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Southwark Council
Town Hall
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23 February 2015

Dear Yvonne,

**Aylesbury Estate, SE17 - First Development Site
Application for Full Planning Permission 14-AP-3843
Submission of Additional Information**

On behalf of Notting Hill Housing Trust, we write in relation to the above planning application which was submitted to the London Borough of Southwark in November 2014.

This submission and associated information is made pursuant to the submitted planning application and seeks to provide clarification and additional information relevant to the determination. In particular, this submission includes a number of amendments and addendums to the original application material which have come about through detailed discussions with Council Officers, a review of consultee responses and design development.

This letter summarises the key amendments to the proposed scheme and provides a list of additional submitted information. In addition, a consultation response schedule is attached which sets out the responses to some of the key issues raised by consultees.

A schedule of plans and material from the original submission that is withdrawn is also included.

Amendments

This section summarises the key amendments to the proposed application scheme.

Revised Unit Numbers

Following the submission of the planning application, continued detailed design work has been

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undertaken by the applicant. This design work has reviewed the proposed internal layouts including the provision of plant and circulation space.

This design review has identified that the amount of plant space originally allocated within the proposed buildings was larger than would be necessary. This has provided an opportunity to reduce the amount of plant space and increase the residential floorspace. As a result there is an increase in the overall residential unit numbers by 15. This increases the number of proposed units from 815 to 830.

In addition, a reconfiguration of the internal layout of the buildings has resulted in minor alterations to the residential mix and unit sizes within the proposed development.

Details of the revised mix of home types and tenures are as follows (the table below is exclusive of the 50 Extra Care units which are not proposed to change):

Submitted Dwelling Mix – November 2014		Revised Dwelling Mix – February 2015	
1B Flats	314	1B Flats	324
2B Flats	258	2B Flats	261
3B Flats	43	3B Flats	48
2B Maisonette / Duplex	36	2B Maisonette / Duplex	35
3B Maisonette / Duplex	61	3B Maisonette / Duplex	60
4B Maisonette / Duplex	6	4B Maisonette / Duplex	5
4B Houses	27	4B Houses	27
5B Houses	20	5B Houses	20
TOTAL	765	TOTAL	780

The revised description of development is as follows:

"Demolition of existing buildings and redevelopment to create a residential-led development comprising 830 private and affordable units (Use Class C3); flexible community use, early years facility (Use Class D1) or gym (Use Class D2); public and private open space; formation of new accesses and alterations to existing accesses; energy centre; gas pressure reduction station; associated car and cycle parking; and associated works."

A detailed breakdown of the revised schedule of accommodation is provided within the updated Planning Statement which accompanies this submission.

Detailed Design Amendments

In conjunction with the increase in residential unit numbers, and in response to design comments from Council Officers, a number of amendments have been made to the detailed design of the 6 blocks proposed as part of the scheme.

A detailed summary of the elevational amendments is contained within the Design and Access Addendum which accompanies this submission.

The minor amendments set out above have been reassessed as part of the supporting planning documentation. In certain cases, such as the Planning Statement, it has been necessary to re-submit a revised version of the document to reflect the changes. In other cases, such as the Environmental Statement, addendums have been prepared to assess the impacts of the amendments on the conclusions of the submitted report.

Environmental Statement

As the original application was EIA development and was accompanied by an Environmental Statement, an Environmental Statement Addendum has been prepared to consider the effects of the proposed changes to the scheme.

Application Documentation

In respect of the amendments set out above, the table below sets out the additional and amended documents submitted with this letter and the documents submitted with the 2014 application which have been withdrawn:

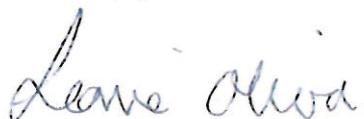
Revised Application Documentation – February 2015	Withdrawn Documentation November 2014 Application
Revised Planning Statement	Planning Statement dated November 2014
Revised Affordable Housing Statement	Affordable Housing Statement dated November 2014
Design and Access Addendum	
Landscape Strategy Addendum	
Revised Energy Strategy	Energy Strategy dated September 2014
Transport Assessment Addendum	
Waste Statement Addendum	
Environmental Statement Addendum including: <ul style="list-style-type: none">- Daylight, Sunlight and Overshadowing Addendum.- Townscape and Visual Impact Assessment Addendum.	
Revised Application Drawings and Associated Drawings	A number of the November 2014 plans have been withdrawn – please refer to enclosed drawing schedule
Log of response to key consultation comments.	

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I would be grateful if you could confirm receipt of the enclosed information.

Please do not hesitate to contact me or Adam Donovan (0207 303 3551 / addonovan@deloitte.co.uk) should you require any further information.

Yours sincerely



Leonie Oliva
Deloitte LLP

Enc:

Aylesbury Estate – First Development Site

Response to Key Consultation Comments – February 2015

Summary of Consultation Comment	Response by Applicant	Detail
<i>Transport for London – 28 January 2015</i>		
<i>No dedicated parking provision appears to be provided for the other non-residential land uses, so this, and arrangements for disabled car parking for these land uses, should be clarified by the applicant prior to determination.</i>	Response provided to TfL – letter dated 28 January.	The application contains 3 non-residential land uses: a small community centre, an extra care facility and some Learning Disability units. The community centre has no associated off-street car parking consequently no dedicated off-street disabled car parking has been provided. Table 6.2 of the London Plan does not require a minimum number of spaces for a community centre. Similarly the Extra Care facility has no off-street car parking and consequently no dedicated off-street disabled parking bay is considered necessary under the requirements of Table 6.2 of the London Plan. The Learning Disability units have two off-street car parking spaces of which one is a disabled car parking space.
<i>The nature of the current CPZ and future arrangements should therefore be clarified by the applicant prior to determination.</i>	Response provided to TfL – letter dated 28 January.	Within LB Southwark's Aylesbury Area Action Plan, at A6.8.34, it confirms that 'on-street parking will be located on streets adopted (managed and maintained) by the council and regulated by a controlled parking zone (CPZ)'.
<i>The application material cites London Plan policy requirements for electric vehicle (EV) charging infrastructure, yet the TA does not state if this will be provided. The approach to EVs should therefore be clarified by the applicant prior to determination.</i>	Please refer to the application drawings.	As set out in the London Plan, 20% of the parking spaces will be provided with EV charging points as indicated on the attached plans. On-street provision is part of on-going discussions with LBS.

<p><i>Dedicated cycle parking to London Plan standards is proposed for the residential element; however the draft further alterations to the London Plan (FALP) standards, which are due to be published imminently, following endorsement by a Planning Inspector at examination in public, should be applied. The FALP standards require two spaces per two bedroom unit, rather than the one space per two bedroom unit the applicant is proposing.</i></p>	<p>Please refer to Section 5 of the Planning Statement Version 2.</p>	<p>Given that the FALP had yet to be adopted at the time of planning submission it is considered that the FDS application was compliant with the prevailing policy at that time. We recognise the aspiration to increase the level of cycle parking and it the amended design a further 206 spaces have been identified as part of revised proposals for the FDS. Although this does not fully achieve the FALP standards it is considered that the quantum of cycle parking (1000+ spaces) is appropriate for the site and is designed in such a manner to maximise its use by residents.</p>
<p><i>TfL recommends that across the Masterplan area, at least two medium sized (30) point docking stations should be provided, one of which should be located in the FDS. At an absolute minimum 60 docking points are required across the Masterplan area.</i></p>	<p>Response provided to TfL – letter dated 28 January.</p>	<p>Following pre-application discussions with Duncan Robertson at TfL, it was suggested that a minimum station size would be 24. It is currently proposed that a 24 space docking station is provided in the FDS in Westmoreland Square. Another 3 potential locations have been identified in the masterplan. Details of the location and size of the other docking station can be set out in the reserved matters submissions, but it is anticipated that the 60 space minimum will be exceeded. Another 6 spaces within the FDS will present difficulties within the space available and it is considered that 24 space docking station represents a reasonable provision in line with earlier discussions with TfL</p>
<p><i>The TA admits that alterations to the Albany Road/Portland Road junction, proposed to be completed as part of the FDS, will double average morning peak hour delay for traffic. This is unlikely to be acceptable to TfL without bus priority measures. Changes to the traffic flows on Albany Road may also have wider network impacts, which could affect the SRN and TLRN. As such, any subsequent planning permission should require any highway works delivered as part of the</i></p>	<p>Response provided to TfL – letter dated 28 January.</p>	<p>Following our meeting, it is clear that this junction design needs to be reconsidered due to the Quietway proposals now being proposed to cross into Burgess Park. We discussed various options for making this operate satisfactorily for all users and agreed that further design development with Sustrans, TfL and LBS is appropriate. We also agreed that the design of the junction need not unnecessarily delay the consideration of the application as it</p>

<p>FDS, and that may affecting traffic flows on Albany Road, to be developed and agreed with TfL.</p>	<p>The full travel plan should accord with TfL guidance, be supported by measures to deliver this mode shift, and have a commitment from the applicant to regularly monitor and review. For example, elsewhere, free membership of the cycle hire scheme and the car club for each first occupation household has been funded, so this will be expected here.</p>	<p>Response provided to TfL – letter dated 28 January.</p>	<p>is related to works within the currently adopted highway and can be agreed as part of the s278 design.</p>
			<p>The draft s106 agreement proposes a Travel Plan and includes provision for three years car club membership, this is being developed by the applicant and LBS.</p>
			<p>Please refer to appendices to the Transport Assessment.</p>
	<p><i>The full Deliveries and Servicing plan (DSP) and full Construction Logistics Plan (CLP) should similarly be in line with TfL guidance and secured by way of condition and/or s106 agreement. The CLP should in particular seek to avoid construction traffic routing via Elephant and Castle, due to the high level of construction activity occurring there over the next few years. The CLP should also maximise the use of FORS contractors, and contain robust measures to protect pedestrians and cyclist from construction traffic and activity.</i></p>	<p>The DSP and CLP form appendices to the submitted TA. The CLP notes in 4.2.2 that:</p> <p>‘For the Aylesbury Regeneration development, as a minimum all contractors should have registered for and gained FORS Bronze accreditation’</p>	
			<p>Greater London Authority – 21 January 2015</p>
	<p>Affordable Housing – The applicant should provide a financial viability statement demonstrating that the scheme is maximising the provision of affordable housing as far as is reasonable possible.</p>	<p>Viability Statement submitted to LBS – February 2015</p>	<p>A Viability Statement has been prepared by the applicant and submitted to LBS on a confidential basis.</p>
	<p>Affordable Housing – The applicant should set out the key principles of the wider estate decent strategy. 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’s wider housing programme.</p>	<p>Further detail on the affordable housing provision and decent strategy is provided within the Affordable Housing Statement (Version 2)</p>	<p>Further detail on LBS’s housing strategy and decent strategy is provided within Affordable Housing Strategy (Version 2).</p> <p>An error was made in the calculation of habitable rooms within the Outline and FDS planning applications. This has been corrected and on a habitable room basis there will be no net loss of affordable housing. Further details are set out</p>

		within the Affordable Housing Strategy (Version 2)
Energy Strategy – Confirmation that the Energy Strategy	Further detail is provided within the Energy Strategy.	The two energy centre's across the FDS and Outline application site have been designed to be connected in the final phases of development.
Landscaping and SUDS – request to include a condition to secure the proposed landscaping and tree planting and SUDS measures set out within the Landscape Strategy and Sustainability Statement	Noted and accepted.	Landscaping, tree planting and the provision of SUDS form part of the application.