

Committee	PLANNING COMMITTEE B	
Report Title	NORTHWEST GARAGES, KNAPDALE CLOSE, LONDON, SE23 3XG	
Ward	FOREST HILL	
Contributors	HOLLY LUCAS	
Class	PART 1	30 TH AUGUST 2018

Reg. Nos. (A) DC/18/106452

Application dated 20.03.2018

Applicant Lewisham Homes on behalf of Lewisham Council

Proposal The demolition of eight (8) existing garages, surface carpark and tarmac drying area at Knapdale Close, SE23, to allow for the construction of seventeen (17) dwellings comprised of three (3) dwelling houses and fourteen (14) flats, together with the provision of landscaping, refuse store, thirty-four (34) car parking spaces and forty-eight (48) cycle spaces

Applicant's Plan Nos. 15.215/D(00)001 (REV A); 15.215/D(00)003 (REV A); 15.215/D(00)004 (REV B); 15.215/D(00)005 (REV C); 15.215/D(00)006 (REV B); 15.215/D(00)007 (REV C); 15.215/D(00)008 (REV B); 15.215/D(00)009 (REV B); 15.215/D(00)010 (REV A); 15.215/D(00)011 (REV A); 15.215/D(00)012 (REV A); 15.215/D(00)013; 15.215/D(20)101 (REV C); 15.215/D(20)102 (REV C); 15.215/D(20)103 (REV B); 15.215/D(20)104 (REV A); 15.215/D(20)105 (REV A); 15.215/D(20)201 (REV B); 15.215/D(20)202; 15.215/D(20)203 (REV A); 15.215/D(20)204; 15.215/SK124; 15.215/SK125; 9106-1; TM235L01 (REV B); TM235L02 (REV A); TM235L03 (REV #); TM235L04 (REV #) TM235L05 (REV #)

ARBORICULTURAL IMPACT ASSESSMENT (MARCH 2018 (REVISED JULY 2018)); DAYLIGHT AND SUNLIGHT ASSESSMENT (MARCH 2018 (REVISED JUNE 2018)); DESIGN AND ACCESS STATEMENT (REV B) (MARCH 2018 (REVISED JULY 2018)); ECOLOGICAL APPRAISAL (MARCH 2018); ENERGY AND SUSTAINABILITY STATEMENT (FEBRUARY 2018); INITIAL GEOTECHNICAL AND LAND CONTAMINATION STUDY (DECEMBER 2015); LANDSCAPE DESIGN REPORT (REV B) (MARCH 2018); OUTLINE CONSTRUCTION MANAGEMENT PLAN (MARCH 2018); PLANNING STATEMENT (MARCH 2018); PLANNING OBLIGATIONS STATEMENT (MARCH 2018); TRANSPORT STATEMENT (MARCH 2018); TRANSPORT STATEMENT ADDENDUM (JULY 2018); UTILITY STUDY (FEBRUARY 2016)

Background Papers (1) Case File LE/959/H21/TP
(2) Development Management Local Plan (adopted November 2014) and Core Strategy (adopted June 2011)

Designation PTAL 2-4
Not a Listed Building
Not in a Conservation Area

1.0 Property/Site Description

Existing Site and Location

- 1.1 This is an application by Lewisham Homes on behalf of Lewisham Council. Knapdale Close, Forest Hill SE23 3XG is located within the wider Forest Estate, which is approximately 0.72ha and is managed by Lewisham Homes. Forest Estate has been identified as a potential site for estate infill as part of the New Homes, Better Places programme led by Lewisham Homes in conjunction with Lewisham Council to provide affordable housing across the borough.
- 1.2 Knapdale Close currently supports eight (8) existing garages, surface carpark and a tarmac drying area as well as two (2) existing 1960's residential tower blocks (both greater than five (5) storeys), being 14-33 and 34-53 Knapdale Close (Refer to Figure 1.0). The tower blocks will remain unchanged by the proposal; however, the garages, carpark and drying area are proposed to be demolished.
- 1.3 Vehicular access into the site is from Eliot Bank, which stems from London Road.



Figure 1.0: Existing Site and Location

Surrounding Context

- 1.4 The site and its surrounding context is predominately residential in character, consisting of 2-3 storey residential development.
- 1.5 The site slopes by approximately 13m from north-east to south-west and is framed by London Road to the north, existing residential development to the east and west and Eliot Bank Primary School to the south.
- 1.6 The Horniman Museum and Horniman Play Park are located approximately 0.5 miles to the north-west of the site. Tarleton Gardens, Baxter Field, Dulwich and Sydenham Hill Golf Course are also located within close proximity to the site.

- 1.7 The subject site is approximately 500m from Forest Hill Overground Station, which provides Overground services and trains to London Bridge, Highbury and Islington and West Croydon/Crystal Palace. A number of frequent bus services (122 to Crystal Palace, 185 to Victoria, 176 to Tottenham Court Road, 197 to Peckham and the 356 to Upper Sydenham) also service the area.
- 1.8 The site and surrounding area has a Public Transport Accessibility Level (PTAL) rating of 2-4, where 0 is worst and 6b is best. The site is on the border of two different PTAL zones, with the area immediately to the north west of the site falling within a PTAL zone 4 and the area including the site falling within a PTAL zone 2. The PTAL score changes suddenly from a 2 to a 4, directly to the north west of the site due to the fact that Forest Hill train station is not included in the calculation for the lower PTAL cell as the PTAL tool perceives that Forest Hill Rail Station is outside of a 960 metre walk distance. It also fails to take into account the pedestrian cut-through to the south east of the site via Shackleton Close and two additional bus services (the 122 and the 356). When manually re-calculated, the true PTAL score for the site is confirmed as 'good' with a rating of 4.

Site Designations and Constraints

- 1.9 The site does not contain any statutory Listed Buildings on or within close proximity. It is not located within a Conservation Area, however is located in close proximity to the Forest Hill Conservation Area.

2.0 Relevant Planning History

- 2.1 No relevant planning history.

3.0 Background

- 3.1 Lewisham Homes is acting as the development agent of Lewisham Council as part of the Council's strategy to deliver as much new affordable housing as possible. In 2012 the Council agreed its New Homes, Better Places programme to deliver 2,000 new affordable homes for Lewisham residents in housing need, including 500 new Council homes at social rent.
- 3.2 This programme responds to the on-going housing crisis in London that is felt most acutely by those with the lowest incomes and the least recourse to access market products. In Lewisham this is expressed most clearly in the fact that 1,900 Lewisham households are homeless and housed in temporary housing of varying kinds. This number has doubled since 2010/11 and has been driven principally by the withdrawal of Government capital funding for new affordable homes, leading to a drop in supply and fewer homes for the Council to use to meet its duties to homeless households.
- 3.3 It was in that context that Lewisham Council initiated its own housebuilding programme to deliver the first new Council homes in the borough for a generation. It is backed by £100m of Council investment, with the new homes being delivered on the Council's behalf principally by Lewisham Homes on a number of small "infill" sites around the borough.
- 3.4 This application is one of the schemes that contribute to this programme, and if approved will contribute seventeen (17) new homes as part of the 500 Council homes target.

4.0 Current Planning Application

The Proposal

- 4.1 Planning permission is sought for the demolition of eight (8) existing garages, surface carpark and tarmac drying area at Knapdale Close to allow for the construction of seventeen (17), 100% affordable residential dwellings for social rent within three (3), part

two/part three storey dwelling houses and one (1) part four/part five storey flat block supporting fourteen (14) flats. In addition to the proposed residential dwellings, planning permission is requested for associated landscaping, refuse store, thirty-four (34) car parking spaces and forty-eight (48) cycle spaces.

- 4.2 The proposed residential dwellings will be owned and managed by Lewisham Homes on behalf of Lewisham Council.
- 4.3 The three (3) proposed dwelling houses will be 3 bed/5 person and the flats block will include 10 x 2 bed/4 person and 4 x 3 bed/5 person flats (Refer to Table 1.0).
- 4.4 The proposed development does not include any wheelchair accessible units due to the gradient of the site (1:12), which is supported by Lewisham Council's Occupational Therapy Officer who advised the site is not suitable for Wheelchair users.
- 4.5 The scheme also proposes a landscape masterplan, which aims to mitigate the loss of the existing landscaped areas and redeliver lost amenity spaces. The proposal specifically includes paved frontages to the proposed dwelling houses, drying area replacement, shared surface paving throughout Knapdale Close, new planting and surfacing around the existing blocks, terraced amenity spaces, informal play features, community growing space and refuse stores.
- 4.6 Thirty-four (34) car parking spaces and forty-eight (48) cycle spaces are proposed in addition to a new, shared surface road, a redefined access to the south and s278 highways improvements. The three (3) dwelling houses will each have secure bicycle storage for four (4) bikes in their respective gardens.
- 4.7 Sixteen (16) car parking spaces will be lost due to the proposal being sited on existing hardstand and the estimated demand of the proposed housing is calculated to be seventeen (17) additional car parking spaces. Three (3) of the eight (8) garages to be demolished have been re-provided as only three (3) are occupied by Forest Estate residents. Three (3) of the garages are used solely for storage (or are unoccupied) and two (2) are let to residents living outside of the estate and therefore have not been re-provided. The car parking demand generated by the proposal is calculated as thirty-six (36) spaces.
- 4.8 The parking re-provision shortfall due to the proposed development is therefore two (2) spaces, which is supported by Highways Officers and further reinforced by the London Plan Policy.

Building

- 4.9 The proposal includes one (1) part four/part five storey residential flat block (14 x flats) amongst the two (2) existing flat blocks within the north-east corner of the subject site. The three (3) part two/part three storey dwelling houses will be located in the north-west corner of the site.
- 4.10 The proposal includes 3 x 3 bed/5 person houses, 10 x 2 bed/4 person flats and 4 x 3 bed/5 person flats.
- 4.11 The proposed dwelling houses would be comprised of predominately brick and cedar cladding with grey roofing. The proposed flat block would be comprised using a combination of predominately masonry brick with grey roof, metal windows (clear or obscure glazing), timber (or similar) vertical screening/fins and metal and timber cladding. Photovoltaic panels proposed on the roof.
- 4.12 All of the proposed dwellings would meet or exceed the minimum Gross Internal Area (GIA) and amenity area requirement stipulated within the London Plan & SPG as identified in Table 1.0 below.

Table 1.0: Amenity Area Compliance with The London Plan & SPG

Dwelling	No of Beds/Persons	GIA (m2)	London Plan Min GIA (m2)	Amenity Area Proposed (m2)	Housing SPG Minimum (m2)	Comply
House 1	3bed/5person	101.5	99	39.5	8	✓
House 2	3bed/5person	103.2	99	33.1	8	✓
House 3	3bed/5person	103.2	99	67.6	8	✓
Flat 1	2bed/4person	71	70	8.2	7	✓
Flat 2	2bed/4person	71	70	23.5	7	✓
Flat 3	3bed/5person	86	86	8.7	8	✓
Flat 4	2bed/4person	71	70	8.2	8	✓
Flat 5	2bed/4person	71	70	8.2	8	✓
Flat 6	3bed/5person	86	86	8.7	8	✓
Flat 7	2bed/4person	71	70	8.2	8	✓
Flat 8	2bed/4person	71	70	8.2	8	✓
Flat 9	3bed/5person	86	86	8.7	8	✓
Flat 10	2bed/4person	71	70	8.2	8	✓
Flat 11	2bed/4person	71	70	8.2	8	✓
Flat 12	3bed/5person	86	86	8.7	8	✓
Flat 13	2bed/4person	71	70	8.2	8	✓
Flat 14	2bed/4person	71	70	8.2	8	✓

- 4.13 The proposed buildings incorporate a pitched roof design, with a small portion of flat roof proposed on the three (3) dwelling houses. A flat roof design on the flats block was explored throughout the design and pre-application process, however was deemed inappropriate by Council Urban Design Officers as it was out of context with the existing tower blocks within the estate.
- 4.14 The ground floor of the flats block incorporates two (2) ground floor flats (2 bed/4 person) with associated amenity, two (2) secure bicycle storerooms, recycling and refuse store, plant and cleaners store. The first to fourth floor plans repeat three (3) flats per floor, each with London Plan compliant amenity space.
- 4.15 The proposed parking areas would be formalised and scattered throughout Knapdale Close, accessed from the existing crossover stemming from London Road. All proposed parking would be unallocated.

- 4.16 Forty-eight (48) cycle spaces are proposed at the Ground Floor of the flat block, within nine (9) secure, compartmentalised secure lockers. Additionally, the three (3) dwelling houses would each have secure bicycle storage for four (4) bikes each within their respective gardens.
- 4.17 The means of fire escape for the upper floors of the dwelling houses would be via a protected staircase of 30-minute fire resistant construction leading to the escape.
- 4.18 The means of fire escape from each flat would be via the ventilated lobby into a protected staircase of 60-minute fire resisting gyproc. Each lobby would also be ventilated automatically by an opening vent (1.5m²). A 1m² vent is also proposed to the staircase at roof level for use by the fire department. All flats would also be protected by 30-minute fire resistant entrance halls.

5.0 **Supporting Documents**

Planning Statement – Prepared by Fuller Long (March 2018)

- 5.1 This statement outlines the proposal, which intends to contribute to housing targets by providing seventeen (17), 100% affordable dwellings for social rent.

Design and Access Statement - Prepared by bptw partnership (March 2018 (Revised July 2018))

- 5.2 This statement provides a comprehensive description of the subject site. It assesses and evaluates the existing site, outlines the project, tenure, consultation and design development, building layout, scale, appearance, landscape design, movement and access, sustainability, safety and security. The statement is supported by massing information, indicative visualisation images and Computer Generated Images (CGI) of the completed development within the context of the existing surrounds.

Landscape Design Report - Prepared by TurkingtonMartin (March 2018)

- 5.3 This report provides an overview of the public realm approach for the site including landscape proposal and strategy, community space proposal, materials, street furniture, lighting, tree species, planting palette and proposed tree removal strategy.

Arboricultural Impact Assessment - Prepared by Tamla Trees (March 2018 (Revised July 2018))

- 5.4 A total of twenty-eight (28) trees or groups of trees have been identified on site, twelve (12) of which are required to be removed to facilitate the development. Four (4) are Category U, five (5) are Category C and three (3) are Category B.
- 5.5 Trees to be removed include T4, T7, T8, SG1, T10, TG2, T11 and T15 as well as the removal of Cat U trees (T1, T6, T9 and T19).

Table 2.0: Proposed Tree Removal

Tree Ref	Species	Category	Comments
T1	Willow (Goat	U	Severely topped with V included basal union. Close to wall. Poor condition.
T4	Maple (Norway)	B1	Surface roots and evidence of sheer cracks low on stem which have stabilised. Removal required to facilitate proposal.
T6	Cherry	U	Thinning canopy suggests health is declining. Remove due to poor condition.

T7	Cherry	C1	Thinning canopy suggests health is declining. Removal required to facilitate proposal.
T8	Acer	C1	Large surface roots. Removal required to facilitate proposal.
T9	Acer	U	Stem wound. Remove due to poor condition.
T10	Sycamore	C1	Removal required to facilitate proposal.
T11	Ash	C1	Removal required to facilitate proposal.
T15	Ash	B2	Predominate amenity tree. Removal required to facilitate proposal.
T19	Birch (Silver)	U	Thinning canopy suggests health is declining. Remove due to poor condition.
TG2	2 x Maple	B1	Close grown trees of low individual quality but as a pair offer wider amenity and screening. Surface roots. Level change (down) at 4.3m on southern side.
SG1	Laurel (Cherry)	C1	Multi stemmed shrubs with various lower stem defects. Remove to facilitate proposal.

- 5.6 The proposal requires foundation excavation within the RPA of T13 and landscape works within the RPA of T17.
- 5.7 None of the trees on site are subject to a Tree Preservation Order (TPO).
- 5.8 The development also proposes extensive (hard and soft) landscaping in addition to extensive planting, including appropriate diversity (in terms of age, class and species) tree replacement.

Initial Geotechnical & Land Contamination Assessment – Prepared by LBH Wembley Geotechnical & Environmental (December 2015)

- 5.9 Possible soil contamination has been identified as being low to medium risk. Pollutant linkages being of a medium or high risk ranking typically warrant some degree of further investigation or mitigation.

Daylight and Sunlight Assessment – Prepared by Herrington Consulting Limited (January 2018 (Revised June 2018))

- 5.10 The impact of daylight and sunlight enjoyed by neighbouring properties has been analysed and found that of the two-hundred and twenty-six (226) windows tested, six (6) will notice minor to moderate transgression impact, however will not represent a notable impact and will be in line with BRE guidance.

Energy and Sustainability Statement – Prepared by STROMA Tech (February 2018)

- 5.11 Solar Photovoltaics (PV) mounted on the roof will achieve an annual reduction in carbon emissions of 12.35 tonnes. Five (5) solar PV arrays are incorporated within the design, which include two (2) arrays on the apartment block and one (1) on each dwelling house. The dwelling house PV arrays will be approximately 6m² each on the proposed houses and 116m² each on the apartment block.

- 5.12 CO2 targets can be achieved through a combination of high performance building fabric (including high levels of insulation), energy efficient gas boilers and solar Photovoltaic arrays (22 kilo-Watt peak).
- 5.13 The five (5) PV Arrays will cover a 250m² area and contribute to CO₂ emission reduction of 36.4%. Given that the proposed CO₂ emission reduction is greater than 35%, no further assessment or offset is required.

Ecological Appraisal (inc. Bat Survey Report) - Prepared by SLR (March 2018)

- 5.14 A field study was undertaken on the site to record habitats and potential protected species, which are outlined as follows:
- Bats: No evidence of roosting bats were recorded.
 - Other Mammals: A fox was recorded in 2015 and it is possible that hedgehogs and other small mammals use the site.
 - Birds: Woodpigeons, urban pigeons and magpies were observed during the 2018 site visit in trees and scrub which may provide nesting habitat and winter food sources, however are relatively small and disturbed by people.
 - Reptiles and Amphibians: The site is considered to be unsuitable for reptiles and amphibians.
 - Plants: No rare plants were recorded on the site.
- 5.15 The site is not covered by any statutory or non-statutory nature conservation designation and the site presents limited potential to support rare, notable or legally protected flora and fauna. The development footprint is therefore identified as having low ecological value.

UCML Level 1 Utility Study – Prepared by Utilities Connections Management Limited (February 2016)

- 5.16 The utilities connection report identifies utility constraints and potential cost and timescale risks that may potentially impact on the delivery of the project proposed.
- 5.17 It is envisaged that there is sufficient capacity in the existing networks to provide supply of electricity, gas, water, BT openreach and virgin media.

Transport Statement – Prepared by Paul Mew Associates (October 2017)

- 5.18 All roads within a 200m radius of the site were surveyed including Derby Hill Crescent, Eliot Bank, Featherstone Avenue and Knapdale Close. Overnight surveys were carried out on Tuesday 14th March and Wednesday 15th March at 0400 and 0100, respectively, which identified 121 unrestricted kerb side parking opportunities, 36 of which were vacant (71% parking stress).
- 5.19 Daytime parking surveys were carried out on Monday 19th October, hourly from 0700 to 1800. The area was most heavily parked at 1800 with 49 available spaces within 200m radius (68% stressed).

Outline Construction Management Plan – Prepared by Paul Mew Associates (March 2018)

- 5.20 The Outline Construction Management Plan details the demolition and construction details, traffic management, monitoring, compliance, reporting and review and CMP management.

Further details such as a Construction Method Statement, Parking Management Plan, Travel Plan and Delivery and Servicing Plan will be secured by condition.

Transport Statement Addendum – Prepared by Paul Mew Associates (July 2018)

- 5.21 A Transport Statement Addendum has been prepared to respond to the issues raised by residents and the Council including the site's PTAL score, existing and proposed refuse and emergency vehicle access, and existing and proposed parking conditions.
- 5.22 An additional parking survey was undertaken on Saturday (14th July 2012 from 1000-1800), which identified 55 cars parked and 28 available spaces (66% stress) with the busiest period from 1400 to 1500 with 75% stress.
- 5.23 Refuse vehicle (collection activity) was observed on Monday 9th July 2018, which identified there are three key areas where parked cars are causing access issues (the Knapdale Close junction with Eliot Bank, the bend in Knapdale Close adjacent to flats 14-33, and the turning head at the end of Knapdale Close adjacent to flats 34-53), however it is concluded the proposed highways works and improvements (s278 agreement) will address the existing issues.

6.0 Consultation

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

Pre Application Consultation

- 6.2 The submission of this application follows a number of formal and informal pre application discussions held between the applicant and London Borough of Lewisham Officers in 2016/2017.

Planning Application Consultation

- 6.3 In April 2018 four (4) site notices were displayed and letters were sent to two hundred and eighty-six (286) residents and businesses in the surrounding area (approximate 50m radius). The relevant Lewisham Councillors, Environmental Protection, Drainage, Thames Water, Met Police, Ecological Regeneration, Environmental Health, Housing, Highways, Strategic Waste and Forest Hill Society were consulted.
- 6.4 Twenty-seven (27) letters of objection and one (1) letter of support were received, which therefore triggered the requirement for a Local Meeting to be held in accordance with the London Borough of Lewisham Statement of Community Involvement. The responses can be summarised as follows:

Written Responses received from Local Residents and Organisations

- Emergency and refuse access is an existing problem
- Development will impact on existing quality of housing and safety of current residents
- The estate is already heavily congested and used inappropriately for parking by Horniman Museum, local schools etc
- Emergency vehicle access is already a concern and is going to be made worse by the development
- Refuse collection is a concern and Lewisham Council are already unable to successfully manage refuse collection on the estate

- Water supply is under constant strain with regular burst mains causing loss of water supply and icy conditions in winter
- The estate has been neglected by Lewisham Council and Lewisham Homes for many years including lack of maintenance to landscape, roads, water supply, fences, handrails, pavements and refuse areas
- Pitched roof design is not appropriate
- Overlooking and height
- Overshadowing/daylight/sunlight analysis – loss of light to surrounding area
- Glare from solar panels
- Traffic issues during construction
- Separation distances
- Loss of visual amenity
- Lack of disabled facilities
- Noise disruption
- Eliot Bank School have no concern with the principle of development, however are concerned about the increased traffic and conflict with vehicles and pedestrians. They have recommended delivery and construction vehicle hours.

6.5 The Local Meeting was held on 4th June 2018 as an informal drop-in session. Thirty-one (31) residents signed the attendance sheet at the door and raised their concerns with regard to the proposed development. Existing estate management, sunlight/daylight/overlooking, design and service vehicle access were raised by residents as points of concern (Refer to Appendix A for Local Meeting Minutes).

Written Responses received from External Statutory Agencies

London Fire

6.6 London Fire Brigade have not objected to the proposal, however advised the scheme should comply with the Fire Safety Guidance Note (GN29).

Thames Water

6.7 Thames Water have no objection to the proposed development, however have provided informatives relating to waste and water to be attached to the Decision Notice, should the development be approved.

Written Responses received from Non-Statutory Agencies

Highways and Transportation

6.8 Highways initially raised an objection to the proposal based on the refuse and emergency vehicle servicing arrangements. A delivery and servicing plan to outline further details of the waste and recycling strategy and additional swept paths with the correct size refuse vehicle (11.2m) and Saturday parking surveys were requested to determine if the Horniman Museum contributes to parking congestion on the estate. A Transport Statement Addendum was submitted in lieu of a Delivery and Servicing Plan (as agreed), which satisfied the concerns raised by Highways officers. Highways now raise no objection subject to appropriate conditions and s278 agreement, outlined below:

- The introduction of double yellow lines (waiting/parking restrictions) at the Knapdale Close junction with Eliot Bank, the bend in Knapdale Close adjacent to flats 14-33, and the turning head at the end of Knapdale Close adjacent to flats 34-53 to improve service vehicle access;

- The installation of dropped kerbs and tactile paving on all pedestrian crossing points and/or junctions along Eliot Bank and Knapdale Close (between London Road and the application sites) to improve pedestrian accessibility;
- The installation of measures to calm traffic along Knapdale Close;
- The creation of a shared surface design and reconfiguration of the existing parking layout;
- Creation of a turning head area to facilitate forward gear access and egress for service vehicles.

Ecological Regeneration

- 6.9 The Council's Ecology Regeneration Manager considers the application unobjectionable, however has requested living roof to be incorporated on any roof area (30 degree slope or less) and the installation of bat/bird bricks.

Environmental Health

- 6.10 In principle, Environmental Health are satisfied with the Outline Construction Management Plan.

Environmental Protection

- 6.11 Environmental Protection raise no objection to the scheme, however have requested a Land Contamination Condition to be attached to the Decision if approved.

Housing

- 6.12 Strategic Housing comments for the demolition of eight (8) existing garages, surface carpark and tarmac drying area at Knapdale Close, SE23, to allow for the construction of seventeen (17) dwellings comprised of three (3) dwelling houses and fourteen (14) flats, together with the provision of landscaping, refuse store, thirty-four (34) car parking spaces and forty-eight (48) cycle spaces.

Housing need

- 6.13 There is currently is a housing crisis and it has become incumbent on Councils to re-engage with the direct delivery of Council homes. The homelessness Charity, Crisis, have just announced that 100,000 homes would need to be built, each year over the next 15 years in order to resolve the homelessness problem, and that a significant amount of tax payers money is being spent on temporary accommodation, which if re-directed to home building, would be better placed to home people permanently.
- 6.14 In July 2012, the Council took the initiative to embark on an ambitious programme to build new Council homes in response to the series of on-going housing policy and delivery challenges, most notably an enduring under-supply of new affordable homes available to the Council to meet housing demand.
- 6.15 Endorsed by the previous Mayor, the New Homes, Better Places programme is to comprise 500 new Council homes and the current application forms part of this programme.
- 6.16 Running concurrently with the delivery of the 500 homes, the New Mayor of Lewisham has pledged to create an additional 1,000 Council homes within his 4 year term. A further tranche of planning applications will therefore follow in the coming months and years in order to deliver the Mayor's bold, but absolutely necessary ambitions.

The Proposal

- 6.17 Lewisham Council's Housing Strategy and Programmes Team **strongly support** the proposed development of **social rent homes** at Knapdale Close comprising seventeen (17) dwellings made up of three (3) dwelling houses and fourteen (14) flats.
- 6.18 The proposal contributes to the Council's New Homes Programme by creating 17 new social rent Council homes. 100% of the new homes provided at Knapdale Close will be let at social rent on secure tenancies to households on Lewisham's Housing Register. Currently, there are almost 10,000 households on the register, and over 500 households in 'bed and breakfast' temporary accommodation. This application helps to address this demand and is in line with the Council's Housing Strategy. The Strategy states that 'In particular we need to ensure that there is an increase in the supply of affordable homes for those who have least capacity to pay unaffordable market rents' and from this, a key objective of the Strategy is to build the homes the borough's residents need.

Policy Position

- 6.19 The scheme has been designed to meet housing need as identified through the Council's Housing Strategy. Core Strategy Policy 1: Housing provision, mix and affordability requires schemes to provide 50% of new homes to be affordable, of which 30% should be intermediate and 70% should be social rent.
- 6.20 Overall, the proposal has been designed to provide the optimum mix of dwellings given the housing need and the constraints of the site.
- 6.21 The scheme will be providing 100% social rent homes, which is significantly over the 50% required by policy. No intermediate housing is to be provided through this development, but given the high level of residents living in temporary accommodation, social rent housing is provided when feasible. Notwithstanding this, across the 1,000 home programme, a mixture of social rent, intermediate and private housing will be provided across the borough and therefore the programme will be policy compliant overall.
- 6.22 Core Strategy Policy 1 also requires a housing mix of 42% of all social units to be 3+ bed. The proposal is for 3 x 3 bed, terraced houses, 4 x 3 bed and 10 x 2 bed flats; 17 units in total. The policy requires only 50% social rent homes (9, rounded up) to be provided of which 4 (rounded up), 3+ bed homes would be required. As 7 3+ bed, family sized units are being provided, officers are satisfied that the proposals remain policy compliant.
- 6.23 In light of the above, Strategic Housing officers fully support the proposal to create 17 social rent, Council homes in the dwelling and tenure mix proposed.

Loss of garages

- 6.24 With regard to the loss of garages, officers are satisfied that the provision of 17, new social rent homes and the addition of 9 additional car parking spaces, 48 cycle spaces, and landscaping significantly outweighs the loss of 8 garages and would provide overall, greater benefit to the borough's residents awaiting new homes.

Conclusion

- 6.25 Strategic Housing strongly support the planning application to demolish 8 garages and the construction of 17 social rent council homes at Knapdale Close.

Drainage

- 6.26 The Lead Local Flood Authority (LLFA) have agreed to secure further SuDS detail by condition.

Occupational Therapist

6.27 Confirm that due to the slope of the site, it is not suitable for Wheelchair users.

Metropolitan Police

6.28 No response received.

Strategic Waste

6.29 No response received.

7.0 Policy Context

Introduction

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

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

7.2 A local finance consideration means:

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

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

National Planning Policy Framework – 'NPPF' (2018)

7.4 The NPPF, originally published in 2012, was revised on 24th July 2018 and is a material consideration in the determination of planning and related applications.

7.5 It contains at paragraph 11, a 'presumption in favour of sustainable development'. Annex 1 of the NPPF provides guidance on its implementation. In summary, this states in paragraph 213, that policies in the development plan should not be considered out of date just because they were adopted prior to the publication of the NPPF and in regard to existing local policies, that '...due weight should be given to them, according to their degree of consistency with this Framework (the closer the policies in the plan to the policies in the Framework, the greater the weight that may be given)'.

7.6 Officers have reviewed the Core Strategy and Development Management Local Plan for consistency with the NPPF and consider there are no issues of significant conflict. As such, full weight can be given to these policies in the decision making process in accordance with paragraph 213 of the NPPF.

National Planning Practice Guidance 'NPPG' (2014 onwards)

- 7.7 On 6th March 2014, DCLG launched the National Planning Practice Guidance (NPPG) resource. This replaced a number of planning practice guidance documents, and is subject to continuous periodical updates in different subject areas.

Other National Guidance

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

London Plan (March 2016)

- 7.9 The London Plan was updated on 14 March 2016 to incorporate the Housing Standards and Parking Standards Minor Alterations to the London Plan (2015). The new, draft London Plan was published by the Mayor of London for public consultation on 29 November 2017 (until 2 March 2018). However, given the very early stage in this process, this document has very limited weight as a material consideration when determining planning applications, does not warrant a departure from the existing policies of the development plan in this instance and is therefore not referred to further in this report. The policies in the current adopted London Plan (2016) relevant to this application therefore are:

- Policy 2.9 Inner London
- Policy 2.13 Opportunity areas and intensification areas
- Policy 2.14 Areas for regeneration
- Policy 3.1 Ensuring equal life chances for all
- Policy 3.3 Increasing housing supply
- Policy 3.4 Optimising housing potential
- Policy 3.5 Quality and design of housing developments
- Policy 3.6 Children and young people's play and informal recreation facilities
- Policy 3.8 Housing choice
- Policy 3.9 Mixed and balanced communities
- Policy 3.10 Definition of affordable housing
- Policy 3.11 Affordable housing targets
- Policy 3.13 Affordable housing thresholds
- Policy 4.1 Developing London's economy
- Policy 5.2 Minimising carbon dioxide emissions
- Policy 5.3 Sustainable design and construction
- Policy 5.10 Urban greening
- Policy 5.11 Green roofs and development site environs
- Policy 5.12 Flood risk management
- Policy 5.13 Sustainable drainage
- Policy 5.21 Contaminated land
- Policy 6.3 Assessing effects of development on transport capacity
- Policy 6.7 Better streets and surface transport
- Policy 6.9 Cycling
- Policy 6.10 Walking
- Policy 6.12 Road network capacity
- Policy 6.13 Parking
- Policy 7.1 Lifetime neighbourhoods
- Policy 7.2 An inclusive environment
- Policy 7.3 Designing out crime
- Policy 7.4 Local character
- Policy 7.5 Public realm
- Policy 7.6 Architecture
- Policy 7.13 Safety, security and resilience to emergency

- Policy 7.14 Improving air quality
- Policy 7.15 Reducing and managing noise, improving and enhancing the acoustic environment and promoting appropriate soundscapes
- Policy 8.3 Community infrastructure levy
- Policy 8.4 Monitoring and review for London

London Plan Supplementary Planning Guidance (SPG)

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

- Accessible London: Achieving an Inclusive Environment (2004)
- Affordable Housing and Viability (2017)
- Housing (2012)
- Sustainable Design and Construction (2006)
- Shaping Neighbourhoods: Play and Informal Recreation (2012)
- The Control of Dust and Emissions during Construction and Demolition (2014)

London Plan Best Practice Guidance

7.11 The London Plan Best Practice Guidance's relevant to this application are:

- Development Plan Policies for Biodiversity (2005)
- Wheelchair Accessible Housing (2007)

Core Strategy

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

- Spatial Policy 1 Lewisham Spatial Strategy
- Core Strategy Policy 1 Housing provision, mix and affordability
- Core Strategy Policy 7 Climate change and adapting to the effects
- Core Strategy Policy 8 Sustainable design and construction and energy efficiency
- Core Strategy Policy 9 Improving local air quality
- Core Strategy Policy 10 Managing and reducing the risk of flooding
- Core Strategy Policy 13 Addressing Lewisham's waste management requirements
- Core Strategy Policy 14 Sustainable movement and transport
- Core Strategy Policy 15 High quality design for Lewisham
- Core Strategy Policy 19 Provision and maintenance of community and recreational facilities
- Core Strategy Policy 21 Planning obligations

Development Management Local Plan

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

7.14 The following policies are considered to be relevant to this application:

- DM Policy 1 Presumption in favour of sustainable development
- DM Policy 7 Affordable rented housing
- DM Policy 22 Sustainable design and construction
- DM Policy 23 Air quality
- DM Policy 24 Biodiversity, living roofs and artificial playing pitches
- DM Policy 25 Landscaping and trees
- DM Policy 26 Noise and vibration
- DM Policy 27 Lighting
- DM Policy 28 Contaminated land
- DM Policy 29 Car parking
- DM Policy 30 Urban design and local character
- DM Policy 32 Housing design, layout and space standards
- DM Policy 33 Development on infill sites, backland sites, back gardens and amenity areas
- DM Policy 35 Public realm
- DM Policy 41 Innovative community facility provision

Residential Standards Supplementary Planning Document (August 2006, Updated 2012)

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

Planning Obligations Supplementary Planning Document (2015)

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

8.0 Planning Considerations

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

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

a) Principle of Development

- 8.2 The proposed development includes the demolition of eight (8) existing garages, surface carpark and tarmac drying area at Knapdale Close to allow for the construction of seventeen (17), 100% affordable residential dwellings for social rent within three (3), part two/part three storey dwelling houses and one (1) part four/part five-storey flat block supporting fourteen (14) flats. In addition to the proposed residential dwellings, planning permission is requested for landscaping, refuse store, thirty-four (34) car parking spaces and forty-eight (48) cycle spaces.

- 8.3 The application site is not located within a town centre, a designated shopping frontage nor within any of the defined Strategic Industrial Locations, Local Employment Locations or Mixed Use Locations as defined by Core Strategy.
- 8.4 Knapdale Close currently supports eight (8) existing garages, surface carpark and a tarmac drying area as well as two (2) existing 1960's residential tower blocks (both greater than five (5) storeys), being 14-33 and 34-53 Knapdale Close. The tower blocks will remain unchanged by the proposal; however, the garages, carpark and drying area are proposed to be demolished.
- 8.5 DM Policy 33 resists residential development on existing amenity areas of landscaped open space attached to existing residential development, unless it is of the highest design quality and it relates successfully to the existing design quality of the streetscape. In addition to being exceptional quality and design, the proposed development will repair active street frontages, increase natural surveillance, re-provide lost private and amenity space and retain all natural features where possible.
- 8.6 The London Plan, London Plan Supplementary Planning Guidance (SPG), Core Strategy, Development Management Local Plan, Residential Standards Supplementary Planning Document and other national planning guidance emphasise the importance of high quality design that complements the existing development and establishes suitable character. The proposal will be assessed in relation to housing and accommodation standards in the following sections of this report.
- 8.7 The proposed development forms part of a Council strategy to provide 500 new, affordable homes across the borough.
- 8.8 Providing housing, particularly affordable housing, is a priority in the Borough and wider London. The site will make a valuable contribution towards meeting housing needs as identified in the London Plan Policies 3.3 and 3.4 to increase housing supply and optimising housing potential, taking into account local context and character, the design principles and public transport capacity. Furthermore, the London Plan Policy 3.8 identifies the need for Londoners to have a genuine choice of high quality affordable housing, which is considered to be in line with this proposal. The proposal will make use of previously developed land and officers therefore do not raise an objection to the principle of development, subject to securing a high quality design.

Residential Density

- 8.9 Core Strategy Policy 15 seeks to ensure high quality development in Lewisham, including residential schemes and densities in accordance with the London Plan. Policy 3.4 of the London Plan 2016 seeks to ensure that development proposals achieve the maximum intensity of use compatible with local context. Table 3.2 (Sustainable residential quality) identifies appropriate residential density ranges related to a site's setting (assessed in terms of its location, existing building form and massing) and public transport accessibility level (PTAL).
- 8.10 The site is located within an existing residential area which has a PTAL rating of 4, indicating a 'good' level of accessibility to public transport connections. The scheme proposes seventeen (17) dwellings on a 0.72ha site, which already supports forty (40) residential dwellings. With consideration to the seventeen (17) additional dwellings, the density will be approximately seventy-nine (79) dwellings (191 habitable rooms) per hectare. The London Plan states a density range of 55-225 units or 200-700 habitable rooms per hectare is sustainable for such a location. Officers therefore consider the proposed density to be acceptable.

b) Design

- 8.11 Paragraph 131 of the National Planning Policy Framework (2018) states that ‘in determining applications, great weight should be given to outstanding or innovative designs which help raise the standard of design more generally in the area’. Paragraph 130 states that ‘permission should be refused for development of poor design that fails to take the opportunities for improving the character and quality of an area and the way it functions’.
- 8.12 Urban design is a key consideration in the planning process. Chapters 8 of the NPPF (2018) makes it clear that national government places great importance on the design of the built environment. Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people. The NPPF (2018) states that it is important to plan positively for the achievement of high quality and inclusive design for all development, including individual buildings, public and private spaces and wider area development schemes.
- 8.13 London Plan Policies 7.1-7.7 (inclusive) and Core Strategy Policy 15 reinforce the principles of the NPPF setting out a clear rationale for high quality urban design.

Demolition of existing garages

- 8.14 The eight (8) existing garages are not of historic nor architectural merit and therefore, subject to a high quality residential development, there is no objection to their demolition.
- 8.15 Three (3) of the eight (8) garages to be demolished have been re-provided as only three (3) are occupied by Forest Estate residents. Three (3) of the garages are used solely for storage (or are unoccupied) and two (2) are let to residents living outside of the estate and therefore have not been re-provided.

Scale and layout

- 8.16 Planning permission is sought for demolition of eight (8) existing garages, surface tarmac and drying area at Knapdale Close within the existing Forest Estate. The proposal includes fourteen (14) flats (10 x 2bed/4person and 4 x 3bed/5person) and three (3) dwellings houses (3bed/5person).
- 8.17 The scale, massing and articulation of the proposed flats block and dwelling houses have been the subject of extensive discussion between officers and the applicant during pre-application stage as well as public consultation and input from local residents. The proposed redevelopment of the site considers the immediate surroundings and wider context. It is considered to be of a comparable proportion, composition, scale and orientation of the surrounding buildings and successfully transitions between the scale of the proposed development and the adjoining buildings.
- 8.18 The flats block has a proposed height of part four/part five storeys, ranging in height from 12.5m at its lowest point (northwest elevation) to 18.0m at its highest point (southeast elevation), which is considered to be in keeping with the existing five (5) storey tower blocks within the estate.
- 8.19 The proposed flats building presents 2 x 2B/4P flats and associated amenity space at Ground Floor in addition to lift core, plant, refuse and recycling store and forty-eight (48) compartmentalised, secure cycle lockers. Eighteen (18) of the cycle stores are allocated to the existing flats, which currently do not provide cycle storage. The first to fourth floor layout proposes three (3) flats per floor (2 x 2B//4P and 1 x 3B/5P).
- 8.20 The houses have a proposed scale of part two/part three storeys, ranging in height from 3.4m at their lowest point (southeast elevation) to 10.4m at their highest point (southwest elevation), which is considered to be in keeping with the existing two (2) storey residential houses to the south-west of Knapdale Close and to the west of the existing garages.

- 8.21 The three proposed dwelling houses present living at ground floor (living room/kitchen/dining, WC and rear garden), 2 x bedrooms, storage and bathroom at first floor and a third bedroom on the second floor.
- 8.22 All proposed dwellings will be double or triple aspect.
- 8.23 The development has carefully considered designing out crime in accordance with DM Policy 32, London Plan Policy 7.3 and Core Strategy 15 and fear of crime also identified within paragraph 91 of the NPPF (2018). The entrance of the buildings will be safe as they are clearly defined and visible from the street through the use of materiality contrast and lighting in accordance with DM Policy 27.

Architecture and Materials

- 8.24 The flats block will be comprised of predominately masonry brick with grey slate roofing, a combination of clear and obscure glazing metal windows, vertical timber fins for screening and metal balustrade. The proposed houses will be comprised of primarily masonry brick, cedar cladding, grey slate cladding, obscure and part obscure windows, timber doors and timber fencing. The proposal makes an effort to tie in with the surrounding materiality by proposing brick and window treatments in line with the existing blocks along Knapdale Close. Officers consider this to be a high quality design solution which suitably responds to the surrounding context.
- 8.25 All new development within Lewisham is expected to be neighbourly, attractive, private and functional as outlined in DM Policy 32. The proposed development will be suitably landscaped with areas of soft landscaping and trees in accordance with the London Plan Policy 7.6.

c) Housing

a) Size and Tenure of Residential Accommodation

- 8.26 The provision of housing has been identified by the Lewisham Mayor as a key priority for London and the borough. Policy 1 of the Core Strategy seeks to provide a mix of dwellings and provide affordable housing. It confirms that the maximum level of affordable housing would be sought by the Council, with a strategic target of 50%, as a starting point for negotiations and subject to an assessment of viability. The policy seeks provision at 70% social rented and 30% intermediate housing (based on total unit numbers) and family housing (three+ bedrooms) in development of more than 10 units. Where existing areas have a high concentration of social rented housing, different proportions of affordable housing could be sought.
- 8.27 The proposal will provide seventeen (17) 100% affordable dwellings for social rent, within an existing estate comprising a high density of social rented housing. Whilst the proposed development would not achieve the 70% social rented and 30% intermediate housing split as specified by the Core Strategy; officers consider this mix to be acceptable in this instance given the urgent need for socially rented dwellings within the borough. As such, officers consider that the proposed development therefore meets the requirements of Core Strategy 1 and significantly provides housing for families currently homeless in the borough.

Table 3.0: Residential Tenure and Size Mix

	1 Bed	2 Bed	3 Bed	4 Bed +	Total
Social Rent	0 (0)	10 (0)	7 (0)	0 (0)	0 (0)
Total	0 (0)	10 (0)	7 (0)	0 (0)	17 (0)

8.28 Due to the slope of the site, no wheelchair user dwellings are proposed.

b) Standard of Residential Accommodation

8.29 The Technical Housing Standards (2015), London Plan's Housing Supplementary Planning Guidance (SPG) and London Plan Policy 3.1 of the London Plan set out the minimum space standards required for dwelling types and amenity space. Policy 3.1 refers to the garden and amenity space required for residential dwellings.

8.30 All proposed dwellings exceed the appropriate recreation space identified in the London Plan as identified below in Table 2.0 above and all residents will have access to the communal central courtyard and children's play space, which is considered to be in accordance with the London Plan Policy 3.6 and LTCP 18.

8.31 The proposals meet, and exceed in places, the minimum internal housing standards as set out in the National Standards, London Plan, Core Strategy and DM Policy 32 and are therefore considered acceptable in this regard.

8.32 The proposal is for 100% affordable housing in accordance with DM Policy 7 and 32, and London Plan Policies 3.10, 3.11 and 3.13. The development will provide a mix of homes (including accessible and adaptable) and meet the needs of the community by creating inclusive environments and communities.

d) Highways and Traffic Issues

The applicant has submitted a Transport Statement (including parking surveys), Transport Statement Addendum and an Outline Construction Management Plan to address highways and traffic issues.

a) Access

8.33 Access to the site can be gained from Eliot Bank, which stems from London Road. The site is located in close proximity to train services from Forest Hill and benefits from a number of frequent bus services. It has a Public Transport Accessibility Level (PTAL) of 4, where '1' is rated as Poor and '6' is rated as Excellent.

8.34 The proposed development is not considered to adversely affect the safety of the surrounding transport network and is therefore considered to be in accordance with the London Plan Policy 6.3.

b) Refuse and Servicing

8.35 Refuse storage would be provided at ground floor of the proposed flats block and screened within the landscape for the houses. Details of such would be secured via condition.

8.36 There are existing refuse collection issues on the estate, which were not adequately assessed within the initial submission, however the Transport Statement (Addendum) submitted in July 2018, identifies that from a physical refuse collection inspection, in all instances the issues regarding access for the refuse collection vehicles is as a result of parked cars. Highways officers consider the proposed s278 works will adequately address refuse issues.

8.37 In accordance with the stipulation from The London Fire Brigade, all new dwellings are generally in accordance with the requirements for fire tenders as per the GEN29 Guideline. The Transport Statement also illustrates that a LFB pump appliance will be able to access

the site, three-point-turn in the turning head provided, and get comfortably within 45 metres of every point on the building as required by GEN29.

c) Cycle Parking

8.38 The London Plan Housing SPG Standard 20, London Plan Policy 6.9 and DM Policy 29 state that all developments should provide dedicated storage space for cycles at the following level:

- 1 per studio and one bed
- 2 per all other dwellings

8.39 In addition, one short stay cycle parking space should be provided for every 40 units.

8.40 A total of forty-eight (48) cycle spaces are proposed for the houses and flats, which will be contained within the ground floor of the proposed flats block and within the amenity space of the houses. All proposed cycle storage will be secure and dry.

8.41 The number of cycle spaces is in accordance with the London Plan and as such is considered acceptable.

d) Car Parking and Highways

8.42 Thirty-four (34) car parking spaces and forty-eight (48) cycle spaces are proposed in addition to a new, shared surface road, a redefined access to the south and s278 highways improvements. The three (3) dwelling houses will each have secure bicycle storage for four (4) bikes in their respective gardens.

8.43 Sixteen (16) car parking spaces will be lost due to the proposal over existing hardstand and the estimated demand of the proposed housing is calculated to be seventeen (17) additional car parking spaces. Three (3) of the eight (8) garages to be demolished have been re-provided as only three (3) are occupied by Forest Estate residents. Three (3) of the garages are used solely for storage (or are unoccupied) and two (2) are let to residents living outside of the estate and therefore have not been re-provided. The carparking demand generated by the proposal is calculated as thirty-six (36) spaces.

8.44 The parking re-provision shortfall due to the proposed development is therefore two (2) spaces, which is supported by Highways Officers and further reinforced by the London Plan Policy.

8.45 The Transport Statement Addendum also considers that even with the proposed s278 agreement (yellow lines), there will be sufficient capacity to accommodate the parking demands within the estate as all parking surveys (Monday, Tuesday and Saturday) all identify significant capacity.

8.46 Officers therefore conclude that based on the parking survey data there is sufficient capacity on-street to accommodate, any displaced parking that occurs as a result of the loss of the lock-up garages. Furthermore, Highways Officers do not consider the proposed development will have an impact on highway capacity or safety.

8.47 The parking strategy is considered to be in accordance with Core Strategy 14, DM Policy 29, London Plan Policy 6.12 and 6.13.

8.48 Further to the above, the applicant must agree with the Highway Authority to secure the highways works, through a s278 agreement, which includes:-

- i) The introduction of double yellow lines (waiting/parking restrictions) at the Knapdale Close junction with Eliot Bank, the bend in Knapdale Close adjacent to flats 14-33, and

the turning head at the end of Knapdale Close adjacent to flats 34-53 to improve service vehicle access;

ii) The installation of dropped kerbs and tactile paving on all pedestrian crossing points and/or junctions along Eliot Bank and Knapdale Close (between London Road and the application sites) to improve pedestrian accessibility;

iii) The installation of measures to calm traffic along Knapdale Close;

iv) The creation of a shared surface design and reconfiguration of the existing parking layout;

v) Creation of a turning head area to facilitate forward gear access and egress for service vehicles.

8.49 Additional documents to be secured via Condition include:

Delivery & Servicing Plan

- It should include further details of the site's waste and recycling strategy, and include further swept-path analysis to determine if parking restrictions or passing spaces are required to enable service vehicle access/egress through the estate.

Construction Logistics Management Plan

- It should specify how the impacts of construction activities and associated traffic will be managed.

Parking Management Plan

- It should provide details of how informal parking will be enforced/managed within the site.

Travel Plan

- It should specify initiatives to be implemented by the development to encourage access to and from the site by a variety of non-car means, shall set targets and shall specify a monitoring and review mechanism to ensure compliance with the Travel Plan objectives.

8.50 Subject to the above, the proposed development is considered to be acceptable with regard to parking and highways matters.

e) Construction

8.51 Given the location of the site on a busy road with active bus lanes, and the existing bus stops adjacent the application site, a full Construction Logistics Management Plan is required to be secured by condition.

e) Impact on Adjoining Properties

8.52 The impact of the proposal on adjoining properties relates to siting, bulk and height with consideration to Core Strategy 15, which states that adverse impact on neighbouring amenity need to be addressed. The Council's Residential Development Standards, also outlines the expectation of developers in an effort to mitigate impact on adjoining properties.

a) Privacy

8.53 The proposed development takes into account the surrounding properties and has been carefully designed and positioned as such. The Council's Residential Development

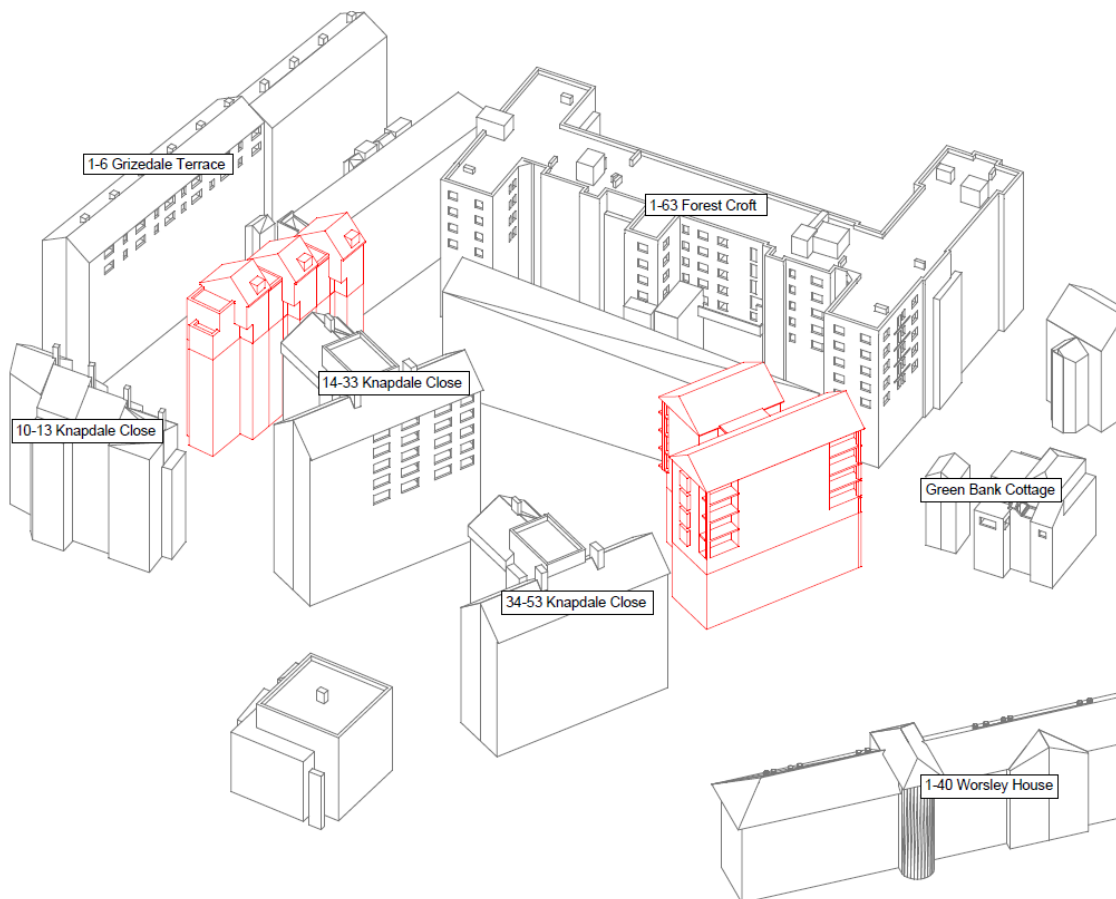
Standards SPD requires a flexible, minimum separation distance of 21 metres between directly facing habitable room windows on main rear elevations.

8.54 The areas proposed for development include the garages to the north and the car parking area to the south, both of which are accessed from Knapdale Close. The existing garages are single storey with associated hardstand and crossover and the existing car parking area is open, poor quality hardstand with no associated boundary treatment.

8.55 There is a significant number of mature trees throughout the site including along the northeast boundary, which provide amenity screening to the neighbouring Forest Croft building.

8.56 Figure 2.0 below illustrates the sensitive surrounding dwellings.

Figure 2.0: Surrounding Context



8.57 Existing flats (14-33 and 34-53 Knapdale Close) are five (5) storey blocks comprised of predominately brick and incorporating a pitched roof design.

8.58 1-63 Forest Croft is located to the north of the proposed flats block and is separated by a minimum of approximately 15m, however this is considered to be acceptable with consideration to the below analysis:

- Living/dining windows on the north-eastern elevation are located so that they have a direct view past Forest Croft and any view into 1-63 Forest Croft is separated by 15.1m to a secondary bedroom window

- Primary bedroom windows on the north-eastern elevation are located approximately 17.5m from 1-63 Forest Croft (secondary windows)
 - Secondary bedroom windows on the north-eastern elevation are located approximately 15-26m from 1-63 Forest Croft.
- 8.59 34-53 Knapdale Close forms a 'T' shape with habitable windows on the northeastern elevation. The proposed building has therefore been designed to sit diagonally adjacent to 34-53 Knapdale Close to avoid overlooking and ensure that most windows on the northeastern elevation of 34-53 Knapdale view directly past the proposed flats block. The proposed southwestern elevation is separated by 19.5m to existing habitable rooms within 34-53 Knapdale Close, however fins are proposed to screen oblique view.
- 8.60 14-33 Knapdale Close is located to the south-west of the proposed flats block, however is separated by a minimum of 24m and therefore no further assessment has been made.
- 8.61 Worsley House is located to the south of the proposed development, however is separated by a minimum of 48.5m and therefore no further assessment has been made.
- 8.62 Greenbank Cottage is located to the east of the proposed flats block, however windows of habitable rooms are separated by more than 21m and therefore no further assessment has been made. Additionally, the corner balconies nearest to Greenbank Cottage propose privacy screens.
- 8.63 1-6 Grizedale Terrace is located to the north-west of the proposed dwelling houses and is separated by 15m-17m, however the proposed layout only incorporates two small windows on the rear elevation (addressing Grizedale Terrace), which are small windows for the bathroom and stair (non-habitable). The entrance level to the new houses are also at least 2.0m lower than those at Grizedale Terrace and therefore their view would primarily be the roof of the proposed dwellings. On balance, the impact on Grizedale Terrace is therefore considered to be acceptable.
- 8.64 10-13 Knapdale Close is separated from the proposed dwelling houses by a minimum of 13m, however the southwestern elevation is flanked at ground floor and stepped back at first and second floor. The windows are also proposed as part obscure.
- 8.65 14-33 Knapdale (existing tower block) is located to the south of the proposed dwelling houses and is separated by approximately 15m, however given the angle of the existing tower block direct overlooking is not considered to be of concern. The dwelling houses also address the rear of the existing flats block, which contains predominately dual aspect dwellings.
- 8.66 1-63 Forest Croft is located to the north-east of the proposed dwelling houses, however the proposed northeast elevation is flank and therefore the 13m separation is considered to be acceptable.
- 8.67 Given the separation distances from surrounding residential uses, which largely are well in excess of the Council's recommended minimum standards it is considered that there would be no unreasonable impact on the occupants of neighbouring residential dwellings with regard to neighbour amenity.
- 8.68 It is accepted that there may be a degree of loss of privacy, however this is not uncommon for such an arrangement in an urban setting and is considered acceptable in this instance.

b) Daylight and Sunlight Assessment

- 8.69 Herrington Consulting Limited prepared a Daylight and Sunlight Assessment for the Development at Knapdale Close, which considers the level of daylight and sunlight received

by the existing neighbouring properties as well as the levels of sunlight and shadow received by their private amenity spaces. It also considers the level of natural light within the proposed residential units and their associated amenity spaces.

8.70 Specifically, it focuses on the development's effects on existing residential accommodation within:

- 1-40 Worsley House
- 1-63 Forest Croft
- 14-33 Knapdale Close
- 34-53 Knapdale Close
- 10-13 Knapdale Close
- 1-6 Grizedale Terrace
- Green Bank Cottage

Daylight Impacts

- Vertical Sky Component Assessment (VSC)

8.71 The BRE Guidelines operate on the general principle where the retained VSC is 27% or greater, or where the VSC is below 27% and is not reduced to less than 0.8 times its former value, then the reduction in daylight is unlikely to be noticeable to the building's occupants and thus the impact is considered to be negligible. Six (6) of the two-hundred and twenty-six (226) windows that have transgressional results, four (4) of which will have minor transgression and two (2) moderate transgression within 34-53 Knapdale Close and 1-63 Forest Croft, respectively. These results should be assessed in conjunction with the other daylight assessments.

- No Sky Line Assessment (NSL)

8.72 The BRE Guidelines state that the area of the working plane within the room that has a view of the sky should not be reduced to less than 0.8 times its former value as a result of new development. None of the one-hundred and sixty-nine (169) windows assessed identified transgression results as the reduction in the area of the working plane that has a direct view of the sky will be less than 20% and therefore occupants are unlikely to notice any change.

- Average Daylight Factor (ADF)

8.73 The ADF method calculates the average illuminance within a room as a proportion of the illuminance available to an unobstructed point outdoors under a sky of known luminance and luminance distribution and takes into account the size and number of windows serving each room and therefore allows a quantitative assessment to be undertaken. The rooms served by the windows that represent transgressional results (VSC) have been assessed, which include 1-63 Forest Croft, 34-53 Knapdale Close and Greenbank Cottage.

8.74 Of the ADF results, there is one (1) room for which the use is unknown and the ADF value is below the adopted average value of 1.5%. If the room is a bedroom, it is concluded that the daylight will be adequate, however if it is a living room or kitchen, then the retained daylight is likely to be below the aspirational target value. Post development, the room will have an estimated ADF value of 1.35%, which is acceptable to perform daily tasks without supplementary lighting.

Sunlight and Overshadowing Analysis

- Annual Probable Sunlight Hours Assessment (APSH)

8.75 The APSH has been tested on all neighbouring property windows that do not face within 90 degrees of due north, which in this case includes 1-63 Forest Croft, 14-33 Knapdale Close, 1-6 Grizedale Terrace and Green Bank Cottage. BRE Guidelines recommend that for the assessment to conclude that the sunlighting of the existing dwelling could be adversely affected, all three of the APSH tests need to have failed. It can be concluded that 100% of the rooms tested, pass at least one of the three sunlight tests and is therefore BRE compliant.

- Sun on the Ground

8.76 The communal area for Knapdale Close, rear gardens of 1-6 Grizedale Terrace and rear garden of Taymount Lodge have been identified as sensitive amenity areas. These areas were tested and it was concluded that with the proposed scheme in place, the amenity areas tested benefit from 2 or more hours of direct sunlight over 90% of their amenity areas on 21st March and therefore will not experience a noticeable change in overshadowing.

- Transient Overshadowing

8.77 It is not considered that any of the potentially affected amenity areas are sensitive to overshadowing and consequently transient overshadowing is not considered appropriate for assessment.

- Solar Glare

8.78 The building does not slope back and does not propose large areas of reflective glass or cladding on the façade, hence solar glare is not considered necessary or appropriate to analyse.

f) Sustainability and Energy

8.79 Policy 5.3 Sustainable Design and Construction of the London Plan states that the highest standards of sustainable design and construction should be achieved in London to improve the environmental performance of new developments and to adapt to the effects of climate change over their lifetime.

8.80 Policy 5.2 Minimising Carbon Dioxide Emissions of the London Plan states that development should make the fullest contribution to minimising carbon dioxide emissions in accordance with the following energy hierarchy:

1. Be lean: use less energy
2. Be clean: supply energy efficiently
3. Be green: use renewable energy

8.81 Achieving more sustainable patterns of development and environmentally sustainable buildings is a key objective of national, regional and local planning policy. London Plan and Core Strategy Policies advocate the need for sustainable development. All new development should address climate change and reduce carbon emissions. Core Strategy Policies advocate the need for sustainable development. All new development should address climate change and reduce carbon emissions. Core Strategy Policy 8 requires all new residential development to meet a minimum of Code for Sustainable Home Level 4.

8.82 The energy assessment confirms that the residual CO₂ savings can be met via the inclusion of five (5) solar PV arrays (two (2) on the flats block with an array size of 116m² and three (3) on the dwelling houses with an array size of 6m² each). The total installed capacity of 22Wp across the site will result in an overall CO₂ emission reduction of 36.4%, which is considered to be in line with the requirements of the Building Regulations Part L (2013).

8.83 Given the above, the proposal is considered acceptable with regard to sustainability and energy.

g) Ecology

8.84 DM Policy 24 (Biodiversity, living roofs and artificial playing pitches) states that Applicants for all major and, where appropriate, non-major development will be required to use up to date surveys and reports that are based on the latest legislation and carried out by a suitably qualified ecologist registered with the Chartered Institute of Ecology and Environmental Management (CIEEM). The surveys should be carried out during an optimal time and contain the appropriate degree of detail needed to identify and consider existing biodiversity interests and possible impacts on them, where the proposed site is part of, or located adjacent to, a site designated for its biodiversity value.

8.85 The applicant has submitted an Ecological Appraisal, which indicate the site is considered to be of low value to birds and identified no evidence of protected species or roosting bats. The site is also considered unsuitable for reptiles and amphibians and is unlikely to support invertebrates of conservation importance. No rare, notable or non-native invasive plants were recorded on the site.

8.86 Officers have requested biodiverse living roofs to be incorporated into the development to provide native and wildlife friendly planting as well as habitat for target species in order to accord with Chapters 15 of the NPPF (2018), which seeks to contribute and enhance the natural and local environment. Bat/brick boxes have also been requested and conditioned.

h) Trees and Landscaping

8.87 Core Strategy Policy 12 (Open Space and Environmental Assets) recognises the importance of trees and details the arboricultural considerations required during the planning process. It states that the Council's targets to conserve nature and green the public realm will be achieved by "protecting trees, including street trees, and preventing the loss of trees of amenity value, and replacing trees where loss does occur".

8.88 DM Policy 25 (Landscaping and Trees) states that Development schemes should not result in an unacceptable loss of trees, especially those that make a significant contribution to the character or appearance of an area, unless they are considered dangerous to the public by an approved Arboricultural Survey. Where trees are removed as part of new development, replacement planting will normally be required. New or replacement species should be selected to avoid the risk of decline or death arising from increases in non-native pests and diseases.

8.89 A total of twenty-eight (28) trees or groups of trees have been identified on site, twelve (12) of which are required to be removed to facilitate the development. Four (4) are Category U, five (5) are Category C and three (3) are Category B. Trees to be removed include T4, T7, T8, SG1, T10, TG2, T11 and T15 as well as the removal of Cat U trees (T1, T6, T9 and T19).

8.90 The tree survey has categorised the existing trees on site using British Standard BS5837:2012 Tree Categorisation Process as follows:

Table 4.0: Tree Categories

Category	Definition
A	High quality, minimum of 40+ years remaining contribution
B	Moderate quality, minimum of 20+ years remaining contribution
C	Low quality, minimum of 10+ years remaining contribution
U	Unsuitable for retention, <10 years remaining contribution

- 8.91 The proposal requires foundation excavation within the RPA of T13 and landscape works within the RPA of T17. It is recommended that a Tree Protection Plan is secured by condition to ensure that the trees proposed for retention are appropriately safeguarded during the construction process.
- 8.92 None of the trees on site are subject to a Tree Preservation Order (TPO).
- 8.93 A landscape strategy has been developed for the extent of the red line boundary, which considers the existing and proposed buildings, existing road, trees to be retained and removed, proposed parking improvements, pedestrian footpaths and the lie of the land.
- 8.94 The proposed development locations are existing hardstand areas and have been selected in an effort to avoid loss of expansive open space areas and retain the mature tree lined perimeter areas and wildlife habitat and corridors to adjacent wooded areas and public parks. The existing open space within the estate comprises approximately 4526m², however with the development in situ, the proposed open space area will cover 4429m², totalling an overall loss of only 97m² of existing open space. Furthermore, it is considered that the enhancements to footpaths and play area will result in a net gain in the quality of the external amenity spaces.
- 8.95 The development also proposes extensive (hard and soft) landscaping in addition to extensive planting, including an appropriate diversity and age class species replacement.
- 8.96 The proposed landscaping scheme including replanting is considered to make a positive contribution to the character, appearance and setting of the area, and an improvement over the existing situation. The details of both soft and hard landscaping be secured by condition.
- 8.97 The redelivery of amenity spaces presents the opportunity to create activity in areas of the estate, which are currently underutilised.
- 8.98 The landscape masterplanned proposal includes landscaping in front of the houses, re-provided drying space shared paved surface, improved landscaping to the existing block, terraced amenity space, informal play and community gardening area.
- 8.99 The community/play space is proposed to the southwest of the existing tower block (14-34 Knapdale Close) and includes timber benches, tree planting, terraced steps and natural play features.
- 8.100 The proposed community (grow) space is proposed in the southeastern corner of the site and comprised of a series of stepped planting beds for intended for horticulture planting to benefit the estate community and encourage interaction. A seating area will be constructed within the space.
- 8.101 The overall landscaping includes concrete paving and textured concrete to define parking areas, larger format concrete block paving in public realm areas and residential paths, resin bound gravel and play surfacing within designated play area, brick walls for retaining, asphalt paving and pre-cast concrete steps to create an attractive environment and define spaces. Colour will be used to delineate welcoming spaces.
- 8.102 The informal play area will be made up of natural features such as logs, rocks, bridges and sand.
- 8.103 Lighting columns and bollards are also proposed throughout the landscape masterplan to ensure the environment is safe and welcoming. Columns are located around the carpark and low bollards are proposed around the parking, close to entrances and within the amenity space.

8.104 London Plan Policy 5.11 confirms that development proposals should include 'green' roofs. Core Strategy Policy 7 specifies a preference for Living Roofs (which includes bio-diverse roofs) which comprise deeper substrates and a more diverse range of planting than plug-planted sedum roofs, providing greater opportunity bio-diversity. The proposal does not incorporate a living roof, however this has been conditioned.

8.105 The proposed development results in an overall loss of 97m² of existing open space including five (5) Category C and three (3) Category B trees. Hard and soft landscaping, including replacement planting, communal amenity and designated play space are proposed in addition to the seventeen (17) 100% affordable dwellings for social rent, which on balance is considered acceptable.

9.0 Local Finance Considerations

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

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

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

9.3 The Mayor of London's CIL is therefore a material consideration. CIL is payable on this application however the applicant has claimed social housing exemption.

10.0 Community Infrastructure Levy

10.1 The proposed development is CIL liable and the applicant has claimed social housing exemption which is expected to be granted.

11.0 Equalities Considerations

11.1 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.

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

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

11.3 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.

11.4 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>

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

1. The essential guide to the public sector equality duty
2. Meeting the equality duty in policy and decision-making
3. Engagement and the equality duty
4. Equality objectives and the equality duty
5. Equality information and the equality duty

11.6 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>

11.7 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.

12.0 Human Rights Implications

12.1 This planning application engages certain human rights under the Human Rights Act 1998 (the HRA). The HRA prohibits unlawful interference by public bodies with conventions rights. The term 'engage' simply means that human rights may be affected or relevant.

12.2 The rights potentially engaged by this application, including the right to a fair trial and the right to respect for private and family life are not considered to be unlawfully interfered with by this proposal.

13.0 Conclusion

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

13.2 The seventeen (17) proposed dwellings will meet a defined need, contributing to addressing the shortage of affordable housing in the borough.

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

14.0 RECOMMENDATION: GRANT PERMISSION subject to the following conditions:

Conditions

1. Full Planning Permission Time Limit

The development to which this permission relates must be begun not later than the expiration of three (3) years beginning with the date on which the permission is granted.

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

2. Develop in Accordance with the Approved Plans

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

15.215/D(00)001 (REV A); 15.215/D(00)003 (REV A); 15.215/D(00)004 (REV B);
15.215/D(00)005 (REV C); 15.215/D(00)006 (REV B); 15.215/D(00)007 (REV C);
15.215/D(00)008 (REV B); 15.215/D(00)009 (REV B); 15.215/D(00)010 (REV A);
15.215/D(00)011 (REV A); 15.215/D(00)012 (REV A); 15.215/D(00)013; 15.215/D(20)101
(REV C); 15.215/D(20)102 (REV C); 15.215/D(20)103 (REV B); 15.215/D(20)104 (REV A);
15.215/D(20)105 (REV A); 15.215/D(20)201 (REV B); 15.215/D(20)202; 15.215/D(20)203
(REV A); 15.215/D(20)204; 15.215/SK124; 15.215/SK125; 9106-1; TM235L01 (REV B);
TM235L02 (REV A); TM235L03 (REV #); TM235L04 (REV #) TM235L05 (REV #)

ARBORICULTURAL IMPACT ASSESSMENT (MARCH 2018 (REVISED JULY 2018));
DAYLIGHT AND SUNLIGHT ASSESSMENT (MARCH 2018 (REVISED JUNE 2018));
DESIGN AND ACCESS STATEMENT (REV B) (MARCH 2018 (REVISED JULY 2018));
ECOLOGICAL APPRAISAL (MARCH 2018); ENERGY AND SUSTAINABILITY
STATEMENT (FEBRUARY 2018); INITIAL GEOTECHNICAL AND LAND
CONTAMINATION STUDY (DECEMBER 2015); LANDSCAPE DESIGN REPORT (REV B)
(MARCH 2018); OUTLINE CONSTRUCTION MANAGEMENT PLAN (MARCH 2018);
PLANNING STATEMENT (MARCH 2018); PLANNING OBLIGATIONS STATEMENT
(MARCH 2018); TRANSPORT STATEMENT (MARCH 2018); TRANSPORT STATEMENT
ADDENDUM (JULY 2018); UTILITY STUDY (FEBRUARY 2016)

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

3. Affordable Housing

At least 50% of the seventeen (17) residential units hereby granted permission shall be provided and maintained in perpetuity as affordable housing for social rent to meet the needs of householders whose incomes are not sufficient to permit them to access and afford to rent on the open market. The affordable housing shall meet the definition of affordable housing in Annex 2 of the National Planning Policy Framework or any future guidance that replaces it.

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

4. Highway Works

(a) No development shall commence until details of the following highways works (including drawings and specifications) have been submitted to and approved in writing by the Local Planning Authority:

- i. The introduction of double yellow lines (waiting/parking restrictions) at the Knapdale Close junction with Eliot Bank, the bend in Knapdale Close adjacent to flats 14-33, and the turning head at the end of Knapdale Close adjacent to flats 34-53 to improve service vehicle access;

- ii. The installation of dropped kerbs and tactile paving on all pedestrian crossing points and/or junctions along Eliot Bank and Knapdale Close (between London Road and the application sites) to improve pedestrian accessibility;
- iii. The installation of measures to calm traffic along Knapdale Close;
- iv. The creation of a shared surface design and reconfiguration of the existing parking layout;
- v. Creation of a turning head area to facilitate forward gear access and egress for service vehicles.

(b) The improvements should include additional lighting to improve pedestrian accessibility.

(c) Prior to occupation the works as required under (a) and (b) must be completed and evidence of approval from the Highways Authority to this work must be submitted and approved by the Local Planning Authority.

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

5. Hard Landscaping Details

(a) Prior to commencement of 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) must 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.

6. Living Roof Details

(a) Prior to commencement of above ground works, plans showing a biodiversity living roof laid out on any area with a slope of up to 30 degrees shall be submitted to and approved in writing by the local planning authority.

(b) The living roofs shall not be used as an amenity or sitting out space of any kind whatsoever.

(c) Prior to first occupation of any building herein, the access and watering provision arrangements for the proposed living roof along with details for management/establishment guarantees for a minimum of two growing seasons shall be submitted to and approved in writing by the local planning authority. The living roof detail hereby approved shall be complied with and maintained in perpetuity.

(d) Prior to first occupation of any building approved herein, evidence that the roof has been installed in accordance with (a) and (c) must be submitted to and approved in writing by the local planning authority.

Reason: To comply with Policies 5.10 Urban greening, 5.11 Green roofs and development site environs, 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).

7. Tree Protection During Construction

(a) Prior to commencement of development a Tree Protection Plan (TPP) must be submitted to and approved by the Council. The TPP should follow the recommendations set out in BS 5837:2012 (Trees in relation to design, demolition and construction – Recommendations). The TPP should clearly indicate on a dimensioned plan superimposed on the building layout plan and in a written schedule details of the location and form of protective barriers to form a construction exclusion zone, the extent and type of ground protection measures, and any additional measures needed to protect vulnerable sections of trees and their root protection areas where construction activity cannot be fully or permanently excluded.

(b) The development shall be carried out in full accordance with the approved Tree Protection Plan (TPP) under part (a).

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

8. Construction Logistics Management Plan

Prior to commencement of development, a Construction Logistics Management Plan must be 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.
 - (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.
- (g) The development shall be carried out in full accordance with the approved Construction Logistics Management Plan under parts (a) - (f), inclusive.

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).

9. Surface Water and Flooding

(a) Prior to commencement of development, a scheme for surface water management, including specifications of the surface treatments and sustainable urban drainage solutions, must be submitted to and approved in writing by the local planning authority.

(b) The development shall be carried out in accordance with the approved scheme and thereafter the approved scheme is to be retained in accordance with the details approved therein.

Reason: To prevent the increased risk of flooding and to improve water quality in accordance with Policies 5.12 Flood risk management and 5.13 Sustainable drainage in the London Plan (July 2011) and Objective 6: Flood risk reduction and water management and Core Strategy Policy 10: Managing and reducing the risk of flooding (2011).

10. Contaminated Land

(a) No development or phase of development (including demolition of existing buildings and structures, except where prior agreement with the Council for site investigation enabling works has been received) shall commence until :-

(i) A desk top study and site assessment to survey and characterise the nature and extent of contamination and its effect (whether on or off-site) and a conceptual site model have been submitted to and approved in writing by the local planning authority.

(ii) A site investigation report to characterise and risk assess the site which shall include the gas, hydrological and contamination status, specifying rationale; and recommendations for treatment for contamination encountered (whether by remedial works or not) has been submitted, (including subsequent correspondences as being necessary or desirable for the remediation of the site) to and approved in writing by the Council.

(b) If during any works on the site, contamination is encountered which has not previously been identified ("the new contamination") the Council shall be notified immediately and the terms of paragraph (a), shall apply to the new contamination. No further works shall take place on that part of the site or adjacent areas affected, until the requirements of paragraph (a) have been complied with in relation to the new contamination.

(c) The development or phase of development shall not be occupied until a closure report for the development or phase has been submitted to and approved in writing by the Council.

This shall include verification of all measures, or treatments as required in (Section (a) i & ii) and relevant correspondence (including other regulating authorities and stakeholders involved with the remediation works) to verify compliance requirements, necessary for the remediation of the site have been implemented in full.

The closure report shall include verification details of both the remediation and post-remediation sampling/works, carried out (including waste materials removed from the site); and before placement of any soil/materials is undertaken on site, all imported or reused soil material must conform to current soil quality requirements as agreed by the authority. Inherent to the above, is the provision of any required documentation, certification and monitoring, to facilitate condition requirements.

Reason: To ensure that the local planning authority may be satisfied that potential site contamination is identified and remedied in view of the historical use(s) of the site, which

may have included industrial processes and to comply with Saved Policy ENV.PRO 10 Contaminated Land in the Unitary Development Plan (July 2004).

11. Soft Landscaping

(a) Prior to the construction of above ground works, a scheme of soft landscaping (including details of all trees or hedges to be retained and proposed plant numbers, species, location, suitability and size of trees and tree pits) and details of the management and maintenance of the landscaping for a period of five (5) years shall be submitted to and approved in writing by the local planning authority.

(b) 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.

(c) 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).

12. Bat/Bird boxes

Prior to the commencement of above ground works, 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 and shall be installed in accordance with the approved details 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).

13. Refuse Storage

The storage of refuse and recycling facilities as approved shall be provided in accordance with plan nos. 15.215/D(00)004 (REV B) prior to first occupation of any building and permanently retained and maintained, thereafter.

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).

14. Delivery and Servicing Plan

(a) Prior to first occupation, a Delivery and Servicing Plan must be submitted to and approved in writing by the local planning authority.

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

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

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

15. Travel Plan

(a) Prior to first occupation, a Travel Plan, in accordance with Transport for London's document 'Travel Planning for New Development in London' must be submitted to and approved in writing by the local planning authority. The development shall operate in full accordance with all measures identified within the Travel Plan from first occupation.

(b) The Travel Plan shall specify initiatives to be implemented by the development to encourage access to and from the site by a variety of non-car means, shall set targets and shall specify a monitoring and review mechanism to ensure compliance with the Travel Plan objectives.

(c) Within the timeframe specified by (a) and (b), evidence shall be submitted to demonstrate compliance with the monitoring and review mechanisms agreed under parts (a) and (b).

Reason: In order that both the local planning authority may be satisfied as to the practicality, viability and sustainability of the Travel Plan for the site and to comply with Policy 14 Sustainable movement and transport of the Core Strategy (June 2011).

16. Parking Management Plan

A Parking Management Plan must be submitted to and approved in writing by the local planning authority, prior to first occupation of any building hereby approved.

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

17. Piling Operations

(a) No piling or any other foundation designs using penetrative methods shall take place, other than with the prior written approval of the local planning authority.

(b) Details of any such operations must be submitted to and approved in writing by the local planning authority prior to commencement of development on site and shall be accompanied by details of the relevant penetrative methods.

(c) Any such work shall be carried out only in accordance with the details approved under part (b).

Reason: To prevent pollution of controlled waters and to comply with Core Strategy (2011) Policy 11 River and waterways network and Development Management Local Plan (November 2014) DM Policy 28 Contaminated land.

18. Cycle Parking Provision

(a) A minimum of forty-six (46) secure and dry cycle parking spaces shall be provided within the development as indicated on the plans hereby approved plan nos. 15.215/D(00)004 (REV B).

(b) No development shall commence on site until the full details of the cycle parking facilities have been submitted to and approved in writing by the Local Planning Authority.

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

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

19. Materials/Quality Design

(a) The development shall be constructed in those materials as submitted in accordance with section 6.3 and section 6.4 of the Design and Access Statement.

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

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

20. Plumbing and Pipes

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

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

21. Construction Deliveries and Hours

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

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

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

22. External Lighting

(a) Any such external lighting as approved shall be installed in accordance with the plan nos. TM235L03 (REV #) and such directional hoods shall be retained permanently.

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

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

Informatives

1. 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.

2. Tree Protection

In accordance with the recommendations of the Arboricultural Impact Assessment (Prepared by Tamala Trees), during construction robust tree protective fencing and ground protection measures are to be erected between the edge of the building and the RPA of T13 to allow effective access around the building for construction purposes and following construction any making good should be with BS3882 compliant top soil imported and raked out by hand where this is undertaken within retained tree RPA areas (T13 and T17).

3. Replacement Planting

Proposed replacement planting should be with a suitable native species such as Silver Birch, Rowan Sorbus Aucuparia, Bird Cherry and Field Maple Acer Campestre as outlined in the Ecological Appraisal prepared by SLR.

4. External Lighting

Any proposed lighting design should ensure that the illumination of peripheral habitats around the boundary of the site is avoided. The height of the lighting columns should be the minimum required to ensure sufficient illumination of walkways and should be fitted with lanterns with appropriate light spectrums that avoid impacting bat behaviour, and directing downwards with flat plane glass as outlined in the Ecological Appraisal prepared by SLR.

5. Crossover and Garage Removal

The applicant will be expected to pay for the removal of the redundant crossovers and garages and the formation of the replacement dropped kerb and pavement.

6. Tree Works

In the event tree works will be completed between 1st March and 31st July (inclusive) a due diligence check for nesting birds must be completed before work starts in order to comply with the Wildlife & Countryside Act 1981. This check should be recorded in the Site Specific Risk Assessment. If active nests are found, work should not take place until the young have fledged.

7. Thames Water

There are public sewers crossing or close to your development. If you're planning significant work near our sewers, it's important that you minimize the risk of damage. Thames Water advise the applicant to read our guide working near or diverting our pipes. https://urldefense.proofpoint.com/v2/url?u=https-3A__developers.thameswater.co.uk_Developing-2Da-2Dlarge-2Dsite_Planning-2Dyour-2Ddevelopment_Working-2Dnear-2Dor-2Ddiverting-2Dour-2Dpipes&d=DwIFAw&c=OMjwGp47Ad5otWI0__lpOg&r=A6bK4sK7myXptjA_uaaZPj7OE6BO0ng5QMu-6ha_RdQ&m=rPXCj9wRsApSGYwFBOE9m0LotoikenCpAHZ4Ot09ioE&s=XMpSsETzzlm m1-apjyBCUXz52igbysPDqDt1qjeMleQ&e

Thames Water expect the developer to demonstrate what measures they will undertake to minimise groundwater discharges into the public sewer. Groundwater discharges typically result from construction site dewatering, deep excavations, basement infiltration, borehole

installation, testing and site remediation. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991.

A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. Thames Water expect the developer to demonstrate what measures they will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Waters Risk Management Team by telephoning 02035779483 or by emailing www.riskmanagement@thameswater.co.uk. Application forms should be completed on line via www.thameswater.co.uk/wastewaterquality

The proposed development is located within 15m of Thames Waters underground assets, as such the development could cause the assets to fail if appropriate measures are not taken.

Please read Thames Water guide "working near our assets" to ensure your workings are in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures.

[https://urldefense.proofpoint.com/v2/url?u=https-3A__developers.thameswater.co.uk_Developing-2Da-2Dlarge-2Dsite_Planning-2Dyour-2Ddevelopment_Working-2Dnear-2Dor-2Ddiverting-2Dour-2Dpipes&d=DwIFAw&c=OMjwGp47Ad5otWI0__lpOg&r=A6bK4sK7myXptjA_uaaZPj7OE6BO0ng5QMu-6ha_RdQ&m=rPXCj9wRsApSGYwFBOE9m0LotoikenCpAHZ4Ot09ioE&s=XMpSsETzzlm1-apjyBCUXz52igbysPDqDt1qjeMleQ&e=.](https://urldefense.proofpoint.com/v2/url?u=https-3A__developers.thameswater.co.uk_Developing-2Da-2Dlarge-2Dsite_Planning-2Dyour-2Ddevelopment_Working-2Dnear-2Dor-2Ddiverting-2Dour-2Dpipes&d=DwIFAw&c=OMjwGp47Ad5otWI0__lpOg&r=A6bK4sK7myXptjA_uaaZPj7OE6BO0ng5QMu-6ha_RdQ&m=rPXCj9wRsApSGYwFBOE9m0LotoikenCpAHZ4Ot09ioE&s=XMpSsETzzlm1-apjyBCUXz52igbysPDqDt1qjeMleQ&e=)

Should you require further information please contact Thames Water:

Email: developer.services@thameswater.co.uk

Phone: 0800 009 3921 (Monday to Friday, 8am to 5pm)

Write: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB

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

Appendix A - Knapdale – Drop-In Session (Minutes)

Knapdale Local Meeting (Drop-In Session) Monday 4th June 2018 – 19:30 – 20:45 @ Civic Suite, Catford

The Knapdale Estate (Local Meeting) was held as a drop-in session with three (3) main discussion tables for design, sunlight/daylight/overlooking and traffic. Informal conversations were had in small groups, however below is a summary of most points discussed.

Attendees:

1. Michael Forrester (LBL - Manager Major and Strategic Projects)
2. Holly Lucas (LBL – Case Officer)
3. Anthony Kelly (Lewisham Homes – PM)
4. Juliet Heap (Planning Consultant)
5. Neill Campbell (bptw Architecture)
6. Thunhairull Islam (bptw Architecture)
7. Barbara Banuls (Herrington Consulting Limited)
8. Nick Ferguson (Paul Mew Associates)

Thirty-one (31) residents signed the attendance sheet at the door.

Comments:

1. Estate Management

- Residents expressed concern with existing issues on the Estate, which they report Lewisham Homes have been made previously aware of. These include:
 - Potholes continually appearing in the bitumen due to runoff. These are filled in, however keep coming back.
 - This has been reported to highways.
 - Refuse consistently not being collected due to the fact that refuse vehicles cannot access all refuse areas.
 - This is a known issue and has been reported to refuse.
 - Burst water mains lead to flooding and poor water pressure, which can cause residents to be without water often.
 - Traffic and parking management is a constant issue. Delivery vehicles cannot enter and at times residents cannot leave the estate if refuse is being collected at the same time.
 - LBL have been made aware of this. Should planning permission be granted, highways improvements will be considered under s278.
 - The roads overall need resurfacing.
 - This has been reported to highways.
 - Abandoned cars are being left on the site and not removed.
 - Lewisham Homes are aware of this.
 - Gutters need cleaning out.
 - Lewisham Homes are aware of this.
 - Many of the existing flats are damp or mouldy.
 - Lewisham Homes are aware of this.
 - Horniman visitors use the estate for parking on the weekend.
 - LBL have been made aware of this. Should planning permission be granted, highways improvements and management will be considered under the s278.

2. Traffic

- Residents are not satisfied that a refuse vehicle will be able to enter the site if cars are parked, as there are already existing issues with access.
 - o LBL refuse have been consulted as part of this application.
- Construction and associated vehicles will cause increased traffic issues.
- Residents queried the PTAL rating identified within the submitted Planning Statement and Transport Assessment as they believe it to be misleading.
 - o Traffic consultant (NF) will check and confirm this.
- Residents questioned the methodology of the parking surveys.
- Horniman parking over the weekend causes additional parking stress.
- Residents reported amenity/footpaths are churned up by vehicles trying to pass tight bends.
- Residents reported previous hardstand areas (drying area) were originally provided for emergency vehicle turn around and should be maintained.

3. Sunlight/Daylight/Overlooking

- Further work to be done on DL/SL. Residents have requested a key drawing or annotated photographs to show which windows and where have been assessed.
- Taymount Lodge
 - o Residents would like to see further SL/DL testing done and impact on their property.
 - o Questioned if LBL could condition obscured glazing/privacy screens.
- Greenbank Cottage
 - o Residents noted that no one has been to the property to inspect the impact or confirm internal layout.
 - o Bedroom to the rear not depicted on the plans as this is a recent extension.
 - Model to be updated for the property at Greenbank Cottage with residents input on room layouts for an amended daylight/sunlight assessment.

4. Design

- Residents would like to see more CGIs/elevations and images from all angles of the development.
 - o Contextual analysis → CGI views of the proposed development as viewed from the rear gardens and houses on Grizedale Terrace.
- Residents believe the height of the building is out of context and should be reduced or at the very least a flat roof should be incorporated.

5. Management & Other

- Residents raised concern around fire safety and wanted a meeting with the fire safety officer.
- Residents have been in contact with Forest Hill Fire Station.
 - o London Fire Brigade have been consulted as part of the consultation process. This response will be incorporated in the Committee Report.
- Residents raised concern regarding emergency vehicle access.
 - o Should planning permission be granted, highways improvements and management will be considered under the s278.
- Residents are concerned about adjoining retaining wall demolition causing cracking.