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# Planning Statement

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Former Coral Day Nursery, 30 Wootton Street

Prepared by Savills (UK) Limited

Homes For Lambeth

December 2020

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## 1. Introduction

1.1. This Planning Statement has been prepared in support of a full planning application for the redevelopment of the Former Coral Day Nursery, 30 Wootton Site hereafter referred to as 'The Site'. The application is submitted to the London Borough of Lambeth on behalf of our client Homes for Lambeth ('The Applicant').

1.2. Full planning permission is sought for the following:

*“Demolition and clearance of existing structures and redevelopment comprising construction of a part 5/8/10 storey mixed use building comprising replacement community floorspace on ground floor, 36 no. residential units (Class C3 ) above with associated resident amenities, cycle parking, car parking and public realm enhancement”*

1.3. The design of the scheme has been developed through an iterative design process with officers at LB Lambeth and the Greater London Authority (GLA).

1.4. The scheme comprises provision of 51.5% affordable housing by habitable room with a tenure compliant residential mix. In line with policies outlined in the London Plan and the Viability SPG it is determined that the scheme qualifies for the fast track approach.

### Supporting Documents

1.5. This Planning Statement considers the development in the context of national, regional and local planning policy guidance. It should be read in conjunction with the plans and drawings submitted as part of the application. In addition to the Planning Statement, the planning application is accompanied by the following documents.

- ❖ Application forms and certificates, prepared by Savills Plc
- ❖ CIL Additional Information Form, prepared by Savills Plc
- ❖ Planning Statement & Draft Heads of Terms, prepared by Savills Plc
- ❖ Location Plan scale 1:1250/1:2500, prepared by Stockwool Architects;
- ❖ Site Plan scale 1:200, prepared by Stockwool Architects;
- ❖ Existing and Proposed levels, prepared by Stockwool Architects;

- ❖ Existing / Proposed GA arrangement plans 1:50 / 1:100, prepared by Stockwool Architects;
- ❖ Existing / Proposed elevation drawings 1:50 / 1:100, prepared by Stockwool Architects;
- ❖ Existing / Proposed GA section drawings 1:50 / 1:100, prepared by Stockwool Architects;
- ❖ Existing / Proposed roof plans 1:50/ 1:100, prepared by Stockwool Architects;
- ❖ Design and Access Statement & Townscape Views, prepared by Stockwool Architects;
- ❖ Townscape and Visual Impact Assessment, prepared by Savills (Urban Design);
- ❖ Heritage Statement, prepared by Mola;
- ❖ Landscaping strategy, prepared by Outterspace;
- ❖ Energy Statement, prepared by Hodkinson's;
- ❖ Sustainability Statement, prepared by Hodkinson's
- ❖ Circular Economy Statement, prepared by Hodkinson's
- ❖ Whole Life Cycle Carbon Emissions Statement, prepared by Hodkinson's
- ❖ Overheating Assessment, prepared by Hodkinson's
- ❖ Environmental Noise Assessment, prepared by Ardent;
- ❖ Transport Assessment, prepared by Mayer Brown;
- ❖ Air Quality Impact Assessment, prepared by Mayer Brown;
- ❖ Daylight & Sunlight Assessment, prepared by EB7;
- ❖ Flood Risk Assessment & Drainage Strategy, prepared by Ardent;
- ❖ Preliminary Ecological Appraisal, prepared by AAE;
- ❖ Archaeological Impact Assessment, prepared by RPS;
- ❖ Geo-Environmental Assessment, prepared by Ardent;
- ❖ Demolition and Construction Environmental Management Plan; prepared by Ardent;
- ❖ Fire Statement, prepared by Elementa; and
- ❖ Statement of Community Involvement; prepared by Thorncliffe.

1.6. The proposals have been brought forwards following consultation with the officers at the LB Lambeth and the Greater London Authority.

## Structure of Planning Statement

1.7. The planning statement is structured as follows:

- ❖ **Section 2 – Background** – Provides an overview to the site, its history, the surrounding context and relevant planning considerations.
- ❖ **Section 3 – The Development** – This section provides a detailed overview to the scheme submitted for approval.
- ❖ **Section 4 – Policy Framework** – This section provides an overview to the planning policy framework at national and local level which inform the assessment of the proposed scheme.
- ❖ **Section 5 – Planning Assessment** – This section provides an assessment of the proposed scheme against the planning policy framework.
- ❖ **Section 6 – Conclusion** – This section summarises the key considerations and benefits delivered from the scheme.

## 2. Context of the Proposal

- 2.1. This section provides a brief description of the site and the immediate surrounding area, together with a summary of the relevant planning history.

### **The Site and Surrounding Context**

- 2.2. The site is a 0.14ha site and is situated to the north of 'The Cut', to the south of Waterloo East National Rail Station and to the west of Southwark London Underground Station. The site is bound by Wootton Street to the north, Greet Street to the east and Windmill Walk to the west. The surrounding context to the south, comprises of a terrace row of 5 storey flats. On the northern side of Wootton Street are a range of commercial premises that include offices and a gym, which utilise the railway arches. Above is the railway viaduct with four railway lines and the platforms and canopies of Waterloo East Station.
- 2.3. Immediately adjoining on the western boundary of the site is Windmill House which is a nine storey block of flats with a landscaped garden to the front. Further residential lies beyond including the Tait & Benson block of flats. Further beyond Windmill Walk are a range of residential blocks which range between three and five storeys.
- 2.4. The site comprises a single storey poor quality building which was previously used as a Nursery. The property has been vacant for a number of years. The property currently offers little townscape and social value due to the poor outlook and lack of activity. The existing building measures approximately 430 sq.m. There are parking spaces located within the area of hardstanding to the south of the site. The site also contains some low-grade landscaping, several semi-mature trees of mixed quality and some residual parking for local residents. The western boundary of the site immediately adjoins public realm servicing Windmill House.
- 2.5. The immediate area surrounding the site is of mixed architectural context. Windmill House to the west is a nine-storey residential slab block dating from the 1960's which is fully occupied and well maintained. To the east is a curving five-storey block comprising Tait and Benson House, the distinctive form of which is at odds with the more rectilinear nature of the majority of local buildings. To the south Ipsden Buildings is a typical Edwardian block owned and managed by Peabody. To the north, across Wootton street, the railway viaduct is the dominant structure in the immediate context by way of its continuous length and height - equivalent to three residential storeys.

- 2.6. In the wider context the Roupell Street conservation area lies to the north of the railway viaduct, The Cut with its bars and restaurants runs roughly east-west to the south of the site and Waterloo station lies approximately 250m to the west.

## Access and Transportation

- 2.7. The Site has a high level of connectivity to public transportation (PTAL 6B). The site is located between Waterloo and Southwark stations and immediately to the south of Waterloo East station. Greet Street provides access to The Cut (B300) to the south of the site, which meets Blackfriars Road (A201) at a priority junction to the east and at a signalised crossroads to the west of Waterloo Road (A301).
- 2.8. Pedestrian accessibility to the public transport network from the site is achievable via footways on both sides of the road of Wootton Street, Cornwall Road and Sandell Street to provide access to the bus stops on either side of Waterloo Road (A301) and Waterloo station.
- 2.9. The site benefits from a good level of connectivity to local amenities and key services which are accessed from 'The Cut' to the south of the site. As outlined in the Transport Statement prepared by Mayer Brown the site is within walking distance (c. 800m) from key local amenities.

## Planning designations

- 2.10. The site is not the subject of any site specific allocation, but lies within the wider: Waterloo Opportunity Area, Central Activities Zone, and Flood Zone 3. The building on the site is not listed, and the site does not fall within a Conservation Area. However, the Waterloo Conservation Area, and Roupell Street Conservation Area lie to the north of the railway line viaduct and Mitre Road and Ufford Street Conservation Area lies to the south of The Cut.
- 2.11. The site has an excellent PTAL value of 6b, and is in close proximity to Waterloo and Waterloo East Stations.

## Conservation Area

- 2.12. The 'Site' is not located within a Conservation Area and is not within close proximity of statutory or locally listed buildings. However, there are a number of Conservation Areas within the immediate vicinity of Wootton Street. To the north immediately beyond Waterloo East

Station is the Roupell Street CA, this is surrounded to the north, east and west by the Waterloo CA. To the north beyond the Roupell Street and Waterloo CAs and extending to the west and south-west is the South Bank CA. To the south-west is the Lower Marsh CA and to the south is the Mitre Road and Ufford Street CA.

- 2.13. Tait House to the east built in the interwar period which is noted for its curved shape (locally listed)
- 2.14. The Heritage Statement prepared by Mola, the Townscape and Visual Impact Analysis assessment prepared by Savills and the Design and Access Statement prepared by Stockwool Architects contain a detailed appraisal of the historic significance and character of the Conservation Areas in the vicinity of the site.

## Planning History

- 2.15. The Council's online planning database identifies that there aren't significant planning history records available online. The only history record of relevance is the grant of permission from June 2014, for façade alterations to the existing building.
- 2.16. There are a number of emerging developments in the wider vicinity of the site. Notably, permission was secured in December 2019 following an appeal (APP/N5660/W/18/3219368) against non-determination for redevelopment of the OCCC estate comprising provision of 215 residential dwellings and commercial floorspace in a series of blocks ranging from between 7-12 storeys. Following an initial review of the LB Lambeth planning records it is apparent that construction activities have not commenced to date, but there is the prospect of this site coming forwards in the future.



## 3. The Application Proposals

- 3.1. This section provides a detailed overview of the proposals contained within this application. This application seeks permission for the following:

*“Demolition and clearance of existing structures and redevelopment comprising construction of a part 5/8/10 storey mixed use building comprising replacement community floorspace on ground floor, 36 no. residential units (Class C3 ) above with associated resident amenities, cycle parking, car parking and public realm enhancement”*

- 3.2. Further detail on the scheme is enclosed with the Design & Access Statement prepared by Stockwool Architects. The design of the scheme has been developed and refined through consultation with officers at LB Lambeth and the Greater London Authority (GLA).

### **Design, layout and materials**

- 3.3. The proposed design comprises a considered response to the site and the surrounding area, and seeks to demonstrate the highest quality of design and architectural form. The proposals have been informed by a detailed contextual analysis of the site and following pre-application discussions with Council officers. The scheme has been
- 3.4. The design of the scheme has been refined to achieve a high quality place sensitive form of design which responds to and enhances local character and mitigates any impact on residential amenity.
- 3.5. The footprint of the building at ground floor level extends along the eastern boundary of the site. The footprint on the upper levels achieves a triangular form arranged over part 5, 8 and 10 upper storeys. The massing of the upper floors of the building have been stepped back at fifth and eighth floor, to achieve an interesting design aesthetic responds to sensitive context. Amenity terraces have been created at fifth and eighth floor providing communal amenity space for occupants of development.
- 3.6. A central design aesthetic has been predicated upon delivery of high quality amenity space surrounding the building and enhancements to public realm surrounding the site to achieve a high quality, inclusive and safe urban environment for occupants of the development and

residents of the wider estate. The existing site is in a poor standard of condition and acts as a blight on the rest of the estate. It is considered that the package of works proposed will deliver a scheme which positively enhance the character of the site and surroundings.

- 3.7. At ground floor the triangular footprint of the building acts as a natural delineation of the site breaking the remaining site into distinct sections allocated for amenity, parking and creating space for retention of existing street trees. The design team sought to maximise active frontages to the principle elevations of the building. Entrances will be located on the Greet Street frontage, animating the facade at ground floor and addressing the residential block opposite and the future station entrance.
- 3.8. The addition of extended projecting balconies along the points of the triangle create a more dynamic form, suggesting a hierarchy of aspect and informing how the form of the building evolves as it rises.

## Community Use

- 3.9. The site is occupied by a single storey building (430 sq.m) formerly occupied as a nursery along with associated child play facilities. The site is vacant, is surplus to requirement and had been identified by LB Lambeth as a site which holds opportunity for development. The quality of floorspace within the existing building is compromised by areas of circulation space. The scheme comprises provision of a modern open plan floorplate which accommodates a range of prospective community uses.
- 3.10. The replacement community unit results in a minor reduction in floorspace beyond current situation. However, the replacement unit delivers a qualitative improvement in functional floorspace delivered on site. The applicant has sought to secure a prospective tenant for the replacement unit. At this stage an occupier has not secured, as such the unit has been designed to achieve sufficient flexibility in layout to cater to a range of potential occupiers.

## Residential use

- 3.11. The scheme comprise delivery of a mix of one, two and three bedroom apartment units. All of the residential units delivered meet and exceed the national described space standards.

3.12. The proposed residential mix is outlined in Table 1 below.

Unit Type	Private Housing	Affordable Rent	Intermediate	Total	%
1 bed	10	2	4	16	44%
2 bed	8	6	2	16	44%
3 bed	1	3	0	4	12%
Total	19	11	6	36	100%

3.13. The scheme provides a mix of private market, affordable rent and intermediate units comprising 45% affordable housing by unit, and 50% by habitable room, with a policy compliant tenure mix.

### Residential Quality

3.14. The Development achieves a high standard of residential quality. All of the units meet and exceed the Nationally Described Space Standards (NDSS) and benefit from private amenity space in the form of external balconies on the corners of the building.

3.15. The residential units have been designed to optimise internal daylight conditions. The majority of the units (81%) achieve dual aspect standard of accommodation. There are 11 no. units which achieve single aspect, albeit these units benefit from secondary windows which provide amenity.

3.16. The scheme includes provision of communal amenity space in the form of external amenity terraces at fifth and eighth floor and high quality communal garden at ground floor. In addition, accessible play space (170 sq.m) is provided within the communal courtyard servicing prospective occupants of the development.

### Residential Density

3.17. The Site is located in a sustainable urban location with a high level of connectivity to public transportation (Ptal 6b). The scheme achieves a residential density of 257 (dwellings per

hectare) and 714 (habitable rooms per hectare) the density is wholly appropriate given the sites location and benefits delivered from the scheme.

## Sustainability

- 3.18. In light of the climate emergency, a key principle driving the design of the scheme has been sustainability. A key priority has been the integration of natural / passive design features which improve the thermal performance of the building, thereby minimising reliance on artificial cooling systems. In addition, to passive features the development will incorporate provision of renewable energy systems contributing to the energy requirements for the building, along with rainwater harvesting systems.
- 3.19. The site is located in a sustainable urban location, sustainable modes of travel will be promoted through provision of secure cycle storage facilities servicing the occupants of the development. The package of sustainability measures incorporated within the development ensure that the development will perform strongly in sustainability terms.
- 3.20. The London plan sets a reduction target of 35% over Building Regulations Part L 2013 for non-domestic units and zero-carbon for residential units, with at least a 35% reduction in carbon emissions being achieved on site.
- 3.21. The development has been designed and will be fabric first construction with sustainability measures incorporated, including PV panels, air source heat pumps transferring heat from the outside conserving energy use and natural ventilation in all units.
- 3.22. The proposed residential development will result in a 56% improvement in carbon emissions against building regulations, with an offset payment to achieve zero carbon.

## Landscaping

- 3.23. The existing site condition contributes little to local streetscene and significantly detracts from character of local area. A key component of the scheme is the delivery of high quality landscaping works within the site and public realm enhancements which integrate with the neighbouring Windmill House and achieve positive enhancement to local streetscene. The development includes provision of replacement public open space along the northern and eastern boundary of the site. Enhancements delivered through this scheme achieve a significant enhancement in amenity and ecological value of the site.

## Parking, Deliveries and Servicing

- 3.24. In line with priorities outlined in the London Plan and draft Local Plan the scheme is car free aside from disabled access bays for the residential 3 no. bays and community 1 no. bay uses.
- 3.25. Cycle parking facilities for the private market and affordable housing units are provided within a communal store at ground floor accessed via the community garden. 64 no. secure cycle parking spaces are provided in the form of josta two tier stackers along with 2 no. visitor parking spaces. The precise use of the community facility hasn't been defined, accordingly cycle parking for the unit has been based on worst case scenario (maximum provision), secure storage facilities will be provided within the unit in the form of 3no Sheffield stands providing 6 long stay spaces; along with 3 no. Sheffield stands within the public realm providing 6 no. short stay spaces.
- 3.26. A central refuse / recycling store is provided to the north of the site fronting onto Wootton Street. Smaller storage receptacles will be provided within the residential units, with transfer to the central store. On collection day, refuse and recycling bins will be transferred to collection point on Wootton Street by building management staff. An internal refuse store will be provided for the community facility, on collection day these will be transferred to Greet Street or Ethelm Street for collection.
- 3.27. Commercial deliveries to the residential units will be made via Wootton Street frontage on the site.

## Pre-application consultation

- 3.28. Prior to the submission of this planning application, the applicant has engaged with LBL officers through the Council's formal pre-application process to discuss the development proposals. Meetings were held on 09<sup>th</sup> December 2019, 31<sup>st</sup> March 2020, 15<sup>th</sup> April 2020 and further meeting were held with the Greater London Authority on the 30<sup>th</sup> September 2020.
- 3.29. The pre-application advice received in relation to the development proposals was generally positive, with Officer's supportive of the principle of replacement community use and residential in this location. The scheme proposals have evolved and been further developed in response to the feedback received during the pre-application process. In particular, the GLA expressed a strong level of support for the proposed scheme.

3.30. Further details are provided in the enclosed Design and Access Statement prepared by Stockwool Architects.

## Public Consultation

3.31. The applicant has engaged in an extensive community consultation exercise with local stakeholders including residents of Windmill / Tait House and Ipseden Buildings and the Waterloo and South Bank residents association.

3.32. The Statement of Community Involvement prepared by Thorncliffe provides further detail on the public consultation process undertaken.

## Key Planning Benefits

3.33. By way of a summary, the proposals will provide a range of planning benefits, as set out below:

- ❖ The development proposals will result in a more efficient use of this underused, accessible site, to the benefit of the local area;
- ❖ The design of the proposed scheme had evolved through analysis of the site and surrounding area and is considered to complement the existing built environment;
- ❖ The proposed development will result in an additional 36 residential dwellings, which contribute to the boroughs housing need. All units will comply with the Mayor of London's residential standards and be provided with private amenity space;
- ❖ The new buildings comprise high quality architectural design which seeks to provide an attractive and safe place for people to live and visit
- ❖ The development will be car free and encourages sustainable modes of transport with the provision of secure cycle parking for all residents

## 4. Planning Policy Framework

- 4.1. The redevelopment proposals have taken account of relevant national, regional and local planning policy. This section of the Planning Statement sets out a summary of the relevant planning policy documents and the following section demonstrates compliance with these policies.
- 4.2. In accordance with Section 38(6) of The Planning and Compulsory Purchase Act (2004), planning applications should be determined in accordance with the development plan unless other material considerations indicate otherwise.
- 4.3. The National Planning Policy Framework (NPPF) (February 2019) is also a material consideration in the determination of all planning applications.
- 4.4. In addition to the above, the National Planning Practice Guidance (2014, as amended) and emerging and adopted Supplementary Planning Guidance notes (SPGs) and Supplementary Planning Documents (SPDs) are all relevant material considerations and are referred to where relevant.

### National Planning Policy

- 4.5. At the national level, the NPPF provides an overarching framework for the production of local policy documents and the determination of planning applications. This sets out the Government's planning policies and how these should be applied and is a material consideration in planning decisions.
- 4.6. The NPPF sets out that the purpose of the planning system is to contribute to the achievement of sustainable development, and that this means that the planning system has three overarching objectives as set out in paragraph 8. These are an economic objective; a social objective; and an environmental objective. Paragraph 9 continues to state that planning decisions should result in sustainable solutions, but that local circumstances should be taken into account, in order to reflect the character, needs and opportunities of each area.
- 4.7. At the heart of the NPPF is a presumption in favour of sustainable development. Paragraph 11 sets out that for decision taking, this means:

*“Approving development proposals that accord with an up-to-date development plan without delay; or where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:*

- i. The application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or*
- ii. Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.”*

4.8. The Government expects the planning system to deliver the homes, business, infrastructure and thriving local places that the country needs, whilst protecting and enhancing the natural and historic environment.

4.9. The Government published its National Planning Policy Guidance (NPPG) notes in March 2014. The NPPG notes support the NPPF and provide high level guidance with regard to specific planning issues and processes. Specific notes are referred to within this Planning Report where applicable.

## Regional Planning Policy

4.10. The London Plan (2016) (consolidated with amendments since July 2011) contains the spatial development strategy for Greater London and sets out the Mayor of London’s overall objectives and strategic plan for London.

4.11. The London Plan is supported by a number of Supplementary Planning Guidance (SPG) which will be referred to in this Planning Statement as appropriate. This includes the Mayor’s Housing SPG (2016) which provides guidance to supplement the housing policies in the London Plan and details the strategic approach to increasing housing supply in London.

4.12. The Mayor is also in the process of adopting the New London Plan. Most recently, following independence examination and receipt of the Inspector’s report, the Intend to Publish Plan (2019) was published in December 2019. The site is not allocated for any particular use within the draft New London Plan however, the relevant policies and considerations from the New



London Plan now form a material consideration in the determination of planning applications and have therefore been considered in Section 5 of this Planning Statement.

## Local Planning Policy

- 4.13. Lambeth's current Local Plan was adopted in 2015 and sets out the vision, strategic objectives and policies for development in Lambeth over 15 years.
- 4.14. LBL also have a number of Supplementary Planning Documents which form a material consideration in respect of planning applications. In relation to this application specifically, the relevant SPD is the Lambeth Development Viability SPD (2017), which sets out the council's approach to assessing development viability in planning proposals.

## Emerging Policy

- 4.15. Following approval by Lambeth Council, the Draft Revised Lambeth Local Plan Proposed Submission Version January 2020 has been published for consultation. The six week publication period ran until 13th March 2020. The publication version of the Draft Local Plan was submitted to the 'Inspector' for examination in Autumn 2020, with adoption and implementation scheduled to commence in Mid to late 2021.
- 4.16. The application site is not allocated or designated for any particular use in the emerging Local Plan.

## 5. Material Planning Considerations

5.1. This section outlines an assessment of the Proposed Development against the planning policy context identified in Section 4. Reference is made to the Design and Access Statement, plans, drawings and other consultants documents submitted in support of the planning application where more detail can be found.

### The decision making process

5.2. The Development Plan, if it can be demonstrated that it is up to date, forms the primary consideration for the planning application. This should be assessed alongside the NPPF, to which significant weight should also be attached.

5.3. The approach to assessing the Proposed Development should be based on the land uses proposed and whether it accords with the Development Plan. If it does, then it has the benefit of the statutory presumption in section 38(6) of the 2004 Act subject to any further material planning considerations. If not, then it is necessary to consider whether there are any other material considerations, such as the NPPF, which indicate that the planning application should be determined otherwise than in accordance with the Development Plan.

5.4. As to the NPPF, it is informative to consider whether the Proposed Development constitutes sustainable development and will thus benefit from the NPPF paragraph 11 presumption in favour of granting planning permission.

5.5. The Proposed Development represents sustainable development for reasons which are summarised below and further supported in the comprehensive technical material that is being submitted in support of this planning application:

- **Economic Role:** the Proposed Development will contribute towards reinforcing a strong, responsive and competitive economy through the delivery of mix of high quality new housing accommodation to satisfy established local demand representing the right type of uses in the right place at the right time“ to support growth”(NPPF paragraph 8). The Proposed Development will lead to an increase in both direct and indirect job creation, and associated increases in footfall, activity and local expenditure which will in turn help support local businesses in the vicinity, with wider consequential benefits on businesses and supply chains. As such, the proposals are

consistent with the NPPF and the Development Plan policies.

- **Social Role:** the Proposed Development will directly “support communities’ health, social and cultural well-being” through the introduction of a mix of housing types and sizes designed to satisfy local market demand. Through the design approach adopted, the Proposed Development will create a high quality built environment, elevating the quality of the street scene for pedestrians and cyclists and acting as catalyst to future high quality investment in the area, especially in terms of public realm, permeability and legibility improvements. Furthermore, the design of the public realm and uses ensures that it is inclusive and accessible to all. This accords with the NPPF and the Development Plan.
- **Environmental Role:** the Proposed Development comprises of a sustainable development with limited environmental impact and a large emphasis on air quality, public realm, ecological improvements, sustainability principles. The Proposed Development represents the optimised use of the Site in a highly accessible and sustainable location. Local built environment will be preserved and, where possible, enhanced as a result of the high level of design quality applied to the proposed building. The impact that the Proposed Development will have on the street scene and heritage assets is acceptable in planning terms. As such the Proposed Development is consistent with Chapters 15 and 16 of the NPPF and the Development Plan. The proposals have also been rigorously tested to demonstrate their consistency with design policies set out in the Development Plan and the NPPF.

## Principle of Development

- 5.6. The site is previously developed land located in a strategically important part of Lambeth and the Central Activities Zone. The site is well connected by public transportation. It therefore presents an excellent development opportunity which should be maximised. The NPPF (2019) promotes the redevelopment of brownfield land to accommodate other policy aspirations notably ‘to significantly boost the supply of housing’. Paragraph 8, of the NPPF states that a key principle of sustainable development relates to the delivery of sufficient housing to meet the needs of present and future generations
- 5.7. LB Lambeth acknowledge that the site is under-utilised and surplus to requirements and could be released for development. The site has been vacant for a number of years and has been

identified on LB Lambeth's small sites housing delivery list for a number of years. Planning policy at all levels encourage the effective use of previously developed land. The Proposed Development would accord with this objective and make a valuable contribution to stimulating further regeneration and investment within LB Lambeth and will positively contribute to meeting the Local Authorities housing supply.

## Loss of existing Nursery Use

- 5.8. The Local Plan policy S1 requires that applications for removal of community use from the site, provide clear evidence demonstrating that there is no existing or future demand for that facility in this location. The alternative position is for replacement facilities to be provided on, or off site to serve the needs of the area. The subtext to the policy is the provision of marketing evidence covering a period of 12 months, or evidence from the relevant agency that the loss of the facility is consistent with agreed strategy of that service in Lambeth.
- 5.9. Policy S1 within the Intend to Publish London Plan states that development proposals that would result in a loss of social infrastructure in an area of defined need as identified in the borough's social infrastructure needs assessment required under part A should only be permitted where: i) there are realistic proposals for re-provision that continue to serve the needs of the neighbourhood and wider community, or ii) the loss is part of a wider public service transformation plan which requires investment in modern, fit for purpose infrastructure and facilities to meet future population needs or to sustain and improve services
- 5.10. The unit has been vacant for a significant period of time. It is understood that the facility was identified as surplus to requirements and formed part of an agreed strategy of disposal already implemented by the Council. Therefore, it is considered that the loss would be acceptable, when it is considered alongside the benefits of the scheme.
- 5.11. Notwithstanding this, in this case, the applicant is proposing to deliver a new community use on site that provides a like for like replacement on the existing usable community floor space. The existing community floorspace within the building is inefficient, dated and constrained. The proposal comprises an equivalent quantum of usable community floorspace compared with the existing situation. The space will be delivered at a better quality and specification than currently provided on site. This therefore complies with local plan policy S1 which requires replacement facilities provided on site of equivalent or better functionality to serve the needs of the area. The new community use will deliver a new modern facility to a range of potential

occupiers.

- 5.12. Given the strategic growth agenda set by the Mayor in both the adopted and emerging London Plan, and the sites sustainable location in the CAZ and Opportunity Area, the redevelopment of the site delivering high levels housing and potentially commercial floorspace should be fully supported. It is considered that delivery of high quality replacement community floorspace represents a tangible benefit. It is therefore considered that the scheme is acceptable in land use terms.

### Reprovision of Estate Amenity Space

- 5.13. In addition to release of the nursery use onsite, there is an existing area of open green space within the boundary of the application site which would be lost as a result of the development. This space falls within the extent of the Central Hill estate. Under Policy EN1, this would be considered as *'housing estate amenity'*, and seeks to protect and maintain this space where the loss of space will not be permitted unless significant regeneration and community benefits would be achieved that could not be achieved in any other way and appropriate compensatory provision for the loss of open space is made, including improvements to the quality of the remaining open space. Whilst the open space is considered as amenity space for the Central Hill estate under the policy, in practice, the open space is underutilized by residents currently.
- 5.14. In the existing situation a perimeter wall runs along the boundary of the Coral Day Nursery site which restricts ingress to the Nursery and associated playground. Beyond this there are strips of soft landscaping along the eastern and northern boundary of the site, constrained by a low perimeter wall which provides limited ecological and amenity benefit to the public. In total, there is c. 383 sq.m of public realm surrounding the site. The strip of land on the northern boundary does not form functional amenity space for local users given the limited depth and proximity to the building line. The eastern edge of the site comprise strip of soft landscaping of circa 180 sq.m. At present the space holds limited quality and amenity value and in fact actually attracts anti-social behaviour.
- 5.15. Policy EN1 of the Local Plan requires that development involving loss of existing public, or private open space will only supported where at least one of the following tests can be satisfied:
- i) ***Replacement open space of equivalent or better quality and quantity is provided within a suitable location in the local area.***

5.16. The existing open space holds limited amenity or ecological value. A key criteria of publically accessible open space is that it is accessible to the general public. Access to the nursery play area is restricted to the patrons of the nursery, now vacant and closed off. The area of public realm to the north of the Nursery centre does not function as public open space it is unusable landscaping which acts to enhance the appearance of the Coral Day centre. The strip of soft landscaping to the east of the site provides limited amenity benefit to the general public and no tangible ecology benefit. As outlined in the scheme prepared by Outterspace the proposed scheme includes provision of 184 sq.m of replacement public open space on the northern and eastern boundary (c. 184 sq.m) of enhanced publically accessible open space comprising high quality landscaping / planting and seating facilities for pedestrians (Page 15 provides a visualisation of plot of POS on northern boundary), along with replacement space on the eastern boundary. The area of public realm links with the communal garden and enclosed play facilities for occupants of the development. The public open space achieves a marked improvement in quality compared with existing situation. It is contended that the proposals fully accord with the policy test.

ii) ***In the case of housing estate amenity areas, significant regeneration and community benefits would be achieved that could not be achieved in any other way, and appropriate compensatory provision for the loss of open space is made, including improvements to the quality of the remaining open space.***

5.17. Existing facilities provide limited benefit to the wider community and actually acts as a target for anti-social behaviour. The development comprises the provision of a replacement community centre along with new high quality housing including 50% affordable housing providing a tangible benefit to the local community. Replacement POS delivered on site comprises compensatory provision in terms of overall sq.m delivery when compared to existing usable space. It also provides a significant tangible improvement in quality, both in terms of amenity value, visual appearance and ecological value. It is considered that the benefits delivered from the scheme and quality of replacement accessible open space is wholly acceptable in planning terms.

5.18. It is considered that the scheme complies with the policy tests outlined above and as such is acceptable in line with policy EN1 of the Lambeth Local Plan. As detailed in the draft landscaping study the scheme will deliver a significant tangible improvement in the local streetscene. It is considered that given the significant public benefits delivered by the proposals the current scheme would be acceptable in planning terms.

## Principle of Residential Use

- 5.19. The National Planning Policy Framework (NPPF, 2019) includes a presumption in favour of sustainable development, through the effective use of land driven by a plan-led system, to ensure the delivery of sustainable economic, social and environmental benefits. The NPPF promotes the efficient use of land with high density development in accessible locations.
- 5.20. Local authorities are also expected to boost significantly the supply of housing and applications should be considered in the context of the presumption in favour of sustainable development. Planning applications are to be determined in accordance with the development plan unless material considerations indicate otherwise (Paragraph 47).
- 5.21. Paragraph 11 of the NPPF further indicates that the presumption in favour of sustainable development, through the effective use of land driven by a plan-led system, to ensure the delivery of sustainable economic, social and environmental benefits. This includes ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations.
- 5.22. Paragraph 59 of the NPPF states that in order to support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed. The NPPF also promotes the efficient use of land with high density development in accessible locations.
- 5.23. The London Plan (2016) states there is a need for 42,000 net additional homes across London. In LBL there is a target for 15,594 new dwellings to be delivered between 2015 - 2025, which equates to an annual target of 1,559 dwellings.
- 5.24. Importantly, within the Intend To Publish New London Plan, the LBL ten year housing target has been set at 13,350 which equates to an annual target of 1,335 dwellings. At the local level, Local Plan Policy PL5 states the Council will make provision for 17,925 new homes over 15 year plan period. Within the Draft Local Plan, a housing requirement of 13,350 homes for the ten year period 2019/20 to 2028/29 is set out.
- 5.25. LB Lambeth acknowledge that the site is surplus to requirement and had been allocated on their small sites list for residential led development. The site benefits from a high level of connectivity to public transportation, located close to transport nodes and local amenities. The site represents a sustainable urban location where residential development should be

promoted. It is considered that delivery of the site for a mixed use residential led development is wholly acceptable and supported by planning policy at all levels.

## Residential Mix

- 5.26. London Plan Policy 3.8 states that boroughs should seek to ensure that new developments offer a range of housing choices in terms of the mix of housing sizes and types. Policy 3.9 further seeks a more balanced mix of tenures in all parts of London.
- 5.27. At local level, Local Plan Policy H4 sets out the housing mix expected to be provided for low cost rented residential development as not more than 20% one bedroom units, between 20-50% two bed units and 40% three-bedroom or more units. For market housing, it is stated that a balanced mix of unit sizes including family-sized accommodation should be provided.
- 5.28. However, Draft Policy H4 of the Proposed Submission Version of the Local Plan, now approved by Cabinet for consultation, sets out an appropriate mix for low cost rented products stating there should be not more than 25% 1 bed, 25-60% 2 bed and at least 35% x 3 bed. The proposed housing mix is set out below:

	Private Housing		Intermediate		Low Cost Rent	
	Units	%	Units	%	Units	%
1 Bed	10	53%	4	66%	2	18%
2 Bed	8	42%	2	34%	6	55%
3 Bed	1	5%	0	0%	3	27%
<b>Total</b>	<b>19</b>		<b>6</b>		<b>11</b>	

- 5.29. Across the wider scheme the development provides a mix of one bed (44%), two bed (38%) and three bedroom units (18%). Across the affordable rent / social rent tenure the scheme comprises 18% one bed, 55% two bed and 27% three bedroom family sized units, which is broadly in line with policy H4 of the emerging Local Plan. Overall the scheme provides a balanced unit mix which responds to the sites location and which has been informed by the



design of the proposed building and its bulk, scale and massing.

## Affordable Housing

- 5.30. NPPF paragraph 64 states that where major housing development is proposed, at least 10% of homes should be available for affordable home ownership.
- 5.31. London Plan Policy 3.13 sets a standard affordable housing provision threshold of sites with capacity to provide 10 or more units. London Plan Policy 3.12 states the maximum reasonable amount of affordable housing should be sought.
- 5.32. Within the emerging New London Plan Policy H4 targets 50% affordable housing on public sector land. Policy H5 states schemes meeting or exceeding this threshold without public subsidy are not required to submit viability information.
- 5.33. Policy H5 also states that public sector landowners with an agreement with the Mayor may provide 50% affordable housing across a portfolio of sites provided at least 35% affordable housing is provided on each site. HFL have not currently got a portfolio agreement in place with the Mayor.
- 5.34. Furthermore draft Policy H6 states that for public bodies with a portfolio agreement with the Mayor, it is possible to agree the requirement to deliver 50% affordable housing, across their wider portfolio of sites.
- 5.35. At the local level, Local Plan Policy H2 sets out that on sites of at least 0.1 hectares or capable of accommodating 10 or more homes, at least 50% of units should be affordable where public subsidy is available, or 40% without public subsidy. The Policy also specifies a tenure split of 70% Social Rent/London Affordable Rent and 30% Intermediate housing.
- 5.36. Draft Policy H2 of the emerging Lambeth Plan seeks to maximise affordable housing in line with draft Policy H6 of the London Plan. There is no portfolio agreement between HFL and the Mayor for the “small sites” portfolio, and therefore the entire portfolio of the “small sites” will target 50% affordable housing on site, in line with the emerging policy framework, subject to financial viability testing.
- 5.37. The scheme provide 47.5% by unit and 51.5% affordable housing by habitable room equating to 10 x Council Level rented units (72.5 %) and 6 x Intermediate units (27.5%), which is

broadly policy compliant. The majority of the larger 3 bed dwellings are provided within the Council Level Rent and intermediate tenure which responds to the greatest housing need within the Borough. The proposed scheme is therefore compliant with Local Plan Policy H2.

- 5.38. As the scheme comprises a policy compliant affordable housing, it is considered that the application meets the threshold set out in New London Plan Policy H5 and therefore benefits from the Fast Track Route and does not need to be supported by a Financial Viability Appraisal. This approach has been confirmed with GLA officers during pre-application discussions. A Financial Viability Assessment has been included with this submission in support of the affordable housing offer which demonstrates that the proposed offer represents the maximum level which can reasonably be drawn from the development.

### Residential Quality

- 5.39. London Plan Policy 3.5 relates to the quality and design of new housing and seeks to ensure that all new development enhances the quality of local places. Housing developments should be of the highest quality internally, externally and in relation to their context and the wider environment.
- 5.40. In terms of quality, London Plan Policy 7.6 requires new buildings and structures to ensure that they do not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings, in relation to a number of factors, including overshadowing and privacy. The layout has been designed to respect neighbouring properties and sufficient separation is provided from the adjacent existing buildings to the east and west of the site.
- 5.41. The London Plan goes on to state that boroughs should provide residential space in line with the standards set out in Table 3.3. These standards are also compliant with the National Technical Standards.
- 5.42. The GLA's Housing SPG states housing should be designed so that people can use it safely and easily and new development should meet inclusive design principles. Housing should be designed to accommodate and easily adapt to a diverse range of needs.
- 5.43. At the local level, Policy H5 specifies a requirement to provide dual-aspect accommodation, unless exceptional circumstances are demonstrated. The proposed design of the scheme seeks to maximise the number of dual aspect properties. The majority of the one bedroom units and all of the units with 2 bedrooms or more benefit from dual aspect comprising 25

dwellings (81% of total), of the remaining units which achieve single aspect standard of outlook, these units have secondary windows which provide amenity to the affected properties.

- 5.44. At local level, Draft Policy Q1 states that new development should be accessible to all, including disabled people, older people, other people with mobility constraints, and children. Draft Policy Q7 seeks a quality design which is visually interesting, well detailed, well-proportioned with adequate detailing/ architectural interest.
- 5.45. In total, 36 no. new dwellings have been created and all units have been designed to be of high quality, with layouts designed to ensure attractive residential environments for new residents. All new units proposed will meet the minimum space standards as set out in London Plan Table 3.3.
- 5.46. The scheme has also been designed to ensure acceptable levels of daylight and sunlight for all residential units. All units will be provided with private amenity space which will further improve internal lighting levels as well as outlook for occupiers. The scheme has been designed to ensure no loss of amenity to surrounding residents and there will be no unacceptable loss of daylight or sunlight to surrounding residential dwellings as a result of the proposals.

## Residential Density

- 5.47. At the national level, whilst the NPPF does not set out any prescriptive guidance with regards to residential density, it encourages new development proposals to optimise the capacity of sites in a manner that is compatible with the use, intensity, scale, character and grain of the surrounding area and the size of the site.
- 5.48. London Plan policy 3.4 seeks to optimise housing potential and Table 3.2 comprises density guidance in the form of a residential quality density matrix. Supporting text makes it clear that the density matrix is only the start of planning for housing development and does not need to be strictly applied. Within the draft London Plan, draft policy D6 states development must make the most efficient use of land and be designed at the optimum density, taking into account the sites context, connectivity and accessibility and the capacity of surrounding infrastructure.
- 5.49. At the local level, Draft Policy H1 states that the council will seek to maximise the supply of

additional homes to meet and exceed the annual housing target set out in the London Plan by seeking levels of residential density consistent with London Plan guidelines.

- 5.50. The site is considered to comprise a 'Central' area, defined in the London Plan as a site located an area with areas with very dense development, a mix of different uses, large building footprints and typically buildings of four to six storeys, located within 800 metres walking distance of an International, Metropolitan or Major town centre.
- 5.51. According to London Plan Table 3.2 a density of between 140-290 units per hectare, or 650-1100 habitable rooms per hectare is considered to be appropriate in density terms.
- 5.52. The proposed development will provide 36 residential units (100 habitable rooms) and taking into account the site area of 0.14 ha, the residential density of the proposed development 257 (dwellings per hectare) and 714 (habitable rooms per hectare) the density is wholly appropriate given the sites location and benefits delivered from the scheme this falls within the London Plan density guide and is considered to be appropriate.
- 5.53. Within the new Draft London Plan, emerging Policy D6 states development proposals must make the most efficient use of land and be developed at the optimum density. The optimum density of a development should result from a design-led approach to determine the capacity of the site which takes into account site context, its accessibility and connectivity and the capacity of surrounding infrastructure. Proposed residential development should optimise the housing density of the site.
- 5.54. The proposals achieve appropriate intensification of the use of the site, providing new high quality employment floorspace as well as providing much needed new housing for the borough. The residential density has been maximised as far as possible and the density of proposed development is considered to respect the character of the surrounding area and provide an appropriate and sensitive response to the sites context and accords with Local Plan Policy H1 and London Plan Policy 3.4.

## Design

- 5.55. The NPPF states that good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people.

Planning policies and decisions should not attempt to impose architectural styles of particular tastes and they should not stifle innovation, originality or initiative through unsubstantiated requirements to conform to certain development forms or styles. However, it is proper to seek to promote or reinforce local distinctiveness.

- 5.56. London Plan Policy 7.1 states the design of new buildings and the spaces they create should help reinforce or enhance the character, legibility, permeability and accessibility of the neighbourhood. Policy 7.4 goes on to state that developments should have regard to the form, function and structure of an area, including the scale, mass and orientation of surrounding buildings.
- 5.57. At the local level, Local Plan Policy Q8 states that when negotiating schemes the council will seek to ensure that proposed building designs and submitted details are buildable and visually attractive. Poorly-detailed and undeliverable built forms will be resisted. Policy Q7 states that new development will generally be supported if it is of a quality design which is visually interesting, well detailed, well-proportioned with adequate detailing/ architectural interest.

### Scale and Massing

- 5.58. London Plan Policy 7.7 states that tall and large buildings should relate well to the form, proportion, composition, scale, and character of surrounding buildings, urban grain, and public realm. The policy seeks to ensure that tall and large buildings contribute to improving the legibility and permeability of the site and wider area. Furthermore Policy 7.7 states that tall buildings should not adversely affect the environment of their surroundings.
- 5.59. Local Plan Policy Q7 states that new development should have a bulk, scale/mass, siting, building line and orientation which adequately preserves or enhances the prevailing local character; or, in the case of regeneration and opportunity areas where the context is changing, it respects and contributes towards the intended future character of the area. Draft Local Plan policy Q7 also supports new development if it does not prejudice the optimum future development of, or access to, adjoining plots.
- 5.60. The proposed design comprises a considered response to the site and the surrounding area, and seeks to demonstrate the highest quality of design and architectural form. The proposals have been informed by a detailed contextual analysis of the site and following pre-application discussions with officers at LB Lambeth and the GLA. The design of the scheme has been refined to achieve a high quality place sensitive form of design which responds to and

enhances local character and mitigates any impact on residential amenity.

- 5.61. The character of the site is mixed comprising a series of midrise (five storey) residential buildings to the south and east of the site with taller residential blocks of (c. nine storeys) to immediately to west of the site and Capital Towers (c. 25 storeys) in wider vicinity close to Waterloo over ground rail station. Immediately to the north of the site is London Waterloo East rail station and the railway viaduct. Beyond the viaduct, the residential character along Roupell Street and Whittlesey Street is characterised by a terrace of c. two – three storey residential dwellings.
- 5.62. The initial scheme comprised construction of a thirteen storey perimeter block style apartment building, with commercial floorspace at ground floor and residential accommodation above. The massing of the proposed building has been refined to achieve a triangular floorplate with stepping of massing on upper floors to achieve a positive relationship with neighbouring properties. The tallest element of the building has been oriented towards the railway viaduct which is a less sensitive frontage given separation from residential properties along Roupell Street to the north of the site. The massing of the buildings form has been stepped at fifth and eighth floor to respond to sensitive context of Windmill House / Ipsden Building / Tait House. Whilst the proposed building is slightly taller than surrounding properties to the south / east refinement of form and massing achieves a design which positively responds to local context and conservation areas in the wider vicinity of the site.
- 5.63. The design of the scheme has been refined and developed in consultation with development control and design officers at Lambeth and the GLA. Informal support had been expressed from Urban Design officers who praised the material design of the proposed building.
- 5.64. The orientation and stepping of buildings massing achieves a good standard of separation from neighbouring properties with minimum separation distance of 18m – 28m between facing windows on the affected properties. It is considered that the scheme achieves a wholly positive relationship with the neighbouring properties.

## Landscaping

- 5.65. A generous landscaped garden is proposed which includes an intergrade area for children's play. The landscape garden is designed to provide a wide range of activities for all ages and

abilities. The planting scheme will contribute to the sites Urban greening factor. Other than the proposed trees, the scheme will incorporate hedges and planting surrounding the sites boundary, permeable paving, landscaped lawn along with planting with a mix of species which enhance the biodiversity value of the site.

5.66. The scheme includes a package of enhancements to accessible public realm to the north and east of the site. The Landscape Strategy prepared by Outer Space provides further detail on the detailed design of the scheme. The planting strategy and design of open space positively contributes to enhancing amenity and biodiversity value generated from development on site.

Amenity Space

5.67. The GLA’s Housing SPG provides a baseline standard for private amenity space stating that a minimum of 5sqm of private outdoor space should be provided for 1-2 person dwellings. At the local level, both adopted and draft Local Plan policies (Policy H5) requires 10 sq.m private amenity space for flats and for development of 10 or more residential units, a further 50 sq.m per scheme of communal amenity space. The requirement and provision of amenity space within the proposed scheme has been set out below:

Private Amenity Space Provision	Required	Provision
Flats	360 sq.m	384.5 sq.m
Communal	50 sq.m	375.3 sq.m
<b>Total</b>	<b>410 sq.m</b>	<b>760.42 sq.m</b>

5.68. All of the apartments will have access to private amenity space in the form of generously sized for upper floor dwellings and rear or side patios at ground floor level.

5.69. In terms of communal amenity space, a communal garden will be provided in the courtyard, providing space for planting, seating and informal play space. In addition, the scheme takes advantage of stepping of the building form at fifth and eighth floor level with the creation of accessible amenity terraces servicing tenures which have access to the affected levels. In

total the communal amenity space across the site would provide 456sqm of amenity space, which exceeds the requirement of Policy H5.

- 5.70. Further details of the proposed provision of private and communal amenity space is provided in the DAS prepared by Stockwool Architects and the Landscape Design Report prepared by Outerspace.

## Play Space

- 5.71. London Plan Policy requires Play provision for all ages, of at least 10sqm per child. Playspace should be provided in accordance with the Mayors 'Shaping Neighbourhoods: Play and Informal Recreation' SPG and calculated using the GLA's play space calculator.
- 5.72. Local Plan Policy H5 also requires at least 10 sq.m play space per child and states formal play provision should normally be made on-site.
- 5.73. In total, the GLA Population Yield Calculator requires 164 sq.m of play space to be provided as part of the scheme. The proposed development will provide 170 sq.m of play space on site, within the communal garden area. This will comprise the whole of the communal garden area rather than a dedicated play area. Interactive pieces of play equipment, that are both fun and educational, have been designed into the garden.
- 5.74. The proposed development is therefore compliant with the London Plan and Local Plan Policy H5. Further details of the play space strategy are provided in the Landscape Design Report prepared by Outerspace.

## Inclusive Design

- 5.75. London Plan Policy 7.2 states that new development should achieve the highest standards of accessible and inclusive design.
- 5.76. London Plan Policy 3.8 specifies a minimum 10% of dwellings meet M4(3) 'wheelchair user dwellings'.
- 5.77. The principles of inclusive design have been addressed throughout the evolution of the scheme proposals. The development has been designed to create an accessible environment and to meet the needs of all potential users. The layout of the site has been designed to be easy to navigate for all residents, with separate and visible entrances to the building



- 5.78. The development has been designed to create an accessible environment and to meet the needs of all potential users. In accordance with planning policy, 10% of the total dwellings will meet Part M4(3) wheelchair user dwellings comprising of three wheelchair accessible dwellings on the ground floor. The remaining dwellings will comply with Part M4(2).
- 5.79. The Design and Access Statement prepared by Stockwool architects and the detailed layout drawings.

## Materials

- 5.80. London Plan Policy 7.7 requires proposals to incorporate the highest standards of architecture and materials.
- 5.81. Local Plan Policy Q7 seeks quality design which is visually interesting, well detailed and is built of durable, robust, low-maintenance materials designed to be flexible and adaptable internally for different uses. Draft Local Plan Policy Q7 further states that its adaptability should accommodate changing circumstances over the lifetime of the development.
- 5.82. The proposed scheme reflects the predominant architectural style in the area, providing brick as the predominant external material. The colours and textures of the brick have been chosen to complement the existing context..
- 5.83. Careful consideration has been given to the choice of materials and elevational detailing proposed whilst being respectful and reflective of the character of the surrounding area.

## **Transport and Parking**

- 5.84. At the national level, the NPPF sets out the Governments aspiration to manage patterns of growth to make the fullest possible use of public transport, walking and cycling, focusing development in locations which are sustainable and accessible.
- 5.85. London Plan Policy 6.1 encourages development which reduces the need to travel and supports development at locations with high public transport accessibility.
- 5.86. This application is supported by a Transport Statement prepared by Mayer Brown which provides further detail of the proposed highways operations and impacts.

## Car Parking

- 5.87. Local Plan Policy T7 states that car parking should be within the maximum standards in the London Plan. Car-free development will supported in accessible areas and the council will require clear evidence and justification for any proposed parking. Disabled accessible parking bays should be a proportion of the overall parking provision.
- 5.88. Maximum car parking standards are set out in Table 6.2 of the Parking Addendum to the London Plan which seeks less than 1 space per 1-2 bedroom unit. London Plan Table 6.3 sets out the Mayor's cycle parking standards. The London Plan also states that development in areas of good public transport accessibility should aim for significantly less than 1 space per unit. Adequate levels of parking for disabled people must also be provided.
- 5.89. Within the draft New London Plan (2017) Policy T6.1 states residential development proposals delivering ten or more units must ensure that at least one designated disabled persons parking bay per dwelling for 3% of dwellings is available.
- 5.90. In accordance with policy, the proposed scheme will be car free, except for the provision of four on street disabled person parking bays, of which three bays will service the residential element and 1 no. space for the community use. The parking strategy has been agreed with officers at LB Lambeth and the GLA it is considered that the strategy is wholly appropriate in planning terms given the sites sustainable urban location.

## Cycling

- 5.91. Cycle parking will be provided for all dwellings in line with the draft London Plan standards, as requested by the Council.
- 5.92. A total of 66 cycle parking spaces will be provided, comprising 64 long stay spaces and 2 visitor spaces. Cycle parking will be provided within secure communal bicycle stores at ground floor level of the development, accessed via the communal garden.
- 5.93. Secure cycle parking facilities are provided for the community use based on worst case scenario. In addition short stay parking facilities are delivered on-site.

## Servicing

- 5.94. The development includes provision of a communal bin store in the northwest corner of the site. The refuse vehicles will collect the bins from Wootton Street with a dropped kerb provided

where there is a gap in on street parking. Refuse collection for the community facility will be from Ethelm Street to the south or Greet Street to the east.

- 5.95. Residential deliveries will be from Wootton Street via the secure courtyard gate and lobby doors operated by the individual residents. Deliveries to the community facility will be from Greet Street. The largest delivery vehicle likely to access the development is a 10m rigid Heavy Goods Vehicle (HGV) swept path analysis contained within the Transport Statement demonstrates that access can be suitably accommodated.

### Construction Traffic

- 5.96. The Outline Construction Logistics Plan prepared by Ardent provides indicative detail on strategy for construction access to the site. Construction vehicle access to the site will be undertaken via Cornwall Road, via The Cut / B3000 or the A301. Primary construction access is proposed via the Wootton Street frontage to the north with secondary access from Ethelm Street to the south. The outline construction logistics plan indicates that development would not impact on on-street highways network.

### Summary

- 5.97. The scheme is well located to make use of the local public transport connections and has been designed to be car free in order to encourage sustainable modes of travel. The proposed car and cycle parking arrangements are in accordance with London Plan and Local Plan policies.

### **Daylight and Sunlight**

- 5.98. Guidelines relating to daylight and sunlight are contained within the Building Research Establishment (BRE) Handbook – Site Layout Planning for Daylight and Sunlight (1991). This guidance includes discussion on how to protect the daylighting and sun lighting of existing buildings when new developments are proposed.
- 5.99. London Plan Policy 7.6 requires new buildings and structures to ensure that they do not cause unacceptable harm to the amenity of surrounding land and buildings in relation to a number of factors, including overshadowing. The policy makes reference to this being particularly important for residential buildings.

- 5.100. Local Plan Policy Q2 states that development will be supported if it would not have an unacceptable impact on levels of daylight and sunlight on the host building and adjoining property. The Draft Local Plan expands on this to state that development will be supported if it would not have an unacceptable impact on levels of daylight and sunlight on the host building or adjoining property, including their gardens or outdoor spaces.
- 5.101. A Daylight and Sunlight study has been completed by EB7 and submitted in support of this planning application. The study has assessed the impact of the proposed development on both daylight/sunlight levels of neighbouring properties, as well as within the development itself.
- 5.102. The Daylight and Sunlight Study on amenity within the proposed development has shown that all of the rooms receive good ADF level with the majority of rooms meeting the relevant BRE criteria.
- 5.103. The impact of the proposed development on the following surrounding properties has been assessed in terms of daylight and sunlight:
- ❖ Windmill House
  - ❖ Ipsden Buildings
  - ❖ Tait House
- 5.104. The Daylight and Sunlight Study impact on neighbouring properties concluded that the scheme responds well to the context with very limited effects to the majority of neighbours. There are some deviations from BRE targets affecting Windmill House and Tait House but the assessment demonstrates that the retained VSC values are above the levels considered typical of urban developments in London.
- 5.105. The selection below summarises the key daylight and sunlight considerations associated with each property.

#### Windmill House

- 5.106. As outlined in the Daylight & Sunlight assessment design constraints in Windmill House in the

form of access decks and walkways constrain daylight levels to the units in the existing situation. The preliminary daylight analysis study indicates that 17 out of 35 windows serving habitable rooms meet the BRE VSC requirement of 0.8 times their original value. In the instances where VSC standards fall below 0.8, all but two of the assessed windows are overhung by access decks from the floor above. Whilst the retained daylight levels for the affected windows achieve a deterioration beyond existing levels. It is notable that the compromised design of these units will significantly limit natural daylight in the existing situation, thereby promoting reliance on artificial lighting. Whilst there are deviations in VSC standards below the BRE methodology, overall the scheme performs favorably when compared with daylight and sunlight impacts assessed on other schemes in the borough notably the Graphite Square scheme. Where windows are not significantly overhung but deviate from the BRE targets, the retained VSC levels with the proposal in place are high at 23.2%-25.5%. Retained VSC values within this range are considered to be broadly typical of urban developments across London.

- 5.107. Notwithstanding the effect of balconies the No Sky Contour (NSC) results show that 30 out of 35 habitable rooms retain levels at or within 0.8 times their existing standards. Where there are deviations this is generated by constraints in the design of the existing building. In an alternative scenario, where the assessment is undertaken with the access deck removed the scheme achieves a marked improvement with 71% of windows affected achieving at least 0.8 times or greater against the VSC standards.

#### Ipsden Buildings – Windmill Walk

- 5.108. As with Windmill House, the design of Ipsden Building is somewhat 'self-limiting' in regards to the outlook and existing daylight levels. The lowest level of the property are 'sunken' with windows that are limited in their outlook by the existing railings and planting to the boundary. In addition, there are windows overhung by access decks further to west along Windmill Walk. The initial daylight and sunlight assessment demonstrates that all of the windows on the fourth / fifth floor achieve compliance with VSC standards, below this there are deviations below 0.8, these are marginal deviations. Notwithstanding, the VSC score the NSC analysis demonstrates that 76 out of 82 windows will achieve full compliance with BRE standards. If an assessment were to be undertaken with the access decks removed 91% of windows affected would demonstrate compliance with the BRE methodology. Whilst reductions in amenity are inevitable the retained values demonstrate that the property is not significantly blighted by the proposal which has been specifically designed to respond to this neighbour

and maximise amenity levels. Retained values are considered to be acceptable for an urban location and again will not affect the use / amenity of the neighbouring residents.

## Tait House

- 5.109. As with the Windmill Walk and Windmill House the majority of the windows assessed achieve compliance with BRE standards in VSC terms. Where there are minor transgressions below the BRE standards these are relatively minor transgressions, generated by constraints in the design of the existing building. NSC analysis indicates that the majority of windows retain at least 0.8 times their original value. In an alternative scenario, where the assessment is undertaken with the access deck removed the scheme achieves a marked improvement in VSC terms with the majority of affected windows demonstrating compliance with BRE standards.

## Summary

- 5.110. Overall, whilst there are reductions below the BRE guideline targets consideration of the retained values demonstrates that levels are broadly in line with levels considered typical of urban development in London. In instances where amenity is already constrained by balconies and access decks, the scheme will not have a significant adverse effect on the normal amenity and use of the neighbouring properties. This is particularly the case in respect of Windmill House where the site facing elevation is significantly affected by the access decks but is a secondary elevation serving mainly non-habitable spaces, with the main living rooms facing west away from the proposal. The design works hard to respond to the neighbours whilst maximising housing delivery. The scheme is commensurate in height to similar developments in the Borough and performs significantly better than recent precedent such as that from the Graphite Square development. As such, the effects of the proposal are considered to be acceptable given the urban context and the flexibility encouraged by the BRE and both local and national planning policy. In addition to the effects on neighbours, the assessment of amenity within the proposed units has shown a very high level of compliance amongst the more constrained rooms at c.98%. The overall internal daylight levels across the entire development are expected to only improve, this is illustrative of the high quality of the proposals. In the localised instances that internal amenity falls below the BRE targets, this is a direct result of the provision of private balconies which further enhance the apartments and provide well-lit external spaces. This is a common 'trade-off' in modern flatted developments and the overall compliance is considered to be excellent for an urban location. Overall, the

scheme is considered to respond appropriately to its context and the relevant residential neighbours as well as providing a high-quality living environment for future occupiers. As such we consider the proposal to be fully in line with the intentions of the BRE guidance

- 5.111. The NPPF 2019 makes it clear that efficient use of sites, particularly for housing delivery, should not be limited by such technical constraints and the proposals will not adversely affect the normal use of these properties. Overall, the schemes design works hard to respond to the neighbours whilst maximising housing delivery. The effects of the proposal are considered to be acceptable given the urban context and the flexibility encouraged by the BRE guidance and both local and national planning policy.
- 5.112. Overall the proposals will achieve a good level of compliance with the relevant daylight and sunlight targets. The amenity impacts are considered acceptable, particularly given the site's urban context. The proposals are therefore in accordance with the standards set by the BRE guidelines and relevant planning policy.

### **Impact on Built Heritage**

- 5.113. The NPPF establishes national level policy on the conservation and preservation of the historic environment. Paragraph 189 requires planning applications to include a description of the significance of any heritage assets affected, including any contribution made by their setting. In accordance with paragraph 193, great weight has been given to the asset's conservation and under paragraph 193-196, opportunities sought for the new development to enhance and better reveal the significance of the heritage asset.
- 5.114. Section 66 of the Listed Buildings and Conservation Areas Act (1990) states that that in considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority shall 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.
- 5.115. The effect of this section of the Listed Building Act is that there is a statutory presumption in favour of the preservation of the Listed Buildings and their setting. Considerable importance and weight is attached to the preservation and enhancement of the assets. Any proposal which cause harm should only be permitted where there are strong countervailing planning considerations which are sufficiently powerful to outweigh the presumption against development.

5.116. The NPPF (February 2019) at Paragraph 190 outlines a requirement for Local Planning Authorities to identify and assess the significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage assets) taking into account the available evidence and any necessary expertise. In determining applications, local planning authorities should take account of:

- a) *the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;*
- b) *the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and*
- c) *the desirability of new development making a positive contribution to local character and distinctiveness.*

5.117. In considering the impact of new development on the significance of the designated heritage asset, great weight should be afforded to the conservation of the asset, this is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance (Para 193).

5.118. Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

- a) *the nature of the heritage asset prevents all reasonable uses of the site; and*
- b) *no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and*
- c) *conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and*
- d) *the harm or loss is outweighed by the benefit of bringing the site back into use.*

5.119. Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use. The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect



non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

- 5.120. At the local level, Policy Q18 (Historic Environment Strategy) states that In order to ensure that heritage assets continue to play a key role in the quality of Lambeth's environment, the council will prepare an Historic Environment Strategy, which will assist developers and other interested parties in understanding the justifications behind its approach to development management policies Q19, Q20, Q21, Q22, Q23, Q24, Q25 and Q26 and the wider local issues relating to the historic environment.
- 5.121. The Heritage Assessment prepared by Mola and the Townscape and Visual Impact Assessment prepared by Savills Urban Design team includes a critical assessment of the scheme in design terms and its impact on designated heritage assets including Roupell Street Conservation Area, other surrounding Conservation Areas and Tait House Locally Listed building. The section below provides a brief summary of the key considerations.

#### Roupell Street Conservation Area

- 5.122. The Roupell Street Conservation Area is located immediately north of the railway viaduct approximately 65m to the north of 'The Site'. Roupell Street CA is characterised by a terrace of two storey residential properties, including a number of listed buildings.
- 5.123. The scheme comprises a building of 10 storeys which is slightly taller than the context to south and east of the site and wider context. It is considered that the proposed scheme will not be out of place given presence of a number of tall buildings to the north and south of the railway line. The triangular footprint of the building and stepping of building massing will help to reduce massing of proposed building in local streetscene views.
- 5.124. The proposed scheme will not have a direct impact on the historic significance of the Roupell Street CA. However, the proposed building will be visible from the neighbouring conservation areas but this will only be in indirect views from over the viaduct in the case of views from the Waterloo & Roupell Street CA. The proposed building will have a broadly positive impact on the character of local streetscene falling within the backdrop of taller buildings closer to Waterloo Road. It is considered that the proposed scheme would have a broadly positive impact on local streetscene and character of wider conservation areas.
- 5.125. A detailed assessment of the impact of the scheme on local townscape views within Roupell

Street and Waterloo conservation area is outlined in the Townscape and Visual Impact Assessment prepared by Savills Urban Design.

## Tait House

- 5.126. Tait House is designated as a 'locally listed building'. The evidential and historic value of this building comes from its construction in the interwar period as an example of philanthropic housing and it was built by architects who built several other examples of philanthropic houses.. The building has an interesting curved shape and is prominently situated so that it is a focal view point on the street. The Heritage Statement prepared by Mola indicates that the scheme holds medium level of historic and aesthetic significance.
- 5.127. As outlined in the section above, the massing of the scheme has been stepped on the eastern and western edge of the building to achieve a positive relationship with Tait House (stepped to 5 storeys) and Windmill House (stepped to 8 storeys) to achieve a positive relationship with neighbouring properties. It is considered that material design of the scheme will achieve a design which positively responds to and enhances the character of local streetscene and by association setting of Tait House.

## Summary

- 5.128. Delivery of the site represents an opportunity to replace an underutilised site which contributes little to the character of the local streetscene and by association the conservation areas which surround the site. The scheme has been developed and refined to achieve a place sensitive form of development which positively responds to the character of local streetscene and wider area. The new scheme will create and active and attractive street frontage as a foreground to buildings in surrounding conservation area, channelling views more clearly towards the historic building stock in the vicinity of the site. It is considered that the development will have a wholly positive impact on the setting of conservation areas in the wider vicinity of the site and will deliver a tangible enhancement to the character of this part of the local streetscene. It is considered that the proposals are wholly acceptable in planning terms. If officers are minded to consider that the scheme would have an impact on the significance of designated heritage assets it is considered that this could only be at the lower end of the scale 'less than substantial harm'. In this instance officers would be required to balance heritage concerns against public benefits delivered from the scheme. In this instance it is contended that delivery of a package of public benefits notably: the delivery of a modern building of high standard of

architectural quality, new housing and affordable housing (50%), new community floorspace and other associated benefits) will outweigh perceptible harm on the heritage assets (Roupell Street and Waterloo CAs). It is considered that the proposed scheme would be wholly acceptable in planning terms.

## Archaeology

- 5.129. The NPPF states that where a site on which development is proposed includes or has the potential to include heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.
- 5.130. London Plan Policy 7.8 states that development should incorporate measures that identify record, interpret, and protect the site's archaeology.
- 5.131. Local Plan Policy Q23 states that the council will maintain a list of undesignated heritage assets which it considers to be of local (or greater) significance. It will be known as the 'local heritage list'. It will include:
- ❖ archaeology (archaeological priority areas);
  - ❖ buildings and structures (local list); and
  - ❖ designed spaces and landscapes (local landscape register).
- 5.132. The council will resist the destruction of assets on the local heritage list and expect applicants to retain, preserve, protect, safeguard and where desirable enhance them when developing proposals that affect them. In addition, proper investigation and recording of archaeological remains and publication and archiving of results to advance understanding will be required.
- 5.133. In terms of relevant, nationally significant designated heritage assets, no World Heritage Sites, Scheduled Monuments, Historic Wrecks or Historic Battlefields lie within the study site or its immediate vicinity.
- 5.134. In terms of relevant local designations, the study site does not lie within an Archaeological Priority Area, as defined by the London Borough of Lambeth and their archaeological planning advisors. The site is not located within an archaeological priority area. The Written Scheme of Investigation prepared by RPS indicates that existing development would have removed any archaeological deposits which could have been present on site. It is considered that there

may be potential for paleo environmental deposits from pre-historic periods to be present on site.

- 5.135. The report concludes that development on this site is unlikely to have an impact on ground conditions and potential archaeological deposits. If LB Lambeth determine that it is expedient the applicant would be content for a pre-commencement condition to be imposed on the consent.

## Noise and Vibration

- 5.136. NPPF Paragraph 180 sets out that policies and decisions should aim to avoid noise from giving rise to significant adverse impacts on health and quality of life as a result of new development, by mitigating and reducing noise to a minimum, including through the use of conditions. In addition, the NPPF recognises that development will often create some noise.
- 5.137. At the regional level, London Plan Policy 7.15 requires development proposals to reduce noise by minimising the existing and potential adverse impacts of noise on, from, within, or in the vicinity of, development proposals.
- 5.138. At the local level, Local Plan Policy Q2 states that development will be supported if the adverse impact of noise is reduced to an acceptable level through the use of attenuation, distance, screening, or internal layout/orientation.
- 5.139. A Noise and Vibration Assessment has been prepared by Ardent to calculate and assess suitable glazing and ventilation specification. The assessment demonstrated that the site is suitable for residential development subject to the following recommendations:
- ❖ External sound levels should be reduced to as low a level as practicable in accordance with the principles of good acoustic design; and
  - ❖ Control measures implemented to manage potential impacts from construction noise.
  - ❖ Sound reduction performance calculations have been undertaken to specify the minimum glazing and ventilation performance.
  - ❖ Up-rated glazing is required in places which experience higher background noise as detailed in Ardent Environmental Noise Report
  - ❖ Enhanced thermal double glazing and enhanced ventilation is required in certain areas as identified in the Environmental Noise statement.

5.140. The scheme is therefore considered compliant with London Plan Policy 7.15 and Local Plan Policy Q2.

## **Air Quality**

5.141. London Plan Policy 7.14 requires that development proposals should minimise increased exposure to poor air quality and promote sustainable construction to reduce emissions. This is also set out in the NPPF which requires planning policies to ensure that pollution is minimised.

5.142. LBL will apply Draft London Plan Policy SI1 Improving air quality to all development proposals in the borough, along with associated Mayoral guidance on Air Quality Neutral and Air Quality Positive standards. LBL will apply London Plan policy SI1 Improving air quality to all development proposals in the borough. Policy SI1 requires development proposals to be at least air quality neutral and set design solutions to prevent or minimise increased exposure to existing air pollution and make provision to address local problems of air quality in preference to post-design or retro-fitted mitigation measures

5.143. An Air Quality Assessment has been undertaken by Mayer Brown and is submitted in support of this application. The Air Quality Assessment concluded that the proposed development requires a construction dust assessment as the site is likely to fall within APEC-A & B. It notes that mitigation measures have been proposed for construction traffic and stationary plant associated with the development.

5.144. The Air Quality Neutral Assessment undertaken predicts that the Total Transport Emissions associated with the proposed development are expected to be higher than the Existing Transport Emissions. However, the proposed development is car free and the majority of the 'additional' trips are likely to arise from the disabled car parking provision, which is a standard requirement within the London Plan and unable to be eliminated from the proposals.

5.145. Following the successful implementation of the specific mitigation measures, the residual effects of construction dust and emissions from construction plant/vehicles upon the local area and sensitive receptors although adverse, will be temporary and considered to be 'not significant'.

5.146. The proposals therefore meet the requirements of London Plan Policies 7.14 and SI1.

## Flood Risk and Drainage

- 5.147. London Plan Policy 5.12 requires that development proposals to comply with the flood risk assessment and management requirements set out in the NPPF and the associated technical Guidance on flood risk. London Plan Policy 5.13 requires development should utilise sustainable urban drainage systems (SUDS) unless there are practical reasons for not doing so, and should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible.
- 5.148. Local Plan Policy EN5 sets out the local policy on flood risk. This policy generally mirrors the requirements of the NPPF and the London plan. Likewise, policy EN6 covers local policy in relation to Sustainable Drainage Systems and Water Management and confirms that the national standards must be applied within Lambeth.
- 5.149. According to the EA flood maps, the Site is located in Flood Zone 3a. Under the NPPF the proposed development is classified as 'more vulnerable' and will be subject to the sequential and exception test. The Flood Risk and Drainage Assessment prepared by Ardent includes an assessment of sources of flood risk to the site and drainage measures to be implemented on site. A summary of the key points are outlined below:
- ❖ Potential flood risk from sources other than fluvial and tidal at the Site include surface water, groundwater and sewers are 'very low risk' following implementation of mitigation measures.
  - ❖ Flood risk from artificial sources including sewer flooding is not considered significant.
  - ❖ Due to the risk of a tidal breach occurring at the site it is proposed to locate all sleeping accommodation at or above the maximum 2100 tidal breach level of 4.31m AOD.
  - ❖ Finished floor levels within the communal areas and community facility will be 300mm higher than external ground levels.
  - ❖ The surface water drainage strategy will reduce flood risk by restricting surface water flows to 2l/s, for all return period events up to and including the 1 in 100-year critical event (including a 40% allowance for climate change).
  - ❖ Provision of Sustainable Urban Drainage Systems (SUDS) in the form of green roof

surfaces and geo-cellular attenuation tank at ground floor (storage volume 79 m3).

- 5.150. The scheme has been designed in a manner to protect the proposed vulnerable uses from extreme flood risk events. Similarly, the proposed sustainable urban drainage systems implemented as part of the development will ensure that delivery of the site will not increase surface water flood risk conditions on site and for neighbouring properties. It is therefore considered that the proposals are wholly align with requirements of Policies, 5.12, 5.13, EN5 and EN6 and as such is wholly appropriate in planning terms.

## Ecology

- 5.151. At the national level, NPPF Paragraph 170 seeks positive improvements in the quality of the natural environment including achieving net gains for nature and biodiversity. The NPPF seeks to minimise the impacts of development on biodiversity and geodiversity, and sets out guidance for local planning authorities to follow in developing policy.
- 5.152. London Plan Policy 7.19 sets out that development proposals should, where possible, make a positive contribution to the protection, enhancement, creation and management of biodiversity.
- 5.153. At the local level, Policy EN1 states that development proposals should wherever possible protect, enhance, create or manage nature conservation and biodiversity interest in accordance with the borough's Biodiversity Action Plan (BAP) and the Mayor's Biodiversity Strategy.
- 5.154. A detailed landscaping strategy has been prepared by Outterspace which outlines the package of landscaping works and public realm enhancements delivered as part of the scheme. A central design philosophy has been the delivery of high quality open spaces, delivery of green roof surfaces and enhancement to accessible public realm surrounding the site. An indicative strategy has been enclosed within the Landscaping Strategy which outlines how enhancements could be delivered within the public realm for Windmill House. At this stage this is solely a concept, a detailed scheme will be secured by another mechanism (either an obligation or separate application). The landscaping strategy illustrates that the scheme by virtue of communal garden, accessible terraces with planting, green roofs, and public realm enhancements represent a significant improvement on the existing situation.
- 5.155. A preliminary ecological appraisal has been prepared by AAE environmental which considers

the baseline conditions of the site and includes high level commentary on the proposed landscaping scheme / public realm enhancements delivered as part of the application. As outlined in the report, existing site conditions hold limited ecological benefit. It is considered that the proposed scheme will deliver significant enhancement in ecological conditions, beyond the existing baseline.

- 5.156. Overall, the development proposals are considered to comply with national, regional and local planning policies regarding the redevelopment the urban environment and enhancements for biodiversity, nature conservation and ecology.

## Existing Trees

- 5.157. London Plan Policy 7.21 states “Existing trees of value should be retained and any loss as the result of development should be replaced. Wherever appropriate, the planting of additional trees should be included in new developments, particularly large-canopied species.”
- 5.158. Draft New London Plan states development proposals should ensure that, wherever possible, existing trees of value are retained. The planting of additional trees should generally be included in new developments – particularly large-canopied species which provide a wider range of benefits because of the larger surface area of their canopy.
- 5.159. At the local level, Local Plan Policy Q10 states development will not be permitted that would result in the loss of trees of significant amenity, historic or ecological/habitat conservation value.
- 5.160. An Arboricultural Impact Assessment (AIA) has been prepared by SJA consulting in support of this scheme. The Tree Survey indicates that all of the principle ‘A’ or ‘B’ category trees are to be retained as part of development, albeit pruning and management measures will be implemented as part of the development to mitigate impact on canopy of retained trees. It is proposed that 2 no. self-seeded small trees will be removed and replaced, on the basis that these trees cannot be comfortably retained on site. None of the main arboricultural features of the site are to be removed. The proposed removal of two small individual trees will represent no alteration to the main arboricultural features of the site, only an insignificant alteration to the overall arboricultural character of the site and will not have an adverse impact on the arboricultural character and appearance of the local landscape.
- 5.161. The proposed development takes account of existing trees on and adjacent to the site by



retaining all trees of significant amenity, historic or conservation value, ensuring that the retained trees are in sustainable relationship with the proposed scheme, and fully protected during the development process. The scheme provides substantial replacement planting to mitigate the loss of trees. As such the proposed development complies with Local Plan Policy Q10.

## Energy and Sustainability

- 5.162. The NPPF encourages local planning authorities to adopt proactive strategies to mitigate and adapt to climate change.
- 5.163. London Plan Policy 5.2 also seeks new development to reduce carbon dioxide emissions by a 40% improvement on 2010 Building Regulations; equivalent to 35% reduction on 2013 Building Regulations. The policy also states development proposals should make the fullest contribution to minimising carbon dioxide in accordance with the following energy hierarchy:
- ❖ **Be Lean:** use less energy;
  - ❖ **Be Clean:** supply energy efficiently; and
  - ❖ **Be Green:** use renewable energy.
- 5.164. London Plan Policy SI4 seeks major development proposals to demonstrate through an energy strategy how they will reduce the potential for internal overheating and reliance on air conditioning systems in accordance with the cooling hierarchy and CIBSE TM59.
- 5.165. At local level, Policy EN3 states that all major developments will be expected to connect to, and where appropriate extend, existing decentralised heating, cooling or power networks in the vicinity of the site, unless a feasibility assessment demonstrates that connection is not reasonably possible. Minor new-build developments should be designed to be able to connect wherever reasonably possible. Where networks do not currently exist, developments should make provision to connect to any planned future decentralised energy network in the vicinity of the site, having regard to opportunities identified through the London Heat Map and area specific energy plans.
- 5.166. Policy EN4 states that all development, including construction of the public realm, highways and other physical infrastructure, will be required to meet high standards of sustainable design

and construction feasible, relating to the scale, nature and form of the proposal. (b) Proposals should demonstrate in a supporting statement that sustainable design standards are integral to the design, construction and operation of the development.

- 5.167. In light of the climate emergency, a key principle driving the design of the scheme has been sustainability. A key priority has been the integration of natural / passive design features which improve the thermal performance of the building, thereby minimising reliance on artificial cooling systems. In addition, to passive features the development will incorporate provision of renewable energy systems contributing to the energy requirements for the building, along with rainwater harvesting systems.
- 5.168. The site is located in a sustainable urban location, sustainable modes of travel will be promoted through provision of secure cycle storage facilities servicing the occupants of the development. The package of sustainability measures incorporated within the development ensure that the development will perform strongly in sustainability terms.
- 5.169. The London plan sets a reduction target of 35% over Building Regulations Part L 2013 for non-domestic units and zero-carbon for residential units, with at least a 35% reduction in carbon emissions being achieved on site.
- 5.170. The development has been designed and will be fabric first construction with sustainability measures incorporated, including PV panels, air source heat pumps transferring heat from the outside conserving energy use and natural ventilation in all units. The scheme includes the following benefits:
- ❖ Energy demands to be reduced substantially through fabric 'Be Lean' measures to achieve the New London Plan energy efficiency target. This locks in CO<sub>2</sub> savings irrespective of the source of the delivered energy;
  - ❖ A holistic approach which balances further considerations such as daylighting, overheating, and noise to ensure resident comfort;
  - ❖ A balanced strategy for the generation of low carbon heating. Homes for Lambeth are committed to the delivery of heat which is both low in CO<sub>2</sub> and not unreasonably costly. A strategy has therefore been proposed which utilises heat pumps in each dwelling.

- ❖ Provision of PV panels enabling on-site electrical generation

5.171. The proposed residential development will result in a 56% improvement in carbon emissions against building regulations, with an offset payment to achieve zero carbon.

5.172. In addition, the Sustainability Statement prepared by Hodkinson's outlines the key measures integrated into the design of the scheme to achieve a form of development which positively responds to the aspirations outlined in London / Lambeth policies. A summary of the key considerations are outlined below:

- ❖ **BREEAM:** The community floorspace (Use Class E) will be designed and built to achieve a BREEAM 'Excellent' rating under the New Construction 2018 Shell Only Scheme.
- ❖ **Energy efficiency:** The development will target a 56% reduction in Regulated CO<sub>2</sub> emissions over Part L 2013 Baseline through energy efficiency measures and individual Air Source Heat Pumps.
- ❖ **Overheating:** The scheme has been designed to ensure overheating risk is reduced to acceptable levels in accordance with CIBSE TM59:2017 requirements.
- ❖ **Water efficiency:** Flow control devices and water efficient fixtures and fittings will be installed in all dwellings to target a maximum internal daily water consumption of 105 litres/person/day.
- ❖ **Waste and recycling:** Adequate facilities will be provided for domestic and construction related waste, including segregated bins for refuse and recycling.
- ❖ **Materials:** Where practical, new building materials will be sourced locally to reduce transportation pollution and support the local economy. New materials will be selected based on their environmental impact and responsible suppliers will be used where possible.
- ❖ **Pollution:** Mitigation measures have been proposed to minimise the impact of noise.
- ❖ **Flood Risk and SUDs:** The proposed development site will benefit from SUDs such as green roofs and attenuation tanks.

- ❖ **Security:** Consultation with a Security Specialist will take place to ensure the development is safe and secure for its residents.
- ❖ **Sound insulation:** The dwellings are to target an improvement on Building Regulations Part E through party walls and floors.
- ❖ **Inclusive access:** 90% of the new dwellings will be designed to meet Building Regulations Approved Document M4(2) and 10% will meet Part M4(3).
- ❖ **Sustainable transport:** The site will benefit from a good existing public transport network and sustainable modes will be encouraged through the provision of 66 cycle storage spaces for the residential units.
- ❖ **Biodiversity and ecology:** Enhancements will be implemented through the provision of landscaped areas and additional tree and shrub planting. The scheme will achieve a net gain in biodiversity beyond the existing conditions.
- ❖ **Sustainable construction:** The site will aim to achieve a 'Beyond Best Practice' score with the Considerate Constructors Scheme and will closely monitor construction site impacts.

5.173. The energy strategy for the proposed development is therefore considered to be acceptable and meets the requirements of London Plan energy hierarchy as well as Local Plan policy EN4.

## Planning Obligations Statement

5.174. The Community Infrastructure Levy (CIL) Regulations (Regulation 122) provide limitations on the use of planning obligations. Planning obligations may only be sought where they meet all of the following tests:

- ❖ necessary to make the development acceptable in planning terms;
- ❖ directly related to the development; and
- ❖ fairly and reasonably related in scale and kind to the development.

5.175. These tests are further reinforced at Paragraph 56 of the NPPF.

5.176. It is anticipated that the financial and non-financial obligations attached to the permission would be limited to the following:

- ❖ Carbon Offset Payment

### Community Infrastructure Levy

5.177. In February 2019 the Mayor adopted a new charging schedule (MCIL2). MCIL2 came into effect on 1 April 2019 and superseded MCIL1 and the associated Crossrail Funding SPG. LBL is identified as a band 2 borough within the Mayoral CIL Charging Schedule and Mayoral CIL is chargeable at £60 per square metre of net additional floorspace in this location.

5.178. The Council's CIL Charging Schedule came into effect in on 1<sup>st</sup> October 2014. The site is located within the Zone A charging area and the rate for residential development is £265 per sq.m.

## 6. Conclusions

- 6.1. Section 38(6) of the Planning and Compulsory Purchase Act 2004, requires proposals for development to be determined in accordance with the Development Plan unless material considerations indicate otherwise.
- 6.2. The Proposed Development optimises the Site's use and delivers new residential development in a highly sustainable town centre location. Planning policy supports the principle of the redevelopment specifically where tangible design and place making benefits and permeability improvements can be delivered. The Proposed Development achieves this.
- 6.3. The planning application is supported by a comprehensive suite of technical reports, demonstrating that the Proposed Development is consistent with policy across a wide range of disciplines including design, transportation, residential amenity, daylight and sunlight and sustainability.
- 6.4. The Proposed Development has been brought forward following close engagement with LB Lambeth Planning and Design Officers and other key stakeholders including the Greater London Authority (GLA) and local stakeholders. This engagement has informed the Proposed Development.
- 6.5. The Proposed Development represents a significant opportunity to deliver the following important economic, social and environmental public and place making benefits:
- ❖ Residential development providing new housing in a mix of 1, 2 and 3 bedroom units all which meet or exceed the nationally described space standards (NDSS);
  - ❖ Provision of 51.5% Affordable Housing by habitable room with a tenure compliant unit mix;
  - ❖ Each dwelling will include private amenity space in the form of external balconies, as well as access to high quality landscaped communal amenity space;
  - ❖ The Proposed Development has no material detrimental impact on existing residential amenity in terms of noise, vibration, daylight/sunlight and overlooking. Private amenity areas are provided for every residential unit;

- ❖ Sufficient parking and cycle parking on site in accordance with the GLA and Lambeth parking standards. The Proposed Development has been demonstrated to have no adverse impact on the local highway network and a detailed servicing and waste strategy is provided
  - ❖ A sustainable development which ensures all new homes meet the highest levels of sustainability through passive design features, integration of renewable energy systems, along with enhancements to biodiversity.
  - ❖ A design of high architectural quality, built on strong urban design principles and comments received at the pre-application stage and will contribute positively to the surrounding townscape; and
  - ❖ A scheme that respects the local character of the area and relates to its existing context
  - ❖ Maximising the development potential of a previously developed site, located within a sustainable and accessible location.
- 6.6. The Development has been progressed through extensive discussions with stakeholders and responds to the majority of comments received, including those from LB Lambeth and the Greater London Authority (GLA).
- 6.7. For the reasons set out in the comprehensive material which is submitted in support of this planning application (including this Planning Statement), the Proposed Development accords with the Development Plan when read as a whole. Accordingly, it benefits from the statutory presumption set out in section 38(6) of the 2004 Act.
- 6.8. Moreover, the application material also demonstrates that the Proposed Development comprises sustainable development within the meaning of the NPPF, such that it engages the presumption set out in paragraph 11. This reinforces the policy support for the Proposed Development. The application also demonstrates that there are a number of material considerations which indicate that the planning application should be granted. It follows that, upon any application of section 38(6) of the 2004 Act, planning permission should be granted for the Proposed Development.