

Committee	PLANNING COMMITTEE A	
Report Title	84 RAVENSBOURNE PARK, LONDON, SE6 4YA	
Ward	Rushey Green	
Contributors	Samuel James	
Class	PART 1	09 January 2020

<u>Reg. Nos.</u>	DC/19/113216
<u>Application dated</u>	23 July 2019
<u>Applicant</u>	Magenta Planning Ltd on Behalf of Ravensbourne Heights Ltd
<u>Applicants Plan Nos.</u>	070-LOC-P1; 070-EXSITE Rev.P1; 070EXGE01 Rev.P1; 070EXGA Rev.P1; 070-SITE Rev.P1; 17-564-TPP-A; 156.RLA.RP.RP01.11; 156.RLA.RP.RP01.12; 156.RLA.RP.RP01.13; 156.RLA.RP.RP01.14; 156.RLA.RP.RP01.15; 156.RLA.RP.RP01.16; 156.RLA.RP.RP01.17; 156.RLA.RP.RP01.18; 156.RLA.RP.RP01.19; 156.RLA.RP.RP01.20; Arboricultural Impact Assessment Rev.A (Canopy Consultancy dated May 2019); Planning, Design & Access Statement (Toner Architects dated July 2019); Energy Statement (Energy Test dated 16 July 2019); Green Roof Proposal 156.RLA.GR.PL (R.LA dated May 2019); Landscape Strategy 156.RLA.RP.RP01 (R.LA dated June 2019); Transport Statement (Odyssey dated June 2019) Received 23 July 2019; CGI Visualisations (Magenta dated July 2019) Received 29 July 2019; 070-GA00 Rev.P2; 070-GA01 Rev.P2; 070-GA02 Rev.P2; 070-GA03 Rev.P2; 007-GARF Rev.P2; 070-GE01 Rev.P1; 070-GE02 Rev.P2; 070-GE03 Rev.P2; 070-GE04 Rev.P1; 070-GS01 Rev.P1; 070-GS01 Rev.P1; 070-GS02 Rev.P1; 070-GS03 Rev.P1; 070-GS04 Rev.P1 (Envelope Section 2); 070-GS04 Rev.P1 (Envelope Section 3); 070-GS05 Rev.P1; 070-StGE01 Rev.P1; 070-StGE02 Rev.P1; 070-StGE03 Rev.P1; 070-StGE04 Rev.P1 Received 28 Oct 2019
<u>Proposal</u>	Demolition of existing two-storey building at 84 Ravensbourne Park, SE6, and construction of 9 self-contained flats (3 x one, 4 x two bed and 2 x three bed), together with 3 car parking and 14 bicycle spaces and associated landscaping.
<u>Background Papers</u>	(1) Core Strategy (adopted June 2011) (2) Development Management Local Plan (adopted November 2014) (3) Local Development Framework Documents (4) The London Plan
<u>Designation</u>	PTAL 4

1 SUMMARY

1 This report sets out Officer's recommendations for the above proposal. The application is before members for a decision as the recommendation is to approve and there are twelve valid planning objections.

2 SITE AND CONTEXT

Site description

2 The application site has a 22.5m road frontage and averages 37m in depth. It contains an existing two-storey property with a flat roof, reflecting the style of the adjoining 4-storey flats in Iona Close, immediately to the south. The site level falls away from the road, setting the existing house at an appreciably lower level than the street. The northern and eastern boundaries of the site adjoin Ladywell Fields, whilst to the south of the site are large semi-detached and detached houses and some flatted development.



Map 1: Site Location Plan

- 3 The plot contains and is bounded by mature trees and hedging. The views of the property from within the park, and from the street, are currently screened by vegetation. One tree within and one adjoining the site are subject to Tree Preservation Orders.

Character of area

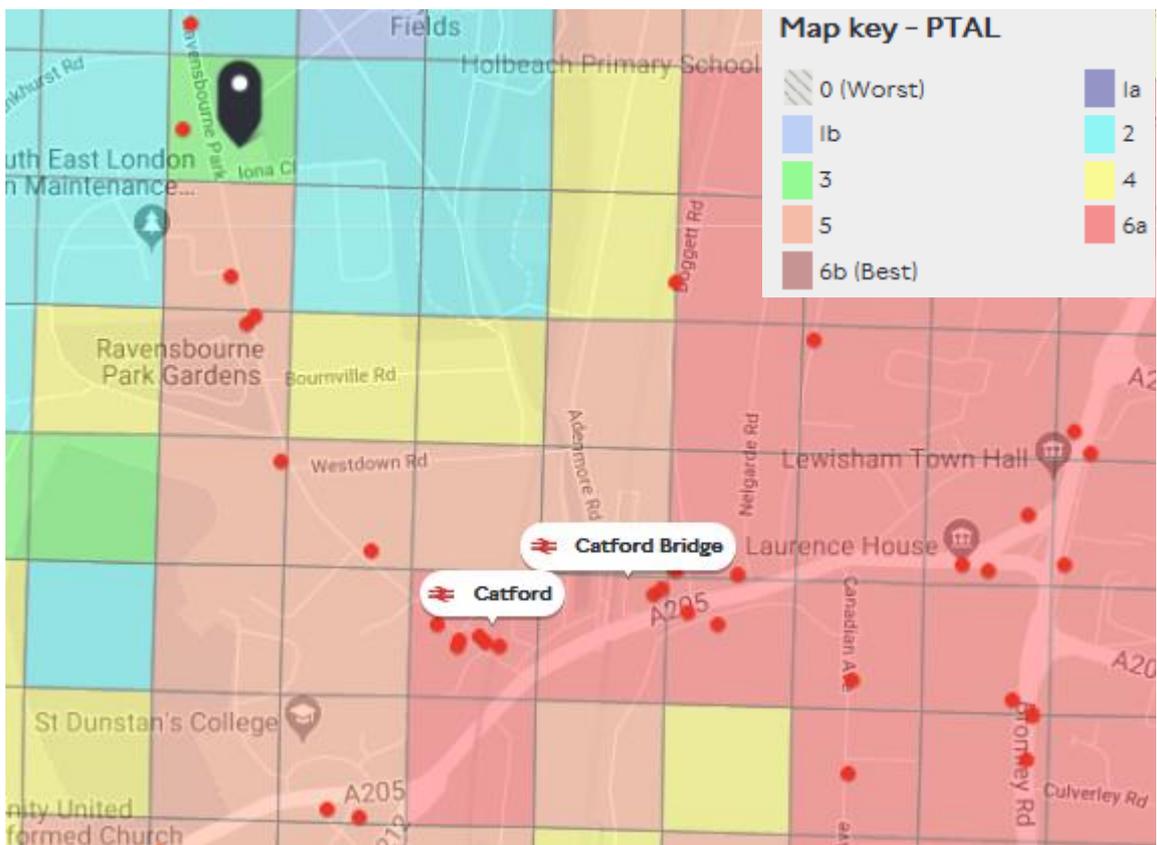
- 4 The application site is situated on the east side of Ravensbourne Park, a residential street with mixed characteristics and no obviously dominate building type, and is formed by differing character areas. The site lies at an intersection of character types, and comprises a rectangular plot of land adjoining the south-west of Ladywell Fields which is designated Metropolitan Open Land (MOL), whilst also being a 'Site of Nature Conservation Importance' (SINC).

Heritage/archaeology

- 5 The site does not fall within a conservation area, nor does it fall within the setting of a listed building.

Transport

- 6 The PTAL of the site is 3 according to TFL's online WEBCAT planning tool, but it is directly adjacent to PTAL 5 (see Map 2). On a scale of 1-6, 6 is excellent. A local bus route operates along Ravensbourne Park, whilst Catford and Catford Bridge Rail Stations lie within 0.3 miles or an approximate six-minute walk. Bus stops served by a large number of London-wide and local routes are an approximate 10 minute walk. The site is therefore well-connected to public transport.



Map 2: Extract from TFL's WebCAT PTAL Planning tool

- 7 The site is not located within a Controlled Parking Zone (CPZ), however the Catford West CPZ (Mon-Fri 9am-7pm) is approximately 150m south of the site on Ravensbourne Park, and side streets off of it leading down to Catford & Catford Bridge Rail Station.

Amenities and services

8 The site is well-connected to the town centre at Catford and is on public transport routes north to Lewisham town centre. It is highly sustainable urban location.

3 RELEVANT PLANNING HISTORY

9 **DC/03/054053:** Outline planning permission was refused in May 2004 for the construction of a three storey building including roof space and semi basement on the site of 84 Ravensbourne Park SE6 to provide 8, two bedroom flats, together with the provision of 9 car parking spaces and bin enclosures. Reason: *The proposed development is unattractive in its massing and design, creates sub-standard residential units at semi-basement level, and would adversely affect the trees and hedges that create the existing leafy environment, the visual amenity of the area and the open character of the MOL and should therefore be refused.*

10 **DC/13/083919:** In 2015, the Planning Inspectorate (Ref: APP/C5690/W/15/3003368) dismissed an appeal for the demolition of the existing building on the site of 84 Ravensbourne Park, and the construction of a four storey building plus basement level incorporating balconies and brown roof to provide 2, one bedroom, 3, two bedroom, and 4, three bedroom self-contained flats, together with the provision of car parking spaces, cycle and refuse stores. The reasoning related to the siting, scale, bulk and height of the proposed development, together with the loss of boundary trees. The inspector noted it would appear as a substantial development that would no longer provide a transition between Ladywell Fields and the flats in Iona Close. As such, it was considered it would appear as an over dominant and incongruous addition to the streetscene, to the detriment of the character and appearance of the surrounding area.

Pre-application advice

11 Pre Application Advice was given in January 2019, which has led to the submission of the current application. The principle of residential redevelopment was supported, subject to high quality design and landscaping, a revised layout, reduction in on-site parking, and protection of trees on-site, together with re provision of any trees which can be justifiably removed.

4 CURRENT PLANNING APPLICATION

12 This application is for the demolition of the existing building on-site, and the construction of a part three, part four storey building consisting of nine residential units consisting of three x one bedroom, four x two bedroom, and two x three bedroom flats, together with 'shade-woodland' theme landscaping.

13 The building would be finished in vertical natural timber cladding for the upper floors, built on a ground floor brick plinth.

14 All units would be provided with private amenity space. The ground floor units with private terraces, and upper floors with balconies.

15 The proposal would provide three off-street parking spaces. 14 dry and secure cycle parking spaces would be provided on site, as would refuse and recycling storage provision for the residential units, which would be located close to the south eastern corner of the site.

Revisions have been made to the proposal during course of application period:

- Reduction in number of off-street car parking spaces
- Amendments to landscaping
- Minor amendment to layouts of flats

5 CONSULTATION

5.1 APPLICATION PUBLICITY

The Council's consultation was undertaken in accordance with the minimum statutory requirements and those required by the Council's adopted Statement of Community Involvement.

16 Letters were sent to adjoining residents in the surrounding area and the relevant ward Councillors on 05/08/2019. The applicant displayed a site notice on 12/08/2019.

5.1.1 Comments in objection

17 Twelve responses were received from individual households objecting to the proposal.

Table [1] Summary of consultation responses

Objection / concern raised	Para where addressed
<i>Housing</i>	
9 flats is overdevelopment	68
No affordable housing proposed	None required as proposal for less than 10 units.
<i>Urban Design</i>	
Massing, scale and size of building	105
Excessive use of hardstanding	115
Would change the character of the area, and impact negatively on existing residents' enjoyment of the park	121
Would spoil this beautiful part of Catford	121
<i>Transport</i>	
How would overspill parking be managed?	135
Off-street parking proposed is insufficient	128
Existing levels of parking stress would be exacerbated.	136
Pedestrian access and refuse storage on Iona Close.	Access is not on Iona Close. Bins within red-line area.
The highway is polluted and congested already, which would be exacerbated	133 212
Increased use of crossover access is road safety concern, considering proximity of pelican crossing	Pelican Crossing is at least 24.5m from the crossover, so there are no safety concerns.
<i>Living conditions of neighbours</i>	
Overbearing impacts	155
Impact on views of park and general outlook	153
Loss of light	155

Impacts on privacy	156
Impacts from construction works	159
<i>Natural environment</i>	
Existing front boundary tree screening absorbs air and noise pollution from highway	212
Tree loss / damage	208
Impacts on ecology on-site (specifically parakeets)	206
<i>Other matters</i>	
The surrounding area does not have sufficient infrastructure (trains, GPs, schools) to deal with this proposal, and other new developments i.e. Catford Green Development	Dealt with via CIL payments for which this development is liable.

5.2 Local Meeting

18 As more than ten valid planning objections were received, objectors, ward councillors and the developer were invited to attend a 'Local Meeting'. As this meeting took place during political 'Purdah' prior to the December 2019 Parliamentary Elections, a ward councillor was not able to chair the meeting. The meeting was chaired by James Hughes, the team leader for the Planning South team.

19 The meeting was held on 6th November 2019, in the Civic Suite, Catford.

20 The meeting was attended by six local residents, Councillor James Walsh, Cllr Krupski the developer's planning agent, architect and sustainability consultant, and planning officers Samuel James and James Hughes (acting Chair).

21 *Discussion*

22 The key concerns raised by objectors mirrored those received in writing. The key planning concerns were the impact on parking in the surrounding area, the design and scale of the proposal, the loss of trees on site, and the proposal's impact on neighbouring residential amenity.

5.3 INTERNAL CONSULTATION

23 The following internal consultees were notified on 18/06/2019.

24 Highways officer: No objections subject to recommended conditions and obligations.

25 Ecological Regen Manager: raised no objections.

26 Arboricultural Officer: comments addressed in report.

27 Design officer: comments incorporated into officer's assessment.

6 POLICY CONTEXT

6.1 LEGISLATION

28 Planning applications are required to be determined in accordance with the statutory development plan unless material considerations indicate otherwise (S38(6) Planning and Compulsory Purchase Act 2004 and S70 Town & Country Planning Act 1990).

6.2 MATERIAL CONSIDERATIONS

29 A material consideration is anything that, if taken into account, creates the real possibility that a decision-maker would reach a different conclusion to that which they would reach if they did not take it into account.

30 Whether or not a consideration is a relevant material consideration is a question of law for the courts. Decision-makers are under a duty to have regard to all applicable policy as a material consideration.

31 The weight given to a relevant material consideration is a matter of planning judgement. Matters of planning judgement are within the exclusive province of the LPA. This report sets out the weight Officers have given relevant material considerations in making their recommendation to Members. Members, as the decision-makers, are free to use their planning judgement to attribute their own weight, subject to the test of reasonableness.

6.3 NATIONAL POLICY & GUIDANCE

- National Planning Policy Framework 2019 (NPPF)
- National Planning Policy Guidance

6.4 DEVELOPMENT PLAN

32 The Development Plan comprises:

- London Plan Consolidated With Alterations Since 2011 (March 2016) (LPP)
- Core Strategy (June 2011) (CSP)
- Development Management Local Plan (November 2014) (DMP)
- Site Allocations Local Plan (June 2013)

6.5 SUPPLEMENTARY PLANNING GUIDANCE

33 Lewisham SPD:

- Alterations and Extensions Supplementary Planning Document (April 2019)

34 London Plan SPG/SPD

- Sustainable Design and Construction (April 2014)
- Housing (March 2016)

6.6 OTHER MATERIAL CONSIDERATIONS

35 The Mayor of London published a draft London Plan on 29 November 2017 and minor modifications were published on 13 August. The Examination in Public commenced on

15 January 2019 and concluded on 22 May 2019. The Inspector's report and recommendations were published on 8 October 2019. This document now has some weight as a material consideration when determining planning applications. The relevant draft policies are discussed within the report (DLPP).

7 PLANNING CONSIDERATIONS

36 The main issues are:

- Principle of Development
- Housing
- Urban Design
- Transport
- Living conditions of neighbours
- Sustainable Development
- Natural Environment

7.1 PRINCIPLE OF DEVELOPMENT

General policy

37 The National Planning Policy Framework (NPPF) at Paragraph 11, states that there is a presumption in favour of sustainable development and that proposals should be approved without delay so long as they accord with the development plan.

38 Lewisham is defined as an Inner London borough in the London Plan. LPP 2.9 sets out the Mayor of London's vision for Inner London. This includes among other things sustaining and enhancing its recent economic and demographic growth; supporting and sustaining existing and new communities; addressing its unique concentrations of deprivation; ensuring the availability of appropriate workspaces for the area's changing economy; and improving quality of life and health.

Policy

39 The National Planning Policy Framework (NPPF 2019) speaks of the need for delivering a wide choice of high quality homes, which meet identified local needs (in accordance with the evidence base), widen opportunities for home ownership, and create sustainable, inclusive and mixed communities.

40 The current London Plan outlines through Policy 3.3, 3.5 and 3.8 that there is a pressing need for more homes in London and that a genuine choice of new homes should be supported which are of the highest quality and of varying sized and tenures in accordance with Local Development Frameworks. Residential developments should enhance the quality of local places and take account of the physical context, character, density, tenure and mix of the neighbouring environment.

41 Locally, CSP 1 Housing provision, mix, and affordability sets out that housing developments will be expected to provide an appropriate mix of dwellings having regard to criteria such as the physical character of the building and site and location of schools, shops, open space and other infrastructure requirements (such as transport links).

42 DMP 2 advises that development should result in no net loss of housing, particularly family housing. The Council will only grant planning permission for the loss of housing by demolition, redevelopment or change of use in a limited set of circumstances.

7.1.1 Loss of existing building

43 The existing building is of no significant architectural merit, and appears to be in a poor state of repair. Officers therefore raise no objection to the loss of this building, subject to re-provision of a greater number of dwellings, as is proposed.

7.1.2 Proposed residential use

44 The proposed nine residential units are acceptable in principle as this is a predominantly residential area and there are no in-principle land-use conflicts.

45 Four x two bedroom, two x three bedroom and three x one bedroom dwellings would replace the existing poor quality dwelling, and therefore the proposed residential development at an increased density and of an improved quality is acceptable in principle.

7.1.3 Impact on the setting of the adjacent Ladywell Fields: Designated Metropolitan Open Land (MOL) and Site of Important Nature Conservation (SINC)

46 CSP 12 Open space and environmental assets seeks to protect the character, historic interest and amenity of, and within, open spaces, as well as the effects of development outside their boundaries.

47 Current adopted LPP 7.17 states that the strongest protection should be given to London's MOL, and inappropriate development refused, giving the same level of protection as the green belt. DLPP G3 is consistent with this.

48 NPPF (2019) Paragraph 143 states that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. It goes on to state in paragraph 144 that when considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt (for which MOL must be given the same level of protection).

49 The application site is not located within the MOL, however it is directly adjacent to and bound by it on it two sides. The design must therefore recognise the special, open and verdant character of the designation, and ensure it enhances the local landscape. It is therefore assessed in terms of its impact on Ladywell Fields and this is further discussed in the 'design' section of the report. Nonetheless, the development is not considered inappropriate for a site that is adjacent to a designated MOL site.

7.1.4 Principle of development conclusion

50 The site will make a valuable contribution towards meeting housing needs as identified in LPP 3.3 and 3.4 to increase housing supply and optimise housing potential. The proposal will make more efficient use of the land and officers therefore support the principle of development. This is subject to a residential scheme of an appropriate design, siting, height, and scale, which respects the open and verdant character of the designated Ladywell Fields (MOL) and natural environment, whilst ensuring that neighbouring amenity is maintained, and a good standard of accommodation is provided.

7.2 HOUSING

51 This section covers: (i) the contribution to housing supply; (ii) the dwelling size mix; (iii) the standard of accommodation;

7.2.1 Contribution to Housing Supply

Policy

- 52 National and regional policy promotes the most efficient use of land.
- 53 The NPPF states that housing applications should be considered in the context of the presumption in favour of sustainable development. The NPPF sets out the need to deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities.
- 54 The NPPF encourages the efficient use of land subject to several criteria set out in para 122. Para 123 applies where there is an existing or anticipated shortage of land for meeting identified housing needs and strongly encourages the optimal use of the potential of each site.
- 55 LPPs 3.3 and 3.4 seek to increase housing supply and to optimise housing output within the density ranges set out in the sustainable residential quality (SRQ) matrix.
- 56 The emerging DLP supports the most efficient use of land and development at the optimum density. Defining optimum is particular to each site and is the result of the design-led approach. Consideration should be given to: (i) the site context; (ii) its connectivity and accessibility by walking and cycling and existing and planned public transport (including PTAL); and (iii) the capacity of surrounding infrastructure.
- 57 The current London Plan sets an annual target of 1,385 new homes until 2025.
- 58 National and regional policy avoids specifying prescriptive dwelling size mixes for market and intermediate homes.
- 59 NPPF para 61 expects planning policies to reflect the need for housing size, type and tenure (including affordable housing) for different groups in the community.
- 60 LPP 3.8 states Londoners should have a genuine choice of homes, including differing sizes and types. Emerging DLPP H12 sets out that an appropriate mix of unit sizes should be informed by several criteria set out in the policy.
- 61 CSP 1 echoes the above with several other criteria however CSP 1 expects the provision of family housing (3+ bedrooms).

Discussion

- 62 The proposal is for nine new dwellings, and the site measures approximately 0.1 hectares in a predominantly residential area. Ravensbourne Park exhibits suburban characteristics, being comprised of mostly detached and semi-detached dwellings at a height of 2 or 3 stories, however Catford Town Centre is approximately 0.5km away, which would clearly fall into the Urban setting (as defined by the SRQ density matrix, Table 3.2, Policy 3.4 LP 2016).
- 63 Local residents have raised concerns with the proposed density. The average number of habitable rooms per unit would be three, the average number of units per hectare would be 90, and the number of habitable rooms per hectare would be 270. This is considered acceptable.
- 64 Table 2 below sets out the measures of density criteria required by emerging DLPP D6 for all sites with new residential units. The final column sets out the density recommendations in LP 3.4, table 3.3.

Table [2]: Measures of Density

Criteria	Value	Density Value	LP Table 3.2 Recommends
Site Area (ha)	0.1		
Units	9	90 U/ha	70-170 U/ha
Habitable rooms	27	270 Hr/ha	200-450 Hr/ha
Bedrooms	17	170 Br/Ha	N/A
Bedspaces	33	330 Bs/Ha	N/A

65 For an urban site, with a PTAL rating of 3 (officers note the site is very well connected to public transport), Table 3.2 of the London Plan advises up to 170 units per hectare and up to 250 habitable rooms per hectare.

66 The proposed number of habitable rooms per hectare is slightly higher than advised for PTAL 3 rated sites in a suburban setting, however this site is a very well connected PTAL 3 as already noted, and two rail stations are within 0.3 miles. Furthermore, the site is within 800m of a major town centre, which is one of the categories that would define the site as being within an urban setting: for which the maximum number of habitable rooms per hectare would be 700.

67 It is also noted that the density matrix should be applied flexibly and the Draft London Plan removes the density matrix.

68 The proposed density is considered to optimise the site, as it is well connected and highly sustainable urban location, and the density values are within the guidelines set out in the adopted London Plan. The proposed dwellings, including two family sized, would optimise the site, and make a valuable contribution to the borough's housing supply and significant weight is given to this in assessment of the proposal.

7.2.2 Dwelling size mix

69 Determining an appropriate mix of dwelling sizes for a site depend on several criteria in CSP 1, relating to: (i) the site's character and context; (ii) previous or existing use of the site; (iii) access to amenity space for family dwellings; (iv) likely parking demand; (v) local housing mix and population density; and (vi) social and other infrastructure availability and requirements.

Table [2]: Dwelling Size Mix

	1 Bed	2 Bed	3 Bed	Total
No.	3	4	2	9
%	33%	45%	22%	100%

70 The proposed mix of unit sizes is considered to be acceptable, in accordance with local policy and would deliver a suitable range of unit sizes to meet the local market demand. The provision of family sized affordable units within the scheme would be acceptable.

7.2.3 Residential Quality

General Policy

71 NPPF para 127 sets an expectation that new development will be designed to create places that amongst other things have a 'high standard' of amenity for existing and future users. This is reflected in relevant policies of the London Plan (LPP 3.5), the Core

Strategy (CS P15), the Local Plan (DMP 32) and associated guidance (Housing SPD 2017, GLA; Alterations and Extensions SPD 2019, LBL).

- 72 The main components of residential quality are: (i) space standards; (ii) outlook and privacy; (iii) daylight and sunlight; (iv) noise and disturbance; (v) accessibility and inclusivity;

Internal space standards

Policy

- 73 LPP 3.5 sets out the minimum floor space standards for new houses relative to the number of occupants. However, in 2015, the ‘Technical housing standards – nationally described space standards’ were introduced. The alterations to the London Housing SPG adopted these standards. The technical housing standards will therefore be applied in this instance. These standards are reflected in the local policy.
- 74 DMP 32 ‘Housing design, layout and space standards’ and LPP 3.5 ‘Quality and design of housing developments’ of the London Plan requires housing development to be of the highest quality internally, externally and in relation to their context. These policies set out the requirements with regards to housing design, seeking to ensure the long term sustainability of the new housing provision. Informed by the NPPF, the Mayors Housing SPG provides guidance on how to implement the housing policies in the London Plan. In particular, it provides detail on how to carry forward the Mayor’s view that “providing good homes for Londoners is not just about numbers. The quality and design of homes, and the facilities provided for those living in them, are vital to ensuring good liveable neighbourhoods”.

Discussion

- 75 The table below sets out proposed dwelling and room sizes.

Table [3]: Internal space standards – proposed v target

Unit No.	Unit type (min req GIA)	Unit size (GIA) (sqm)	Room sizes (metres squared)	Floor to ceiling heights (metres)	Amenity space (m. squared)	Compliance
00.01	3b6p (95)	100.2	Bed 1 (double) – 16.2 Bed 2 (double) – 12.1 Bed 3 (double) – 12	2.4	15	Yes
00.02	3b5p (86)	100	Bed 1 (single) – 10.8 Bed 2 (double) – 14 Bed 3 (double) – 17.2	2.4	16	Yes
01.01	1b2p (50)	63.2	Bedroom – 13.6	2.4	6	Yes
01.02	2b4p (70)	75.5	Bed 1 (double) – 13.2 Bed 2 (double) – 11.5	2.4	7.7	Yes
01.03	1b2p (50)	55.4	Bedroom – 14.4	2.4	7.2	Yes
02.01	1b2p (50)	63	Bed – 13.6	2.4	6.5	Yes

02.02	2b4p (70)	74.5	Bed 1 – 13 Bed 2 – 11.5	2.4	7.6	Yes
02.03	2b4p (70)	75	Bed 1 - 12.5 Bed 2 – 11.8	2.4	7	Yes
03.01	2b4p (70)	79.6	Bed 1 – 13.6 Bed 2 – 11.8	2.4	7	Yes

76 The proposed dwellings would all provide a greater area than the minimum required Gross Internal Area for their respective number of occupants, and in this respect the standard of amenity would be very high. The rooms are all of a good layout, and the individual bedrooms meet the standards. The minimum floor to ceiling height would be 2.45m, which meets the London Plan requirements.

77 Each flat would be provided with at least the minimum required outside amenity space, in the form of terraces/balconies. The three bedroom units would have larger terrace areas and the site is directly adjacent to Ladywell Fields, which is a large park with an abundance of recreational facilities, including children’s play areas. The proposal is therefore policy compliant with regard to provision of external amenity space and children’s play facilities.

78 In conclusion, the floor areas, size of dwellings and external amenity areas provided would be high quality and therefore acceptable, in line with Policy DM32.

Outlook & Privacy

Policy

79 LPP 3.5 seeks high quality internal and external design of housing development. Emerging draft London Plan Policy D1(8) requires development to achieve ‘appropriate outlook, privacy and amenity’. Within the same document, policy D4 seeks to maximise the provision of dual-aspect dwellings (i.e. with openable windows on different elevations).

80 DMP 32(1)(b) expects new developments to provide a ‘satisfactory level’ of privacy, outlook and natural lighting for its future residents.

Discussion

81 Each of the proposed dwellings would be at least dual aspect, and would be provided with good levels of outlook and views from habitable spaces. The outlook provided is therefore considered acceptable.

82 In terms of privacy, none of the proposed units would overlook each other, and all of the habitable rooms are provided with adequate levels of privacy. There are sufficient distances to neighbouring dwellings to ensure no harmful levels of overlooking would occur into the new units.

Daylight and Sunlight

Policy

83 LPP 3.5 seeks high quality internal and external design of housing development. Emerging DLPP D1(8) requires development to achieve ‘appropriate outlook, privacy and amenity’. DMP 32(1)(b) expects new developments to provide a ‘satisfactory level’ of natural lighting for its future residents. The London Housing SPD and the Lewisham Alterations and Extensions SPD promote access to sunlight and natural daylight as important amenity factors, particularly to living spaces.

Discussion

84 Given the at least dual aspect dwellings, and the amount of glazing proposed, the dwellings would be provided with good levels of natural daylight and sunlight. All habitable rooms would be provided with windows, and officers consider the levels of daylight and sunlight to be provided would be acceptable.

85 Overall the levels of daylight and sunlight provided would be acceptable, in line with Policy DM32.

Accessibility and inclusivity

Policy

86 LPP 3.8 and DLPP D5 require 10% of residential units to be designed to Building Regulation standard M4(3) 'wheelchair user dwellings', i.e. is designed to be wheelchair accessible, or easily adaptable for residents who are wheelchair users, with the remaining 90% to M4(2) 'accessible and adaptable dwellings'.

87 CSP 1 requires major schemes to provide 10% of all units and each tenure type to be constructed as accessible. DMP 32 states that the Council will require new build housing to be designed to ensure that internal layout and external design features provides housing that is accessible to all intended users. Whilst this is not a major scheme, an assessment of the level of accessibility proposed follows.

Discussion

88 This is not a major scheme, so CSP 1 does not apply. The development has been designed to comply with Part M of the Building Regulations and part 6 of the accompanying Design and Access statement outlines the proposed development has been designed to meet the required regulations both in terms of access to and movement within the proposed buildings and in regard to the internal layout of the proposed units.

89 The building would be designed with a lift at the core, ensuring all units would be accessible.

90 The building would have step-free, level access with flush thresholds designed in accordance with M4.

91 Officers are satisfied the building would comply with accessibility and inclusivity policies. Nonetheless, a separate building control application would be required to demonstrate this compliance for a residential scheme of this scale.

Summary of Residential Quality

92 Officers are satisfied that the design and layout of the proposed units would be suitable and the proposal would provide an acceptable standard of residential accommodation in accordance with the above policies.

7.2.4 Housing conclusion

93 The proposal would deliver nine dwellings, including two family sized units, all with a high standard of residential amenity. It would contribute to the Borough's housing targets in a predominantly residential and highly sustainable urban location, making the most efficient use of land and optimising density. This is a planning merit to which very significant weight is given.

7.3 URBAN DESIGN

General Policy

- 94 The NPPF at para 124 states the creation of high quality buildings and places is fundamental to what the planning and development process should achieve.
- 95 LPP 7.4 requires development to have regard to the form, function, and structure of an area, place or street and the scale, mass and orientation of surrounding buildings. It is also required that in areas of poor or ill-defined character, new development should build on the positive elements that can contribute to establishing an enhanced character for the future function of the area. Policy 7.6 seeks the highest quality materials and design appropriate to its context.
- 96 CSP 12 seeks to protect the character, historic interest and amenity of, and within, open spaces, as well as the effects of development outside their boundaries.
- 97 CSP 15 outlines how the Council will apply national and regional policy and guidance to ensure highest quality design and the protection or enhancement of the historic and natural environment, which is sustainable, accessible to all, optimises the potential of sites and is sensitive to the local context and responds to local character.
- 98 DMP 25 requires the submission of a landscape scheme, including 5 years of management and maintenance of high quality hard and soft landscapes and trees.
- 99 DMP 30 requires planning applications to demonstrate a site specific response which creates a positive relationship with the existing townscape whereby the height, scale and mass of the proposed development relates to the urban typology of the area.
- 100 As the proposal site projects into Ladywell Fields (designated MOL), the impact on the green and open character of the adjacent Metropolitan Open Land must be considered.

Discussion

- 101 The development site is bound by trees, and although it has an existing residential use, the building is limited in scale, and this gives the site a transitional character between Ladywell Fields (Designated MOL) and the flatted residential development of Iona Close. This was noted by the Inspector during assessment of the previously dismissed appeal: APP/C5690/W/15/3003368. For the proposed design to be successful, it must maintain this transitional verdant character of the site through its scale, materiality, boundary treatments and landscaping.

7.3.1 Height, scale and massing

- 102 The proposed building would be significantly larger and taller than that which currently exists on-site. However, the scale and massing to Ravensbourne Park is acceptable, as it would respect the massing of buildings in close proximity and would not look uncomfortable as part of the streetscene.
- 103 Following advice which was given at pre application stage, the proximity of the elevations to the site boundaries has been improved, and there is more space around the building to ensure sufficient landscaping is provided.
- 104 The building has been designed with the tallest elements closest to the centre and the southern boundary of the site, which reduces the height and massing when viewed from Ladywell Fields.
- 105 Overall, the height, scale and massing are considered to be appropriate for the site and surrounding area.

106 The current proposal has been assessed against the relevant DM Policy 30 and CS15, and is considered to be acceptable in terms of its height and massing.

7.3.2 Elevational treatments and materials

107 The majority of the building would be finished in natural timber cladding with vertical elements, which aim to imitate and blend in with the wooded character of the site. The front and rear roof slopes would have biodiverse living roofs, this would relate to the woodland context, which is welcomed.

108 The ground level 'plinth' element would be constructed in facing brickwork, and would have climbing planters, these would be secured by the soft landscaping condition.

109 The vertical timber treatment and green roofs are a creative response to this unique site. It is considered that these would reduce the visual impact of the building when viewed from Ladywell Fields, by giving a relatively soft and natural appearance, especially when compared to the stark brickwork that has been used in the construction of Iona Close. Final details of materials would be secured by condition, to ensure their high quality and durability.

110 The proposed boundary treatment is steel fencing, typical of the kind that would usually be found in parkland. Planting of hedgerows inside the boundary would green the border, whilst the fencing would allow visual permeability into the site, whilst protecting the amenity of future residents. Details of the boundary treatments would be secured by condition, should Members be minded to grant planning permission.

111 The elevational treatment is therefore acceptable and the design is considered to be a high quality, site specific response, which also respects the special characteristics of the adjacent MOL. It would not have a harmful impact on its spaciousness or open character, in line with Policy 12 of the Lewisham Core Strategy.

7.3.3 Layout, Landscaping and Trees

112 This section addresses the landscape setting for the building as part of the urban design analysis. Discussion on trees to be retained and those to be removed is in section 7.7.1, below.

113 The overall theme of the landscaping scheme is noted as a 'woodland palette' and is designed to retain the woodland setting, and transitional nature of the site.

114 The landscaping to the front has been revised following submission. One parking space has been removed to allow more space around the root protection area of the retained Category A tree (T2 on the TPP drawing No. 17-564-TPP-A) and to allow more space for landscaping close to the front boundary.

115 The hardstanding area will be the maximum that is required, and would be permeable to reduce surface water run off.

116 There is a clearly delineated pedestrian pathway through the site, which would provide a welcoming and clear entrance for pedestrians when arriving at the property. This would be in the form of a raised deck walkway area, constructed to protect TPO tree T2.

117 Significant planting of hedgerows, shrubbery, vegetation and trees is proposed within the site curtilage, and there is minimal hardstanding proposed. Biodiverse living roofs are also proposed to the roof slopes where this is possible. The proposed planting plan is acceptable in principle to alleviate the loss of the on-site trees, and to ensure the site remains as a visual transition between the starkness of Iona Close, and the open and verdant nature of Ladywell Fields. The proposed planting plan and landscaping plans,

including 5 years of management would be secured by condition, should the scheme to granted.

- 118 The majority of the soft landscaping around the building would not be accessible to residents, as it has been designed to create a green buffer around the building, in order that the character of the site be protected. The landscaping is proposed to be enjoyed by residents from their own private amenity terraces and balconies. This should help to ensure the long term survival of hedges and shrubbery that is proposed. The private amenity spaces provide at least the minimum required private outdoor space, and residents would be able to use Ladywell Fields for recreation purposes.
- 119 The existing group of tall leylandii trees would be removed from the front boundary. These are uncharacteristic and overgrown, and are not considered to provide much amenity value. Their removal, together with the proposed planting strategy would help to provide a better transition between the park, and the built form as the proposed building and park setting would be visible through the site, where currently the leylandii do not allow much visual permeability through the site from Ravensbourne Park.
- 120 To conclude, the proposed landscaping scheme is of a high quality, and it would ensure the retention of the site character as a transition between Ladywell Fields and the built form of Ravensbourne Park, subject to final details being secured by condition.

7.3.4 Urban Design conclusion

- 121 In summary, the proposed building is a creative and high quality, unique, site-specific response that would create interest at this currently under optimised site. It is of an appropriate height and scale, and would use suitable materials for the sensitive setting; it is considered that the proposed landscaping scheme would uphold the character of the site as a transition between Ladywell Fields and Ravensbourne Park. The design of the proposal is therefore acceptable, and in line with the aforementioned policies.

7.4 TRANSPORT IMPACTS

General Policy

- 122 LPP 6.1 sets out the Mayor's strategic approach to transport which aims to encourage the closer integration of transport and development. This is to be achieved by encouraging patterns and nodes of development that reduce the need to travel, especially by car; seeking to improve the capacity and accessibility of public transport, walking and cycling; supporting measures that encourage shifts to more sustainable modes and appropriate demand management; and promoting walking by ensuring an improved urban realm.
- 123 LPP 6.13 seeks to ensure a balance is struck to prevent excessive car parking provision that can undermine cycling, walking and public transport use. Through the use of travel plans, it aims to reduce reliance on private means of transport.
- 124 CSP 14 'Sustainable movement and transport' promotes more sustainable transport choices through walking, cycling and public transport. It adopts a restricted approach on parking to aid the promotion of sustainable transport and ensuring all new and existing developments of a certain size have travel plans.

7.4.1 Public transport

- 125 The application site is well connected to the wider public transport network with a PTAL rating of 3, but is located directly adjacent to PTAL 5 rated properties. There are bus stops close to the site on Ravensbourne Park, and Catford and Catford Bridge Stations are approximately 300m to the south, as are bus stops served by an abundance of

London-wide Bus routes. A travel plan is recommended to be conditioned, which would encourage residents to use sustainable modes of transport.

7.4.2 Car Parking

- 126 Local residents have raised concerns about the proposed parking, in terms of the additional demand for parking that could be generated by the proposed development.
- 127 It is acknowledged that the proposal could generate some additional demand for parking, however, DLPP T6 states that car-free development should be the starting point for all development in areas that are well-connected by public transport. It goes on to state that 'car parking should be restricted in line with levels of existing and future public transport and accessibility'. The Policy goes on to state in Table 10.3 (Maximum residential parking standards) that the maximum parking provision for Inner London areas with a PTAL of 4 or more should be Car Free.
- 128 As the site has a PTAL of 3, and contains family sized units, it is acceptable for the scheme to provide some off street car parking spaces, even though it is very well connected and within 0.5km of a major town centre.
- 129 It is noted that the council's highway officer raised some concern regarding the additional parking stress that could be generated, and recommended the developer should pay for the fees for a consultation of surrounding residents to extend the existing Catford West CPZ. The highways officer has also asked for a Travel Plan to be submitted as a condition of development. Officers are of the view these requests do not meet the requirements for imposing planning conditions or obligations.
- 130 For a scheme of nine units, where three off-street car parking spaces are proposed, it would not be reasonable or proportionate to expect the developer to pay towards the implementation of a CPZ. Furthermore, it is considered that the production of and monitoring of a Travel Plan would be a disproportionate requirement for a development of this scale. The impact on the surrounding highway would not be severe, and therefore would not be so significant that the proposal would be unacceptable without these contributions in planning terms, especially considering the existing and emergent policy direction of reducing reliance on private car ownership.
- 131 Further to the above, and to encourage future residents against private vehicle ownership, the developer has agreed to offer free car club membership to the first occupants of each dwelling for a period of three years, which would be secured by a planning obligation. This is considered proportionate.
- 132 The provision of three car parking spaces is therefore considered acceptable.
- 133 Concern has been raised regarding the levels of congestion that exists on Ravensbourne Park. The three additional parking spaces and nine additional units would not generate significantly higher levels of traffic than the existing situation. The majority of traffic on Ravensbourne Park is through-traffic.
- 134 Swept path drawings have been submitted, which demonstrate vehicles could enter and egress the site in forwards gear, and final details of boundary treatment would be conditioned to ensure sufficient visibility of the pavement and road for users of the car park, to ensure pedestrian and vehicle safety. A condition stipulating that no more than three cars should be parked in the forecourt at any one time will ensure that vehicles could exit and enter the site in forward gear.
- 135 Concern has also been raised with regard to future residents and their visitors parking on Iona Close.. Iona Close is a private road, and there is an existing sign at its entrance which states 'Resident Parking Only'. There is also a lockable vehicle gate (this has been observed to be open on every occasion I have visited the site). Since this is a

private road, the issue of non-resident parking is a management matter for Iona Close owners and/or residents.

136 On balance, considering the good PTAL rating of the site, the availability of excellent public transport links, existing and emergent London Plan Policies and the number of homes proposed, the provision of three off-street car parking spaces is considered acceptable, and compliant with Policy DM14, London Plan Policy 6.13, and draft London Policy T6.

7.4.3 Cycle Parking

137 LPP 6.9 Cycling states that developments should provide secure, integrated, convenient and accessible cycle parking facilities in line with the minimum standards set out in Table 6.3 and the guidance set out in the London Cycle Design Standards (or subsequent revisions).

138 The proposal includes cycle parking for 14 bikes within bike stores, close to the car park. This meets the minimum requirement, but final details of cycle parking would be secured by condition to ensure the appearance (green roof are expected) and capacity of the proposed stores is acceptable, and to ensure spaces would be dry and secure.

139 The cycle parking arrangements are therefore considered to be acceptable, and in line with CSP 14, subject to submission of final details.

7.4.4 Refuse Storage

140 Lewisham generally requires 250l of total waste capacity per dwelling. For developments with more than six households, communal 1100 or 1280 litre Eurobin containers should be provided for both refuse and recycling.

141 Space has been indicated towards the front of the plot for storage of refuse, recycling and food waste in separate containers. This is acceptable, being less than 10m distance to the highway and less than 30m from the front door of the building.

142 Final details of the refuse and recycling storage arrangements, and appearance of bin stores, as well as details of a waste management will be secured by a condition requiring submission of final details, including management, should the application be approved. It is expected that bin stores will be provided with green roofs, as noted in the Design and Access statement

143 Subject to submission of acceptable final details, the refuse and recycling storage arrangements are acceptable.

7.4.5 Transport conclusion

144 The proposal would have an acceptable impact on transport in terms of car parking, encouraging sustainable modes of movement and accommodating the sites servicing needs, subject to conditions and a planning obligation in relation to car club membership.

7.5 LIVING CONDITIONS OF NEIGHBOURS

General Policy

145 NPPF para 127 sets an expectation that new development will be designed to create places that amongst other things have a 'high standard' of amenity for existing and future users. This is reflected in relevant policies of the London Plan (LP7.6), the Core Strategy

(CP15), the Local Plan (DMP32) and associated guidance (Housing SPD 2017, GLA; Residential Standards SPD 2012, LBL).

146 DMP32(1)(b) expects new developments to provide a 'satisfactory level' of privacy, outlook and natural lighting for its neighbours.

147 The main impacts on amenity arise from: (i) overbearing enclosure/loss of outlook; (ii) loss of privacy; (iii) loss of daylight within properties and loss of sunlight to amenity areas; and (iv) noise and disturbance.

148 The surrounding area is predominantly residential in nature, and the closest adjoining residential neighbour of the site is Iona Close, which is to the South.

149 The northern and eastern boundaries are shared with Ladywell Fields, and the western boundary is the front boundary with the highway.

7.5.1 Enclosure and Outlook, Daylight and Sunlight

150 The only properties that could be affected by these matters are the flats within Iona Close.

151 The closest Iona Close window facing the site is at least 15m from the site boundary, and the minimum separation to the proposed building would be 20.5m.

152 At this separation distance the proposed building would have no significant impact on the amenity of existing Iona Close residents by way of increased sense of enclosure, overbearing impact or loss of daylight and sunlight. It is also noted that the site is north of Iona Close, so there would be no overshadowing impacts.

153 Some residents have raised concerns they would lose their view. Loss of a specific view from individual properties is not a material planning consideration. Instead, Officers have considered whether the proposal would result in a loss of outlook or overbearing sense of enclosure, and have concluded that would not be the case in this instance.

154 The loss of trees on site would have some impact on the visual amenity of the Iona Close dwellings. The design of the proposed building, being natural timber vertical cladding, with green roofs, would soften this impact, as would the proposed replacement vegetation and landscaping scheme. Notwithstanding this, the majority of existing residents would still retain their views towards the verdant and open Ladywell fields.

155 The impact on the residential amenity of neighbouring occupiers in terms of enclosure, outlook, and daylight and sunlight is therefore considered to be acceptable, and in line with Policy 15 of the Core Strategy, and Policy 32 of The DM Local Plan.

7.5.2 Privacy

156 The closest window to window distance between the proposed building, and the existing Iona Close dwellings would be at least 20.5m. This is acceptable for an inner London context, complies with published guidance and would not result in harmful levels of overlooking into neighbouring properties from the proposed dwellings.

157 There are balconies proposed on the southern elevation at first, second and third floor levels. These balconies would have open outlook north-easterly towards the park, but also a south easterly aspect towards Iona Close. Slatted screening would be incorporated on the south easterly side of these balconies which would stop direct views towards Iona Close in this direction. The overlooking distance between these balconies and Iona Close would be at least 28m, when accounting for the proposed slatted screening, which would not result in a harmful loss of privacy to Iona Close residents. A

condition would be imposed to secure the installation and retention of the privacy screens.

Noise and disturbance impacts

158 Nine new dwellings could generate more noise and disturbance than the existing house, however, this would all be of a domestic nature, and in a residential setting such as this it would not cause any harm.

7.5.3 Construction impacts

159 A level of disruption is to be expected whilst building works are ongoing, and this cannot be avoided. A construction management plan has been submitted, which details how levels of disruption will be minimised. The Management plan shall also demonstrate that deliveries will take place outside of school peak arrival and departure times. This would be subject to a condition to ensure it is adhered to during all construction works.

7.5.4 Living conditions of neighbours conclusion

160 For the reasons as stated above, the living conditions of neighbours would not be affected by harmful loss of daylight, sunlight, outlook or privacy. The amenity impacts to adjoining occupiers is therefore considered to be acceptable.

7.6 SUSTAINABLE DEVELOPMENT

General Policy

161 NPPF para 148 sets an expectation that planning will support transition to a low carbon future.

162 This is reflected in relevant policies of the London Plan and the Local Plan.

163 CS Objective 5 sets out Lewisham's approach to climate change and adapting to its effects. CSP 7, CSP 8 and DMP 22 support this.

7.6.1 Energy and carbon emissions reduction

Policy

164 CSP8 seeks to minimise the carbon dioxide (CO₂) emissions of all new development and encourages sustainable design and construction to meet the highest feasible environmental standards.

165 DMP22 require all developments to maximise the incorporation of design measures to maximise energy efficiency, manage heat gain and deliver cooling using the published hierarchy.

Discussion

166 The application is accompanied by an Energy Statement, Energy Test, H Davey, (16 July 2019). This sets out the measures to be taken to reduce carbon emissions, including an enhanced fabric, and the installation of a communal air source heat pump to serve central heating and Domestic Hot Water. The Strategy concludes that the total reduction in emissions resulting from energy efficiency measures and the installation of renewable technology is 58.2% compared to the regulated emissions from a building, designed to just meet Building Regulations (2013) Part L1A. This surpasses the target reduction of 35%, as required by the London Plan.

Be Lean

167 Having reduced energy demand through improvements to the fabric, this development shall seek to reduce energy consumption further through the specification of mechanical and electrical systems with efficiencies that surpass the requirements of the Domestic Building Services Compliance Guide. This is considered to be acceptable.

Be Clean

168 The submitted Energy Statement sets out why the scheme is not suitable for Combined Heat and Power systems due to its small scale, and furthermore it is not within the vicinity of an existing district heating network. Officer's accept the findings of the Energy Statement.

Be Green

169 PV or solar thermal panels are not proposed, due to the requirement for the building to be designed with green roofs for design reasons. Wind turbines and biomass heating systems are also unsuitable for the location and scale of development. A centralised air source heat pump is proposed to reduce carbon emissions, which is considered acceptable for a scheme of this nature.

170 Furthermore the design and access statement states that EV charging points would be provided to car parking spaces, but no further details have been submitted. In order to secure at least one EV charging point, a condition requiring final details to be submitted and approved in writing prior to occupation of the scheme. This would exceed the policy requirement of 1 EV point per 10 spaces.

Carbon Offset

171 The cumulative on-site saving as a result of the above would be 58% from renewable energy. For a scheme of this scale (i.e. not major development), a carbon offset contribution is not required.

7.6.2 Overheating

Policy

172 LP5.9 states that proposals should reduce potential overheating beyond Part L 2013 of the Building Regulations reduce and reliance on air conditioning systems and demonstrate this in accordance with the Mayor's cooling hierarchy. Draft LPP SI14 echoes this.

173 DMP 22 reflects regional policy.

Discussion

174 A scheme of this scale would be required to comply with the Building Regulations in terms of overheating risk analysis, which would require a separate application. Furthermore, the submitted Energy Statement concludes that it will comply the London Plan requirements regarding overheating.

7.6.3 Urban Greening

Policy

175 LPP 5.10 requires development to contribute to urban greening, including tree planting, green roofs and walls and soft landscaping, recognising the benefits it can bring to mitigating the effects of climate change.

- 176 LPP 5.11 encourages major development to include planting and especially green roofs and walls where feasible, to deliver as many of the policy's seven objectives as possible.
- 177 DLPP G5 expects major development to incorporate measures such as high-quality landscaping (including trees), green roofs and green walls.
- 178 CSP 7 expects urban greening and living roofs as part of tackling and adapting to climate change. DMP 24 requires all new development to take full account of biodiversity and sets standards for living roofs.

Discussion

- 179 The proposal includes several measures to contribute to urban greening, including green roofs, new and improved landscaping and significant planting of a number of native species of shrubs, hedges and trees in and around the site.

Urban greening factor

- 180 Although the proposed building would cover more ground area than the existing, the proposed landscaping plan, planting proposals and green roofs would ensure no net loss of green surface area.
- 181 It is noted that the site currently is not well landscaped, and consists of mostly poor quality compacted grass, and hardstanding. The proposal would overall be an improvement in terms of urban greening, due to the high quality landscaping which would increase the numbers of plant species, and coverage of the site in vegetation. Furthermore, financial contributions for tree planting in Ladywell Fields would be secured in a planning obligation.

Living roofs

- 182 Green roofs are proposed to approximately half of the roof slope areas, where they would be most successful in sustaining vegetation. The applicant has submitted an indicative 'green roof proposal' which demonstrates this, but final details are to be secured by condition. Subject to details the living roofs proposed would be acceptable, and would help to ensure the site contributes positively to urban greening.

7.6.4 Sustainable Urban Drainage

Policy

- 183 The NPPF at para 165 expects major development to incorporate sustainable urban drainage systems (SUDS) unless there is clear evidence it is inappropriate.
- 184 LPP 5.13 requires SUDS unless there are practical reasons for not doing so. In addition, development should aim to achieve greenfield run-off rates and ensure surface water is managed in accordance with the policy's drainage hierarchy.
- 185 DLPP SI13 expects development to achieve greenfield run-off rates in accordance with the sustainable drainage hierarchy.
- 186 CSP 10 requires applicants demonstrate that the most sustainable urban drainage system that is reasonably practical is incorporated to reduce flood risk, improve water quality and achieve amenity and habitat benefits.

Discussion

- 187 As this is not a major application there was no requirement for SUDS calculations to be submitted, however the scheme does include several merits to reduce surface run off.

188 Firstly the area of hardstanding for parking would be a permeable 'cell-web' surface to reduce run-off. The remainder of the site not covered by the building would be soft landscaped, and approximately 50% the building roof area would have green roofs, which also reduce surface run off.

189 In light of the proposed measures, and considering the scale of the scheme, it would have no unacceptable impact on localised flooding, and run-off rates would be acceptable, in line with the above policies.

7.6.5 Sustainable Development conclusion

190 The proposal has been designed to reduce carbon emissions through an enhanced fabric and the use of a communal air source heat pump, and it has been demonstrated that the reduction is policy compliant. A condition is proposed to secure these benefits. Through its enhanced hard and soft landscape scheme and use of green roof the proposal would contribute to urban greening in accordance with LP policies and furthermore it would not result in harmful additional surface water run off. As this is not a major application, some limited weight is given to this.

7.7 NATURAL ENVIRONMENT

General Policy

191 Contributing to conserving and enhancing the natural environment and reducing pollution is a core principle for planning.

192 The NPPF and NPPG promote the conservation and enhancement of the natural environment (chapter 15) and set out several principles to support those objectives.

193 NPPF para 180 states decisions should ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the sensitivity of the site or wider area to impacts that could arise from the development.

194 LPP 2.18 sets out the Mayor of London's vision for Green Infrastructure as a multifunctional network that brings a wide range of benefits including among other things biodiversity, adapting to climate change, water management and individual and community health and well-being.

7.7.1 Green spaces and trees

Policy

195 S.197 of the Town and Country Planning Act gives LPAs specific duties in respect of trees.

196 NPPF para 170 expects development to contribute to and enhance the natural and local environment.

197 LPP 7.21 protects trees of value and replacements should follow the principle of 'right place, right tree'. New development should include additional trees wherever appropriate, particularly large-canopied species. DLPP G7 expects development proposals to ensure that, wherever possible, existing trees of value are retained. Where it is necessary to remove trees, adequate replacement is expected based on the existing value of the benefits of the trees removed, determined by, for example, i-tree or CAVAT or other appropriate valuation system.

198

CSP 12 seeks to protect trees and prevent the loss of trees of amenity value, with replacements where loss does occur. DMP 25 sets out the required information to support development affecting trees.

Discussion

Table [3]: Summary of tree removals

Boundary	To be Removed	To be Retained	Proposed Mitigation
Front	T1, G1		New native Hedging to front, species and numbers secured by condition.
Southern & Eastern	T11, T12, T13, T14, T15, T16, T17, G2	T2 (Cat. A London Plane)	3x Betula Pendula, Native hedgerow species. Final species and numbers to be secured by condition. Also Planting outside Eastern boundary proposed, to be secured by negotiated S106 Agreement.
North	T7 (TPO), T8, T9	T3, T4, T5, T6, T10 (all just off-site) (T18)	Planting outside boundary proposed, to be secured by negotiated S106 Agreement.

199

The only Category A tree on site is the London Plain (T2) towards the front of the site. This tree would be retained, and the submitted Arboricultural Impact Assessment demonstrates how this tree will be protected. The raised boardwalk pedestrian entrance pathway would be built over the root protection area of this tree, however non-intrusive construction methods will be used for this boardwalk to ensure the protection of the tree. The driveway to the parking spaces would also be over part the RPA of this tree, however a Cellweb tarmac will be used, which would protect the roots of the tree underneath by way of permeability and flexibility. There is a no-dig zone around the root protection area of this tree. The tree protection measures and its retention will be secured by condition.

200

It is also noted that following concern raised by the Arboricultural officer, the proposed area of Cell Web tarmac has been reduced, and moved away from the RPA of T2.

201

One Tree with an existing TPO would be removed (T7) which is a Category B Ash tree. Its removal is considered regrettable, however the building has been designed in a position to ensure the protection of the Category A London Plane Tree, which is of greater value, but which is not protected by an existing TPO. Furthermore, the impact of the loss of T7 when viewed from the setting of Ladywell Fields would be screened by the off-site T18 (also a Category A tree).

202

Only T7 is protected by a TPO, meaning the developer could remove all but this one tree, without permission, at any time. Officer' consider the non-TPO trees proposed to be removed are of insufficient value to warrant their protection with TPOs.

203

The existing front boundary trees (G1) are an overgrown group of Leyland Cypress trees, and these are not considered to be of a high quality. Their removal is justified, as it

will open up the front boundary of the site to allow views through to the proposed building and park, and they would be replaced with a row of native hedgerow species, the final details of which are to be secured by condition, which will require approval from planning officers. The removal and replacement of the Leylandii trees is considered to be an improvement on the character of the site as a transition between Ladywell Fields and Ravensbourne Park, because it would allow these glimpse through the site to the park.

- 204 Each of the other trees to be removed are not considered to be of high individual value, however they do contribute to the significance of the site as a transition between Ladywell Fields and the buildings on Iona Close and Ravensbourne Park. Nonetheless, in order to ensure the impacts of the proposal on the open and verdant nature of Ladywell Fields (MOL) are acceptable, new trees and shrubs should be planted outside the boundaries of the site, within Ladywell Fields, to screen the development.
- 205 The recommendation to grant permission is subject to financial contribution in a Section 106 agreement to secure these re-planting works. The number of trees to be replanted would be greater than the number removed, and once these trees reach maturity they will be of greater amenity value to the park than the existing lower quality trees, many of which have been identified as being towards the end of their lifespan.
- 206 In order to mitigate against any lost habitats from the tree removals in the shorter term, the building would incorporate bird and bat boxes into its fabric, and the final details of these will be reserved by condition, should permission be granted.
- 207 It has already been noted that the proposed landscaping scheme is high quality, and would preserve the setting of the site as a 'green buffer' between the parkland (MOL) and the existing development on Ravensbourne Park.
- 208 On a balance of the great weight given to the contribution to the borough's housing stock (including two new family dwellings), and the optimisation of the site, together with the high quality design and on-site landscaping scheme, and subject to agreement of a Section 106 contribution of £11,000 for additional tree planting outside of the site boundaries, the loss of the on-site trees is considered to be acceptable. Their loss would have some impact on the open and verdant nature of Ladywell Fields, however this is not considered so harmful that it would constitute inappropriate development, and the impact on the openness of the adjacent MOL would be acceptable.

7.7.2 Air pollution

Policy

- 209 NPPF para 170 states decisions should among other things prevent new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of air pollution. Development should, wherever possible, help to improve local environmental conditions such as air quality.
- 210 LPP 7.14 states new development amongst other requirements must endeavour to maintain the best ambient air quality (air quality neutral) and not cause new exceedances of legal air quality standards. DLPP SI1 echoes this.
- 211 CSP 7 reflects the London Plan. CSP 9 seeks to improve local air quality. DMP 23 sets out the required information to support application that might be affected by, or affect, air quality.

Discussion

- 212 Objections have been received relating to air pollution due to the traffic congestion, which occurs on Ravensbourne Park. It has been specifically noted that the Leylandii trees at the front of the site help to reduce pollution from reaching Iona Close.
- 213 The additional traffic created by the proposal would not result in significantly more congestion and pollution on Ravensbourne Park than currently exists. The majority of traffic using the highway is unrelated to the properties on Ravensbourne Park as it is a busy road.
- 214 The existing trees to the front may screen pollution to some degree – however the highway also extends in front of Iona Close, and it is unlikely the trees cause a significant level of screening that their removal would result in additional harmful levels of air pollution reaching Iona Close residents.
- 215 Furthermore, the proposed replanting inside and outside of the site would improve local air quality in the longer term, by increasing the number of trees.

7.7.3 Natural Environment conclusion

- 216 To conclude, the impact on the adjacent Ladywell Fields (MOL) would be acceptable, as the site would retain its character as a green buffer between Ladywell Fields and Ravensbourne Park, through high quality landscaping and materials. The proposed loss of trees on site, on a balance of the merits of the scheme, and the trees that would be reprovided through S106 agreement, is considered acceptable. Furthermore, the proposed development would have an acceptable impact on air quality in the surrounding area.

8 PLANNING OBLIGATIONS

- 217 The National Planning Policy Framework (NPPF) states that in dealing with planning applications, local planning authorities should consider whether otherwise unacceptable development could be made acceptable through the use of conditions or planning obligations. Planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition. The NPPF further states that where obligations are being sought or revised, local planning authorities should take account of changes in market conditions over time and, wherever appropriate, be sufficiently flexible to prevent planned development being stalled. The revised NPPF also sets out that planning obligations should only be secured when they meet the following three tests:
- 218 (a) Necessary to make the development acceptable
- 219 (b) Directly related to the development; and
- 220 (c) Fairly and reasonably related in scale and kind to the development
- 221 Regulation 122 of the Community Infrastructure Levy Regulations (April 2010) puts the above three tests on a statutory basis. A planning obligation cannot be a reason for granting planning permission, unless it satisfies the tests set out in Regulation 122.
- 222 The obligations secured need to be considered in the context the infrastructure payments covered by the Community Infrastructure Levy CIL
- 223 Officers have been in negotiations with the Applicant regarding the Section 106 requirements arising from the redevelopment proposals.
- 224 In this a contribution relates to the provision of new trees, and an obligation related to providing car club membership to future residents are considered necessary to make the

development acceptable in planning terms. The following S106 requirements have been identified in respect of the scheme:

- **Financial contribution of £11,000:** to local offsite tree replanting, subject to indexation
- **Car club membership:** 3 years free membership
- **Parking permit restriction should a future CPZ be implemented:** Developer required to notify prospective purchasers of the residential units that they will not be eligible for a resident's parking permit.
- **Monitoring and Costs**

225 Meeting the Council's reasonable costs in preparing and monitoring the legal obligations.

226 The monitoring costs in this instance would be payable on or prior to completion of the s106 agreement as per the Planning Obligations SPD.

227 As set out elsewhere in this report, the obligations outlined above are directly related to the development. They are considered to be fairly and reasonably related in scale and kind to the development and to be necessary and appropriate in order to secure policy objectives, to prescribe the nature of the development, to compensate for or offset likely adverse impacts of the development, to mitigate the proposed development's impact and make the development acceptable in planning terms. Officers are therefore satisfied the proposed obligations meet the three legal tests as set out in the Community Infrastructure Levy Regulations 2010

9 LOCAL FINANCE CONSIDERATIONS

228 Under Section 70(2) of the Town and Country Planning Act 1990 (as amended), a local finance consideration means:

- 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
- sums that a relevant authority has received, or will or could receive, in payment of Community Infrastructure Levy (CIL).

229 The weight to be attached to a local finance consideration remains a matter for the decision maker.

The CIL is therefore a material consideration. £64,800 Lewisham CIL and £48,660 Mayoral CIL is estimated to be payable on this application, subject to any valid applications for relief or exemption, and the applicant has completed the relevant form. This would be confirmed at a later date in a Liability Notice.

10 EQUALITIES CONSIDERATIONS

230 The Equality Act 2010 (the Act) introduced a new public sector equality duty (the equality duty or the duty). It covers the following nine protected characteristics: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

231 In summary, the Council must, in the exercise of its function, have due regard to the need to:

- eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act;
- advance equality of opportunity between people who share a protected characteristic and those who do not;
- foster good relations between people who share a protected characteristic and persons who do not share it.

232 The duty continues to be a “have regard duty”, and the weight to be attached to it is a matter for the decision maker, bearing in mind the issues of relevance and proportionality. It is not an absolute requirement to eliminate unlawful discrimination, advance equality of opportunity or foster good relations.

233 The Equality and Human Rights Commission has recently issued Technical Guidance on the Public Sector Equality Duty and statutory guidance entitled “Equality Act 2010 Services, Public Functions & Associations Statutory Code of Practice”. The Council must have regard to the statutory code in so far as it relates to the duty and attention is drawn to Chapter 11 which deals particularly with the equality duty. The Technical Guidance also covers what public authorities should do to meet the duty. This includes steps that are legally required, as well as recommended actions. The guidance does not have statutory force but nonetheless regard should be had to it, as failure to do so without compelling reason would be of evidential value. The statutory code and the technical guidance can be found at: <https://www.equalityhumanrights.com/en/publication-download/technical-guidance-public-sector-equality-duty-england>

234 The Equality and Human Rights Commission (EHRC) has previously issued five guides for public authorities in England giving advice on the equality duty:

- The essential guide to the public sector equality duty
- Meeting the equality duty in policy and decision-making
- Engagement and the equality duty
- Equality objectives and the equality duty
- Equality information and the equality duty

235 The essential guide provides an overview of the equality duty requirements including the general equality duty, the specific duties and who they apply to. It covers what public authorities should do to meet the duty including steps that are legally required, as well as recommended actions. The other four documents provide more detailed guidance on key areas and advice on good practice. Further information and resources are available at: <https://www.equalityhumanrights.com/en/advice-and-guidance/public-sector-equality-duty-guidance>

236 The planning issues set out above do not include any factors that relate specifically to any of the equalities categories set out in the Act, and therefore it has been concluded that there is no impact on equality.

11 HUMAN RIGHTS IMPLICATIONS

237 In determining this application the Council is required to have regard to the provisions of the Human Rights Act 1998. Section 6 of the Human Rights Act 1998 prohibits authorities (including the Council as local planning authority) from acting in a way which is incompatible with the European Convention on Human Rights. “Convention” here means the European Convention on Human Rights, certain parts of which were incorporated into English law under the Human Rights Act 1998. Various Convention rights are likely to be relevant including:

- Article 8: Respect for your private and family life, home and correspondence
- Protocol 1, Article 1: Right to peaceful enjoyment of your property

238 This report has outlined the consultation that has been undertaken on the planning application and the opportunities for people to make representations to the Council as Local Planning Authority.

239 Members need to satisfy themselves that the potential adverse amenity impacts are acceptable and that any potential interference with the above Convention Rights will be legitimate and justified. Both public and private interests are to be taken into account in the exercise of the Local Planning Authority's powers and duties. Any interference with a Convention right must be necessary and proportionate. Members must therefore, carefully consider the balance to be struck between individual rights and the wider public interest.

12 CONCLUSION

240 This Report has considered the proposals in light of adopted development plan policies and other material considerations.

241 The proposed residential development would achieve a number of the urban design and spatial planning objectives set out in the Core Strategy, including the following planning merits to which significant weight is attached:

- Optimising the housing potential of an underused residential site;
- Providing a range of type and sizes of new homes, including family housing;
- Comprising an appropriate scaled and high quality building that takes account of the existing context, including the adjacent park

242 The scale of the proposed development is acceptable, and the building has been designed to respond to the context and constraints including the adjacent MOL.

243 The proposal would maximise the potential of the site and the development would provide a high standard of accommodation for future residents. It would be designed and built to comply with overarching objectives to reduce carbon emissions and improve urban greening.

244 Given the acceptability of the proposed use and policy compliance, the proposal is considered to be in accordance with the development plan as a whole.

245 The revised NPPF is underpinned by a presumption in favour of sustainable development. Officers consider that with the recommended mitigation, planning conditions and obligations in place, the scheme is consistent with national policy

246 In light of the above, the application is recommended for approval.

13 RECOMMENDATION

That the Committee resolve to **GRANT** planning permission subject to:

The prior completion of a Legal Agreement pursuant to Section 106 of the 1990 Act (and other appropriate powers) to secure the following PLANNING OBLIGATIONS, authorise the Head of Law to complete a legal agreement to cover among other things the following matters: -

- (a) Payment on completion of the deed of the Council's legal and professional fees in preparing and thereafter monitoring the agreement
- (b) Notice of commencement 28 days prior to a material operation
- (c) Tree replanting financial contribution of £11,000 plus indexation
- (d) Car club membership for residents

That the Head of Planning is delegated authority to negotiate the Legal Agreement.

That the Head of Planning is delegated authority to issue the planning permission and impose conditions (and informatives).

That the Head of Planning is delegated authority to make changes to the wording of the Committee's decision (such as to delete, vary or add conditions, informatives, planning obligations or reasons for the decision) prior to the decision being actioned, provided that the Head of Planning is satisfied that any such changes could not reasonably be regarded as deviating from the overall principle of the decision reached by the Committee nor that such change(s) could reasonably have led to a different decision having been reached by Committee.

13.1 CONDITIONS

Time Limit

1. 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.

Plan Numbers

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

070-LOC-P1; 070-EXSITE Rev.P1; 070EXGE01 Rev.P1; 070EXGA Rev.P1; **070-SITE Rev.P1**; 17-564-TPP-A;

156.RLA.RP.RP01.11; 156.RLA.RP.RP01.12; 156.RLA.RP.RP01.13;
156.RLA.RP.RP01.14; 156.RLA.RP.RP01.15; 156.RLA.RP.RP01.16;
156.RLA.RP.RP01.17; 156.RLA.RP.RP01.18; 156.RLA.RP.RP01.19;
156.RLA.RP.RP01.20;

Energy Statement (Energy Test dated 16 July 2019) Received 23 July 2019;

070-GA00 Rev.P2; 070-GA01 Rev.P2; 070-GA02 Rev.P2; 070-GA03 Rev.P2; 007-GARF Rev.P2; 070-GE01 Rev.P1; 070-GE02 Rev.P2; 070-GE03 Rev.P2; 070-GE04 Rev.P1; 070-GS01 Rev.P1; **070-GS01 Rev.P1**; **070-GS02 Rev.P1**; **070-GS03 Rev.P1**; **070-GS04 Rev.P1 (Envelope Section 2)**; **070-GS04 Rev.P1 (Envelope Section 3)**; **070-GS05 Rev.P1**; 070-StGE01 Rev.P1; 070-StGE02 Rev.P1; 070-StGE03 Rev.P1; 070-StGE04 Rev.P1 Received 28 Oct 2019

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.

Construction Management

3. No development shall commence on site until such time as a Construction Management Plan has been submitted to and approved in writing by the local planning authority. The plan shall cover:-
 - (a) Dust mitigation measures.
 - (b) The location and operation of plant and wheel washing facilities
 - (c) Details of best practical measures to be employed to mitigate noise and vibration arising out of the construction process
 - (d) Details of construction traffic movements including cumulative impacts which shall demonstrate the following:-
 - (i) Rationalise travel and traffic routes to and from the site.
 - (ii) 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 related activity, including during peak school pick up and drop off times.
 - (iii) Measures to deal with safe pedestrian movement.
 - (e) Security Management (to minimise risks to unauthorised personnel).
 - (f) Details of the training of site operatives to follow the Construction Management Plan requirements and any Environmental Management Plan requirements (delete reference to Environmental Management Plan requirements if not relevant).

Reason: In order that the local planning authority may be satisfied that the demolition and construction process is carried out in a manner which will minimise possible noise, disturbance and pollution to neighbouring properties and to comply with 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).

1:20 Architectural Details

4. (a) Notwithstanding the details hereby approved, no development above ground level shall commence until detailed plans at a scale of 1:20 showing windows, doors, balconies, terraces, entrances and important joints have been submitted to and approved in writing by the local planning authority
- (b) The development shall be carried out in accordance with the approved details.

Reason: In order that the local planning authority may be satisfied as to the detailed treatment of the proposal and to comply with Policy 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.

Materials Details

5. No development above ground shall commence on site until a detailed schedule and specification of all external materials and finishes, windows and external doors, roof coverings and balustrades to be used on the building have been submitted to and approved in writing by the local planning authority. The development shall be carried out in accordance with the approved details.

Reason: To ensure that the local planning authority may be satisfied as to the external appearance of the building(s) and to comply with Policy 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.

Refuse Storage

6. (a) No development above ground level shall commence until full details of proposals for the storage of refuse and recycling facilities for each residential unit hereby approved, have been submitted to and approved in writing by the local planning authority.
- (b) The facilities as approved under part (a) shall be provided in full prior to occupation of the development 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).

Cycle Parking

7. (a) Prior to first occupation, full details of the cycle parking facilities (14 spaces required) shall be submitted to and approved in writing by the local planning authority.
- (b) All cycle parking spaces shall be provided and made available for use prior to occupation of the development and maintained permanently 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).

Hard Landscaping

8. (a) Prior to above ground works drawings showing hard landscaping of any part of the site not occupied by buildings (including details of the permeability of hard surfaces) shall be 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.

Tree Protection Plan

9. The development shall be implemented in full accordance with the tree protection measures specified in the submitted Arboricultural Impact Assessment Document and Tree Protection Plan: 17-564-TPP-A (Canopy Consultancy dated May 2019).

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

Soft Landscaping

10. (a) A scheme of soft landscaping (including details of any trees or hedges to be retained and proposed plant numbers, species, location and size of trees and tree pits; and details of the climbing plants indicated on the elevation plans), and details of the management and maintenance of the landscaping **for a period of 5 years** shall be submitted to and approved in writing by the local planning authority prior to construction of the above ground works.
- (b) All planting, seeding or turfing shall be carried out in the first planting and seeding seasons following the completion of the development, in accordance with the approved scheme under part (a). Any trees or plants which within a period of five years from the completion of the development die, are removed or become seriously damaged or diseased, shall be replaced in the next planting season with others of similar size and species.

Reason: In order that the local planning authority may be satisfied as to the details of the proposal and to comply with Core Strategy Policy 12 Open space and environmental assets, Policy 15 High quality design for Lewisham 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).

Boundary Treatment

11. (a) Details of the proposed boundary treatments including any gates, walls or fences shall be submitted to and approved in writing by the local planning authority prior to construction of the above ground works.
- (b) The approved boundary treatments shall be implemented prior to occupation of the buildings and retained in perpetuity.

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).

Bird and Bat boxes

12. Details of the number and location of the bird bat boxes to be provided as part of the development hereby approved shall be submitted to and approved in writing by the local planning authority prior to commencement of above ground works and shall be installed before occupation of the building and maintained in perpetuity.

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).

EV Charging Points

13. (a) Details of the number and location of electric vehicle charging points to be provided and a programme for their installation and maintenance shall be submitted to and approved in writing by the local planning authority prior to construction of the above ground works.
- (b) The electric vehicle charging points as approved shall be installed prior to occupation of the Development and shall thereafter be retained and maintained in accordance with the details approved under (a).

Reason: To reduce pollution emissions in an Area Quality Management Area in accordance with Policy 7.14 Improving air quality in the London Plan (July 2011), and DM Policy 29 Car parking of the Development Management Local Plan (November 2014).

Living Roof

14. (a) Full details of the indicative biodiversity living roofs shown on plan no.070GARF Rev.P2 and Green Roof Proposal document ref:156.RLA.GR.PL (R.LA dated May 2019), which shall allow for a substrate depth of not less than 150 mm shall be submitted to and approved in writing by the local planning authority within 2 months of commencement of above ground works.
- (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) 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.

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).

External Lighting

15. (a) Prior to occupation of the development a scheme for any external lighting that is to be installed at the site, including measures to prevent light spillage shall be submitted to and approved in writing by the local planning authority.
- (b) Any such external lighting as approved under part (a) shall be installed in accordance with the approved drawings and such directional hoods shall be retained permanently.
- (c) The applicant should 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 Policy 12 Open space and environmental assets of the Core Strategy (June 2011), DM Policy 27 Lighting, and

DM Policy 24 Biodiversity, living roofs and artificial playing pitches of the Development Management Local Plan (November 2014).

Vehicular Access and repair of footway following construction

16. A. The development hereby approved shall not be occupied until the vehicular access as shown on plan 070-GA00 Rev.P2 has been constructed in full accordance with the said plan.
- B. If, during construction works, any damage occurs to the highway or footway, the developer shall be liable to repair all damage caused, prior to first occupation of the dwellings hereby approved.

Reason: In order to ensure that satisfactory means of access is provided and to comply with the Policy 14 Sustainable movement and transport of the Core Strategy (June 2011).

Plumbing & Pipes on external faces

17. Notwithstanding the Town and Country Planning (General Permitted Development) Order 1995 (or any Order revoking, re-enacting or modifying that Order), no plumbing or pipes, other than rainwater pipes, shall be fixed on the external faces of the building.

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).

Car Parking Provision

18. a. The whole of the car parking accommodation shown on drawing no.070-GA00 Rev.P2 hereby approved shall be provided prior to the occupation of any dwelling and retained permanently thereafter.
- b. The maximum number of cars, vans or other large motor vehicle parked on site at any one time shall not exceed three (3).

Reason: To ensure the permanent retention of the spaces for parking purposes, to ensure that the use of the building does not increase on-street parking in the vicinity and to comply with Policies 1 Housing provision, mix and affordability and 14 Sustainable movement and transport of the Core Strategy (June 2011), DM Policy 29 Car Parking of the Development Management Local Plan, (November 2014), and Table 6.2 of the London Plan (2016).

Construction Deliveries

19. No deliveries in connection with construction works shall be taken at or despatched from the site other than between the hours of 10am and 2.30pm, and 4pm and 6pm 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 as well as the safety of school users, 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).

Protection of trees

20. 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).

Balcony Screening

21. The screening to the balconies on the southern elevation for Flats 01.03; 02.03; and 03.01 as shown on plan Nos.070-GA01 Rev.P5; 070-GA02 Rev.P5; 070-GA03 Rev.P5 respectively, shall be installed prior to first occupation of the development, and retained and maintained thereafter.

Reason: To avoid the direct overlooking of adjoining properties and consequent loss of privacy thereto and to comply with DM Policy 32 Housing design, layout and space standards of the Development Management Local Plan (November 2014).

Energy Compliance

22. The development shall be constructed in full accordance with the measures and recommendations to reduce CO2 emissions, including the enhanced building fabric and installation of a Communal Air Source Heat Pump, as set out in the submitted Energy Statement (Energy Test, H Davey dated 16 July 2019).

Reason: To comply with Policies 5.1 Climate change and mitigation, 5.2 Minimising carbon dioxide emissions, 5.3 Sustainable design and construction, 5.7 Renewable energy in the London Plan (2016) and Core Strategy Policy 7 Climate change and adapting to the effects, Core Strategy Policy 8 Sustainable design and construction and energy efficiency (2011).

13.2 INFORMATIVES

- A. **Positive and Proactive Statement:** The Council engages with all applicants in a positive and proactive way through specific pre-application enquiries and the detailed advice available on the Council's website. On this particular application, positive and proactive discussions took place with the applicant prior to the application being submitted through a pre-application discussion. As the proposal was in accordance with these discussions and was in accordance with the Development Plan, no contact was made with the applicant prior to determination.
- B. As you are aware the approved development is liable to pay the Community Infrastructure Levy (CIL) which will be payable on commencement of the development. An '**assumption of liability form**' must be completed and before development commences you must submit a '**CIL Commencement Notice form**' to the council. You should note that any claims for relief, where they apply, must be submitted and determined prior to commencement of the development. Failure to follow the CIL payment process may result in penalties. More information on CIL is available at: - <http://www.lewisham.gov.uk/myservices/planning/apply-for-planning-permission/application-process/Pages/Community-Infrastructure-Levy.aspx>

- C. 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.
- C. You are advised to contact the Council's Drainage Design team on 020 8314 2036 prior to the commencement of work.
- D. The assessment of the light spill and lux level at the window of the nearest residential premises shall follow the guidance provided in The Institution of Lighting Engineers, Guidance Notes for the Reduction of Obtrusive Light.
- E. The applicant be advised that the implementation of the proposal will require approval by the Council of a Street naming & Numbering application. Application forms are available on the Council's web site.