

### Consultation responses received Statutory and non-statutory organisations

#### **Greater London Authority (including Transport for London comments) -Support with comments**

London Plan policies on housing, urban design, inclusive access, sustainable development and transport are relevant to this application. Whilst the scheme is strongly supported in principle, the net loss of affordable housing does not comply with the London Plan. A summary of strategic issues in this case is set out below:

**Housing:** The proposed estate regeneration would deliver a step change in housing quality, support mixed and balanced communities, and appropriately prioritise family sized housing as part of a well-considered illustrative residential schedule. However, the net loss of affordable housing does not comply with London Plan Policy 3.14. Given the scale, ambition and complexity of the regeneration scheme, the difficulties of achieving a like for like replacement of affordable housing are appreciated. Nevertheless, given the current position with respect to Policy 3.14, the applicant should address the points below prior to the Mayor's decision making stage:

Having regard to advice in the 'maximum reasonable amount of affordable housing' section of this report the applicant should provide a financial viability statement demonstrating that the scheme is maximising the provision of affordable housing as far as reasonably possible. GLA officers encourage Southwark Council to consider securing an upwards only affordable housing review mechanism as part of any future section 106 agreement.

The applicant (working in conjunction with Colleagues at Southwark Council) should set out the key principles of the estate decant strategy –including whether existing residents would have the option to return to redeveloped phases of the estate in future. (GLA officers also seek discussions with council colleagues to explore how the proposed net loss of affordable units would fit within the context of Southwark Council's wider housing programme, and affordable housing pipeline.

**Urban design:** The design of the outline masterplan draws on the core design principles of the Aylesbury AAAP, and the proposed spatial strategy for the scheme is broadly supported in accordance with London Plan Policy 7.1. Nevertheless, GLA officers seek further discussion with respect to a north-south masterplan report west of Thurlow Street.

**Inclusive access:** The proposed response to access and inclusion within the outline masterplan is broadly supported in line with London Plan Policy 7.2

**Sustainable development:** Subject to a number of clarifications the proposed energy strategy is supported in accordance with the London Plan Policy 5.2. The council is encouraged to secure details of landscaping, tree planting and sustainable urban drainage by way of panning condition in line with London Plan policies 5.10, 5.11, 5.13 and 7.21.

**Transport:** Whilst the outline application is broadly acceptable in strategic terms, issues with respect to car and cycle parking; Cycle Hire; highway and public transport impacts, public realm, cycling and walking; way-finding; and travel plan, deliveries and servicing plan and construction logistics plan need to be resolved to ensure accordance with

London Plan policies 6.3, 6.7, 6.9, 6.13, and 6.14.

### **English Heritage -Support with comments**

English Heritage has been aware of these emerging proposals for the Aylesbury Estate for some time, and recently provided comments on the scheme at scoping stage (our ref: PA00321234, 9 May 2014). We advised then that the development, which seeks an increase in height from the existing 14 storeys of the Aylesbury Estate to a maximum of 20 storeys, has the potential to impact on the setting of a wide range of designated heritage assets. These include Grade I listed Church of St Peter, various Grade II listed buildings within Burgess Park, as well as a number of conservation areas such as Liverpool Grove, Addington Square, Sutherland Square and Grosvenor Park.

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

Notwithstanding the above comments, we recommend that the application should be determined in accordance with national and local policy guidance, and on the basis of your specialist conservation advice. It is not necessary for us to be consulted again. However, if you would like further advice, please contact us to explain your request. Please note that this response relates to historic building and historic area matters only. If there are any archaeological implications to the proposals it is recommended that you contact the Greater London Archaeological Advisory Service for further advice (Tel: 020 7973 3712).

### **Environment Agency - Support with comments**

We have no objection to the planning application as submitted, subject to the attached conditions being imposed on any planning permission granted. Without these conditions, the proposed development on this site poses an unacceptable risk to the environment and we would wish to object to the planning application.

### **Condition 1**

Prior to the commencement of development approved by this planning permission (or such other date or stage in development as may be agreed in writing with the Local Planning Authority), the following components of a scheme to deal with the risks associated with contamination of the site shall each be submitted to, and approved in writing by, the Local Planning Authority:

- 1) a site investigation scheme, based on the submitted geo-environmental and geotechnical preliminary risk assessment by WSP UK Ltd (dated 22 September 2014 with reference 50600304), to provide information for a detailed assessment of the risk to all receptors which may be affected, including those off site;
  - 2) the results of the site investigation and detailed risk assessment referred to in (1) and, based on these, an options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken;
  - 3) a verification plan providing details of the data which will be collected in order to demonstrate that the works set out in the remediation strategy in (2) are complete and identifying any requirements for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action.
- Any changes to these components require the express consent of the Local Planning

Authority. The scheme shall be implemented as approved.

**Reason**

For the protection of controlled waters. The site is located over a Secondary Aquifer and it is understood that the site may be affected by historic contamination.

**Condition 2**

If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until the developer has submitted, and obtained written approval from the Local Planning Authority for, a remediation strategy detailing how this unsuspected contamination shall be dealt with. The remediation strategy shall be implemented as approved, verified and reported to the satisfaction of the Local Planning Authority.

**Reason**

There is always the potential for unexpected contamination to be identified during groundworks. We should be consulted should any contamination be identified that could present an unacceptable risk to controlled waters.

**Condition 3**

Prior to occupation of the development, a verification report demonstrating completion of the works set out in the approved remediation strategy and the effectiveness of the remediation shall be submitted to and approved, in writing, by the Local Planning Authority. The report shall include results of sampling and monitoring carried out in accordance with the approved verification plan to demonstrate that the site remediation criteria have been met. It shall also include a plan (a 'long-term monitoring and maintenance plan') for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action, as identified in the verification plan, if appropriate, and for the reporting of this to the Local Planning Authority. Any long-term monitoring and maintenance plan shall be implemented as approved.

**Reason**

Should remediation be deemed necessary, the applicant should demonstrate that any remedial measures have been undertaken as agreed and the environmental risks have been satisfactorily managed so that the site is deemed suitable for use.

**Condition 4**

Piling or any other foundation designs using penetrative methods shall not be permitted other than with the express written consent of the Local Planning Authority, which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to groundwater. The development shall be carried out in accordance with the approved details.

**Reason**

The developer should be aware of the potential risks associated with the use of piling where contamination is an issue. Piling or other penetrative methods of foundation design on contaminated sites can potentially result in unacceptable risks to underlying groundwaters. We recommend that where soil contamination is present, a risk assessment is carried out in accordance with our guidance 'Piling into contaminated sites'. We will not permit piling activities on parts of a site where an unacceptable risk is posed to controlled waters.

**Condition 5**

Whilst the principles and installation of Sustainable Drainage Systems (SuDS) are to be

encouraged, no infiltration of surface water drainage in to the ground is permitted other than with the express written consent of the Local Planning Authority, which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to controlled waters. The development shall be carried out in accordance with the approval details..

### **Reason**

Infiltrating water has the potential to cause remobilisation of contaminants present in shallow soil or made ground which could ultimately cause pollution of groundwater

### **Natural England – Support with comments**

We have considered the contents of the documents submitted to us concerning the outline planning application for the redevelopment of the site and have the following comments to make:

#### Provision of high quality publicly accessible green and open spaces

We are pleased to note that there are references to open spaces and green links in the Design and Access Statement relating to the outline planning permission application. The National Planning Policy Framework (NPPF) states at paragraph 114 that:

“Local planning authorities should ... set out a strategic approach in their Local Plans, planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure”.

The NPPF also states at paragraph 117 that local authorities should plan for green infrastructure and:

“ ... promote mixed use developments and encourage multiple benefits from the use of land in urban and rural areas, recognising that some open land can perform many functions (such as for wildlife, recreation, flood risk mitigation, carbon storage, or food production)”.

We recommend that as much provision is made as possible within the Aylesbury Estate for networks of green spaces, as despite the proximity of the Estate to Burgess Park, it will still benefit from additional green spaces/links, for the reasons mentioned in the NPPF.

#### Green infrastructure potential

The Aylesbury Estate is within an area that Natural England considers could benefit from enhanced green infrastructure (GI) provision. As such, Natural England would encourage the incorporation of GI into the redevelopment of the estate.

GI can be designed to maximise the benefits needed for this area, for example it can be used to promote opportunities for recreation, improve links between communities and enhance flood-water management to protect surrounding homes and businesses. It can also be used to improve connectivity to other green spaces and to improve conservation and biodiversity. We strongly encourage you to maximise opportunities to incorporate green infrastructure during the development of the Estate.

The following link provides access to guidance for local planning authorities on Green Infrastructure:

<http://www.publications.naturalengland.org.uk/publication/35033?category=49002>.

#### Green roofs

One way of providing enhanced green infrastructure and biodiversity in such an environment can be through the provision of green roofs. We note that some provision is

made for green roofs in the application, but we would recommend incorporating more green roofs into the development of the Estate.

Natural England is supportive of the inclusion of green roofs in all appropriate development. Research indicates that the benefits of green roofs include reducing run-off and thereby the risk of surface water flooding, reducing the requirement for heating and air-conditioning and providing habitat for wildlife.

We would advise your council that some living roofs, such as sedum matting, can have limited biodiversity value in terms of the range of species that grow on them and habitats they provide. Natural England would encourage you to consider the use of bespoke solutions based on the needs of the wildlife specific to the site and adjacent area. I would refer you to <http://livingroofs.org/> for a range of innovative solutions and <http://www.london.gov.uk/sites/default/files/uploads/living-roofs.pdf> (London GLA 2008) regarding the fit with the London Plan policy.

#### Accessible Natural Greenspace Standard

Natural greenspaces are important to our quality of life, providing a wide range of benefits for people and the environment. Evidence shows that access to natural greenspaces for fresh air, exercise and quiet contemplation has benefits for both physical and mental health. Research provides good evidence of reductions in levels of heart disease, obesity and depression where people live close to greenspaces.

In addition to their potential ecological value, greenspaces also help us adapt to changes in climate through their role in reducing the risk of flooding and by cooling the local environment. Where trees are present they also act as filters for air pollution.

Natural England believes that everyone should have access to good quality natural greenspace near to where they live and have produced "Nature Nearby - Accessible Natural Greenspace Guidance" to help people make this a reality.

The guidance is aimed at decision makers, planners and managers of green space. It describes the amount, quality and level of visitor services that we believe everyone is entitled to.

#### Ecologist's reports

We support the references to the provision of bat boxes, bird boxes and other bat roost features on the developed Estate, the use of native species planting where possible, bat sensitive lighting and green and brown roofs, referred to in the ecologist's emails. We also support the reference to obtaining an EPSL licence prior to demolition on the Estate.

#### **Thames Water – Support with Comments**

(Waste Comments)

Following initial investigation, Thames Water has identified an inability of the existing waste water infrastructure to accommodate the needs of this application. Should the Local Planning Authority look to approve the application, Thames Water would like the following 'Grampian Style' condition imposed. "Development shall not commence until a drainage strategy detailing any on and/or off site drainage works, has been submitted to and approved by, the local planning authority in consultation with the sewerage undertaker. No discharge of foul or surface water from the site shall be accepted into the public system until the drainage works referred to in the strategy have been completed". Reason - The development may lead to sewage flooding; to ensure that sufficient capacity is made available to cope with the new development; and in order to avoid

adverse environmental impact upon the community. Should the Local Planning Authority consider the above recommendation is inappropriate or are unable to include it in the decision notice, it is important that the Local Planning Authority liaises with Thames Water Development Control Department (telephone 0203 577 9998) prior to the Planning Application approval.

Thames Water requests that the Applicant should incorporate within their proposal, protection to the property by installing for example, a non-return valve or other suitable device to avoid the risk of backflow at a later date, on the assumption that the sewerage network may surcharge to ground level during storm conditions.

Surface Water Drainage - With regard to surface water drainage it is the responsibility of a developer to make proper provision for drainage to ground, water courses or a suitable sewer. In respect of surface water it is recommended that the applicant should ensure that storm flows are attenuated or regulated into the receiving public network through on or off site storage. When it is proposed to connect to a combined public sewer, the site drainage should be separate and combined at the final manhole nearest the boundary. Connections are not permitted for the removal of groundwater. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. They can be contacted on 0800 009 3921. Reason - to ensure that the surface water discharge from the site shall not be detrimental to the existing sewerage system.

There are public sewers crossing or close to your development. In order to protect public sewers and to ensure that Thames Water can gain access to those sewers for future repair and maintenance, approval should be sought from Thames Water where the erection of a building or an extension to a building or underpinning work would be over the line of, or would come within 3 metres of, a public sewer. Thames Water will usually refuse such approval in respect of the construction of new buildings, but approval may be granted in some cases for extensions to existing buildings. The applicant is advised to contact Thames Water Developer Services on 0800 009 3921 to discuss the options available at this site.

No impact piling shall take place until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement. Reason: The proposed works will be in close proximity to underground sewerage utility infrastructure. Piling has the potential to impact on local underground sewerage utility infrastructure. The applicant is advised to contact Thames Water Developer Services on 0800 009 3921 to discuss the details of the piling method statement.

Thames Water would recommend that petrol / oil interceptors be fitted in all car parking/washing/repair facilities. Failure to enforce the effective use of petrol / oil interceptors could result in oil-polluted discharges entering local watercourses.

(Water Comments)

The existing water supply infrastructure has insufficient capacity to meet the additional demands for the proposed development. Thames Water therefore recommend the following condition be imposed: Development should not be commenced until: Impact studies of the existing water supply infrastructure have been submitted to, and approved in writing by, the local planning authority (in consultation with Thames Water). The

studies should determine the magnitude of any new additional capacity required in the system and a suitable connection point. Reason: To ensure that the water supply infrastructure has sufficient capacity to cope with the/this additional demand.

No impact piling shall take place until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface water infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement. Reason: The proposed works will be in close proximity to underground water utility infrastructure. Piling has the potential to impact on local underground water utility infrastructure. The applicant is advised to contact Thames Water Developer Services on 0800 009 3921 to discuss the details of the piling method statement.

**London Underground Infrastructure Protection (No comment).**

I can confirm that London Underground Infrastructure Protection has no comment to make on this planning application.

These comments relate only to the London Underground infrastructure protection issues raised by the application. They should not be taken to be representative of the position which may be taken by the Mayor and/or another part of TfL. You are advised to consider whether it is also necessary or appropriate to consult other parts of TfL and whether the application should be referred to the Mayor as an application of potential strategic importance pursuant to the provisions of the Town and Country Planning (Mayor of London) Order 2008. All other consultations with TfL should be made by e mailing [boroughplanning@tfl.gov.uk](mailto:boroughplanning@tfl.gov.uk).

**EDF Energy**

No comments received.

**London Fire & Emergency Planning Authority**

No comments received.

**Metropolitan Police Service (Designing out Crime) (Comments)**

This area suffers from above average levels of crime generally, but specifically Burglary, Anti-Social Behaviour and Violent crime. This is obviously of concern when proposing a new development, and security measures need to be an essential component of any further plans.

At this stage of the planning it would appear that particular consideration should be given, but not limited, to the following:

- Secure Windows/Doors (communal doors - LPS 1175, Accessible Flat/House doors and windows - PAS24) with laminated glazing.

- Access Control
- Boundary treatments
- Mail delivery/Utilities

The communal entrances must be suitable to ensure that the development is secure. I would strongly advise that secure lobbies be designed into the development. This means that someone entering the building will have to pass through two secure (LPS 1175 type 2) doors in order to reach the residential corridors.

The application therefore does not yet fully demonstrate how such measures are to be

incorporated into the development especially given the guidance within NPPF paragraphs 58 and 69 which state :-

Paragraph 58 of National Planning Policy Framework clearly states that local and neighbourhood policy should 'create safe and accessible environments where the fear of crime does not undermine quality of life or community cohesion.'

Paragraph 69 of this document 'promoting Healthy Communities' underlines this statement by encouraging the planning system to play an important part in facilitating 'safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion.'

However the proposal should be able to gain Secured by Design accreditation for design and layout as well as part 2 physical security, with the guidance of 'New Homes 2014 guide' and by incorporating accredited, tested certificated products. I would therefore seek to have the agreed 'Full Secure by Design accreditation' condition attached to any permissions that may be granted in connection with this application and that the wording is such that the development will achieve certification - not merely seeking to achieve accreditation.

It has been statistically evidenced that having a Secured by Design consultation at the earliest possible stage can be productive in reducing development costs and tackling criminal activity and anti social behaviour. It also limits the on-going maintenance costs of the development. For those reasons I would request meeting the architect at the earliest opportunity to discuss further plans.

### **Neighbours responses and local groups**

139 letters and comments were received in response to public notices. The majority of comments were received following re-consultation which commenced on March 2 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 Letters)

Comment (2 Letters)

Objection (133 Letters)

#### Neighbour responses

Gayhurst, Aylesbury Estate

116 Roffo Court, Boundary Lane, London SE17 2FP

Flat 128 Roffo Court, Boundary Lane, SE17 2FP

14 Fielding Street London

53 Woodsford SE17 2TN

157 Bradenham SE172BD

148 Chartridge, Westmoreland Road, London SE17 2DA

60 Dawes House, Orb Street SE17 1RD

213 Missenden, Inville Road, London SE17 2HX

359 Wendover Thurlow Street SE17 2UR

21 Abbey Court, Macleod Street Se17 3ha

102 brandonStreet SE17 1AL

74 Aylesbury Rd SE17 2EH

Boundary Lane, London SE17 2BH  
13 Gateway SE17 3HQ  
74 Wendover, SE17  
30 Berryfield Rd, SE17 3QE  
175 Bradenham House, Boyson House, London, SE17 2BE  
107 Taplowhouse, thurlow street, London, se172uj  
145F Chatham Street SE17 1PA  
117 Latimer SE17 2EP  
146 Taplow SE17 2UJ  
7 St Edmunds House, Horsley Street SE17 2AR  
25 Fielding Street SE17 3HE  
St Edmunds House Horsley St SE17 2AR  
22 Fielding street SE17 3HD  
105 Chiltern Portland Street SE17 2DD  
4 Sutherland Walk SE17 3EF  
85c Balfour Street SE17  
Flat 60 Dawes House Orb Street SE17 1RD  
8 St Edmunds House Horsley St London SE17 2AR  
149, Taplow, Thurlow Street SE17 2UJ  
Walworth Resident SE17  
3 Hurley Crescent SE16 6AL  
49 John Kennedy House SE16 2QE  
2 Middleton Drive SE16 6RZ  
52 Columbia Point SE16 7BG  
30 Webster Road SE16 4DF  
18 Market Place, Blue Anchor Lane, London, SE16 3UQ  
34 Huberd House SE1 4DN  
15 Hamilton Square, Kipling Street SE1 3SB  
402 OXOTower  
15 Hamilton Square SE1 3SB  
7 Dauncey House, Webber Row, London  
Flat 9 Bath House, Bath Terrace SE1 6PU  
48 Lancaster Street SE1 ORY  
Flat D, 110 Dunton Road, Southwark, London SE1 5UN  
Belvedere Road SE18XT  
57A Lant Street SE1 1QN  
7 Dauncey House, Webber Row, London SE1 8QS  
Park Street, SE1 9AB  
34 Huberd house SE1 4DN  
76 Perronet House, Princess Street SE1 6JS  
Flat 21, 43 Searles Road SE1 4YL  
11/R Peabody Buildings, Duchy Street SE1 8DY  
27 Green Walk SE1 4TT  
45 Blackfriars Road SE1 8NZ  
Camberwell SE5  
4a Albany Mews, Albany Road, SE5 0DQ  
71 Crossmount House, Bowyer St, London SE50XB  
5 Hart House, 2 Lilford Road SE5 9HJ  
65b Camberwell road SE5 0EZ  
45 Ruskin Park House, Champion Hill SE5 8TQ  
19 Crofton road SE5 8LY  
160 Benhill Road SE5 7LZ  
6 Vaughan road SE5 9NZ  
12 Marble House, SE50DD  
13 Evesham Walk SE5 8SJ

92 Southampton Way SE5 7TT  
43 Comber House Comber Grove London, SE5 0LJ  
14 Gaumont House SE15 5TS  
141 Linden Grove Nunhead SE15 3LP  
Flat 4 Sophia Court 1 Anstey Road SE15 4JX  
70 Northfield house Peckham park road London SE156TN  
26 Kirkwood Road SE15 3XX  
Flat B, 173 Gordon Road SE15 3RT  
23 Elcot Avenue SE15 1QB  
106b Dunstons Road London SE22 0HE  
13 Wheatland House SE22 8AG  
2 Overhill Road SE22 0PH  
303 Upland Road SE22 0DL  
10a Forest Hill Rd SE22 0RR  
85 Delawyck Crescent SE24 9JD  
69A Railton Rd SE24 0LR  
56 Trehurst Street E5 0EB  
28 Greenleaf Close SW2  
108 Acre Road KT2 6EN  
30 Crossfield Road N17 6AY  
11Weavers Terrace SW6 1QE  
40 Silk House E2 8GH  
Flat 59 Chaucer Court N16 8TS  
7 Rowley Road N15 3AX  
21 Diana Road E17 5LE  
7 Cressida Road N19 3JN  
97b Mercers Road N19 4PS  
9 Sanford Walk SE14 6NB  
116 Algernon Road SE137AW  
4b BarmestonRoadSE63BH  
Via La Spezia, 47 00055  
19 Bolton Walk N7 7RW  
247a WalmerRoad W11 4EY  
205 Well Street E9 6QU  
29 Graham Mansions E8 1EY  
Doughty Street WC1N 2PL  
88 Willesden Lane NW6 7TA  
20A Somerfield Road N4 2JJ  
8 Eade Road N4 1DH  
99b Forest Road E8 3BH  
34 Carr Rd E17 5EN  
Barnsbury RoadN10HD  
127a Clarence Road E5 8EE  
35a Slaithwaite Rd SE136DJ  
Mells BA11 3PJ  
10 Banner Road BS6 5LZ  
215 Balham Highroad SW17 7BQ  
3 Knights Walk SE11 4PA  
11 Weavers Terrace SW6 1QE  
Flat 34 Kestrel House SE10 8FP

#### Local Groups

Conservation Advisory Advisory Group  
The Three Cross Society  
Stop Killing Cyclists

People's Republic of Southwark