

**Canterbury Arms, Brixton**

in the London Borough of Lambeth

planning application no. 15/07141/FUL

**Strategic planning application stage 1 referral**

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

**The proposal**

The proposals are for the demolition of the existing public house and redevelopment to provide mixed use development comprising 37 residential units (Use Class C3), 123sqm of flexible commercial use (A1/A2/A3/B1/D1) in a nine storey building including the provision of communal garden and 61 cycle parking spaces.

**The applicant**

The applicant is **May Developments Ltd** and the architect is **Unit Architects LLP**.

**Strategic issues**

Concerns are raised that the development of the site **in isolation from the wider regeneration of Brixton town centre** does not prejudice the development potential of the adjoining sites, nor **impact in the long term on the design and appearance of the surrounding area**. Further clarity on the progress of wider regeneration scheme should be provided.

Issues with respect to **affordable housing, urban design, housing quality, sustainable development** and **transport** should be resolved before the application is referred back to the Mayor at his decision making stage.

**Recommendation**

That Lambeth Council is advised that some concern is raised regarding the principle of developing the site in isolation from the wider regeneration of Brixton town centre. The Council should ensure that the development does not prejudice the development potential of the adjoining sites, nor impact in the long term on the design and appearance of the surrounding area. Further clarity on the progress of wider regeneration scheme should be provided. GLA officers encourage further discussion regarding this issue and those that set out in paragraph 59 of this report.

**Context**

1 On 23 December 2015 the Mayor of London received documents from Lambeth Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008 the Mayor must provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.

2 The application is referable under Category 1C(c) of the Schedule to the Order 2008: *"Development which comprises or includes the erection of a building more than 30 metres high and is outside the City of London."*

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

4 The Mayor of London's statement on this case will be made available on the GLA website [www.london.gov.uk](http://www.london.gov.uk).

## Site description

5 The application site is located in Brixton town centre on the southern side of Canterbury Crescent, in the London Borough of Lambeth. It is bounded to the north by Canterbury Crescent, to the west by Pope's Road, to the east by a Council owned residential estate and to the south by a temporary ice rink site, now occupied by POP Brixton. Immediately opposite the site to the north is the Grade II Listed St John's Church of England School, which is within the Brixton Conservation Area, however, the application site is not within the boundary. The site is within the boundary of the Brixton Central Regeneration Area as designated in the Brixton Supplementary Planning Document (SPD) June 2013.

6 The site was until recently occupied by the Canterbury Arms public house, which has had a documented presence on the site since 1875. The public house building was three storeys in height and provided ancillary storage space and residential accommodation above the ground floor. The public house did not benefit from local or statutory listing and was not a non-designated heritage asset, but did contribute to the setting of the Grade II Listed School building directly opposite.

7 However, the Canterbury Arms public house is currently undergoing demolition, implementing a planning permission granted in May 2014 by Lambeth Council (ref: 13/03273/FUL, for the *demolition of the existing Public House and redevelopment to provide a mixed use development comprising 31 residential dwellings (Use Class C3), 162sqm of Public House/Restaurant (use class A4/A3) in a 9 storey building including the provision of a communal garden and 42 cycle parking spaces*).

8 The consented scheme is a similar form of development to that currently proposed. The consented application was originally referred to the GLA at Stage I in September 2013 and was considered by the Mayor on 9 October 2013 (D&P/3244/01). Subsequently however, the applicant amended the scheme to reduce the height of the building to below 30m (the height was reduced to 29.9m), ensuring it was no longer referable to the GLA. The current proposals are for a building of 30.8m in height, and the new application is thus referable. Other proposed changes to the consented scheme include an extension of the footprint of the building further to the east, and an increase in the number of residential units from 31 to 37.

9 The surrounding area is characterised by a mix of land uses and building typologies. To the north and east of the site is predominantly residential in buildings ranging from 19<sup>th</sup> Century terrace houses to post-war housing developments. To the west and south towards Brixton Town Centre the area is characterised by a range of commercial, business, leisure and residential buildings.

10 The immediate vicinity of the site is dominated by large bulky buildings, most notably the Brixton Recreation Centre to the south west, the 12 storey International House council office building immediately adjacent to the site and the former temporary ice rink site to the south. Both the International House site and the former ice rink site are designated as key development sites in the Brixton SPD. These sites together with the Brixton Recreation Centre site, also fall within a Major Development Opportunity Site (MDO5) as designated by the Lambeth Core Strategy Proposals Map 2011. The Canterbury Arms site and the former temporary ice rink site also fall within Lambeth Local Plan 2015 Policy PN3, Site 15 – Popes Road, identified as a key site supporting future development.

11 The site is served by twenty daytime and five night time bus routes and Brixton London Underground and National Rail stations are within 200 metres. As a result, the site has a public transport accessibility level of 6b, which is the highest level of accessibility.

## Details of the proposal

12 The proposals are for the demolition of the existing public house (NB, since the application was submitted, the building is now in the process of being demolished) and redevelopment to provide mixed use development comprising 37 residential units (Use Class C3), 123sqm of flexible commercial use (A1/A2/A3/B1/D1) in a nine storey building including the provision of communal garden and 61 cycle parking spaces.

## Strategic planning issues and relevant policies and guidance

13 The relevant issues and corresponding policies are as follows:

- |                            |  |
|----------------------------|--|
| • Principle of development | <i>London Plan</i>   |
| • Housing                  | <i>London Plan; Housing SPG; draft interim Housing SPG; Housing Standards Policy Transition Statement; Housing Strategy; Shaping Neighbourhoods: Play and Informal Recreation SPG; Shaping Neighbourhoods: Character and Context SPG</i> |
| • Affordable housing       | <i>London Plan; Housing SPG; draft interim Housing SPG; Housing Standards Policy Transition Statement; Housing Strategy</i>  |
| • Urban design             | <i>London Plan; Shaping Neighbourhoods: Character and Context SPG; Housing SPG; draft interim Housing SPG; Shaping Neighbourhoods: Play and Informal Recreation SPG</i>  |
| • Inclusive design         | <i>London Plan; Accessible London: achieving an inclusive environment SPG</i>  |
| • Sustainable development  | <i>London Plan; Sustainable Design and Construction SPG; Mayor's Climate Change Adaptation Strategy; Mayor's Climate Change Mitigation and Energy Strategy; Mayor's Water Strategy</i>   |
| • Transport and parking    | <i>London Plan; the Mayor's Transport Strategy</i>   |

For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is the Lambeth Core Strategy (2011), the Lambeth Local Plan 2015 and the 2015 London Plan.

The following are also relevant material considerations:

- The National Planning Policy Framework and Technical Guide to the National Planning Policy Framework.
- The Brixton Supplementary Planning Guidance 2013.
- Draft Minor Alterations to the London Plan (2015).

## **Principle of development**

14 The Canterbury Arms site is situated in the Brixton Central Area as designated in the Brixton Supplementary Planning Document (SPD) adopted June 2013. As part of the statutory consultation process for the document, the GLA welcomed the broad aspirations of the SPD that seek to promote Brixton's vitality and viability, but raised concerns that the document should seek a more strategically cohesive approach to regeneration in Brixton (ref: PDU/LDF22/LDD14/JF01). In particular, the town centre and key opportunity sites within the core of Brixton's commercial area need to be considered in a coordinated manner that optimises the development of town centre vitality and viability, and housing benefits through a strategic masterplanning approach.

15 Lambeth Council has now adopted the Brixton SPD and has prepared a draft 'Future Brixton Masterplan' which includes a comprehensive approach for the development of Council and Network Rail-owned sites around Popes Road. The masterplan envisages the redevelopment of the Canterbury Arms site in accordance with the 2014 consented scheme, with the northern elevation of the redeveloped ice rink site closely adjoining the southern elevation of the redeveloped Canterbury Arms site.

16 It is envisaged that a planning submission for the redevelopment of the Popes Road area will be made later in 2016. However, given that there are design implications associated with the development of the Canterbury Arms in isolation (see further below), further clarity on the progress of wider regeneration scheme should be provided. The Council should ensure that the development of the Canterbury Arms does not prejudice the wider regeneration aspirations or the development potential of the adjoining sites.

17 In its Stage I response in 2013, it was noted by the GLA that the proposals required the demolition of the existing Canterbury Arms public house. Concerns were raised about the principle of the loss of the pub, given that the London Plan recognises the value of London's pubs as an important focus for community life, and in Brixton public houses form an important part of the night time economy cluster of regional/sub-regional importance.

18 Since this time, however, planning permission has been granted for a scheme involving the demolition of the public house, and the building is currently undergoing demolition. The GLA's concerns about the loss of the pub are thus no longer of relevance to the assessment of the current proposals.

19 Notwithstanding concerns raised above regarding the site's role in the wider regeneration of Brixton town centre, the principle of providing residential dwellings as part of any redevelopment on this site would help meet London's housing need, and would be broadly supported by the strategic aspirations of London Plan Policy 3.3, providing that this was done in a way that did not limit the development potential of neighbouring sites.

## **Housing**

20 The scheme proposes 37 residential units (as opposed to the consented 31 units) and the table below illustrates the proposed housing schedule:

| <b>Unit size</b> | <b>Number of units</b> |
|------------------|------------------------|
| One bed          | 14                     |
| Two bed          | 19                     |
| Three bed        | 4                      |
| <b>Total</b>     | <b>37</b>              |

#### Affordable Housing and tenure

21 The applicant is proposing to provide 6 affordable housing units, which equates to 16% of the total housing provision. The unit mix of this affordable component has not been specified at this stage. In response to the requirements of London Plan Policy 3.12 (which seeks to secure the maximum reasonable amount of affordable housing), the applicant has submitted a financial viability assessment to the Council to support proposed affordable housing. The viability report, and the financial modelling which underpins it, is currently undergoing a locally-led assessment to verify whether the proposed affordable housing provision would be the maximum reasonable. Given the site's relatively central location and the likely high sales volumes the level of affordable housing appears low, and the applicant should look to increase the offer if shown to be viable. GLA officers will update the Mayor of the findings of the assessment, and of any further negotiations, at the decision making stage.

22 The applicant is proposing that 4 of the 6 units would be affordable rented units and the remaining two would be intermediate shared ownership units. This is in accordance with the strategic target of 60:40 affordable rent:intermediate tenure split as proposed by London Plan policy 3.11.

23 It is noted that the consented scheme for 31 units provided 5 affordable housing units (16%), with 3 affordable rented units (60%, 2x1 bed and 1x2 bed units) and 2 intermediate shared ownership units (40%, 2x1 bed units). A review mechanism was agreed within the S106, which would see the scheme revert to 12 intermediate units if it could be demonstrated that an RSL could not be found to take on the rented flats.

#### Mix of units

24 London Plan Policy 3.8, together with the Mayor's Housing SPG, and the draft Revised Housing Strategy, seek to promote housing choice and a balanced mix of unit sizes in new developments, with particular focus on affordable family homes. The development includes four three-bed family units, comprising 11% of overall provision. Given the site's town centre location, the proposed mix prioritises non-family units, and includes 51% two-bed and 38% one-bed. In this context, the mix is acceptable.

#### Residential quality

25 The applicant has provided a residential schedule that confirms that all the residential units meet or exceed the Mayor's minimum space standards set out in table 3.3 in the London Plan. Further assessment of the residential quality of the scheme is set out in the urban design section of this report.

### Children's play space

26 The scheme proposes 107.3sq.m.of communal amenity space, however, it is not clear from the submitted documentation what form this space will take. The current ground floor plan seems to show this space as a rather uninspiring area of hard landscaping. Policy 3.6 of the London Plan seeks to ensure that development proposals include suitable provision for play and recreation. Further detail is provided in the Mayor's Shaping Neighbourhoods: Play and Informal Recreation Supplementary Planning Guidance. Given the proposed mix, it is expected that the child yield for the development would be below the threshold of 10 children whereupon on-site play facilities are required, as detailed in the Mayor's SPG. Using the methodology within the Mayor's SPG, the applicant should confirm the actual expected child yield for the proposals, to confirm this is in fact correct. It is noted that an off-site contribution to playspace is proposed by the applicant and further details of this should be provided.

### Density

27 Given the high PTAL level of the application site as described in paragraph nine, the London Plan density matrix shown in table 3.2 of the London Plan would suggest that the development should achieve a residential density in the region of 650 to 1100 habitable rooms per hectare.

28 The supporting material calculates the residential density by dividing the number of habitable rooms (101) by the area of the site in hectares (0.08 ha), which results in a density of 1,263 habitable rooms per hectare. This figure exceeds the London Plan density range for a site of this character. However, given the high public transport accessibility of the site and the fact that the London Plan identifies town centres as potential locations for higher densities above the density matrix, plus the fact that Lambeth Council's Local Plan identifies as a key development site which could support higher density development, the density could be acceptable in this instance.

29 Whilst GLA officers are broadly comfortable with the proposed density, the applicant should provide density figures based on net residential area for further clarification, in accordance with guidance in London Plan paragraphs 3.30 and 3.31 in support of London Plan Policy 3.4, and the Mayor's Housing SPG (2012).

## **Urban design**

30 As discussed above, it is important that the design of any proposals for the redevelopment of this site do not compromise the prospects for the strategically cohesive approach to regeneration in Brixton envisaged within the Brixton SPD and the Future Brixton Masterplan.

### Layout

31 The proposed development will occupy a marginally more slender footprint than the existing public house building that extends slightly further south towards the former ice rink site. The northern boundary will maintain the existing building line that fronts Canterbury Crescent, retaining the element of open space currently provided by the existing beer garden, thus reducing any potential encroachment on the setting of the Grade II Listed St John's School opposite.

32 The proposed ground floor layout presents the opportunity to provide new active frontages on Pope's Road and Canterbury Crescent. This opportunity has been realised in the current scheme by creating regular large glazed openings to the commercial unit which would occupy a large part of this frontage, with the substation and refuse storage areas repositioned to the northern side of the building. An active frontage would therefore be provided on a prominent corner of the development for pedestrians arriving from the south on Pope's Road, and an attractively sized commercial unit would be created. Furthermore, the proposed double-height entrance will create a legible entrance to the new residential building from Pope's Road. These amendments to the original 2013 scheme were negotiated prior to the consent, and are welcomed.

33 It is understood that the southern elevation and an element of the eastern elevation have been 'blanked' in order to prevent any potential overlooking of the future development on the former ice rink site. It is important and necessary to take account of the future schemes that form the planned comprehensive development of the area, and this consideration is welcomed. However, if the adjacent sites are not developed in the way envisaged by the masterplan, the proposed design could have a significant impact on the overall quality and appearance of the building and surrounding area by creating a permanently visible eight storey blank elevation when viewed from the south. Further clarification should be provided on the feasibility and progress of the masterplan proposals to ensure that the development of the Canterbury Arms site separately to the adjacent sites does not have a permanently detrimental impact on the character and appearance of the area, or compromise the future schemes coming forward.

#### Residential quality

34 The overall internal residential quality of the scheme is generally supported. The low number of units per floor creates a high proportion of dual aspect units and would ensure a good sense of ownership over the communal spaces. As discussed above, the applicant has confirmed that all units meet or exceed the Mayor's minimum space standards. However, the quality of the southern units, which represent a significant proportion of the overall provision, could be improved further by addressing the "blank" flank wall issue raised above. These units would have compromised outlook and access to daylight and sunlight as a result of the current design of this façade.

35 In terms of external amenity space, it is noted that only 16 out of the 37 units would be provided with private amenity space. The Mayor's Housing SPG states that private open space should be provided in all new housing developments, with a minimum of 5 sqm per unit. The development would have an area of communal open space, however as mentioned above it is unclear from the drawings and documents what the quality and value of this space would be. The applicant states that more of the units could be provided with balconies but in discussion with Lambeth Council it is considered that given the site's location and scheme design it would be preferable to provide more generous internal living space. It is noted that an off-site contribution is to be offered towards the provision of informal playspace/open space and further details of this are required in order to satisfy GLA officers that this approach is acceptable.

#### Height, massing and scale

36 The proposed height and massing creates a legible and elegant form, albeit that the building occupies a slightly wider footprint than the consented scheme. The minimal material palette is welcomed providing a greater focus on the detail and quality of the materials. Officers are supportive of the scale, form and design of the building, notwithstanding the comments on the southern façade as outlined above.

### **Inclusive design**

37 The applicant has stated that all new homes will meet Lifetime Home standards and that 10% (4 units) will be wheelchair accessible in accordance with strategic policy, which is welcomed. Compliance with each of these standards should be demonstrated on plan, using a sample of flat layouts. The applicant should refer to the quality and design standards set out in the Mayor's Housing Supplementary Planning Guidance, and should ensure that the wheelchair accessible units meet the best practice guidance set out in Annex Two of the SPG. It should be clear on the plans where the wheelchair accessible homes are located and how many there are. These should be distributed across tenure types and sizes to give disabled and older people similar choices to non-disabled people (unless the council through their Accessible Housing Register work can advise on the need in this part of the borough for a particular size of wheelchair accessible home).

## **Sustainable development**

### Energy

38 The applicant has submitted an energy strategy. A range of passive design features and demand reduction measures have been proposed to reduce the carbon emissions of the proposed development. Both air permeability and heat loss parameters will be improved beyond the minimum backstop values required by building regulations. Other features include low energy lighting and mechanical ventilation with heat recovery.

39 The applicant should confirm the efficiency of the gas boiler as it is referenced as both 95% and 96% throughout the document. The applicant should also ensure that the efficiency used in the modelling is based on the gross fuel input rather than net fuel input. A data sheet showing the gross efficiency should be provided.

40 The demand for cooling will be minimised through solar control glazing. However, it is noted that the g-value used in the SAP modelling is significantly higher than the 0.4 proposed in the energy strategy. The applicant should update the modelling and provide updated carbon emission figures as the lower g-value will impact on the heating demand.

41 The development is estimated to achieve a reduction of 8 tonnes per annum (15%) in regulated CO<sub>2</sub> emissions compared to a 2013 Building Regulations compliant development.

42 The applicant has carried out an investigation and there are no existing networks within the vicinity of the proposed development. The development is situated within the Brixton District Heating Opportunity Area and the applicant has stated that the two 1.6 MWth CHP are to be installed as part of the network, however this is a draft strategy at present. The applicant should contact the local energy officer to determine timescales for the network. Evidence of correspondence should be provided. The applicant has, however, provided a commitment to ensuring that the development is designed to allow future connection to a district heating network should one become available. The communal heat network will be supplied from a single energy centre located on the ground floor.

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

44 The applicant has investigated the feasibility of a range of renewable energy technologies and is proposing to install 82 m<sup>2</sup> of Photovoltaic (PV) panels on the roof of the development. A reduction in regulated CO<sub>2</sub> emissions of 6 tonnes per annum (16%) will be achieved through this third element of the energy hierarchy.

45 Overall, a reduction of 10 tonnes of CO<sub>2</sub> per year in regulated emissions compared to a 2013 Building Regulations compliant development is expected, equivalent to an overall saving of 27%.

46 The on-site carbon dioxide savings fall short of the targets within Policy 5.2 of the London Plan. While it is accepted that there is little further potential for carbon dioxide reductions onsite, in liaison with the borough the developer should ensure the shortfall in carbon dioxide reductions, equivalent to 4 tonnes of CO<sub>2</sub> per annum, is met off-site.

### Flood Risk

47 The site is less than 1ha in area and located within Flood Zone 1. As a result, no Flood Risk Assessment (FRA) will be required. However, the Sustainability Statement prepared by the applicants indicates that an FRA will be prepared at the detailed design stage.

48 Environment Agency mapping reveals that the site is not at risk of significant surface water flooding. However, the adjacent roads (Canterbury Crescent and Pope's Road) are at risk of surface water flooding.

### Drainage

49 Given the surface water flood risk of the neighbouring roads, London Plan policy 5.13 (sustainable drainage) will be particularly important. The Design & Access Statement prepared by the applicants proposes an extensive green roof system (integrated with PV panel support structure) and suggests that a communal garden will be provided. The Sustainability Statement proposes an underground attenuation tank to reduce the discharge rate to 50% of the existing rate.

50 The provision of a green roof is welcome. It is understood that underground attenuation will be required. However, there is potential for additional SuDS measures, such as Design for Exceedance (areas specifically designed to flood to a shallow depth for a relatively short time during rare storm events, e.g. once every 10 years) in the communal garden. London Plan Policy 5.13 – Sustainable Drainage and the Mayor's Sustainable Design and Construction SPG aspires to achieve greenfield run-off rates and requires at least a 50% reduction in current discharge rates. Further details on the design of the sustainable drainage measures will be required to determine compliance with London Plan policy 5.13.

## **Transport**

51 Given the excellent public transport accessibility level of the site, the car free proposal is supported and should be secured via the Section 106 agreement. As the development provides 4 accessible units, TfL requests that 4 Blue Badge parking spaces are identified and provided in the vicinity of the site, in accordance with London Plan policy 6.13. TfL suggests the applicant utilises the opportunity to provide one Blue Badge space next to the site, as outlined in Appendix C of the Transport Assessment. It is also suggested the applicant provides a two year free car club membership to all occupants. This should be included within the Travel Plan and secured through the Section 106 agreement.

52 The proposed cycle parking is in accordance with London Plan standards for residential units and should be secured by planning condition. TfL requests the applicant provides an additional two visitor spaces to serve the retail element of the site, and this should also be secured through condition. Cycle parking should be located in a secure, sheltered and accessible location.

53 The commitment to prepare a Construction Logistics Plan (CLP) and Delivery and Servicing Plan (DSP) is welcomed. TfL has provided guidance on the methodology and further information regarding construction routing to Lambeth Council. Maintaining cycle safety during construction and ensuring construction vehicles avoid key strategic routes and peak hour movements is essential. The plans should be secured by condition and submitted and approved by the Council prior to commencement of the development, including demolition.

## Community Infrastructure Levy

54 In accordance with London Plan policy 8.3 '*Community Infrastructure Levy*', the Mayor has agreed a CIL Charging Schedule which came into operation on 1 April 2012. It will be paid by most new development in Greater London. Boroughs are arranged into three charging bands with rates of £50 / £35 / £20 per square metre of net increase in floorspace respectively. The proposed development is in the London Borough of Lambeth, where the charge is £35 per square metre. More details are available via the GLA website <http://london.gov.uk/>.

55 London borough councils are also able to introduce CIL charges which are payable **in addition** to the Mayor's CIL. Lambeth Council adopted its own CIL scheme in 2014. See the council's website for more details.

## Local planning authority's position

56 The local planning authority's position is not known at the time of writing this report.

## Legal considerations

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

## Financial considerations

58 There are no financial considerations at this stage.

## Conclusion

59 London Plan policies on housing, affordable housing, urban design, inclusive access, sustainable development and transport are relevant to this application. It is considered that the scheme would be broadly compliant with the London Plan, however, there are some outstanding issues that need to be resolved and these and their potential remedies are set out below:

- **Principle of development:** Some concerns are raised regarding the principle of developing the site in isolation from the wider regeneration of Brixton town centre. The

Council should ensure that the development does not prejudice the development potential of the adjoining sites, nor impact in the long term on the design and appearance of the surrounding area. Further clarity on the progress of wider regeneration scheme should be provided. Notwithstanding the above issues, the principle of providing residential dwellings as part of any redevelopment on this site would be broadly supported by the strategic aspirations of London Plan Policy 3.3.

- **Affordable housing:** The viability of the scheme should be fully assessed at the local level to ensure accordance with London Plan Policy 3.12, however the current offer appears low. Pending the outcome of the viability assessment the GLA seeks further discussion regarding the maximum reasonable amount of affordable housing.
- **Urban design:** The Council should ensure that the proposed development on this site is compatible with the coherent design strategy being prepared for this site and the adjacent sites. This is particularly required as a justification for the blank façade on the southern elevation.
- **Housing Quality:** Details of the contribution towards open space and playspace should be provided to satisfy the GLA that the lack of external private amenity space within the scheme could be suitably addressed.
- **Inclusive Design:** The applicant has stated that all new homes will meet Lifetime Home standards and that 10% will be wheelchair accessible in accordance with strategic policy, which is welcomed. Further information and plans should be submitted demonstrating compliance with each of these standards.
- **Sustainable development:** Further clarification and information is sought with regards to the off-site contributions to meet shortfall in carbon reduction. The applicant should provide confirmation of the gas boiler efficiency, provide updated SAP modelling, and clarify the timescales for the provision of the district heating network. Further details of sustainable drainage measures are required.
- **Transport:** The applicant and the Council should identify suitable on street disabled parking and ensure future occupants are exempt from eligibility for local car parking permits through the S106 agreement. The cycle parking, CLP and DSP should be secured by planning condition.

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