



Deloitte LLP
Athene Place
66 Shoe Lane
London
EC4A 3BQ
United Kingdom

Tel: +44 (0) 20 7936 3000
Fax: +44 (0) 20 7583 1198
www.deloitterealestate.co.uk
Direct: +44 (0) 20 7303 2908
loliva@deloitte.co.uk

Yvonne Lewis
Southwark Council
Town Hall
Tooley Street
PO Box 64529
London
SE1P 5LX

23 February 2015

Dear Yvonne,

**Aylesbury Estate, SE17 – Outline Application Site
Application for Outline Planning Permission 14-AP-3844
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, in conjunction with this letter is a consultation response schedule 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A schedule of plans and material from the original submission that is withdrawn is also included.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.

Plots 18a and 18b – Amendments to Proposed Massing

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

Deloitte LLP is a limited liability partnership registered in England and Wales with registered number OC303675 and its registered office at 2 New Street Square, London EC4A 3BZ, United Kingdom.

Deloitte LLP is the trade name of the executive member firm of Deloitte Touche Tohmatsu Limited (DTTLA), a UK private company limited by guarantee whose member firms are legally separate and independent entities. Please see www.deloitte.co.uk/about for a detailed description of the legal structure of DTTLA and its member firms. Real estate services regulated by RICS.

undertaken by the applicant. In particular, detailed design work has continued in relation to development parcels 18a and 18b, which will be the first to be delivered in the outline application site.

Development parcels 18a and 18b will provide the majority of the community facilities which will be delivered across the Masterplan area including the Health Centre. The detailed design work has identified that a minor increase in height and a reconfiguration of the development parcel extent would allow for greater flexibility in the delivery of the Health Centre and community uses.

As such it is proposed to increase the maximum height parameter for these development parcels by between 2.85m and 4m and relocate the maximum extent of the development parcels southwards. There will be no change to the proposed maximum floorspace which will be provided within these development parcels.

Habitable Rooms

There is no change to the number and mix of residential units proposed within the application. However, it has been identified that the number of habitable rooms indicated for the illustrative Masterplan scheme had been incorrectly calculated within the original supporting documentation.

Specifically, all of the two bed units were identified as generating 3 habitable rooms. This is correct for the smaller two bed / three person units. However, it is proposed that the application provides 219 two bed / four person maisonettes and duplexes. These maisonettes / duplexes are split level units with independent kitchen / dining rooms and living rooms and it is therefore appropriate to identify these as providing 4 habitable rooms. Therefore, the illustrative scheme will provide an additional 219 habitable rooms and these are now referred to within the supporting documentation, particularly the Planning Statement and Affordable Housing Statement.

Car Parking Numbers

The original application proposed an overall car parking ratio across the whole of the application site of 0.4. This is the ratio which was tested within the Transport Assessment and accompanying Environmental Statement. However, the description of development contained an error in terms of the number of parking spaces it referred to. The revised description of development is as follows:

"Outline application, including access, for demolition of existing buildings and redevelopment to provide up to 2,745 private and affordable units (Use Class C3), 600 sqm to 2,500 sqm of employment use (Use Class B1), 200 sqm to 500 sqm of retail space (Use Class A1); 3,100 to 4,750 sqm of community use, medical centre and early years facility (Use Class D1); 600 sqm to 3,000 sqm flexible retail use (Use Class A1/A3/A4) or workspace use (B1); new landscaping; public and private open space; energy centre; gas pressure reduction station; up to 1,098 car parking spaces; cycle parking; landscaping; and associated works."

Parameter Plans

As a result of detailed discussions with Planning and Design Officers the Parameter Plans submitted with the original application have been amended. The amendments are proposed to allow for a greater degree of flexibility in design response at the reserved matters stage whilst maintaining the overall objectives of the outline scheme.

With the exception of the changes to development parcels 18a and 18b set out above, the changes to the parameter plans do not propose any alterations to the height, massing, footprint or floorspace on the plots.

In summary, the key changes to the plans are as follows:

- The site location plan redline boundary has been extended to include part of Portland Street.
- Subplot 9c has been merged with 18a to allow the plot to be delivered in one phase. Now referred to as development parcel 18a.
- There have been a number of minor adjustments to the location of the defined development parcels.

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 EIA 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 November 2014 Documentation	2014 Application
Revised Planning Statement	Planning Statement dated November 2014	
Revised Affordable Housing Statement	Affordable Housing Statement dated November 2014	
Revised Development Specification	Development Specification dated November 2014	
Design and Access Addendum		
Revised Design Code	Design Code dated November 2014	
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	A number of the November 2014 plans have been withdrawn – please refer to enclosed drawing	

Deloitte.

Drawing schedule	schedule
Log of response to key consultation comments.	

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

In the meantime, 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 – Outline Application

Response to Key Consultation Comments – February 2015

Summary of Consultation Comment	Response by Applicant	Detail
Transport for London – 28 January 2015		
<i>There does not appear to be any dedicated car parking proposed for the non-residential uses, which is supported. This should be clarified by the applicant prior to determination.</i>	Response provided to TfL – letter dated 28 January.	There is a general assumption that non-residential uses will not have dedicated car parking within the masterplan area. There are some uses where servicing / delivery / drop-off bays may be required as details are developed. Where these are to be provided they will be set out in the reserved matters submissions.
<i>16 car club spaces overall, including three in the First Development Scheme (FDS), are proposed. This is a doubling of existing provision, which is supported. However there is no evidence to show how this number of car club spaces has been selected, so justification should be provided by the applicant.</i>	Response provided to TfL – letter dated 28 January.	Within the masterplan area there are 4 existing car club spaces. Contact has been made with the car club provider Zipcar with reference to the development proposals and they suggested that 10 spaces would be appropriate for the scale of development proposed. In order to allow some flexibility and room for future growth, 16 spaces have been proposed.
<i>The provision of disabled parking should therefore be clarified and confirmed by the applicant prior to determination, together with drop off/pick up arrangements for residents, staff and visitors to the development.</i>	Response provided to TfL – letter dated 28 January.	Disabled car parking spaces will be provided within the masterplan to both the number and design standard required by the London Plan. Details for each phase will be set out in reserved matters submissions.
<i>The current coverage of CPZ and future arrangements will therefore need to 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)'.

	<p>TfL is concerned that the balance of parking leans heavily towards on-street parking, which could undermine cyclists' safety if it is poorly designed, so this will need to be considered and addressed.</p>	Response provided to TfL – letter dated 28 January.	The layout of streets with on-street parking is considered an inevitable consequence of the removal of the existing closed courtyard arrangement that is one of the core principles of the regeneration proposals. It is considered that the application of filtered permeability and street design will make streets where traffic movements are less frequent and are suitable for cycling. The design of the masterplan streets can be reviewed in each reserved matters submission.
	<p>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 will therefore need to be clarified prior to determination, and secured in any subsequent planning permission.</p>	Response provided to TfL – letter dated 28 January.	The application will provide EV charging infrastructure in accordance with the London Plan. Details for each phase will be provided within the reserved matters submissions
	<p>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.</p>	Response provided to TfL – letter dated 28 January.	Cycle parking within the masterplan area will be provided to the FALP standards as requested by TfL. The reserved matters submissions will set out how this is achieved for each phase and with details of location and layout in accordance with the LCDS. Given the long expected programme of this site, it will be reasonable to review the cycle parking provisions if policy changes occur.
	<p>In terms of layout and location, cycle parking should be provided in accordance with the London Cycle Design Standards (LCDS), with a commitment to review provision in the future, at the reserved matters application stages and as part of the travel plan.</p>	<p>The full Deliveries and Servicing plan (DSP) and full</p>	Response provided to TfL –

<p><i>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>letter dated 28 January.</p>	<p>CLP notes in 4.2.2 that: 'For the Aylesbury Regeneration development, as a minimum all contractors should have registered for and gained FORS Bronze accreditation'</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 (please refer to FDS application response for further details) with another 3 potential locations 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.</p>
<p><i>Opening up the street network without filtered permeability could result in rat-running, which could have unforeseen implications for the highway network, as well as cycle and pedestrian safety and amenity impacts. It is not clear how this will be managed and prevented, so this should be clarified by the applicant.</i></p>	<p>Response provided to TfL – letter dated 28 January.</p>	<p>Details of the proposals for filtered permeability are set out in Appendix C of the Transport Assessment. The proposal uses a combination of pedestrian and cycle only access, shared surface areas and raised tables to filter permeability and discourage rat-running. Further details on how each traffic management tool will be applied will be set out in the reserved matters submissions. It is considered that the street layout will enable a flexible response to these concerns.</p>
<p><i>It is noted that a number of concerns have been raised by TfL in relation to walking and cycling. The response concludes:</i></p>	<p>Response provided to TfL – letter dated 28 January.</p>	<p>It is agreed that a strategic approach is appropriate for dealing with these concerns, particularly following the publication of the Council's consultation on cycling strategy</p>

<p><i>These issues should be addressed at the detailed design stage, but within a flexible framework agreed now, for example through a site-wide walking and cycling strategy that would be developed and agreed with TfL and the Council prior to reserved matters applications coming forward. TfL will be happy to discuss the issues and this approach further with the Council and the applicant.</i></p>	<p>that occurred after the submission of the application. We would be happy to accept a planning condition to prepare a walking and cycling strategy that is then used to ensure that reserved matters applications fit within an overall strategy. With the acceptance of the above I would not foresee that the issues raised prevent the outline Masterplan application being determined.</p>	
<p><i>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.</i></p>	<p>Response provided to TfL – letter dated 28 January.</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>Response provided to TfL – letter dated 28 January.</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>Greater London Authority – 21 January 2015</p>		

<p>Affordable Housing – The applicant should set out the key principles of the wider estate decent strategy. GIA 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 within the Affordable Housing Strategy (Version 2)</p>