

Committee	PLANNING COMMITTEE A	
Report Title	Kenton Court - 132 Adamsrill Road, London, SE26 4AU	
Ward	Bellingham	
Contributors	Holly Lucas	
Class	PART 1	7 <sup>th</sup> December 2017

Reg. Nos. (A) DC/17/103961

Application dated 06 October 2017

Applicant Mr Anthony Kelly for Lewisham Homes on behalf of Lewisham Council

Proposal The demolition of Kenton Court, 132 Adamsrill Road SE26 and the construction of a part three/part four storey building to provide 25 residential dwellings comprised of 5 x 1 bed, 15 x 2 bed, 4 x 3 bed and 1 x 4 bed self contained flats, together with improvements to the existing pedestrian walkway, the creation of a shared landscaped space within a rear courtyard, secure cycle and refuse storage

Applicant's Plan Nos. 1\_561-00-001:1\_561-00-002:1\_561-00-003:1\_561-00-004:1\_561-00-005:1\_561-00-010:1\_561-00-011:1\_561-00-100:1\_561-00-101:1\_561-00-102:1\_561-00-103:1\_561-00-104:1\_561-00-201:1\_561-00-202:1\_561-00-203:1\_561-00-204:1\_561-00-205:1\_561-00-206:1\_561-00-207:1\_561-00-208:1\_561-00-301:1\_561-00-302:1\_561-00-310:1\_561-00-311:1\_561-00-312:1\_561-00-401:1\_561-00-402:1\_561-00-403:1\_561-00-404:1\_561-00-405:1\_561-00-406:1\_561-00-407:1\_561-00-408:1\_561-00-409:1\_561-00-410:1\_561-00-411:1\_561-00-412:1\_561-00-501:1\_561-00-601:  
Design And Access Statement: External Lighting Report: Daylight And Sunlight Assessment: Preliminary Ecological Appraisal: Energy Statement: Proposed Demolition Sequence and Traffic Management Assessment: Transport Statement: Residential Travel Plan: CDM Traffic Management Logistics And Overview of Waste Management Plan: Statement of Community Involvement: Thames Water Utilities Asset Location Search

Background Papers (1) Case File LE/214/B/TP  
(2) Development Management Local Plan (adopted November 2014) and Core Strategy (adopted June 2011)

## Designation

PTAL 2  
Local Open Space Deficiency  
Not in a Conservation Area  
Not a Listed Building  
Unclassified

## **2.0 Property/Site Description**

- 2.1 This is an application by Lewisham Homes on behalf of Lewisham Council. The site, known as Kenton Court, is a 2700m<sup>2</sup> site located in Sydenham, in the south of the Lewisham Borough. The site is located on the south side of Adamsrill Road, bound by Champion Road to the west and existing two (2) to three (3) storey residential developments to the east and south. Adamsrill Primary School and its associated sports facilities are located directly to the north of the subject site, on the opposite side of Adamsrill Road, and span further north-west down Adamsrill Road.
- 2.2 The site is generally flat and is currently occupied by a three (3) storey residential disused care facility containing twenty-nine (29) studio flats, two detached garages, private courtyard, existing mature vegetation and associated car parking areas accessed from Dillwyn Close. The existing residential care facility is not suitable for extra care and studies undertaken confirm it is not possible to cost effectively refurbish the existing building. The building was built in the 1970's and has been vacant since 2015.
- 2.3 Adamsrill Road consists of predominately Victorian terraced style residential housing, varying in height from two (2) to three (3) storeys, which are generally comprised of brick tile and cladding external facades.
- 2.4 Mayow Park, Lewisham Boroughs oldest Municipal Park, is a 7 hectare site located at the western end of Adamsrill Road, being the largest existing area of open space within 1 kilometre to the subject site.
- 2.5 The site does not lie within a protected viewing corridor; it is also not within, nor located near, a conservation area and the existing building is not listed, nor is it within the setting of a listed building.
- 2.6 The site and surrounding area has a Public Transport Accessibility Level (PTAL) rating of 2, where 0 is worst and 6b is best. However, it is within walking distance to Lower Sydenham rail station and a number of bus routes, and is therefore considered to be well connected to surrounding public transport routes.

## **3.0 Relevant Planning History**

The relevant planning history pertains to an application lodged to Lewisham Council on 29 February 2016 by Lewisham Homes on behalf of Lewisham Council (Council Case Reference: DC/16/095702) for the purpose of the demolition of Kenton Court, 132 Adamsrill Road SE26 and the construction of a part three/part four storey building to provide 10 x 1 bed, 22 x 2 bed and 3 x 2 bed self-contained flats, together with improvements to the existing pedestrian walkway, the creation of a shared space within a rear courtyard, provision of 4 wheelchair accessible parking bays and cycle and refuse storage. This was formally withdrawn by the applicant on 27<sup>th</sup> May 2016 in order for the applicant team to address issues in

relation to the layout and scale of the building, quality of the units and amenity space which raised concern from officers.

#### **4.0 Background**

- 4.1 Lewisham Homes is acting as the development agent of Lewisham Council as part of the Council's strategy to deliver as much new affordable housing as possible. In 2012 the Council agreed its New Homes, Better Places programme to deliver 2,000 new affordable homes for Lewisham residents in housing need, including 500 new Council homes at social rent.
- 4.2 This programme responds to the on-going housing in crisis in London that is felt most acutely by those with the lowest incomes and the least recourse to access market products. In Lewisham this is expressed most clearly in the fact that 1,900 Lewisham households are homeless and housed in temporary housing of varying kinds. This number has doubled since 2010/11 and has been driven principally by the withdrawal of Government capital funding for new affordable homes, leading to a drop in supply and fewer homes for the Council to use to meet its duties to homeless households.
- 4.3 It was in that context the Lewisham Council initiated its own housebuilding programme to deliver the first new Council homes in the borough for a generation. It is backed by £100m of Council investment, with the new homes being delivered on the Council's behalf principally by Lewisham Homes on a number of small "infill" sites around the borough.
- 4.4 This application is one of the schemes that contribute to this programme, and if approved will contribute 25 new homes as part of the 500 Council home target.

#### **5.0 Current Planning Application**

##### The Proposal

- 5.1 Planning permission is sought for the development of the Kenton Court site for residential purposes. The proposal includes the demolition of the existing disused three storey residential care building to allow for the redevelopment of the part three part four storey residential building comprising 25 new (100% affordable, social rent) residential flats, associated landscape works, 46 secure cycle spaces and refuse storage.
- 5.2 The residential accommodation proposed will provide a mix of 5 x 1 bed, 15 x 2 bed, 4 x 3 bed and 1 x 4 bed dwellings, the creation of a shared landscaped space within the rear courtyard, 46 secure cycle spaces and refuse storage. The three (3) existing car parks to the rear of the site will be retained and the two garages are proposed to be demolished.
- 5.3 The proposed residential dwellings will be owned and managed by Lewisham Homes on behalf of Lewisham Council.

##### Building

- 5.4 One (1) part three/part four storey building is proposed on the subject site, which will form an 'L' shape layout, addressing Champion Road and Adamsrill Road with

a proposed shared internal landscaped space. The proposal includes 25 residential flats.

- 5.5 The proposed building will be constructed using a mixture of materials including orange/red clay tiles, brown multi bricks, metal work and Siberian Larch timber.
- 5.6 Three (3) wheelchair units are provided at ground floor (FTW-01, FTW-07 & FTW-08).
- 5.7 Most ground floor flats (FT02-03, FT02-04, FT02-05, FT02-06, FT07-02, FTW-07, FTW-08, FT01-09) will provide private amenity space ranging from 8.2m<sup>2</sup> to 12m<sup>2</sup>, which meets or exceeds the minimum requirement as identified in the London Plan.
- 5.8 The proposed ground floor corner flat does not provide any private amenity space (FTW-01) due to certain design constraints, and requests from officers not to have private amenity space in the front garden (to retain a wider pavement).
- 5.9 All proposed dwellings on the first, second and third floor provide private amenity space by a mixture of balconies and roof terraces ranging from 7m<sup>2</sup> to 11.5m<sup>2</sup>.
- 5.10 No additional car parking is proposed. The existing three (3) car parks to the rear of the site will be retained for the purpose of disabled car parking. There are also disabled car parks located outside the property boundary along Adamsrill Road.
- 5.11 A total of 46 cycle spaces are proposed, which will be contained within two main secure storage areas and within storage sheds of six (6) ground floor flats. One secure cycle storage area is located inside the building on the ground floor and provides sufficient storage for twelve (12) bicycles. The second storage area is located outside the building in the courtyard, which provides sufficient storage for twenty-two (22) bicycles. Both proposed storage locations can be accessed with key fob access for security. Six (6) of the ground floor units (FT 02-03, FT 02-04, FT 02-05, FT 02-06, FT 0702 and FT 01-09) provide storage sheds within the rear garden, which each provide sufficient storage for two (2) bicycles each.
- 5.12 All ground floor flats will gain access directly from Adamsrill Road and Champion Road by gates accessing front doors.
- 5.13 Six (6) proposed first and second floor flats (FT 04-19, FT 04-18, FT 05-17, FT 04-24, FT 04-25 & FT 05-17) will gain predominate access from the external walkway, however will also have access to the lift.
- 5.14 The remaining flats will gain access by the main lift or stairwell via the main entrance stemming from Adamsrill Road
- 5.15 A 1.2m fence is proposed along the Adamsrill Road and Champion Road boundaries to defensible space with a 1.2m gate to access front doors. A low brick wall will form a planter on the corner of Champion Road and Adamsrill Road and also separating the site from the public access footpath stemming from Champion Road to Dillwyn Close. A 1.5m fence to the rear of the site is proposed where it interfaces with Dillwyn Crescent and includes a gate accessing the communal courtyard with fob entry system. All ground floor private amenity space will be separated from the communal courtyard by a 1.5m fence and internal accessing gates. A 2m fence is also proposed along the south eastern elevation

where the proposed rear amenity space for unit FT 01-09 adjoins the flank of 144 Adamsrill Road. All proposed fencing will be comprised of a timber railing on a painted mild steel form.

#### Landscape and Courtyard

- 5.16 There are a number of mature trees located on the subject site, which form part of its character and are located along Champion Road, Adamsrill Road and internally within the proposed communal courtyard. However, the trees on site do not have any statutory protection as they are not in a Conservation Area nor are they subject to a Tree Preservation Order. The seventeen (17) identified trees of significance include London Planes, Lime, Norway Maple, Sorbus, Acer, Cherry, Fig and Apple Trees. Nine (9) trees will be retained and eight (8) will be removed with four (4) to be replaced with high quality, mature trees.
- 5.17 The proposed landscaping strategy for the communal courtyard area will include a combination of paved areas, lawn (to be retained), seating, children play space and low level planting, which is also proposed to provide a privacy buffer.

#### Supporting Documents

*Arboricultural Impact Assessment – Prepared by Tamla Trees Consulting Arborists (July 2017)*

- 5.18 This document provides advice on the Arboricultural issues relating to the proposed redevelopment of the subject site at Adamsrill Road. It highlights the site specific soils, root protection area, tree loss, tree shading proposal and tree plan protection strategy.
- 5.19 The report identifies seventeen (17) significant trees, nine (9) of which will be retained and eight (8) will be removed with four (4) to be replaced with high quality, instant impact (4.5m tall) mature trees and diversify species and age class i.e. Fastigate Oak.
- 5.20 The report identifies the main constraint trees, being London Plane species, which are currently located along Champion Road and Lime trees, which are located along Adamsrill Road. All London Plane trees are proposed to be retained; however the removal of three (3) Lime trees, one (1) Norway Maple tree, one (1) Sorbus tree, two (2) Acer trees and one (1) Cherry tree is proposed. Removal of trees has been avoided wherever possible.

*Planning Statement – Prepared by Fuller Long Planning Consultants (September 2017)*

- 5.21 This statement outlines the proposal of a high quality residential development, which intends to contribute to housing targets by providing twenty-five (25) 100% affordable dwellings.

It describes the site and its surroundings, history and relevant planning policy. It briefly outlines the proposed residential mix, design, character, appearance, density, amenity, standard of accommodation, highways, access, parking, ecological impact and the landscape strategy. Finally, the statement addresses planning obligations and affordable housing.

*Design & Access Statement – Prepared by Waugh Thistleton Architects (September 2017)*

- 5.22 This statement provides a comprehensive description of the subject site. It outlines the contextual analysis, design evaluation, impact for neighbours, building arrangement, landscape and amenity provision, methods for construction, architectural response, refuse proposal and schedule of accommodation. The statement is suitably supported by massing information, indicative visualisation images and Computer Generated Images (CGI) of the completed development within the context of the existing surrounds.

*Lighting Proposal – Prepared by Delta Lighting*

- 5.23 This statement identifies the lighting arrangement for the proposed development, which is supported by an External Lighting Plan prepared by Waugh Thistleton Architects (Drawing Number: 1\_561-00-601). It outlines the three (3) proposed lighting products, quantities and lamp voltage. All proposed lighting is located within the communal courtyard and along the public pedestrian access route for safety and amenity.

*Daylight and Sunlight Assessment – Prepared by Herrington Consulting Limited (September 2017)*

- 5.24 This report assessed the potential impact of the proposed development at Kenton Court in relation to daylight, sunlight and overshadowing on the neighbouring buildings in line with the relevant assessment criteria and policies.
- 5.25 It analysed the baseline conditions at the site, potential impacts of the development on the daylight and sunlight currently received by the neighbouring buildings, assessment of these impacts in line with the relevant planning policies and best practice guidelines and further analysis and quantification of the natural daylight available within the habitable rooms of the proposed development.
- 5.26 The proposed development will not result in a noticeable increase in overshadowing to the neighbouring gardens or amenity areas.
- 5.27 Direct sunlight to all apartments will be suitable and will meet the design standards set out in the BRE guidelines.
- 5.28 Based on the results there will be a nil or very small alteration from the existing scenario and the impact will be negligible.

*Preliminary Ecological Appraisal – Prepared by SLR Global Environmental Solutions (August 2015)*

- 5.29 SLR Consulting Limited have undertaken a preliminary Ecological Appraisal of the subject site and confirm there is currently potential presence of nesting birds and therefore any clearing should be done between October to February. It is also desirable for nest boxes to be installed throughout the development phase. At least 80% of all proposed landscaping should be native or similar.

*Kenton Court Energy Statement – Prepared by Max Fordham (July 2017)*

- 5.30 Max Fordham has prepared an Energy Statement in line with the London Mayors energy hierarchy: Be Lean, Be Clean, Be Green. The report describes the design measures used to lower the schemes energy consumption and carbon emissions, in line with the requirements of the London Plan. Specifically it outlines how the development has been designed with consideration to using less energy, supplying energy efficiently and using renewable energy, where possible.
- 5.31 The proposed development exceeds the minimum standards set out in the London Plan for CO<sub>2</sub> emissions.
- 5.32 The use of balconies, photovoltaic rays, design measures, building fabric selections, glazing elements and an on-site communal heating system have been implemented to achieve a 35% site wide reduction from the 2013 notional building.

*Proposed Demolition Sequence and Traffic Management Assessment – Prepared by Potter Raper Partnership (May 2017)*

- 5.33 Potter Raper have prepared an assessment of the demolition and traffic management procedure for the demolition work proposed on the subject site. The report outlines a number of key considerations including consulting with the adjacent school, erecting sheeting around the school fence and reducing the speed limit where necessary. Safety should also be considered with regard to above power lines, removal of hazardous materials and contamination management.

*Transport Statement – Prepared by Paul Mew Associates Traffic Consultants (July 2017)*

- 5.34 Paul Mew Associates (Traffic Consultants) have prepared a Transport Statement, which assesses the parking and highways impact of the proposed development on the adjoining highway. It confirms the development provides suitable access and servicing arrangements and the on-street car parking accommodation will not be unduly affected.
- 5.35 Three (3) disabled parking bays are provided on-site, however no additional on-site parking will be provided. Forty-six (46) secure cycle parks will also be provided in accordance with the Council's minimum standards and the London Plan.
- 5.36 Overall, the proposed development is expected to produce less vehicle trips than the current use and will not strain the existing highway capacity, safety or neighbourhood amenity.

*Residential Travel Plan – Prepared by TTP Consulting (September 2017)*

- 5.37 TTP consulting have prepared a residential travel plan which aims to identify more suitable ways to travel to and from the proposed development site through the use of public transport and active modes, therefore minimising the impact of the development on the surrounding network. The site is considered to be generally walkable, with a number of local amenities such as schools and shops within acceptable walking distances (<2000m<sup>2</sup>).

- 5.38 The site has seven bus stops within a 650m<sup>2</sup> radius and a number of roads within the surrounding area that are considered to be suitable for cyclists.
- 5.39 Lower Sydenham rail station is located 1.1km south-east of the site providing south eastern rail services.

*CDM Traffic Management Logistics and Overview of Waste Management Plan – Prepared by Potter Raper Partnership (May 2017)*

- 5.40 Potter and Raper prepared a traffic management plan for the proposed demolition of Kenton Court, which duly considers the width of surrounding roads for access and turning, overhead power cables and vehicle parking. It also outlines the necessary consideration of sensitive surrounding areas such as the primary schools. Contractors should note the considerations outlined within the report.

## **6.0 Consultation**

- 6.1 This section outlines the consultation carried out by the Council following the submission of the application and summarises the responses received. The Council's consultation exceeded the minimum statutory requirements and those required by the Council's adopted Statement of Community Involvement.

### ***Pre Application Consultation***

- 6.2 The submission of this application follows extensive, formal and informal, pre application discussions (30 September 2016, 25 October 2016, 7 February 2017 and 23 May 2017) held between the applicant and London Borough of Lewisham Officers.
- 6.3 Pre-application reference (PRE/16/002524) for the demolition of Kenton Court, 132 Adamsrill Road SE26 and the construction of a part three/part four storey building to provide a new residential development.

### ***Planning Application Consultation***

- 6.4 Four (4) site notices were displayed and letters were sent to two hundred and twenty residents and businesses in the surrounding areas. The relevant Lewisham Councillors (Councillor Alan Hall, Councillor Sue Hordijkeno, Councillor Jacq Paschoud), Sydenham Society and Thames Water were consulted.
- 6.5 London Borough of Lewisham's Urban Design, Environmental Sustainability, Highways, Housing, Ecological Regeneration, Section 106, CIL, Legal Services, Environmental Protection, Policy, Drainage, Economic Development and Tree Officer were also consulted.

### **Written Responses received from Local Residents and Organisations**

- 6.6 A total of six (6) submissions were received in relation to the proposal from Adamsrill Road residents and the Sydenham Society who objected to the proposals on the following summarised grounds:
- Removal of a care facility when there is currently a shortage for aged care accommodation.

- The proposed development will strain traffic, parking and emergency access, which are current issues.
- The proposed building will be higher than any other on the street and the large footprint is cramping the site and its surroundings.
- Balconies of 2nd and 3rd floor flats will overlook neighbouring gardens and impact on privacy.
- The proposed courtyard and bike racks will create noise and encourages potential anti-social behaviour.
- The external walkway will be noisy and the timber slats will not provide sufficient noise or privacy screening.
- The proposed development also requires the removal of shrubs and trees, which will destroy the wildlife habitat.
- The new planned development will be nearer to adjoining properties.
- Construction noise will disrupt sleeping children.
- Loss of privacy to rear gardens.
- Cycle store will be noise from people accessing their bicycles.
- Private amenity space on the roof will overlook private gardens.
- The proposed building will be visually overbearing and the proposed increase in height will reduce the daylight and sunlight in homes and gardens.

Copies of representations are available for Members to view.

The applicant has provided a response to the written comments and objections, which have been reflected throughout this report within the planning considerations in part 8 of this agenda.

Comments received from statutory agencies are summarised below.

#### Environmental Protection

- 6.7 Environmental Protection consider the application to be unobjectionable.
- 6.8 Further information is required regarding noise management from the site, work equipment and the intended hours of work are required to be confirmed.
- 6.9 The Lewisham Good Practice Guide for Control of Pollution and Noise From Demolition and Construction Sites should be provided in relation to monitoring noise.
- 6.10 Work equipment being used on site should comply with the NRMM (Non Road Mobile Machinery) and section 4.1.1 of the Good Practice Guide for Control of Pollution and Noise From Demolition and Construction Sites.
- 6.11 The London Council's Best Practice Guidance provides detailed methods to mitigate emissions of dust and other pollutants and follows a risk assessment approach as to the level of monitoring and mitigation required.
- 6.12 The issues raised by Environmental Protection can be dealt with by Condition.

#### Ecological Regeneration & Open Space

- 6.13 Ecological Regeneration and Open Space consider the application to be unobjectionable.

- 6.14 Ecological Regeneration are supportive of the proposed brown biodiverse roof system, however request a plug planted and over-seeded roof as opposed to the proposed one which is intended to establish via natural colonisation.
- 6.15 The proposed brown biodiverse roof has two sections; one of which appears to have no access point. Access and watering provision arrangements are therefore required to be requested.
- 6.16 The ongoing management commitment details and/or establishment guarantees that extend to a minimum of 2 growing seasons are required to be requested. This is to avoid value engineering post approval.
- 6.17 The suggested living roof specification guidance is to be provided as an informative about what would be expected with respect to the implementation of this roof system.
- 6.18 The issues raised by Ecological Regeneration & Open Space can be dealt with by Condition.

#### Thames Water

Thames Water have no objection to the proposed development, however have provided comments relating to waste and water.

#### *Waste Comments*

- 6.19 Proper provision for surface water drainage to ground, water courses or a suitable sewer is the responsibility of the developer. The applicant should ensure that storm flows are attenuated or regulated into the receiving public network through on or off site storage. When it is proposed to connect to a combined public sewer, the site drainage should be separate and combined at the final manhole nearest the boundary. Connections are not permitted for the removal of groundwater. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required to ensure that the surface water discharge from the site shall not be detrimental to the existing sewerage system.
- 6.20 In order to protect public sewers and to ensure that Thames Water can gain access to those sewers for future repair and maintenance, approval should be sought from Thames Water where the erection of a building or an extension to a building or underpinning work would be over the line of, or would come within 3 metres of, a public sewer.
- 6.21 No piling shall take place until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water.
- 6.22 It is recommended that petrol/oil interceptors be fitted in all car parking/washing/repair facilities. Failure to do so could result in oil-polluted discharges entering local watercourses.

### *Water Comments*

- 6.23 Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.

### Highways and Transportation

- 6.24 Highways consider the application to be unobjectionable.
- 6.25 They have confirmed that the parking survey submitted with the planning application shows that there is sufficient on-street car parking capacity within the vicinity of the site to meet the car parking demand generated by the proposed development.
- 6.26 They have requested the following details to be provided:
- A Construction Management Plan
  - A Parking Management Plan (for the three wheelchair accessible spaces)
  - Delivery & Servicing Plan / Waste Management Strategy
  - Details of the improvements to the parking area and the pedestrian routes / walkways (between Adamsrill Road & Dillwyn Close, and between Champion Road & Dillwyn Close) including additional lighting, to improve pedestrian accessibility.
  - The applicant will also be required to enter into a S278 agreement with the Highway Authority to secure highways improvement works on the public highway adjacent to the site on the Adamsrill Road/Champion Road junction, including provision of tactile paving and the removal of the ambulance bay on-street on Adamsrill Road.
- 6.27 The issues raised by Highways and Transportation can be dealt with by Condition.

### Housing

- 6.28 Lewisham Council's Housing Strategy and Programmes Team strongly support the proposed re-development of social housing on the Kenton Court site.
- 6.29 The re-development of the Kenton Court site forms part of Lewisham Council's New Homes Programme. The scheme will provide 25 new Council homes. 100% of the new homes provided at Kenton Court will be let at social rent on secure tenancies to households on Lewisham's Housing Register. Currently there are almost 1000 households on the register, and over 500 households in poor quality 'bed and breakfast' temporary accommodation.
- 6.30 The scheme has been designed to meet housing need as identified through the Council's Housing Strategy and will provide much-needed family-sized social housing. A mix of unit types has been proposed in a range of sizes: 5x 1-bed, 15 x 2-bed, 4 x 3-bed and 1 x 4- bed.
- 6.31 The new homes will be maintained and managed by Lewisham Homes, Lewisham Council's Arm's Length Management Organisation. Lewisham Homes submitted the application for the scheme on behalf of Lewisham Council, acting in their role as Development Agent.

- 6.32 The former extra care scheme on the site was de-commissioned and decanted in 2014 as it no longer met with modern aspirations and standards with extra care. New extra care schemes have been commissioned at Hazelhurst Court, Conrad Court and Campshill road, to meet demand for older people's specialist housing in the borough.

## **7.0 Policy Context**

### Introduction

- 7.1 Section 70(2) of the Town and Country Planning Act 1990 (as amended) sets out that in considering and determining applications for planning permission the local planning authority must have regard to:-

- (a) the provisions of the development plan, so far as material to the application,
- (b) any local finance considerations, so far as material to the application, and
- (c) any other material considerations.

A local finance consideration means:

- (a) a grant or other financial assistance that has been, or will or could be, provided to a relevant authority by a Minister of the Crown, or
- (b) sums that a relevant authority has received, or will or could receive, in payment of Community Infrastructure Levy (CIL)

- 7.2 Section 38(6) of the Planning and Compulsory Purchase Act (2004) makes it clear that 'if regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise'. The development plan for Lewisham comprises the Core Strategy, the Development Management Local Plan, the Site Allocations Local Plan and the Lewisham Town Centre Local Plan, and the London Plan. The NPPF does not change the legal status of the development plan.

### National Planning Policy Framework

- 7.3 The NPPF was published on 27 March 2012 and is a material consideration in the determination of planning applications. It contains at paragraph 14, a 'presumption in favour of sustainable development'. Annex 1 of the NPPF provides guidance on implementation of the NPPF. In summary, this states in paragraph 211, that policies in the development plan should not be considered out of date just because they were adopted prior to the publication of the NPPF. At paragraphs 214 and 215 guidance is given on the weight to be given to policies in the development plan. As the NPPF is now more than 12 months old paragraph 215 comes into effect. This states in part that '...due weight should be given to relevant policies in existing plans according to their degree of consistency with this framework (the closer the policies in the plan to the policies in the Framework, the greater the weight that may be given)'.

- 7.4 Officers have reviewed the Core Strategy for consistency with the NPPF and consider there is no issue of significant conflict. As such, full weight can be given to these policies in the decision making process in accordance with paragraphs 211, and 215 of the NPPF.

#### Other National Guidance

- 7.5 On 6 March 2014, DCLG launched the National Planning Practice Guidance (NPPG) resource. This replaced a number of planning practice guidance documents.

#### London Plan (March 2016)

- 7.6 On 14 March 2016 the London Plan (consolidated with alterations since 2011) was adopted. The policies relevant to this application are:

Policy 2.9 Inner London

Policy 3.3 Increasing housing supply

Policy 3.4 Optimising housing potential

Policy 3.5 Quality and design of housing developments

Policy 3.8 Housing choice

Policy 3.10 Definition of affordable housing

Policy 3.11 Affordable housing targets

Policy 3.13 Affordable housing thresholds

Policy 5.2 Minimising carbon dioxide emissions

Policy 5.3 Sustainable design and construction

Policy 5.11 Green roofs and development site environs

Policy 6.3 Assessing effects of development on transport capacity

Policy 6.9 Cycling

Policy 6.12 Road network capacity

Policy 6.13 Parking

Policy 7.2 An inclusive environment

Policy 7.3 Designing out crime

Policy 7.4 Local character

Policy 7.6 Architecture

Policy 7.19 Biodiversity and access to nature

Policy 7.20 Geological conservation

Policy 7.21 Trees and woodlands

Policy 8.3 Community infrastructure levy

Policy 8.4 Monitoring and review for London

#### London Plan Supplementary Planning Guidance (SPG)

- 7.7 The London Plan SPG's relevant to this application are:

Housing (2016)

Sustainable Design and Construction (2006)

## Core Strategy

- 7.8 The Core Strategy was adopted by the Council at its meeting on 29 June 2011. The Core Strategy, together with the Site Allocations, the Lewisham Town Centre Local Plan, the Development Management Local Plan and the London Plan is the borough's statutory development plan. The following lists the relevant strategic objectives, spatial policies and cross cutting policies from the Lewisham Core Strategy as they relate to this application:

### Spatial Policy 1 Lewisham Spatial Strategy

Core Strategy Policy 1 Housing provision, mix and affordability

Core Strategy Policy 8 Sustainable design and construction and energy efficiency

Core Strategy Policy 14 Sustainable movement and transport

Core Strategy Policy 15 High quality design for Lewisham

## Development Management Local Plan

- 7.9 The Development Management Local Plan was adopted by the Council at its meeting on 26 November 2014. The Development Management Local Plan, together with the Site Allocations, the Lewisham Town Centre Local Plan, the Core Strategy and the London Plan is the borough's statutory development plan. The following lists the relevant strategic objectives, spatial policies and cross cutting policies from the Development Management Local Plan as they relate to this application:

- 7.10 The following policies are considered to be relevant to this application:

DM Policy 1 Presumption in favour of sustainable development

DM Policy 2 Prevention of loss of existing housing

DM Policy 5 Specialist accommodation for older people

DM Policy 7 Affordable rented housing

DM Policy 22 Sustainable design and construction

DM Policy 24 Biodiversity, living roofs and artificial playing pitches

DM Policy 25 Landscaping and trees

DM Policy 27 Lighting

DM Policy 29 Car parking

DM Policy 30 Urban design and local character

DM Policy 32 Housing design, layout and space standards

## Residential Standards Supplementary Planning Document (August 2006, updated 2012)

- 7.11 This document sets out guidance and standards relating to design, sustainable development, renewable energy, flood risk, sustainable drainage, dwelling mix, density, layout, neighbour amenity, the amenities of the future occupants of developments, safety and security, refuse, affordable housing, self containment, noise and room positioning, room and dwelling sizes, storage, recycling facilities and bin storage, noise insulation, parking, cycle parking and storage, gardens and amenity space, landscaping, play space, Lifetime Homes and accessibility, and materials.

## Planning Obligations Supplementary Planning Document (2015)

- 7.12 This document sets out guidance and standards relating to the provision of affordable housing within the Borough and provides detailed guidance on the likely type and quantum of financial obligations necessary to mitigate the impacts of different types of development.

### **8.0 Planning Considerations**

- 8.1 The main issues to be considered in respect of this application are:

- a) Principle of Development
- b) Design
- c) Housing
- d) Highways and Traffic Issues
- e) Impact on Adjoining Properties
- f) Sustainability and Energy
- g) Ecology and Landscaping

#### Principle of Development and Loss of Care Home Facility

- 8.2 The proposed development includes the demolition of a disused existing three storey residential care building to allow for the redevelopment of the part three part four storey residential building comprising 25 new (100% affordable) residential flats, associated landscape works, 46 secure cycle spaces and refuse storage. Mayor and Cabinet agreed the demolition of the existing scheme in November 2014; the existing care building has consequently been vacant since May 2015.
- 8.3 The London Plan, London Plan Supplementary Planning Guidance (SPG), Core Strategy, Development Management Local Plan, Residential Standards Supplementary Planning Document and other national planning guidance emphasise the importance of high quality design that complements the existing development and establishes suitable character. The proposal will be assessed in relation to housing and accommodation standards in the following sections of this report.
- 8.4 Currently the site supports a vacant three (3) storey Council managed residential extra care facility containing twenty-nine (29) studio flats, two detached garages, private courtyard, existing mature vegetation and associated car parking areas accessed from Dillwyn Close. The Mayor of Lewisham requested a review of housing for elderly people as a key priority of the Housing Matters Programme in July 2012 and as such Kenton Court was identified as being no longer fit for the identified purposes due to the unit sizes, inappropriateness for wheelchair access and shared bathroom arrangements. This was agreed upon at Mayor and Cabinet on 12 November 2014. Studies undertaken also confirm it is not possible to cost effectively refurbish the existing building and it will therefore be demolished, which is proposed in line with DM Policy 2.
- 8.5 DM Policy 5 resists the loss of specialist accommodation for older people, unless:

*Adequate replacement specialist accommodation will be provided*

*It can be demonstrated that there is a surplus of that particular type of specialist accommodation in the area and;*

*It can be demonstrated that the existing specialist accommodation is incapable of meeting relevant industry standards for suitable accommodation.*

- 8.6 In this case, and as above, the Council has identified this site as being not fit for purpose, and is currently vacant. As such there would be no displacement of residents. Officers also note that the Council, working with partners is delivering bespoke extra care facilities across the Borough, such as Hazlehurst Court (Beckenham Hill) and Campshill Road (Lewisham Park), in addition to already delivered facilities such as Conrad Court (Marine Wharf). Officers are therefore satisfied that suitable bespoke provision is available across the borough, and that adequate replacement specialist accommodation will be provided, which is balanced against the need to provide affordable housing which meets immediate local need.
- 8.7 Providing housing, particularly affordable housing, is a priority in the Borough and wider London. It is considered that this site will make a valuable contribution towards meeting housing needs as identified in the London Plan Policies 3.3 and 3.4 to increase housing supply and optimise housing potential. Furthermore, the London Plan Policy 3.8 identifies the need for Londoners to have a genuine choice of high quality affordable housing, which is considered to be in line with this proposal. The proposals would make use of previously developed land and Officers therefore do not raise an objection to the principle of development, subject to securing a development of the highest quality.

#### Design

- 8.8 Urban design is a key consideration for new developments. National and regional policies place emphasis on high quality, sustainable design of the built environment. DM Policy 30, Core Strategy 15 and London Plan Policy 3.5 identify that all new development should achieve a high standard of internal and external design, while also protecting and enhancing the surrounding environment and being sensitive to the local context and character as outlined in London Plan Policy 7.4.

#### *Demolition of existing Kenton Court*

- 8.9 The existing Kenton Court is not of historic nor architectural merit and therefore, subject to a high quality replacement building, there is no objection to its demolition.

#### *Scale and layout*

- 8.10 Permission is sought for a replacement building measuring part three/part four storeys. This is arranged in an L shape around the site boundaries with the three storey block aligned to Adamsrill Road and the four storey mass along Champion Road. The layout of the block largely follows that of the existing building which is unobjectionable.
- 8.11 The scale, massing and articulation of the proposed building have been the subject of extensive discussion between officers and the applicant during pre-application stage and throughout the process of amending the design of the

previously withdrawn application. Since being withdrawn, the scheme has been amended and the bulk, height, layout and scale have been reduced from a part three/part four storey building containing 35 flats with heights ranging from 9.40m to 12.80m to a part three/part four storey building containing 25 flats with heights ranging from 9.40m to 12.40m. The proposed redevelopment of the site is now considered to be of a comparable proportion, composition, scale and orientation of the existing building and is considered to successfully transition between the scale of the proposed development and the neighbouring properties.

- 8.12 The development has carefully considered designing out crime in accordance with DM Policy 32, Policy 7.3 and Core Strategy 15 and fear of crime also identified within paragraph 58 of the NPPF. Currently, the garages and fencing located at the end of Dillwyn Close create a barrier where passive surveillance of the area is not possible and is believed to encourage anti-social behaviour. Furthermore, the current public pedestrian route which connects Dillwyn Close and Champion Road is also not highly visible and local residents have identified it as a problem area which occasionally attracts small vehicles to enter. It is proposed to widen this route, to improve legibility and end to end visibility this improving natural surveillance. The increased width will allow bollards to be installed which will be used to avoid pedestrian and vehicle conflict. The courtyard will also be enclosed with visually permeable fencing to create a secure environment where currently it is not transparent. The entrance of the building will be safer as it is more clearly defined and visible from the street through the use of glazing and includes lighting in accordance with DM Policy 27. CCTV will also be installed.
- 8.13 The proposal is therefore in accordance with London Plan Policies 7.3 and 7.6, Core Strategy 15 and DM Policy 32.

#### *Architecture*

- 8.14 The proposed building will be comprised of 'soft' domestic materials, which will reduce the visual impact on the public realm. All facades will incorporate a mixture of materials including orange/red clay tiles, brown multi bricks, metal work and Siberian Larch timber cladding, which is considered to appropriately correspond and compliment the neighbouring properties in accordance with London Plan Policy 7.6. The tallest elements of the building will use orange/red clay tiles and incorporate metal balconies and windows to contrast, while the lower elements of the building will support brown multi bricks and Siberian larch timber fencing surrounding. The building consists of four blocks, which are visually separated but married together by slatted timber screening; allowing light, views and air to infiltrate. The articulated layout of the development is considered to successfully break up the massing of the building.
- 8.15 All new development within Lewisham is expected to be neighbourly, attractive, private and functional as outlined in DM Policy 32. The building is arranged around a central courtyard, accessible by all residents, which will be landscaped with areas of soft landscaping and trees, providing a high quality outdoor secure playable space for children and residents in accordance with London Plan Policy 7.6.
- 8.16 The scheme has the potential to be robust and elegant and is therefore considered to be acceptable in principle. However, the success of the design and therefore the acceptability of the scheme will depend entirely on securing high

quality materials and detailing to ensure that the simplicity of the proposal does not lead to a scheme that is bland and fails to respond to the surrounding context. This is why it has been considered necessary for the applicant to demonstrate key junctions (through bay details) of the building to detail window reveals and fixing of balconies and why many details have been agreed up front, however, these details should be secured by condition. The details provided upfront however, provide officers with suitable assurance that the design is high quality and deliverable without amendment.

## Housing

### *a) Size and Tenure of Residential Accommodation*

- 8.17 The provision of housing has been identified by the Lewisham Mayor as a key priority and for London and the borough. Policy 1 of the Core Strategy seeks to provide a mix of dwellings and provide affordable housing.

**Table 1: Residential Tenure and Size Mix\***

	<b>1 Bed</b>	<b>2 Bed</b>	<b>3 Bed</b>	<b>4 Bed +</b>	<b>Total</b>
<b>Private</b>	0 (0)	0 (0)	0 (0)	0 (0)	0 (0)
<b>Social Rent</b>	0 (0)	0 (0)	0 (0)	0 (0)	0 (0)
<b>Affordable Rent</b>	5 (2)	15 (1)	4 (0)	1 (0)	25 (3)
<b>Shared Ownership</b>	0 (0)	0 (0)	0 (0)	0 (0)	0 (0)
<b>Total</b>	5 (2)	15 (1)	4 (0)	1 (0)	25 (3)

\*Wheelchair accessible units shown in ( )

- 8.18 The proposal includes 25 new dwellings, 100% of which are affordable. The dwellings will be comprised of a mix of 5 x 1 bed, 15 x 2 bed, 4 x 3 bed and 1 x 4 bed dwellings, equating to a total provision of 20% 1 bed flats, 60% of 2 bed flats, 16% of 3 bed flats and 4% of 4 bed flats.
- 8.19 Core Strategy Policy 1 and DM Policy 7 outline that all developments of 10 or more dwellings are to provide 3 bed family units, which is complied with and is an increase compared to the previous withdrawn scheme.
- 8.20 Three (3) wheelchair accessible units are proposed (FTW-01, FTW-07, FTW-08), which is in accordance with the Core Strategy Policy 1 requirement of 10% of units to be wheelchair accessible or adaptable. The units should also be capable of meeting the required building control standard (M4(3)(2)(b)).
- 8.21 Three (3) wheelchair accessible car parking bays will be located off street to the rear of the site, which will provide convenient access into the building entrance.

### *b) Standard of Residential Accommodation*

- 8.22 The Technical Housing Standards (2015), London Plan's Housing Supplementary Planning Guidance (SPG) and London Plan Policy 3.1 of the London Plan set out the minimum space standards required for dwelling types and amenity space. Policy 3.1 refers to the garden and amenity space required for residential dwellings.
- 8.23 The one bed 2 person units range between 58m<sup>2</sup> and 74m<sup>2</sup>, two bed 3 person units are 90m<sup>2</sup> and the two bed 4 person units range between 71m<sup>2</sup> and 91m<sup>2</sup>. The proposed three bed 5 person units range from 115m<sup>2</sup> to 121m<sup>2</sup> and the one proposed four bed 6 person unit is 140m<sup>2</sup>.
- 8.24 A vast majority of the proposed dwellings exceed the appropriate recreation space identified in the London Plan, however due to certain design constraints, and requests from officers not to have private amenity space in the front garden (to retain a wider pavement), it has not been possible to provide amenity space for the ground floor unit FTW-01. All residents will have access to the communal central courtyard. This on balance is considered to be acceptable.
- 8.25 The proposals meet, and exceed in places, the minimum internal housing standards as set out in the National Standards, London Plan, Core Strategy and DM Policy 32 and are therefore considered acceptable in this regard.
- 8.26 The proposal is 100% affordable rented housing in accordance with DM Policy 7 and 32, and London Plan Policies 3.10, 3.11 and 3.13.

#### Highways and Traffic Issues

The applicant has submitted a Transport Statement and Residential Travel Plan.

##### *a) Access and Servicing*

- 8.27 The current access arrangement includes pedestrian access from Adamsrill Road and Dillwyn Close, which will be maintained. It should be noted that there is also a public pedestrian access point stemming from Champion Road which has been identified as an area of concern due to the fact that residents believe it encourages antisocial behaviour and is occasional used by small vehicles. It will be widened and bollards will be installed to discourage access by vehicles and lighting will be installed to improve safety.
- 8.28 Vehicles can access the site via Adamsrill Road to the front and Dillwyn Close to the rear.
- 8.29 The site has a PTAL rating of 2, which identifies a poor level of accessibility to public transport, however the site is serviced by six frequent bus services and Lower Sydenham Railway Station, all of which are within 10-15 minutes walking.
- 8.30 The proposed development is not considered to adversely affect the safety of the surrounding transport network in accordance with London Plan Policy 6.3.

##### *b) Cycle Parking*

- 8.31 London Plan standards and DM Policy 29 require secure cycle parking provision at the rate of 1 cycle space per 1 bed unit and 2 spaces for all other dwellings. The required provision for this scheme would therefore be 45 spaces.

- 8.32 Two main secure cycle storage areas are proposed on site, which provide storage for a total of 46 secure cycle spaces. One secure cycle storage area is located inside the building on the ground floor and provides sufficient storage for twelve (12) bicycles. The second storage area is located outside the building in the courtyard, which provides sufficient storage for twenty-two (22) bicycles. Both proposed storage locations can be accessed with key fob access for security. Additionally, six (6) of the ground floor units (FT 02-03, FT 02-04, FT 02-05, FT 02-06, FT 0702 and FT 01-09) provide storage sheds within the rear garden, which each provide sufficient storage for two (2) bicycles.
- 8.33 There is adequate cycle parking proposed in accordance with the London Plan Policy 6.9 and DM Policy 29.

*c) Car Parking*

- 8.34 Three (3) car parking spaces will be provided for the purpose of wheelchair accessible parking, which is considered to be in accordance with Core Strategy 14 and DM Policy 29. All other vehicles will be permitted to park on the surrounding unrestricted kerbside, which is supported by London Plan Policy 6.13.
- 8.35 The applicant is also requested to enter into a s278 agreement with the Highway Authority to secure highways improvement works on the public highway adjacent to the site on the Adamsrill Road/Champion Road junction, including provision of tactile paving and the removal of the ambulance bay on-street on Adamsrill Road, which will provide for additional wheelchair accessible parking.
- 8.36 Two (2) parking stress surveys were carried out at approximately 0100 on Wednesday 30<sup>th</sup> September 2015 and Thursday 1<sup>st</sup> October 2015. These results are still considered to be accurate and relevant as it is not envisaged the situation on street would have been altered significantly since the data was collected.
- 8.37 All roads within a 200m distance, extending from the front and the rear entrances, were surveyed. A total of 307 unrestricted car parks were identified. The results concluded that of the identified total unrestricted parking spaces, 135 spaces were free at the time of survey. The overall parking stress within the identified area was 56%, which is relatively low and below a highly stressed parking classification.
- 8.38 Daytime parking surveys were also carried out on Monday 19th October 2015 on an hourly basis (0700 – 1800), which is considered particularly important given the surrounding primary schools. Surveyed streets included Adamsrill Road, Bell Green, Champion Crescent, Champion Road, Dillwyn Close, Fairwyn Close, Normandy Close and Perry Rise. The findings of the Transport Statement prepared by Potter Raper Partnership confirmed ‘there are plenty of free parking spaces within the study area throughout the day. The hourly parking stress was reasonably low throughout the day, with average demand levels of between 53% and 69%. The area was most heavily parked at 69% between 1500-1600, coinciding with the end of the school day.’
- 8.39 There are also three car club bays located within the surroundings of the subject site which range between 750m and 900m away. All three sites (Wynell Road,

Mayow Road and Helvetia Street) all currently have the capacity to accept one (1) additional car each.

- 8.40 The parking strategy is considered to be in accordance with Core Strategy 14, DM Policy 29 and London Plan Policy 6.13.

*d) Refuse*

- 8.41 The refuse strategy will be consistent with the current arrangement. Refuse stores will be provided at lower ground floor level and will be serviced in accordance with the current arrangement for the existing site. The proposed refuse strategy will include individual bin stores to include 1 x 180L general waste bin and 1 x 240L recycling bin. Additionally, the communal bin store will include 2 x 940L general waste bins and 2 x 940L recycling bins.

Impact on Adjoining Properties

- 8.42 The impact of the proposal on adjoining properties considers the siting, bulk and height with consideration to Core Strategy 15, which states that adverse impact on neighbouring amenity need to be addressed. The Council's Residential Development Standards, also outlines the expectation of developers in an effort to mitigate impact on adjoining properties.
- 8.43 The previous withdrawn scheme raised objections from adjoining properties with concern about privacy and overlooking. The design has since been amended to more carefully consider the impact on adjoining properties.

*a) Privacy*

- 8.44 The Council's Residential Development Standards requires a flexible, minimum separation distance of 21 metres between directly facing habitable room windows on main rear elevations, dependent on the context of the area. The proposed scheme achieves a 21.4m separation between facing elevations to minimise overbearing and overlooking and is therefore considered to be in accordance with this guidance.
- 8.45 The adjoining property to the rear of the site, along Champion Road will be separated by a width of 6.2m including the pedestrian route and external escape stair. The external escape stair will be enclosed by timber screening for privacy and noise attenuation. The adjoining property at 74 Dillwyn Close has no windows along their northern façade facing Kenton Court and therefore will not be adversely affected by the proposal.
- 8.46 All the proposed units facing Adamsrill Road are dual aspect and majority of main living areas and balconies face away from the directly adjoining properties, being 134-144 Adamsrill Road. Furthermore, the rear elevation facing the internal courtyard and parallel with Dillwyn Close supports vertical timber slats along all proposed external walkways and stairwells for added privacy and a more subtle overall impact.
- 8.47 Concern has been received from residents regarding the development moving closer to adjoining properties and the 2nd floor balconies overlooking rear gardens. There is also concern regarding roof gardens overlooking and affecting adjoining properties. Adjoining residents have also identified their concern for the

communal courtyard and its associated activity, landscaping, removal of trees and inclusion of bike store. The position of the bicycle store is considered to be acceptable and would not generate unacceptable noise levels given its size. Officers also acknowledge that these are typical structures within communal gardens and raise no objection.

- 8.48 The proposed north-east elevation, which addresses the adjoining properties is very similar to the existing arrangement and is not considered to impose unacceptable further impacts, beyond the existing situation. Currently the windows along this elevation already address the adjoining properties, which is the intention of the proposed development.
- 8.49 The landscaping scheme also proposes significant retention of vegetation and improvement planting which will result in almost every window and balcony being screened from view of adjoining properties, once mature. Furthermore, the proposed north-east elevation is more visually appealing with the inclusion of a planted flank wall along trellis.
- 8.50 There are no adjoining properties along the northern or western boundaries.
- 8.51 The living brown roof is provided for the purpose of sustainability and ecology and will only be accessed for the purpose of maintenance. It will add visual appeal to the skyline as it matures, which will improve the outlook for the adjoining residents. It would not form a roof terrace or raised amenity deck.
- 8.52 The removal of the existing garages at the rear of the site will also improve the safety and overall amenity of the area by creating additional natural surveillance and open aspect.
- 8.53 The existing height of the building ranges from 10.6m to 12m with the proposed height ranging from 9.4m to 12.4m, therefore an overall increase of 0.4m in some locations. Based on a height increase of 0.4m, there is considered to be minimal impact on the adjoining properties beyond the existing context.
- 8.54 The existing building is currently setback by 20m from the external wall to the rear of the properties located at 134-144 Adamsrill Road, however the proposed development will be sited closer to the adjoining properties and will be setback as follows, which officers consider to be acceptable.
- 21.5m from the proposed external wall to the external wall of the adjoining properties (134-144 Adamsrill Road);
  - 16.4m from the external wall to the adjoining rear gardens (134-144 Adamsrill Road);
  - 13.4m from the proposed external balconies to the adjoining rear gardens (134-144 Adamsrill Road).
- 8.55 A degree of overlooking of rear gardens is not out of character or unusual in a developed area such as this. The external walkway features a timber-slatted screen which would restrict outward views toward neighbouring properties which is considered to be an acceptable response. The provided landscaping, together with bespoke design will soften the overall appearance of the proposed development. On this basis, the proposed scheme is considered appropriate to the context of the site in accordance with London Plan Policy 7.6 is not

considered to cause unacceptable harm to the amenity of the surrounding neighbouring residential buildings.

#### *b) Daylight and Sunlight Assessment*

- 8.56 Herrington Consulting Limited have provided a daylight and sunlight assessment for the proposed development. The BRE guidelines require at least 50% of amenity areas to receive 2 hours of sunlight on 21 March of any given year. Based on the assessment undertaken, the rear gardens of 130 Adamsrill Road, 134 to 152 Dillwyn Close (even numbers only), 74 Dillwyn Close and school grounds of Adamsrill Primary School have been identified as sensitive areas, however all amenity areas tested exceed the requirements outlined by the BRE and some notice a slight improvement. It is concluded that the development will not result in a noticeable reduction in light received by adjoining properties.

#### Sustainability and Energy

- 8.57 London Plan Policy 5.3 requires sustainable design and construction, which should be achieved in London to improve the environmental performance of new developments. London Plan Policy 5.2 further outlines the desire to minimise the emissions of carbon dioxide by using less energy, supplying energy efficiently and using renewable energy in line with the London Mayors 'Be Lean, Be Clean, Be Green' strategy for London. These have been achieved by considering the building form and construction through reducing the need for mechanical and electrical services, investigating potential district heating networks and using appropriate renewable/low carbon energy technologies.
- 8.58 The proposal is for a modular form of construction which has a lower environmental impact, reduced pollution, faster construction time and a lessened impact of noise and pollution on the surrounding neighbouring developments. This is supported by officers in promoting sustainable development and fast track of housing delivery.
- 8.59 The submitted Energy Statement identifies that the scheme will incorporate a range of energy efficiency measures, including mechanical extract ventilation, balconies glazed windows, LED and low energy lighting, which reduce the need for cooling and heating.
- 8.60 Light internal finishing's also encourage a responsive thermal design.
- 8.61 Through the design process, priority has been given to reducing the energy demand and heat load from hot water production. A number of proposals were tested and resulted in the incorporation of centralised high efficiency boilers to provide circulating Low Temperature Hot Water for each dwelling.
- 8.62 A Photo Voltaic (PV) array will be used to generate electricity and encourage the use of renewable energy, based on them being the most suitable renewable technology for the proposed development. The large flat roof will provide space for PV arrays, with high efficiency panels across, resulting in a saving of approximately 13.3 tonnes of CO<sub>2</sub> per annum from renewable energy. The implemented sustainable design components will achieve a 35% site wide reduction from the existing building. The proposed development therefore exceeds the minimum standards set out in the London Plan for CO<sub>2</sub> emissions.

8.63 Overall the development will reduce regulated CO2 emissions by lowering the schemes energy consumption, which is in line with requirements of Core Strategy Policy 8, DM Policy 1, DM Policy 22, Sustainable Design and Construction SPG and London Plan Policy 5.2.

*a) Living Roofs*

8.64 In accordance with DM Policy 24 the borough requires all new development to take account, and minimise impacts on biodiversity, commonly in the form of a living roof or wall, which are both elements of the proposed design. Living roofs and walls are required to be designed in accordance with DM Policy 24 and London Plan Policy 5.11 and are essential for sustainable design. London Plan Policy 7.19 states that, where possible, developments should make a positive contribution to the protection, enhancement, creation and management of biodiversity.

8.65 The brown roof is proposed to the upper roof on the second floor and will incorporate planted vegetation, sedums, grasses, herbs, succulents and wildflowers and will be accessed from the central circulation core. The overall design will include a layered effect comprising a 500mm wide pebble border, bitumen applied to the slab, insulation, waterproof membrane, protection fleece, drainage/reservoir layer, filter fleece, growing medium and biodiverse layer.

**Table 2: Living Roof Provision**

<b>Type of Living Roof/Wall</b>	<b>Size of Living Roof/Wall (m2)</b>	<b>Size of Living Roof (as % of total roof space)</b>
Biodiverse brown roof system	480m <sup>2</sup> (aprox)	54%
Planted wall	91m <sup>2</sup> (aprox)	-
<b>Total</b>	<b>571m<sup>2</sup> (aprox)</b>	-

8.66 Ecological Regeneration are supportive of the proposed brown biodiverse roof system, however request a plug planted and over-seeded roof as opposed to the proposed one which is intended to establish via natural colonisation.

*b) Sustainable Urban Drainage Systems*

8.67 Sustainable Urban Drainage Systems aid in alleviating local flood risk, managing water quality and enhancing biodiversity. The living roof and planted wall will contribute to the green infrastructure of the site and enhance biodiversity. Porous surfaces, such as permeable landscaping will be used to contribute to infiltration.

Ecology and Landscaping

8.68 There are a number of mature trees located on the subject site, which form part of its character and are located along Champion Road, Adamsrill Road and internally within the proposed communal courtyard. However, as the trees on site do not have any statutory protection as they are not in a Conservation Area nor

are they subject to a Tree Preservation Order. The seventeen (17) identified trees of significance include London Planes, Lime, Norway Maple, Sorbus, Acer, Cherry, Fig and Apple Trees. Nine (9) trees will be retained and eight (8) will be removed with four (4) to be replaced with high quality, mature trees.

- 8.69 An Arboricultural Impact Assessment has been undertaken and provides advice on the Arboricultural issues relating to the proposed redevelopment of the subject site at Adamsrill Road. It highlights the site specific soils, root protection area, tree loss, tree shading proposal and tree plan protection strategy.
- 8.70 The report identifies the main constraint trees, being London Plane species, which are currently located along Champion Road and Lime trees, which are located along Adamsrill Road. All London Plane trees are proposed to be retained; however the removal of three (3) Lime trees, one (1) Norway Maple tree, one (1) Sorbus tree, two (2) Acer trees and one (1) Cherry tree is proposed.
- 8.71 The proposal is therefore considered to be in line with London Plan Policies 7.19, 7.20 and 7.21, DM Policy 25 and Core Strategy 12.
- 8.72 The proposed landscaping strategy for the communal courtyard area will include a combination of paved areas, lawn (to be retained), seating, children play space and low level planting, which is also proposed to provide a privacy buffer and is considered to be an appropriate response for this residential development.

#### Local Finance Considerations

- 8.73 Under Section 70(2) of the Town and Country Planning Act 1990 (as amended), a local finance consideration means:
- (a) a grant or other financial assistance that has been, or will or could be, provided to a relevant authority by a Minister of the Crown; or
  - (b) sums that a relevant authority has received, or will or could receive, in payment of Community Infrastructure Levy (CIL).
- 8.74 The weight to be attached to a local finance consideration remains a matter for the decision maker.
- 8.75 The Mayor of London's CIL is therefore a material consideration. CIL is payable on this application and the applicant has completed the relevant form.

#### **9.0 Community Infrastructure Levy**

- 9.1 On 1st April 2015 the Council introduced its Local CIL to be implemented along with the existing Mayoral CIL. The charge will replace a number of financial contributions currently required through Section 106 Agreements.
- 9.2 CIL is chargeable on the net additional floorspace (gross internal area) of all new development.
- 9.3 Under the CIL charging schedule, the amount of CIL payable for the SE26 postcode for new residential development is £70 per sqm. The Mayor CIL is charged at £35 per sqm of new development.

- 9.4 It is the Local Planning Authority's responsibility to collect CIL payments from new development.
- 9.5 Under Part 2 and Part 6 of the Community Infrastructure Levy Regulations 2010 (as amended) affordable housing is exempt from CIL. However, it should be noted that the applicant is required to apply for the exemption.

## **10.0 Equalities Considerations**

- 10.1 Section 149 of the Equality Act 2010 ("the Act") imposes a duty that the Council must, in the exercise of its functions, have due regard to:-
- (a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Act;
  - (b) advance equality of opportunity between persons who share a relevant protected characteristic and those who do not;
  - (c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
- 10.2 The protected characteristics under the Act are: age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation.
- 10.3 The duty is a "have regard duty" and the weight to attach to it is a matter for the decision maker bearing in mind the issues of relevance and proportionality.

The development proposes to demolish the disused residential care facility, containing 29 residential flats, which is not considered suitable for extra care and studies undertaken confirm it is also not possible to cost effectively refurbish the existing building. The residents have been relocated. In this matter there is not considered to be any impact on equality.

### Removal of certain permitted development rights

- 10.4 Officers recommend that if this application is approved conditions are imposed to remove certain permitted development rights in respect of the site. Paragraph 017 of that part of the Planning Practice Guidance that is concerned with the use of planning conditions states that "conditions restricting the future use of permitted development rights or changes of use will rarely pass the test of necessity and should only be used in exceptional circumstances". Officers in this case consider that exceptional circumstances exist to justify the limited removal of certain permitted development rights as set out in proposed conditions for the reasons stated therein.

### Prevention of crime and disorder

- 10.5 S.17 of the Crime and Disorder Act 1998 provides that it shall be the duty of the Council to exercise its various functions with due regard to the likely effect of the exercise of those functions on, and the need to do all that it reasonably can to prevent crime and disorder in its area (including anti-social and other behaviour adversely affecting the local environment).

- 10.6 Officer's do not consider the layout would give rise to crime based on its open layout and natural surveillance.

### Human Rights Act

- 10.7 Impacts of the development have been considered within the amenity section of the report and officers note that the proposals do not require relocation of residents given the vacant nature of the building.

## **11.0 Conclusion**

- 11.1 This application has been considered in the light of policies set out in the London Plan, core strategies, development plan and other material considerations.

- 11.2 The proposed units will meet a defined need, contributing to addressing the shortage of affordable housing in the borough.

- 11.3 The proposed development is considered to be satisfactory in principle and subject to the imposition of suitable conditions regarding the matters set out below, it is recommended that permission is granted.

## **12.0 RECOMMENDATION**

**GRANT PERMISSION** subject to the following conditions:-

### **(1) Full Planning Permission and Time Limit**

The development to which this permission relates must be begun not later than the expiration of three years beginning with the date on which the permission is granted.

**Reason:** As required by Section 91 of the Town and Country Planning Act 1990.

### **(2) Develop in Accordance with the Approved Plan**

The development shall be carried out strictly in accordance with the application plans, drawings and documents hereby approved and as detailed below:

1\_561-00-001:1\_561-00-002:1\_561-00-003:1\_561-00-004:1\_561-00-005:1\_561-00-010:1\_561-00-011:1\_561-00-100:1\_561-00-101:1\_561-00-102:1\_561-00-103:1\_561-00-104:1\_561-00-201:1\_561-00-202:1\_561-00-203:1\_561-00-204:1\_561-00-205:1\_561-00-206:1\_561-00-207:1\_561-00-208:1\_561-00-301:1\_561-00-302:1\_561-00-310:1\_561-00-311:1\_561-00-312:1\_561-00-401:1\_561-00-402:1\_561-00-403:1\_561-00-404:1\_561-00-405:1\_561-00-406:1\_561-00-407:1\_561-00-408:1\_561-00-409:1\_561-00-410:1\_561-00-411:1\_561-00-412:1\_561-00-501:1\_561-00-601:Design And Access Statement: External Lighting Report: Daylight And Sunlight Assessment: Preliminary Ecological Appraisal: Energy Statement: Proposed Demolition Sequence and Traffic Management: Assessment: Transport Statement: Residential Travel Plan: CDM Traffic Management Logistics And Overview of Waste Management Plan: Statement of Community Involvement: Thames Water Utilities Asset Location Search.

**Reason:** To ensure that the development is carried out in accordance with the approved documents, plans and drawings submitted with the application and is acceptable to the local planning authority.

### **(3) Affordable Housing**

All of the 25 (twenty-five) residential units hereby granted permission shall be provided as 100% affordable social housing on an affordable rent to meet the needs of householders whose incomes are not sufficient to permit them to access and afford to rent on the open market. The affordable housing shall be provided in accordance with the Planning Statement and shall meet the definition of affordable housing in Annex 2 of the National Planning Policy Framework or any future guidance that replaces it.

**Reason:** In order to meet the housing needs of the borough and comply with Core Strategy Policy 1 of the Lewisham Core Strategy (2011).

### **(4) Materials/Design Quality**

The development shall be constructed in those materials as submitted namely: orange/red clay tiles, brown multi bricks, metal work and Siberian Larch timber in accordance with pages 49-51 of the Design and Access Statement.

The scheme shall be carried out in full accordance with those details, as approved.

**Reason:** To ensure that the design is delivered in accordance with the details submitted and assessed so that the development achieves the necessary high standard and detailing in accordance with Policies 15 High quality design for Lewisham of the Core Strategy (June 2011) and Development Management Local Plan (November 2014) DM Policy 30 Urban design and local character.

### **(5) Living Roof**

- a) The development shall be constructed with a biodiversity living brown roof laid out in accordance with plan nos. 1\_561-00-501-A hereby approved and maintained thereafter.
- b) The living roofs shall not be used as an amenity or sitting out space of any kind whatsoever and shall only be used in the case of essential maintenance or repair, or escape in case of emergency.
- c) Access and watering provision arrangements for the proposed brown roof along with details for management/ establishment guarantees for a minimum of two growing seasons shall be submitted to and approved in writing by the local planning authority prior to the first occupation of the development hereby approved and maintained in perpetuity.
- d) Evidence that the roof has been installed in accordance with (a) shall be submitted to and approved in writing by the local planning authority prior to the first occupation of the development hereby approved and maintained in perpetuity.

**Reason:** To comply with Policies 5.10 Urban greening, 5.11 Green roofs and development site environs, 5.12 Flood risk management, 5.13 Sustainable

Drainage and 7.19 Biodiversity and access to nature conservation in the London Plan (2015) , Policy 10 managing and reducing flood risk and Policy 12 Open space and environmental assets of the Core Strategy (June 2011), and DM Policy 24 Biodiversity, living roofs and artificial playing pitches of the Development Management Local Plan (November 2014).

#### **(6) Refuse Storage**

The storage of refuse and recycling facilities as approved shall be provided in full prior to occupation of the development in accordance with plan nos. 1\_561-00-100 and shall thereafter be permanently retained and maintained.

**Reason:** In order that the local planning authority may be satisfied with the provisions for recycling facilities and refuse storage in the interest of safeguarding the amenities of neighbouring occupiers and the area in general, in compliance with Development Management Local Plan (November 2014) DM Policy 30 Urban design and local character and Core Strategy Policy 13 Addressing Lewisham waste management requirements (2011).

#### **(7) Cycle Parking**

A minimum of forty-six (46) secure and dry cycle parking spaces shall be provided within the development as indicated on the plans hereby approved plan nos. 1-561-00-100.

All cycle parking spaces shall be provided and made available for use prior to occupation of the development and maintained thereafter.

**Reason:** In order to ensure adequate provision for cycle parking and to comply with Policy 14: Sustainable movement and transport of the Core Strategy (2011).

#### **(8) Construction Deliveries and Hours**

No deliveries in connection with construction works shall be taken at or despatched from the site other than between the hours of 8 am and 6 pm on Mondays to Fridays and 8 am and 1 pm on Saturdays and not at all on Sundays or Public Holidays.

No work shall take place on the site other than between the hours of 8 am and 6 pm on Mondays to Fridays and 8 am and 1 pm on Saturdays and not at all on Sundays or Public Holidays.

**Reason:** In order to safeguard the amenities of adjoining occupants at unsociable periods and to comply with Paragraph 120 of the National Planning Policy Framework and DM Policy 26 Noise and Vibration, and DM Policy 32 Housing design, layout and space standards of the Development Management Local Plan (November 2014).

#### **(9) Protection of Trees During Construction**

No development shall commence on site until a Tree Protection Plan (TPP) has been submitted to and approved by the Council. The TPP should follow the recommendations set out in BS 5837:2012 (Trees in relation to design, demolition

and construction – Recommendations). The TPP should clearly indicate on a dimensioned plan superimposed on the building layout plan and in a written schedule details of the location and form of protective barriers to form a construction exclusion zone, the extent and type of ground protection measures, and any additional measures needed to protect vulnerable sections of trees and their root protection areas where construction activity cannot be fully or permanently excluded.

**Reason:** To safeguard the health and safety of trees during building operations and the visual amenities of the area generally and to comply with Policy 12 Open space and environmental assets of the Core Strategy (June 2011), and DM Policy 25 Landscaping and trees and DM Policy 30 Urban design and local character of the Development Management Local Plan (November 2014).

#### **(10) Boundary Treatment**

The approved boundary treatments shall be implemented prior to occupation of the buildings and retained in perpetuity.

All ground floor units (except FTW-01) are to provide direct access from the internal courtyard into the dwelling.

**Reason:** To ensure that the boundary treatment is of adequate design in the interests of visual and residential amenity and to comply with Policy 15 High quality design for Lewisham of the Core Strategy (June 2011) and DM Policy 30 Urban design and local character of the Development Management Local Plan (November 2014).

#### **(11) Plumbing or Pipes**

Notwithstanding the Town and Country Planning (General Permitted Development) Order 2015 (or any Order revoking, re-enacting or modifying that Order), no plumbing or pipes, including rainwater pipes, shall be fixed on the external faces/front elevation of the building(s).

**Reason:** In order that the local planning authority may be satisfied with the details of the proposal and to accord with Policy 15 High quality design for Lewisham of the Core Strategy (June 2011) and DM Policy 30 Urban design and local character of the Development Management Local Plan (November 2014).

#### **(12) Hardscape Landscaping**

- a) No development shall commence on site until drawings showing hard landscaping of any part of the site not occupied by buildings (including details of the permeability of hard surfaces) have been submitted and approved in writing by the local planning authority.
- b) All hard landscaping works which form part of the approved scheme under part (a) shall be completed prior to occupation of the development.

**Reason:** In order that the local planning authority may be satisfied as to the details of the proposal and to comply with Policies 5.12 Flood risk management and 5.13 Sustainable Drainage in the London Plan (2015), Policy 15 High quality design for Lewisham of the Core Strategy (June 2011) and Development

Management Local Plan (November 2014) Policy 25 Landscaping and trees, and DM Policy 30 Urban design and local character.

### **(13) External Lighting**

Any such external lighting as approved shall be installed in accordance with the plan nos. 1\_561-00-601 and such directional hoods shall be retained permanently.

The applicant should submit a Lighting Assessment to demonstrate that the proposed lighting is the minimum needed for security and working purposes and that the proposals minimise pollution from glare and spillage.

**Reason:** In order that the local planning authority may be satisfied that the lighting is installed and maintained in a manner which will minimise possible light pollution to the night sky and neighbouring properties and to comply with DM Policy 27 Lighting of the Development Management Local Plan (November 2014).

### **(14) Piling**

No piling shall take place until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water.

**Reason:** In the interest of protecting Thames Water infrastructure.

### **(15) Construction Logistics Plan**

No development shall commence on site until a Construction Logistics Management Plan has been submitted to and approved in writing by the local planning authority. The plan shall demonstrate the following:-

Rationalise travel and traffic routes to and from the site.

Provide full details of the number and time of construction vehicle trips to the site with the intention and aim of reducing the impact of construction vehicle activity.

Measures to deal with safe pedestrian movement.

The measures specified in the approved details shall be implemented prior to commencement of development and shall be adhered to during the period of construction.

**Reason:** In order to ensure satisfactory vehicle management and to comply with Policy 14 Sustainable movement and transport of the Core Strategy (June 2011), and Policy 5.3 Sustainable design and construction, Policy 6.3 Assessing effects of development on transport capacity and Policy 7.14 Improving air quality of the London Plan (2015).

### **(16) Delivery and Servicing Plan**

The development shall not be occupied until a Delivery and Servicing Plan has been submitted to and approved in writing by the local planning authority.

The plan shall demonstrate the expected number and time of delivery and servicing trips to the site, with the aim of reducing the impact of servicing activity.

The approved Delivery and Servicing Plan shall be implemented in full accordance with the approved details from the first occupation of the development and shall be adhered to in perpetuity.

**Reason:** In order to ensure satisfactory vehicle management and to comply with Policy 14 Sustainable movement and transport of the Core Strategy (June 2011).

### **(17) Wheelchair Homes**

- a) The detailed design for each dwelling hereby approved shall meet the required standard of the Approved Document M of the Building Regulations (2015) as specified in the schedule below:

Unit reference number	Approved Document M (2015) Access Requirement	Dwelling Type
3 wheelchair units at ground floor as shown on drawings 1_561-A-00-410, 1_561-A-00-409, 1_561-00-100	M4(3)(2)(a)	Wheelchair user (adaptable)
All other units	M4(2)	Accessible and adaptable

- b) No development above ground shall commence until written confirmation from the appointed Building Control Body has been submitted to and approved in writing by the Local Planning Authority to demonstrate compliance with Part a).
- c) The development shall be carried out in accordance with the approved details under part b).

**Reason:** To ensure that there is an adequate supply of wheelchair accessible housing in the Borough in accordance with Policy 1 Housing provision, mix and affordability and Policy 15 High quality design for Lewisham of the Core Strategy (June 2011) and DM Policy 32 Housing design, layout and space standards of the Development Management Local Plan (November 2014).

### **(18) Retention of Trees**

None of the trees shown as being retained on the permitted plans shall be lopped or felled without the prior written consent of the local planning authority.

**Reason:** To comply with Policy 12 Open space and environmental assets of the Core Strategy (June 2011) and policies DM 25 Landscaping and trees and 30

Urban design and local character of the Development Management Local Plan (November 2014).

### **(19) Demolition and Construction Works**

All demolition and construction works shall be carried out in complete accordance with the approved Preliminary Ecological Appraisal prepared by SLR Global Environmental Solutions dated August 2015.

**Reason:** To comply with Policy 7.19 Biodiversity and access to nature conservation in the London Plan (2015), Policy 12 Open space and environmental assets of the Core Strategy (June 2011), and DM Policy 24 Biodiversity, living roofs and artificial playing pitches and local character of the Development Management Local Plan (November 2014).

### **(20) Parking Management Plan**

The development shall not be occupied until a Parking Management Plan has been submitted to and approved in writing by the local planning authority.

**Reason:** In order to ensure adequate provision for disabled parking and to comply with Policy 14: Sustainable movement and transport of the Core Strategy (2011).

### **(21) Parking Area Improvements**

Details of the improvements to the parking area and the pedestrian routes/walkways (between Adamsrill Road & Dillwyn Close, and between Champion Road & Dillwyn Close) are to be submitted to Council. The improvements should include additional lighting to improve pedestrian accessibility.

**Reason:** In order to ensure adequate provision for disabled parking and to comply with Policy 14: Sustainable movement and transport of the Core Strategy (2011).

### **(22) Living Wall**

The development shall not be occupied until further information regarding the Living Wall has been submitted to and approved in writing by the local planning authority.

**Reason:** To comply with Policies 5.10 Urban greening, 5.11 Green roofs and development site environs and 7.19 Biodiversity and access to nature conservation in the London Plan (2015), Policy 10 managing and reducing flood risk and Policy 12 Open space and environmental assets of the Core Strategy (June 2011), and DM Policy 24 Biodiversity, living roofs and artificial playing pitches of the Development Management Local Plan (November 2014).

### **(23) Highway Authority Agreement**

The applicant shall submit evidence of its agreement to enter into an s278 agreement with the Highways Authority prior to first occupation of the development hereby approved.

**Reason:** To secure highways improvement works on the public highway and to accord with Policy 14: Sustainable movement and transport of the Core Strategy (2011).

## **INFORMATIVES**

### **(1) Construction**

You are advised that all construction work should be undertaken in accordance with the "London Borough of Lewisham Code of Practice for Control of Pollution and Noise from Demolition and Construction Sites" available on the Lewisham web page.

### **(2) Demolition and Construction Sites**

You are advised that all construction work should be undertaken in accordance with the "London Borough of Lewisham Code of Practice for Control of Pollution and Noise from Demolition and Construction Sites" available on the Lewisham web page.

Demolition and construction to be carried out in accordance with the London Council's Best Practice Guidance provides detailed methods to mitigate emissions of dust and other pollutants and follows a risk assessment approach as to the level of monitoring and mitigation required.

### **(3) Living Roof**

A plug planted and over-seeded roof is to be provided as opposed to the proposed design. The Specification for Biodiverse Living Roof Guideline provides details with respect to the implementation of the roof system.

### **(4) Surface Water Drainage**

With regard to surface water drainage it is the responsibility of a developer to make proper provision for drainage to ground, water courses or a suitable sewer. In respect of surface water it is recommended that the applicant should ensure that storm flows are attenuated or regulated into the receiving public network through on or off site storage. When it is proposed to connect to a combined public sewer, the site drainage should be separate and combined at the final manhole nearest the boundary. Connections are not permitted for the removal of groundwater. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. The contact number is 0800 009 3921. Reason - to ensure that the surface water discharge from the site shall not be detrimental to the existing sewerage system.

### **(5) Public Sewers**

In order to protect public sewers and to ensure that Thames Water can gain access to those sewers for future repair and maintenance, approval should be sought from Thames Water where the erection of a building or an extension to a building or underpinning work would be over the line of, or would come within 3 metres of, a public sewer. Thames Water will usually refuse such approval in respect of the construction of new buildings, but approval may be granted for

extensions to existing buildings. The applicant is advised to visit [thameswater.co.uk/buildover](http://thameswater.co.uk/buildover).

**(6) Petrol/Oil Interceptors**

Thames Water would recommend that petrol / oil interceptors be fitted in all car parking/washing/repair facilities. Failure to enforce the effective use of petrol / oil interceptors could result in oil-polluted discharges entering local watercourses.