better alignment to the Mayor's Cycling Vision and London Cycling Design Guidance as well as a requirement in any subsequent planning permission for TfL to be consulted upon and agree relocation and upgrading of the bus stops on Albany Road. A travel plan and Construction Logistics Plan should be secured as should funding for initial cycle hire membership. In terms of the S106 agreement safeguarding/funding should be secured for bus service enhancements, relocation of bus stops on Albany Road, cycle hire docking station, Legible London signage and the Elephant and Castle strategic transport contribution.
417. Neighbour consultation responses  
Following neighbour consultation a total of 139 responses were received to both applications. The council issued a single letter on each occasion to cover both the outline and FDS applications, and most responses did not specify whether they wished to comment on one of both applications. Therefore, the responses have been taken into account on both applications, and recorded in both Planning Committee reports. The majority of comments were received following re-consultation which commenced on 2 March 2015. Of the responses received 34 originated from residents and local groups in and around the Aylesbury estate with a further 48 responses from further a field within the borough. 40 were received from outside the borough and the UK and one response was received from Italy. Sixteen people did not leave an address or opted for their address not to be disclosed within this report. The responses can be summarised as;  
Support (4 responses)  
Comment (2 responses)  
Objection (133 responses)
418. Demolition versus refurbishment  
Various objections have cited concern regarding the decision to demolish and

redevelop the estate as opposed to refurbishing the existing fabric. This issue is considered in the body of the report under 'Principle of development'. The main points of these objections are summarised and addressed below;

419. There is no justification for the demolition of the estate.  
**Response** – Structural surveys have highlighted the extent of works needed to the existing fabric of the estate and it was concluded that the cost of refurbishing the estate to an acceptable standard would be prohibitive. Work to the individual blocks could not overcome the fundamental shortcomings of the layout of the estate, with its lack of active frontages, confusing and difficult pedestrian routes, and hostile architecture, and would limit opportunities for inward investment to support the regeneration. This is consistent with the AAAP.
420. Refurbishment of the estate would be a more sustainable option than demolition.  
**Response** – Refurbishment of the Estate to a suitable level would have been prohibitively expensive and would not overcome the inherent design and efficiency shortcomings of the existing fabric. Redevelopment to provide well designed, safe, secure and energy efficient homes is considered a more sustainable approach for the long term, as set out in the AAAP.
421. The loss of the housing is unnecessary as housing lists are long and the flats are good subject to refurbishment.  
**Response** – On the FDS the loss of affordable housing has been minimised to the point that there will be a net loss of only three habitable rooms. Overall, the FDS will result in uplift in housing numbers, creating more housing opportunities on the estate. Refurbishment would be prohibitively expensive and would not overcome the design and layout shortcomings of the estate.
422. There is no case for demolition, refurbishment is possible, would be cheaper and is in the public interest.  
**Response** – The survey previously undertaken demonstrated that the costs would be prohibitive and in any event would not overcome the other issues prevalent on the estate such as poor design, layout and legibility. Additionally, refurbishment would limit opportunities for inward investment to support the regeneration.
423. Re-provision of housing and affordable housing  
The main points of the objections to the housing provision of the FDS have been summarised and addressed below. Further information on this topic can be found in the housing sections in the main body of the report.
424. There is a lack of clarity on the tenure of new homes.  
**Response** – There are four tenures being provided on the FDS. Private Market housing is housing that will be sold privately on the open housing market. Affordable housing is being provided in three distinct tenures, Intermediate, Affordable Rent and Social Rent. Social rent is housing provided by a registered provider at rents set significantly below market levels. Affordable Rent is accommodation that can be rented at up to 80% of Market Rent. Intermediate housing is homes for sale and rent provided at a cost above social rent, but below market levels. Tenants typically purchase a share of the equity of the housing (usually between 25%-75%) and pay rent to the registered provider on the outstanding portion.
425. The scheme would result in the net loss of affordable housing and a net loss of Social Rented housing.  
**Response** – There would be a net loss of affordable units on the FDS, but only a

marginal loss in relation to habitable rooms. The existing Estate has only one type of affordable housing in the form of 'social rented' housing. The proposal will include Social Rent, Affordable Rent and Intermediate affordable housing. The new tenures are consistent with the AAAP, and Affordable Rent is used only for 27 of the specialist housing units.

426. There is a concern that the social rented housing will be become Affordable Rent housing.

**Response** – In terms of affordable housing the applicant has specified Social Rent and Affordable Rent as distinct tenures with different rent levels and affordability thresholds and these will be secured as such in the S106 Agreement.

427. There is a concern that the replacement affordable housing will be come unaffordable to current residents.

**Response** – As detailed above, affordable housing within the three distinct affordable tenures (Social Rent, Affordable Rent and Intermediate) will be secured as affordable housing through the S106 Agreement.

428. The affordable homes will be small and there will be a loss of affordable residential floorspace overall.

**Response** – The affordable homes being provided on the FDS have been designed to generous space standards that are in excess of both Southwark and London Plan guidance, in recognition of the larger sizes currently on the estate. In the case of the Arklow block, the flats will be much larger than the existing.

429. The scheme is contrary to London Plan Policy 3.8 as it fails to provide a genuine choice of homes that people can afford.

**Response** - There are four clear tenures being provided and this is considered to provide a genuine choice of homes and is broadly supported by the GLA.

430. Affordable homes are unlikely to be affordable when rents are proposed at 80% of Market Rent.

**Response** – Only 27 affordable rent homes are included, and the rent levels will be capped at Local Housing Allowance rates for the area.

431. Current residents and leaseholders cannot all be accommodated on the redeveloped estate as there will be a reduction in the number of affordable homes.

**Response** – The net reduction in affordable homes equates to just three habitable rooms. The council and NHHT are working together to ensure all households are offered replacement homes on the estate or in the local area.

Quality of accommodation, design and open spaces

432. Further detail on these issues can be found within the relevant sections in the main body of the report. The main points of objection on these topics are summarised and addressed below;

433. The proposal will result in the net loss of open space.

**Response** – There will be the loss of some open space, but the quality of new space is high, and includes public parks as well as private and communal gardens, with a wider range of uses that currently available.

434. The scheme is contrary to London Plan Policy 7.1 as the open space provision is inadequate.

**Response** – The FDS will provide quality open spaces and landscaped streets linking



southwards to Burgess Park. In terms of playspace both under 5's and 5-11 year olds are well catered for whilst it is reasonable to assume children over 11 year could use the larger spaces in Burgess Park, and funding is provided for play improvements there.

435. There is insufficient playspace and recreation space.  
**Response** – The FDS is policy compliant in terms of on-site play space provision for the under 5's age group. For the 5-11 age group there is a negligible shortfall of 6sqm. Recreation space for the 12+ age group will need to be provided off-site which is acceptable.
436. The proposed design does not incorporate open space in a way that would enable or encourage inclusion or community cohesion and would not promote active lifestyles.  
**Response** – The proposed open space is well dispersed across the FDS and the landscaped streets link southwards to Burgess Park. Both Westmoreland Park and Portland Park have informal play areas and more formal seating areas and areas for reflection.
437. Lack of clarity on dwelling size standards.  
**Response** – The application meets the minimum standards given in the AAAP/SPD.
438. Inadequate daylight in courtyards and private gardens.  
**Response** – Whilst there is some overshadowing to some parts of the courtyard, the quality of the open space will not be compromised to an unacceptable degree.
439. The application does not make it clear that all new dwellings will exceed the minimum room sizes as specified in the AAAP.  
**Response** – Room sizes are shown on the drawings. In terms of unit sizes 99% of units meet the relevant minimum requirements outlined in the SPD and AAAP.
440. The private and intermediate dwellings have less generous floorspace than the affordable dwellings and this is discrimination.  
**Response** - The AAAP sets different minimum flat sizes for social rented, intermediate and private flats, reflecting the current larger flats on the estate.
441. The proposed buildings on Bradenham Close will create a similar effect to the current buildings in terms of poor access to light and sky as well as being over dominant, too high /broad and not of a human scale.  
**Response** – The separation distances between the proposed buildings and neighbouring buildings is acceptable and there will be no adverse impact in terms of daylight and sunlight.
442. The design of the buildings due to the balconies will lead to problems with noise due to parties.  
**Response** – It is not considered that the provision of amenity spaces in the form of balconies will lead to undue noise disturbance. Issues of noise disturbance can be reported to the council's Environmental Protection Team.
443. The tall building on Portland Street/Albany Road is of a poor design, particularly with regards to the balconies.  
**Response** – The tall building on Portland Street is considered to be a well designed response to the AAAP requirement for a tall/landmark building.

444. Environmental Impacts

The main points of objection on this topic are summarised and addressed below. Further detail can be found in the Environmental Impact Assessment section of the main report.

445. The proposal does not thoroughly address environmental issues.

**Response** – In terms of Environmental Impacts the FDS has been fully tested as part of the Environmental Statement submitted with both applications which concludes that it will not result in any significant adverse environmental impacts.

In terms of the Environmental Impact Assessment, the applicant has failed to provide supporting information to demonstrate the main alternatives studied by the applicant and an indication of the main reasons for the choice made, taking into account environmental effects.

**Response** – The regeneration of the Aylesbury Estate is a plan-led redevelopment that designed to conform to the AAAP. The AAAP was subject to options assessment and concluded that redevelopment was the best option to deliver the regeneration objectives. No further alternatives are required to be considered.

446. There will be no significant economic development or reduction in poverty.

**Response** – The proposal will improve the townscape and living environment by providing well designed homes, facilities and open spaces. The FDS will also secure construction jobs during the course of the development, including apprenticeships whilst the uplift in population on the FDS will be a benefit to the existing retail on Walworth Road/Westmoreland Road.

447. The plans do not benefit Southwark residents and will be detrimental to the local community.

**Response** – The proposal increase overall housing supply and provide new attractive routes around the area, improving connections to transport, shops and services.

448. The demolition and construction phases are likely to cause considerable disturbance to the immediate and wider area, affecting residents and businesses alike.

**Response** – This is considered at length in the ES. Controls will be put in place to manage disruption including controlling the hours of work as well as demolition and construction management plans in order to minimise the impact on the local area and nearby residents/businesses.

449. The application does not include a detailed Equalities Impact Assessment to assess the impact on any black and minority ethnic groups.

**Response** – The regeneration of the Aylesbury Estate is a plan led development that will be driven by the AAAP. The redevelopment of the FDS is considered to be in compliance with the AAAP. An Equalities Impact Assessment was under taken as part of the AAAP and is covered in paragraphs 383.

450. Transport

The transport impacts of the development have been fully considered in the Transport section of the main report. The main points of the objections on this topic have been summarised and addressed below;

451. There is no parking allocated to visitors and no parking management plan.

**Response** – The FDS will form part of a new Controlled Parking Zone. The terms of the parking permit allocation will be agreed in the s106 agreement and the principles are described in the Transport section in the main body of the report and the terms of

the permit allocation strategy will be agreed as part of a Parking Delivery Plan

452. There is a lack of car parking spaces and accessible car parking spaces.  
**Response** – 287 car parking spaces are being provided and of these 40 will be accessible spaces to serve the 40 wheelchair units. The level of car parking and accessible car parking are compliant with the AAAP.
453. There no parking management plan to show how overspill parking or on street parking will be managed/restricted.  
**Response**– The FDS will form part of a new Controlled Parking Zone, which will prevent overspill into surrounding zones. The Parking Delivery Plan will manage and control permit allocation to ensure demand does not exceed reasonable availability.
454. Car parking provision is inadequate and it is not clear if all residents will be eligible for CPZ permits - if they are there is insufficient provision.  
**Response** – As detailed above and in the main Transport section of the report, the Parking Delivery Plan will manage permit allocation.
455. There is no indication of whether or not people who obtain an undercroft parking space will be able to apply for a street permit.  
**Response** – This will be covered within the Parking Delivery Plan which is still under negotiation however the intention is that people with an allocated undercroft parking space will not be able to apply for a street permit.
456. The proposed levels of cycle parking are inadequate.  
**Response** - The proposal will provide a significant amount of cycle parking, including visitor cycle parking and whilst this falls marginally short of the updated London Plan standards it is considered that the level of cycle parking provision will assist is prioritising cycling as a transport method.
457. No provision has been made for segregated cycle lanes.  
**Response** – The issue of cycle lanes is still under negotiation between the applicant, council and TfL and will form part of the S106 Agreement and be included as S.278 (Highways) works. There is no proposal for segregated lanes in the FDS area, but the provision of a Quietway along Portland Street is a benefit of the proposal.
458. Land use  
The issue of land use has been fully considered at the outset of the assessment under the Principle of Development section of the report. The main points of objection relate to community use and these are summarised and addressed below;
459. There is a lack of community space.  
**Response** – The FDS will provide 263sqm of community space which is in excess of the AAAP requirement.
460. Little detail has been provided on how the proposed community space will be managed or used.  
**Response** – This is still under discussion, hence the requirement for a flexible consent that will allow a community use, gym or Early Years Centre. Hours of operation will be conditioned to safeguard amenity.
461. There is a lack of community space being provided on the estate and that which is being provided is simply a re-provision of what is being lost from the estate.  
**Response** – As detailed above, the FDS will provide 263sqm of community space

which is in excess of the AAAP requirement. Additional space is provided under the Outline application.

462. The proposed development will not be sufficient to change relative room rental values and the area will remain mid-low market.

**Response** – This is not a material planning consideration. The objective of the regeneration is to provide new, high quality homes across a range of tenures to raise living standards and create a safe, pleasant and sustainable living environment.

463. Renewable energy

Renewable energy has been fully considered under the Sustainable development section of the report. The main point of objection on this topic is summarised and addressed below;

464. Inadequate provision of renewables.

**Response** – Photovoltaic panels are proposed for the areas of roof that will achieve enough sunshine to make them viable. Currently this stands at 697sqm. It is acknowledged that this represents a small proportion of the available roof space across the FDS however, as a result of the townscape requirements that sought taller buildings on the park edge with heights reducing incrementally northwards, much of the remaining roof space is overshadowed by the taller elements to the south.

Further objections

465. There is no real evidence of anti-social behaviour or crime.

**Response** – The Metropolitan Police have indicated that the Estate suffers from higher levels of crime generally and more specifically burglary, anti-social behaviour and violent crime.

466. Consultation with leaseholders has been inadequate.

**Response** - Two consultation exercises have been undertaken for the current planning applications and an extensive consultation programme was undertaken as part of the AAAP. Discussions on leasehold acquisitions is not a planning consideration.

467. Leaseholders have been told they have no right to return to the estate thereby forcing leaseholders out of their homes and off the estate; leaseholders will not be able to afford to remain on the estate

**Response** – Whilst not strictly a planning issue, the council and Notting Hill are in discussions with leaseholders about options for remain on the estate or in nearby housing including shared equity housing.

468. The main points of support are outlined below;

- The buildings are not in a good condition and do not provide sufficient heating
- Regeneration is a positive thing for the area
- The current estate is unsightly and intimidating with a poor standard of housing
- The regeneration will bring a visual and atmospheric boost to the area
- Housing will be improved
- The site is in a prime location with excellent public transport links and extra housing will be easily absorbed into the area
- New healthy homes are needed as current homes suffer from mould, inside and out

469. Various responses offered comments on the planning application as opposed to points

of objection or support and these are summarised below;

- The scheme should provide expressive architecture especially in the towers
- The design of buildings and materials should not be too repetitive
- Provision should be made for a places of religious worship as they provide vital emotional and spiritual services to the community
- The scheme should provide segregated cycle lanes
- The scheme is dense and adequate provision should be made to ensure the roads can cope with cars associated with new dwellings
- Burgess park could be dominated by tall buildings impacting on visual amenity
- There should be a bus route along Albany Road linking Thurlow Street and Old Kent Road
- Barclays Bikes should be provided in the new development
- Traffic calming measures on Albany Road should be implemented to ensure vehicles travel no faster than 20mph
- Burgess Park Railings should not be removed from the park on Albany Road
- Adequate physical and social infrastructure should be in place for the new population (including energy, water, sewage, schools, doctors surgeries and hospitals)
- A high proportion of council and affordable housing should be provided to allow current residents to remain on the estate to retain local identity
- Inclusion of open spaces, cycle parking and community facilities is essential
- Construction periods should be minimised to allow people to be rehoused as soon as possible
- Consultation with Heygate redevelopment should take place to allow a smooth and rapid site completion.

### Human rights implications

470. This planning application engages certain human rights under the Human Rights Act 2008 (the HRA). The HRA prohibits unlawful interference by public bodies with conventions rights. The term 'engage' simply means that human rights may be affected or relevant.
471. This application has the legitimate aim of providing new high quality homes, affordable housing, community use and new streets and open spaces as part of the Aylesbury Estate regeneration. The rights potentially engaged by this application, including the right to a fair trial and the right to respect for private and family life are not considered to be unlawfully interfered with by this proposal.

### BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
Site history file: TP/H1059 Application file: 14/AP/3843 Southwark Local Development Framework and Development Plan Documents	Chief Executive's Department 160 Tooley Street London SE1 2QH	Planning enquiries telephone: 020 7525 5403 Planning enquiries email: planning.enquiries@southwark.gov.uk Case officer telephone: 020 7525 5365 Council website: www.southwark.gov.uk

## APPENDICES

No.	Title
<b>Appendix 1</b>	Consultation undertaken
<b>Appendix 2</b>	Consultation responses received

## AUDIT TRAIL

<b>Lead Officer</b>	Gary Rice, Head of Development Management	
<b>Report Author</b>	Terence McLellan, Team Leader, Planning	
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<b>Key Decision</b>	No	
<b>CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER</b>		
<b>Officer Title</b>	<b>Comments Sought</b>	<b>Comments included</b>
Strategic Director of Finance & Corporate Services	No	No
Strategic Director of Environment and Leisure	No	No
Strategic Director of Housing and Community Services	No	No
Director of Regeneration	No	No
<b>Date final report sent to Constitutional Team</b>		<b>14 April 2015</b>