

Thrayle House, Stockwell Park Estate

in the London Borough of Lambeth

planning application no.15/04500/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

Redevelopment of Thrayle House for residential-led mixed use development of up to twenty storeys, comprising 177 homes and 1,358 sq.m. of flexible retail (Class A1 and A2) and community use (Class D1).

The applicant

The applicant is **Community Trust Housing**, the architect is **PRP**, and the agent is **JLL**.

Strategic issues

The proposed residential-led development is supported in strategic planning terms; however issues with respect to **retail and town centre uses, affordable housing, inclusive design, transport** and **climate change** should be addressed before the application is referred back to the Mayor at his decision making stage. **Social infrastructure, public open space, housing and estate renewal, urban design and tall buildings**, and **historic environment** policies are also relevant to this application.

Recommendation

That Lambeth Council be advised that while the application is generally acceptable in strategic planning terms, it does not yet comply with the London Plan, for the reasons set out in paragraph 79 of this report; but that the possible remedies set out in that paragraph could address these deficiencies.

Context

1 On 4 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 has until 14 January 2016 to provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.

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

- 1A “Development which comprises or includes the provision of more than 150 houses, flats, or houses and flats.”
- 1B(c) “Development (other than development which only comprises the provision of houses, flats, or houses and flats) which comprises or includes the erection of a building or buildings (c) outside Central London and with a total floorspace of more than 15,000 square metres.”
- 1C(c) “Development which comprises or includes the erection (c) a building of more than 30 metres high and 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.

Site description

5 The 0.77 hectare site is bounded by Stockwell Road to the west, Rumsey Road to the north, and Benedict road to the east. To the south is the existing skatepark (an Asset of Community Value), used for skateboarding and BMX, beyond which is Stockwell Park Walk. The existing Thrayle House is made up of four linked blocks of three and four storeys, containing 76 residential units (now vacant) around a courtyard. The block along Stockwell Road includes the offices of the applicant and the Brixton Cycles retail space. The site slopes away from Stockwell Road by approximately one storey towards Benedict Road.

6 The site is on the south-west corner of the Stockwell Park Estate, which is the subject of an extensive estate renewal programme, with an outline masterplan approved in 2007, including refurbishment and new-build. For Thrayle House, this included demolition and rebuild of perimeter blocks of five to seven storeys around a courtyard. The Estate is made up of residential blocks of up to twenty storeys.

7 The site is just outside Brixton town centre, which lies to the south-east and is classified as a Major centre in the London Plan. Brixton Conservation Area also lies to the south-east. Further along Stockwell Road to the north-east lies the Stockwell Green Conservation Area. The areas to the south and west are generally made up of lower-rise nineteenth century development.

8 The level of public transport accessibility (PTAL) ranges between 6a and 6b (‘excellent’). Brixton National Rail Station lies 460 metres to the south of the site, alongside Brixton London Underground (LU) Station. Stockwell LU Station, also on the Victoria line, lies approximately 750 metres northwards. A total of 20 bus routes, including 7 night buses, are available from the site’s Stockwell Road (A203) frontage, or a short distance away on Brixton Road (A23). Both roads form part of the Transport for London Road Network (TLRN). The Cycle Hire network currently extends up to Clapham Road (A3), with the closest station adjacent to Stockwell LU station.

Details of the proposal

9 The proposal is to demolish the existing building and construct a residential-led mixed use development of up to twenty storeys around a central amenity courtyard, comprising 177 homes and 1,358 sq.m. of flexible retail (Class A1 and A2) and community use (Class D1). This includes:

- A part nine-storey, part-twenty storey block accessed from beside the skatepark, comprising commercial and community space at ground floor, with 76 residential units above.
- A five-storey block accessed from Stockwell Road, comprising ground floor commercial space with 40 active elderly residential units above.
- A seven-storey block accessed from Benedict Road, comprising 57 residential units, including 4 duplex units.
- Four three-storey houses accessed from Rumsey Road.
- Benedict Road will become a shared surface with perpendicular car parking, new tree planting and widened footpaths;
- A new public 'plaza' is proposed between the southern building edge and the skatepark, including new planting, lighting and seating.
- A central courtyard is proposed, providing shared secure communal amenity for residents, with seating and a play area for 0-5 year-olds.
- An additional external amenity area for residents is proposed at first floor.

10 Thrayle House is the final phase of the Estate masterplan.

Case history

11 In 2007, outline planning permission was issued (LPA ref: 06/01769/OUT) for the regeneration of the Stockwell Park Estate, including 500 dwellings, community and commercial uses, along with improvements to existing streets, pedestrian routes, open spaces, and provision of cycle and parking spaces. This included some demolition and new build elements, including Thrayle House.

12 On 3 February 2015, a pre-application meeting was held at City Hall for full planning permission for the redevelopment of Thrayle House for a residential-led mixed use development comprising circa 177 homes and 1,362 sq.m. of retail and community space, in buildings of up to twenty storeys. The GLA's pre-application advice report of 17 February 2015 concluded that the principle of residential-led development at this site was supported in strategic planning terms; however issues with respect to social infrastructure, retail and town centre uses, public open space, housing and estate renewal, affordable housing, urban design, tall buildings, inclusive design, climate change and transport should be fully addressed prior to the submission of any future planning application.

Strategic planning issues and relevant policies and guidance

13 The relevant issues and corresponding policies are as follows:

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|---------------------------|--|
| • 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> |
| • Retail/town centre uses | <i>London Plan; Town Centres SPG</i> |
| • Social infrastructure | <i>London Plan; Social Infrastructure SPG</i> |
| • Affordable housing | <i>London Plan; Housing SPG; Draft Interim Housing SPG; Housing Standards Policy Transition Statement; Housing Strategy</i> |
| • Density | <i>London Plan; Housing SPG; Draft Interim Housing SPG</i> |

- Urban design *London Plan; Shaping Neighbourhoods: Character and Context SPG; Housing SPG; Draft Interim Housing SPG; Shaping Neighbourhoods: Play and Informal Recreation SPG*
- Tall buildings/views *London Plan, London View Management Framework SPG*
- Historic Environment *London Plan*
- Inclusive design *London Plan; Accessible London: achieving an inclusive environment SPG;*
- Transport *London Plan; the Mayor's Transport Strategy*
- Parking *London Plan; the Mayor's Transport Strategy*
- Crossrail *London Plan; Mayoral Community Infrastructure Levy; Use of planning obligations in the funding of Crossrail and the Mayoral Community infrastructure levy SPG*
- Climate change *London Plan; Sustainable Design and Construction SPG; Mayor's Climate Change Adaptation Strategy; Mayor's Climate Change Mitigation and Energy Strategy; Mayor's Water Strategy*

14 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 2015 Lambeth Local Plan and the 2015 London Plan (Consolidated with Alterations since 2011).

15 The following are also relevant material considerations:

- The National Planning Policy Framework and accompanying Planning Practice Guidance.
- The 2015 draft Minor Alterations to the London Plan.

Principle of development

Residential development

16 London Plan Policy 3.3 'Increasing Housing Supply' recognises the pressing need for new homes in London and Table 3.1 gives an annual monitoring target of 1,559 new units in Lambeth between 2015 and 2025. The provision of 177 residential units is therefore supported in strategic planning terms.

Social infrastructure

17 London Plan Policy 3.16 'Protection and Enhancement of Social Infrastructure' supports the provision of high quality social infrastructure, based on local and strategic needs assessments. Further guidance is contained within the Social Infrastructure SPG.

18 The existing site incorporates the applicant's offices, including a meeting room for use by the community. These facilities will be relocated to the redeveloped Albermarle House, known as 'The Junction', which is currently under construction just to the east of the site. In addition to the relocated space, this proposal includes a community space of approximately 140 sq.m., on ground and basement levels, facing onto the skatepark. It is intended that these facilities will include a record of the Estate's history as well as allowing flexible community uses. Further community facilities of a different type are available to the north of the site on Aytoun Place. The re-provision of an element of community space is supported, in line with Policy 3.16.

Retail and town centre uses

19 London Plan Policies 2.15 'Town Centres', 4.7 'Retail and Town Centres', and 4.8 'Supporting a Successful and Diverse Retail Sector' provide the strategic policy context in which the proposals are considered. Further guidance is provided in the Town Centres SPG.

20 The proposal includes four retail units comprising 380 sq.m. for the existing Brixton Cycles (larger than existing) on the corner of Stockwell Road and the skatepark; two further retail units on Stockwell Road (522 sq.m. and 173 sq.m.); and a further unit of 146 sq.m. adjacent to the lobby access to the twenty storey block, fronting onto the skatepark.

21 Although the site is not within Brixton town centre, it is adjacent to the boundary on Stockwell Park Walk to the south, and neighbours other retail uses on Stockwell Road to the north. Furthermore, the space proposed is similar to the existing commercial floorspace, and will provide a welcome element of active use on Stockwell Road. The provision of a relatively small amount of retail space is supported in strategic planning terms, and in particular the proposed re-provision of much improved space for Brixton Cycles. The applicant is requested to provide further details on the arrangements for temporary space for Brixton Cycles, in recognition of its value to the local community.

Public open space

22 London Plan Policy 7.18 'Protecting Public Open Space and Addressing Deficiency' resists the loss of protected open space unless equivalent or better quality provision is made.

23 The proposal involves development on a strip of land of approximately 15 metres, adjacent to the skatepark, which is currently public open space; however the space has no protection, is of a very poor quality, and was to be built on as part of the outline planning permission. The space will be replaced by a much improved area of open space, in the form of a plaza with seating, trees and other planting, between the new Thrayle House and the skatepark. It is also proposed that the strip of open space to the east of the skatepark will be improved by reseeding with a wildflower mix. It is also recognised that much improved communal external amenity space will be provided for residents in the form of a new ground floor courtyard and first floor podium garden. Consequently, the loss of an element of public open space is considered acceptable in this instance.

Housing and estate renewal

24 The continued regeneration of the Estate is strongly supported, in accordance with London Plan Policy 2.14 'Areas for Regeneration' and as established under the outline planning permission.

25 Policy 3.14 'Existing Housing' states that the *"loss of housing, including affordable housing, should be resisted unless the housing is replaced at existing or higher densities with at least equivalent floorspace"*. Paragraph 3.82 of the London Plan states that estate renewal should take into account regeneration benefits to the local community, the proportion of affordable housing in the surrounding area and the amount of affordable housing to be provided elsewhere in the Borough. More detailed guidance is set out in the Housing SPG, which clarifies that there should be no net loss of affordable housing.

26 This scheme proposes redevelopment of the site, for which outline planning permission has previously been granted for 154 units as part of the estate-wide masterplan. The applicant has now reviewed the proposals with a view to improving residential quality and increasing unit numbers. The comparison of the schemes and existing situation is as follows:

Unit Type	Existing	Extant permission	Proposed scheme			Total
			Social rent	Active elderly (affordable)	Private	
Studio	11	N/K	0	0	0	0
1-bed	35	N/K	16	28	58	102
2-bed	7	N/K	17	12	29	58
3-bed	11	N/K	2	0	9	11
4-bed	12	N/K	6	0	0	6
Total	76	154	41 (23%)	40 (23%)	96 (54%)	177

27 Residents of the 76 existing units (all social rent) on the site have already been rehoused and all of the units are now empty. The existing units do not meet London Plan space standards and the provision of a greater number of larger-sized affordable units (81) is welcomed, in line with Policy 3.14. The applicant states that former residents have been offered the opportunity to return to the completed scheme under the same social rented tenancy agreements, without transitioning to higher affordable rents, which is supported. Although it is recognised that not all of these former residents will return and there may be an element of downsizing, the reduction in three and four bed units may not allow former residents to be rehoused, and the applicant should provide further information to justify this.

Affordable housing

28 London Plan Policy 3.12 'Negotiating Affordable Housing' seeks to secure the maximum reasonable amount of affordable housing and Policy 3.9 'Mixed and Balanced Communities' seeks development that promotes mixed and balanced communities by tenure and household income.

29 The scheme would deliver 46% of units as affordable housing, providing a greater number of affordable units than currently exists, which is welcomed. Lambeth Council's policy requires 50% of units to be affordable housing where public subsidy is available and 40% without public subsidy. It is understood that the applicant has submitted viability assessment and the Council should share its independent review of this with GLA officers in order to confirm that the maximum reasonable amount of affordable housing is being provided in line with Policy 3.12. The introduction of market housing to the site is welcomed, in line with Policy 3.9.

30 London Plan Policy 3.11 'Affordable Housing Targets' requires that 60% of the affordable housing provision should be for social and affordable rent, and 40% for intermediate rent or sale. In this case, the provision will be 100% social rented units; however it is recognised that this is a reflection of the need to re-provide the existing social rented units. This may be acceptable; however, this is subject to confirmation of the viability assessment review.

Housing Choice

31 London Plan Policy 3.8 'Housing Choice' encourages a choice of housing based on local needs, while affordable family housing is stated as a strategic priority. Housing that responds to the varied needs of older people is also encouraged. Policy 3.11 also states that priority should be accorded to the provision of affordable family housing.

32 Of the social rent units (not including active elderly), 20% are family sized; however as stated above, there are concerns that vacated families may not be able to move back to the site, which requires further explanation. The existing studio units are not being re-provided as these do not meet residents' needs, which is supported. The provision of 40 'active elderly' one and two bed units is welcomed, in line with Policy 3.8. These units are wheelchair accessible with large winter gardens, and come with block communal facilities and services, including a social space, laundry room, podium garden space, and support office. As well as allowing residents to live more comfortably, the provision of these units will also encourage larger family-sized units to be vacated.

Residential density

33 London Plan Policy 3.4 'Optimising Housing Potential' states that taking into account local context and character, the design principles in Chapter 7 and public transport capacity, development should optimise housing output within the relevant density range shown in Table 3.2. The site is considered to be within a 'central' setting, where the density matrix sets a guideline of 650-1,100 habitable rooms, or 140-405 units, per hectare with a PTAL of 4-6. GLA officers calculate the density to be approximately 230 units per hectare, which is within the density range and is therefore acceptable in strategic planning terms.

Children's play space

34 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 supplementary planning guidance 'Shaping Neighbourhoods: Play and Informal Recreation', which sets a benchmark of 10 sq.m. of useable child play space to be provided per child, with under-5 child play space provided on-site as a minimum.

35 The child yield is expected to be 50 (excluding the active elderly provision), with 22 under-five's, requiring 220 sq.m. of play space as a minimum. The proposals include 439 sq.m. of play space for under-five's in the courtyard, including formal and informal facilities. It is recognised that the neighbouring skatepark will provide play space for older children and the application demonstrates that there are extensive play facilities in the vicinity. The proposed play provision is acceptable; however the Council should ensure that detailed design secures play space that is fully useable as play space.

Urban design and tall buildings

36 The applicant engaged in pre-application discussions with the Council and the GLA, and concerns raised have been appropriately responded to, which is welcomed.

37 The overall approach of locating buildings on all four edges of the site ensures that the public realm is well defined and enclosed, and allows private open space to be located behind the buildings, which is strongly supported. The provision of commercial units and community uses facing onto Stockwell Road and the new plaza adjacent to the skatepark will generate good levels of activity and overlooking of the public realm, ensuring it feels safe and inviting. The plaza also provides a clear pedestrian route from Stockwell Road to Benedict Road, with a clear sight-line, which is much improved since pre-application stage.

38 The skatepark is an important asset for the skateboarding/BMX community; however there are also noise impacts on neighbouring residents arising from this use. The proposed plaza provides appropriate mitigation in the form of distance, landscaping and tree planting. The planting also provides a clear delineation between the skatepark and the plaza, which should deter skateboarding in the plaza, while allowing views into the skatepark from the proposed seating. The

applicant states that new toilets in the development will be available to skatepark users, which should be appropriately secured by the Council. At pre-application stage, the opportunity to include a low rise building and terraced seating along the eastern side of the skatepark was discussed. Although this is not included in the proposals, it is understood that the applicant and the Council are investigating opportunities to allocate local CIL monies to skatepark improvements.

39 The generous distribution of front entrances to maisonettes along Benedict Road, as well as access to Cores B and C, will generate good levels of activity onto the public realm and is supported. The provision of townhouses along Rumsey Road provides an additional housing typology and good levels of activity. At pre-application stage, concerns were expressed about the inclusion of car ports adjacent to the townhouses, which undermined the quality of the frontage. These have now been removed, and replaced with residential space.

40 London Plan Policy 3.5 'Quality and Design of Housing Developments' promotes quality in new housing provision, including space standards, with further guidance provided by the Mayor's draft interim Housing SPG. The overall residential quality of the scheme is high, exceeding minimum space standards, with a minimum ceiling height of 2.5 metres. The provision of maisonettes and townhouses is particularly supported, providing desirable homes with their own front doors. A good proportion of dual aspect units are included, with no north facing single aspect units. The quality of the 'active elderly' units is also high. While this block includes a higher number of units per core (ten) than advised by the draft interim Housing SPG, and thus a high proportion of single aspect units, given the limited number of floors, the active elderly use, and the inclusion of a residents lounge and communal external amenity space, this is considered acceptable in this instance.

41 The appearance of the proposals incorporates light stock brick, stone effect cladding, and dark bronze infills in a simple gridded approach, which relates well to the local context and is supported. The use of stone effect cladding on the twenty storey block will also help to lighten the appearance of this taller element. The design of the blocks is tenure blind.

42 The twenty storey block is significantly taller than its immediate context; however it is recognised that the almost complete Wayland House, on the northern edge of the Estate, rises to a slightly greater height. Tall buildings also lie to the south-east in Brixton, as well as towards Stockwell to the north-west. The proposals do not impact any strategic views and are considered to be of a high design quality, in line with London Plan Policy 7.7 'Location and Design of Tall and Large Buildings'.

Historic environment

43 London Plan Policy 7.8 'Heritage Assets and Archaeology' states that development should identify, value, conserve, restore, re-use and incorporate heritage assets where appropriate. The Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the tests for dealing with heritage assets in planning decisions. In relation to listed buildings, all planning decisions should *"have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses"* and in relation to conservation areas, special attention must be paid to *"the desirability of preserving or enhancing the character or appearance of that area"*.

44 The NPPF states that when considering the impact of a proposal on the significance of a designated heritage asset, great weight should be given to the asset's conservation, and the more important the asset, the greater the weight should be. Significance is the value of the heritage asset because of its heritage interest, which may be archaeological, architectural, artistic or historic, and may derive from a heritage asset's physical presence or its setting. Where

a proposed development will lead to ‘substantial harm’ to or total loss of the significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss. Where a development will lead to ‘less than substantial harm’, the harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.

45 The only designated heritage asset in close proximity to the site is the Grade II listed terrace at 148-166 Stockwell Road, approximately 50 metres to the north of the site. Three Conservation Areas and a number of other listed buildings are located at a greater distance. The application includes a Townscape, Heritage and Visual Impact Assessment, which demonstrates that the tallest element of the proposals will be visible from 148-166 Stockwell Road and the Stockwell Green Conservation Area, and will therefore affect their setting; however GLA officers do not consider that any harm will be caused to their significance, in terms of their physical presence or setting.

Inclusive design

46 The aim of London Plan Policy 7.2 ‘An Inclusive Environment’ is to ensure that proposals achieve the highest standards of accessibility and inclusion (not just the minimum). Inclusive design principles, if embedded into the development and design process from the outset, help to ensure that all, including older people, disabled and Deaf people, children and young people, can use the places and spaces proposed comfortably, safely and with dignity.

47 Policy 3.8 ‘Housing Choice’ requires all new housing to be built to ‘Lifetime Homes’ standards. In order to bring the London Plan into line with new national housing standards, the draft Minor Alterations to the London Plan (MALP) proposes to replace this with *“ninety percent of new housing meets Building Regulation requirement M4(2) ‘accessible and adaptable dwellings’”*. Policy 3.8 also requires 10% of units to be wheelchair accessible or easily adaptable, which the draft Minor Alterations to the London Plan proposes to replace this with *“ten per cent of new housing meets Building Regulation requirement M4(3) ‘wheelchair user dwellings’, i.e. is designed to be wheelchair accessible, or easily adaptable for residents who are wheelchair users”*. In advance of the MALP, a Housing Standards Policy Transition Statement sets out how the existing housing standards should be applied from October 2015. This is also set out in the draft Interim Housing SPG, alongside the other London standards which are not affected by the introduction of national standards.

48 The applicant states that all units will meet Lifetime Homes requirements and that 22% will be wheelchair accessible, comprising the ‘active elderly’ units. The Council should secure M4(2) and M4(3) requirements by condition, to ensure the design of a scheme has considered the standard. Although the wheelchair accessible units are limited to the ‘active elderly’ units, the applicant states that the overall provision of wheelchair accessible units across the Estate is greater than 10%. The provision of wheelchair accessible units is therefore acceptable in this case.

49 The proposals include steps from the plaza down to Benedict Road, in response to a significant level change. It is recognised that there is no opportunity to include a ramp in this area, and alternative routes are available nearby via Rumsey Road and to the south of the skatepark, which is acceptable in this instance.

50 As discussed under ‘Transport’ below, 40 Blue Badge parking spaces should be provided.

Transport

51 Improved walking routes into the site are proposed from Stockwell Road and Rumsey Road. Public realm improvements would also create a new shared surface along Benedict Road.

52 Vehicular access to an underground parking basement is proposed via a ramp from Benedict Road. Four refuse collection areas are proposed; one for each of the residential cores. Servicing by larger vehicles, including refuse collection, is proposed from Rumsey Road and Benedict Road, avoiding the TLRN, which is supported.

53 A total of 65 car parking spaces are proposed for residents, 5 of which would be Blue Badge spaces. This represents a ratio of 0.37 spaces per residential unit. Given the excellent PTAL of 6a-6b, a much lower level of parking or a car free scheme would be expected in this location. In addition, a Blue Badge parking space should be provided for each wheelchair accessible unit to accord with the Mayor's Accessible London SPG. As the scheme proposes 40 'active elderly' wheelchair accessible units, 40 Blue Badge car parking spaces should be provided. Notwithstanding this, a car parking management plan (CPMP) should be secured by section 106 agreement, including proposals for flexible management of the car parking spaces in response to changing patterns of demand by both disabled and non-disabled residents. All car parking spaces should preferably be allocated on a short-term basis, rather than indefinitely allocated to specific individual units, and 20% active and 20% passive electric vehicle charging points should be secured by condition. All residents should also be excluded from applying for local controlled parking zone (CPZ) permits in the section 106 agreement.

54 Cyclists would access the development either via the new public realm adjacent to the skatepark; by using the pedestrian residential entrances; or via the ramp to the basement cycle parking areas. A total of 354 secure residential cycle parking spaces are proposed, mainly at basement level, at a ratio of 2 per residential unit, which exceeds London Plan standards and is welcomed. Sheffield stands are also proposed in the public realm, in line with London Plan standards.

55 Trip generation analysis has been provided in the transport assessment and it is accepted that the development would be unlikely to have a significant strategic transport impact on the local public transport and highway networks.

56 A draft Travel Plan (TP) has been provided in the application submission, which is satisfactory. The TP sets ambitious targets for reducing car mode share amongst residents of the development, which is welcomed. Other targets proposed in the draft TP are acceptable; however it is suggested that more robust measures are required to achieve them. TfL has provided detailed comments directly to the applicant on this matter. A full TP should be secured by condition, and discharged in consultation with TfL.

57 The provision of on-site car club bays, with subsidised 3 year membership for residents, is strongly supported, in line with London Plan Policies 6.11 and 6.13. Both of these measures should be secured in the section 106 agreement.

58 The application proposes a bespoke wayfinding signage system to be used across the larger masterplan area; however the applicant should use Legible London wayfinding, as this is the recognised system used across London. TfL has published advice and guidance on use of Legible London. This matter should be discussed further between the applicant, the Council and TfL.

59 The Cycle Hire network currently extends up to Clapham Road (A3), with the closest docking station adjacent to Stockwell LU station, approximately 500 metres to the north. Further analysis subsequent to the pre-application meeting suggests that this area is considered to be an appropriate location to expand the Cycle Hire network and the applicant is requested to discuss this further with TfL. For information, the cost of a new 40 point docking station would be £200,000.

60 A draft Construction Management Plan (CMP) has been provided, which is broadly satisfactory. A full CMP should be secured by condition and discharged in consultation with TfL.

61 Clarification is required as to how the proposed commercial units would be serviced. In particular, it is unclear whether on-street bays on Rumsey Road would be for parking or loading. The on-street bays on Rumsey Road may be appropriate for car club and short-stay loading; however it is preferred that no loading takes place from the TLRN on Stockley Road. A full Deliveries and Servicing Plan (DSP) should be secured by pre-commencement condition and discharged in consultation with TfL.

Community Infrastructure Levy

62 In accordance with London Plan Policy 8.3, 'Community Infrastructure Levy', the proposed development is within the London Borough of Lambeth, where the Mayoral CIL charge is £35 per square metre Gross Internal Area (GIA).

Climate Change

Energy

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

64 Information should be provided on how the demand for cooling will be minimised, in line with the cooling hierarchy outlined in London Plan Policy 5.9 'Overheating and Cooling'. Evidence should also be provided demonstrating that the risk of overheating has been assessed and addressed through the design. See the latest GLA Guidance on preparing energy assessments (April 2015): <https://www.london.gov.uk/what-we-do/planning/planning-applications-and-decisions/pre-planning-application-meeting-service-0>.

65 The development is estimated to achieve a reduction of 4 tonnes per annum (2%) in regulated CO2 emissions under the first stage of the energy hierarchy ('Be Lean'), compared to a 2013 Building Regulations compliant development. Sample DER and TER worksheets and BRUKL sheets, including efficiency measures alone (i.e. excluding CHP and PV) should be provided to support the savings claimed under this step of the energy hierarchy.

66 The applicant has not carried out an investigation into the availability of district heating networks in the vicinity. The London Heat Map suggests that there are no existing or proposed heat networks near the site; however the site is near a district heating opportunity area. The applicant should therefore commit to ensuring that the development is designed to allow future connection to a district heating network should one become available.

67 The applicant should confirm that all apartments and non-domestic building uses will be connected to the site heat network. The network will be supplied from a single energy centre

located in Barrett House, which is adjacent to the application site. Further information on the floor area and availability of the energy centre should be provided. The applicant has stated that the site is part of a wider masterplan and further information should be provided on how the application site fits into the wider masterplan in terms of the energy strategy. This should clarify if the Barrett House energy centre is already in operation; whether it includes capacity to serve Thrayle House; and whether there are any obstacles that may stop the application site from connecting.

68 The applicant is proposing to serve the development from a combined heat and power (CHP) system, which will meet 65% of the heat load. It is unclear whether the CHP engine will be serving this site alone or whether a system is already in place serving other parts of the masterplan and this should be clarified. The application site appears too small to sustain a CHP system on its own as running hours are likely to be low. Further information should be provided, including estimated monthly load profiles, CHP system capacity, running hours and operational arrangements to demonstrate that the strategy proposed will work in practice.

69 A reduction in regulated CO₂ emissions of 64 tonnes per annum (28%) is claimed through this second part of the energy hierarchy ('Be Clean'); however further information should be provided to support the savings claimed.

70 The applicant has investigated the feasibility of a range of renewable energy technologies and is proposing to install 30kWp of solar PV on the roofs of the buildings. A roof plan identifying the available roof area has been provided.

71 A reduction in regulated CO₂ emissions of 13 tonnes per annum (5%) will be achieved through this third element of the energy hierarchy ('Be Green').

72 Based on the energy assessment submitted, a reduction of 81 tonnes of CO₂ per year in regulated emissions is claimed, compared to a 2013 Building Regulations compliant development, equivalent to an overall saving of 35%. The carbon dioxide savings exceed the target set within Policy 5.2 of the London Plan; however the comments above should be addressed before the carbon savings and compliance with London Plan energy policy can be verified.

Climate change adaptation

73 The Flood Risk Assessment (FRA) undertaken by Tully De'Ath confirms that the site is within flood risk zone 1 and has no significant surface water flood risk. Therefore the proposals are acceptable in terms of London Plan Policy 5:12 'Flood Risk Management'.

74 Although the site itself is not at any significant risk of surface water flooding, other areas in the wider local vicinity are at risk and it is important that this development manages its rainwater in line with London Plan Policy 5:13 'Sustainable Drainage', particularly as the proposals will result in a net increase in impermeable area.

75 The FRA confirms that the development will utilise soakaways and sub-surface attenuation/storage. However, the FRA does not confirm that the proposals will meet the London Plan Policy 5:13 requirement to achieve a greenfield run-off rate wherever practical, and achieve at least a 50% reduction from current run-off rates. The applicant should confirm that this is the minimum aim and that the capacity of the soakaway(s), attenuation and any other sustainable drainage techniques will be sized to meet this policy requirement.

Local planning authority's position

76 Lambeth Council's position is not yet known.

Legal considerations

77 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

78 There are no financial considerations at this stage.

Conclusion

79 London Plan policies on social infrastructure, retail and town centre uses, public open space, housing and estate renewal, affordable housing, urban design and tall buildings, historic environment, inclusive design, transport and climate change are relevant to this application. The application complies with some of these policies but not with others, for the following reasons:

- **Social infrastructure:** The re-provision of an element of community space is supported.
- **Retail and town centre uses:** The provision of a relatively small amount of retail space is supported. The applicant is requested to provide further details on the arrangements for temporary space for Brixton Cycles.
- **Public open space:** The loss of an element of poor quality public open space is acceptable, to be replaced by a much improved area of public open space, in the form of the plaza.
- **Housing and estate renewal:** The continued regeneration of the Estate and the provision of 177 residential units, with an increase in affordable units, is strongly supported. The choice of units, density, and play space provisions are all acceptable.
- **Affordable housing:** The scheme would deliver 46% affordable housing, which is welcomed; however the Council should share its independent review of the applicant's viability assessment with GLA officers in order to confirm that the maximum reasonable amount of affordable housing is being provided, in line with Policy 3.12.
- **Urban design and tall buildings:** The design of the scheme and the residential quality proposed is considered to be of a high standard.
- **Historic environment:** No harm will be caused to designated heritage assets.
- **Inclusive design:** The Council should secure M4(2) and M4(3) requirements by condition.

- **Transport:** The application is broadly acceptable in strategic transport terms; however there should be a reduction in car parking spaces; a CPMP should be secured by condition; residents should be excluded from local parking permits by section 106 clause; 20% active and 20% passive EVCPs should be secured by condition; options for a new Cycle Hire docking station should be discussed with TfL; further discussions are required to clarify the wayfinding strategy for the site; a full TP should be secured by condition; a car club bay and three years' free membership per household should be secured by section 106; a full CMP and DSP should be secured by condition and discharged in consultation with TfL; and clarification on the deliveries and servicing strategy for the commercial units should be provided.
- **Climate change:** The carbon dioxide savings exceed the target set within Policy 5.2 of the London Plan; however further information should be provided on how the demand for cooling will be minimised; sample DER and TER worksheets and BRUKL sheets; a commitment to ensuring that the development is designed to allow future connection to a district heating network; confirmation that all apartments and non-domestic building uses will be connected to the site heat network; the floor area of the energy centre; detail on how the application site fits into the wider masterplan area; and details of the CHP system. The applicant should confirm that the proposals will achieve a greenfield run-off rate wherever practical, and achieve at least a 50% reduction from current run-off rates.

80 On balance, while the application is generally acceptable in strategic planning terms, it does not yet comply with the London Plan for the reasons set out above; however the possible remedies set out above could address these deficiencies.

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