

Committee Date:	22 October 2020		
Item No.	1		
Site Address:	The Alton Estate		
Application Number:	2019/2516	Date Validated:	07 June 2019
Ward:	Roehampton	Officer:	Janet Ferguson / Joanna Chambers
Application Type:	Hybrid- part full/part outline (Reg.3 - Council's Own)		
Proposal:	<p>a. Phased demolition of all existing buildings and structures (except Alton Activity Centre community building);</p> <p>b. Mixed-use phased development ranging from 1-9 storeys above ground level comprising up to 1,108 residential units and up to 9,377sqm (GIA) of non-residential uses comprising new and replacement community facilities (including library and healthcare facilities, youth facilities, community hall, children's nursery & children's centre) (Class D1); flexible commercial floorspace (comprising retail (Class A1), financial and professional services (Class A2), café / restaurants (Class A3), hot-food takeaways (Class A5), business (Class B1), and community uses (Class D1)); landscaping; removal and replacement of trees; public realm improvements; access improvements; relocation of bus turnaround area and provision of bus driver toilet facility; improvements to children's play facilities; provision of energy centre and associated rooftop plant enclosure; car & cycle parking; and other highway works incidental to the development. All matters reserved except for Blocks A, K, M, N, O, Q, Portswood Place Nursery and Community Centre and highway/landscape/public realm improvements</p>		
Recommendation Summary:	Approve subject to conditions and s106 legal agreement		

SITE DETAILS:

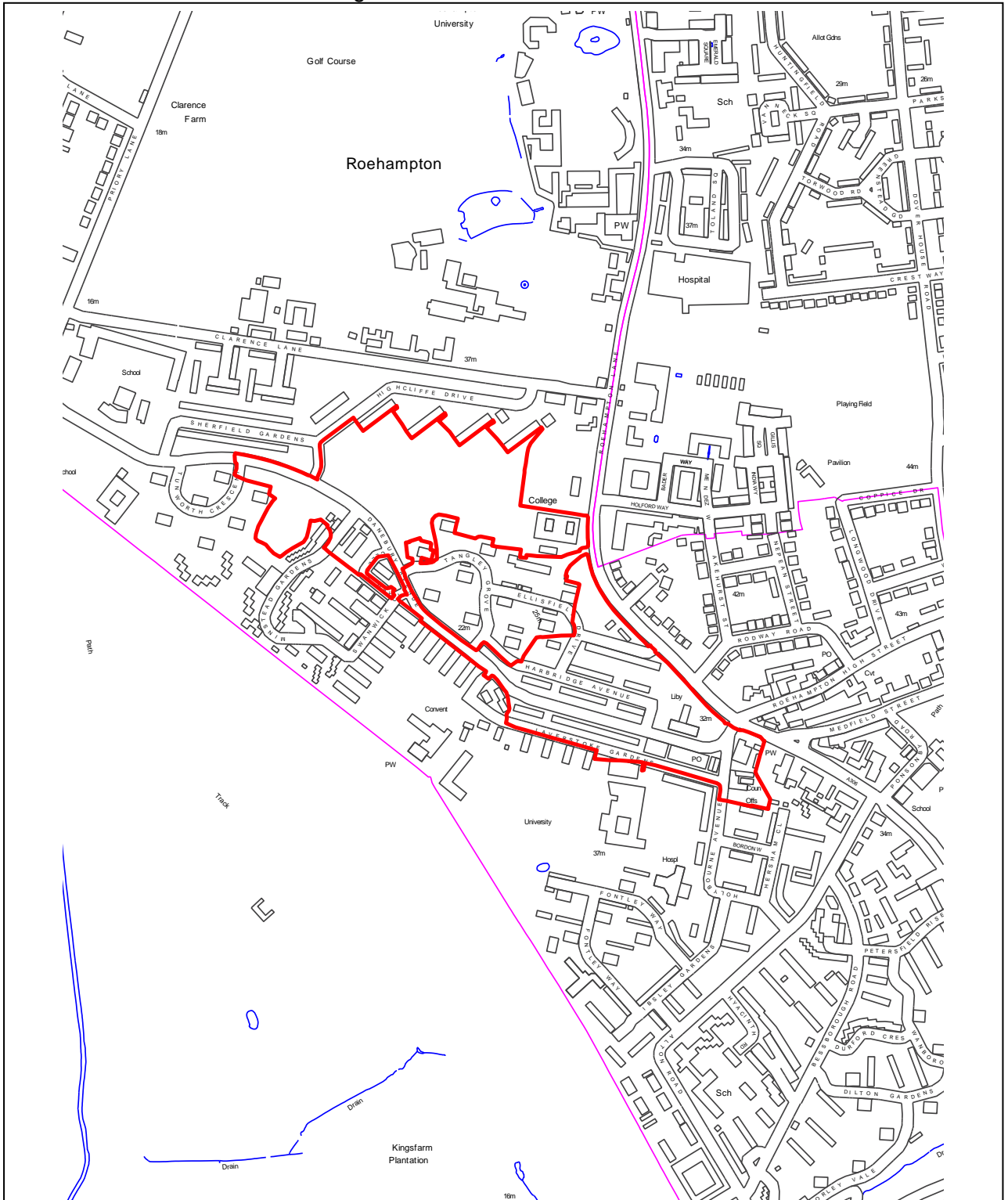
The planning application site is located within the Alton Estate one of the largest Council housing estates in the UK constructed in the 1950s. The irregularly shaped site is located to the north east of the Richmond Park Golf course beyond which lies Richmond Park (covered by a Metropolitan Open Land designation), the edge of which marks Wandsworth's boundary with the London Borough of Richmond Upon Thames. The site is bounded by Roehampton Lane and St Joseph's RC Church to the East; Highcliffe Drive to the North; Laverstock Road, Hersham Close, Danebury Avenue and Minstead Gardens to the South and Tuncliffe Crescent to the West.

The application site extends to 12.5 ha (4.9 ha of which is the open space known as Downshire Field).

The application site includes a number of existing buildings- Allbrook House and residential properties in Danebury Avenue, Portswood Place, Harbridge Avenue, and Roehampton Lane; the Roehampton Library; the Roehampton Base and Roehampton Youth Club; the Roehampton Boys Supporters Club; 166-168 Roehampton Lane (Nursery and Children's Centre); Alton Medical Practice; Danebury Avenue Surgery; commercial properties in Danebury Avenue and

Portswood Place; and the Alton Activity Centre. It also includes Downshire Field open space.

Figure 1: Site Location Plan



Wandsworth

Application No: 2019/2516
Alton Estate London SW15

**Planning and Transport – Environment and
Community Services Directorate**

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Scale:
1:7159
Date:
14-Oct-20

The eastern part of the Application Site is formed of four principle streets (Danebury Avenue, Harbridge Avenue, Kingsclere Close and Laverstoke Gardens) running in an east/west direction. North to south connections are provided by Holybourne Avenue and Ellisfield Drive. The Roehampton Local Centre in the eastern most part of the estate is characterised by concrete framed structures, typically four storeys in height. Allbrook House is the tallest of the existing buildings at 10 storeys. To the west of the Roehampton Local Centre, the buildings are typically 3 to 4 storeys in height and provide residential accommodation only. Alongside these buildings is the Alton Activity Centre, which comprises a single storey community building and children's play space enclosed by fencing.

In the south-eastern most corner of the Application Site is a multi-use games area attached to the youth centre (now closed) accessed via Hersham Close / Holybourne Avenue

The northern edge of the Application Site is defined by 166 and 168 Roehampton Lane. These 3 and 4 storey buildings currently accommodate Eastwood Children's Nursery and Children's Centre and a number of community organisations and services.

Downshire Field is a large area of open space located towards the western side of the Application Site. An existing children's play area is located in the north-east corner of Downshire Field and is set within a landscape interspersed by trees of varying size, age and quality, and pedestrian footpaths. There are a significant number of trees across the remainder of the Application Site, which contribute to the character of the area.

At the base of Downshire Field is Portswood Place, which comprises a small retail parade comprising a convenience store, off-licence and a community organisation known as 'Regenerate'. A GP practice and community club room building for the elderly residents living in the Minstead Gardens bungalows is located to the west of the Portswood Place retail parade. An existing bus turnaround facility is located at the junction between Minstead Gardens and Danebury Avenue. Double decker buses park at the bus stand along Danebury Avenue at the base of Downshire Field before starting their routes.

CONSTRAINTS:

The site is located on the east part of the Alton West Estate, which includes a number of listed buildings dating from the C18th and from the redevelopment of the site in the 1950s, and a number of listed public artworks added subsequently. The five slab blocks on Highcliffe Drive adjacent to the northern boundary of the site were listed at Grade II* in 1998 together with 40 bungalows for the elderly on Minstead Gardens which were listed at Grade II.

Most of the Alton Estate was designated a conservation area in 1998 so that the landscape, setting and other positive buildings in the area could also be conserved and enhanced. The eastern part of the application site is outside the conservation area boundary but the western part of the application site including Block Q and part

of Block M; Portswood Place; the proposed bus turnaround area and Downshire Field; and Harbridge Avenue are located within the designated area.

There are a number of designated heritage assets within and in close proximity to the application site boundary including:

- Grade II listed Bull sculpture located at the bottom of Downshire Field;
- Richmond Park Grade I Registered Park and Garden;
- Grove House Grade I Registered Park and Garden and Grade II* Grove House to the north of the site;
- Grade I Listed Mount Clare House and Temple (Grade II*) in Minstead Gardens to the west of the site;
- Grade I Listed Parkstead House to the south of Danebury Avenue;
- Grade II* Listed Highcliffe slab blocks set within a retained Georgian landscape to the south of Clarence Lane adjacent to the application boundary to the north;
- Grade II* Listed Devonshire House and Gates to the north east of the site;
- Grade II Listed Alton West Bungalows (Nos 1-13) and Minstead Gardens (Nos 15-33) also to the west of the site;
- Grade II listed Danebury Avenue (Nos 245-261) to the south of Danebury Avenue, beyond the application site boundary; and
- Grade II Listed Roehampton House and Lodge to the north east of the site.

The Landscapes to Alton East and Alton West were added to the Register of Parks and Gardens of Special Historic Interest in England by Historic England on 11 June 2020. The boundary of the designated area follows the boundary of the Conservation Area. Whilst inclusion on the Register in itself entails no additional statutory controls, the historic interest of a park or garden is established as a material planning consideration if changes or proposals for development are being contemplated.

The site is located beyond an acceptable walking distance to rail and underground stations; however, there are six bus routes within an acceptable walking distance, with stops located on Roehampton Lane and Danebury Avenue. The site has a public transport accessibility level (PTAL) range of 2 to 3 with the majority of the regeneration site being 3, on a scale of 0 to 6b where 6b is the most accessible. Due to complex level changes throughout the Application Site and the length of building frontages, north/south pedestrian access is often challenging and is not suitable for wheelchair users.

REASON FOR REFERRAL:

The Council's Constitution does not give the Assistant Director of Environment & Community Services (Planning & Transport Strategy) delegated powers to determine the application in the way recommended and it must be determined by the Planning Applications Committee.

RELATED PLANNING APPLICATIONS:

2008/4552: Roehampton Centre, Danebury Avenue - outline planning application for the demolition of the existing buildings and the erection of buildings up to 6 storeys high plus basements to provide 281 flats, supermarket, commercial units, library, health facility, leisure, offices, landscaping, public square and associated car parking spaces. The application was later withdrawn.

2014/2124: 170 Roehampton Lane - Demolition of parts of existing building and erection of part three-, part two-, part single-storey building to provide two-form entry primary school, with associated landscaping, hard and soft play areas, habitat areas, bicycle parking and parking, and felling of 27 trees.

2013/1857: Downshire House, Roehampton Lane– Erection of three buildings between 3 and 5 storeys high, comprising 204 student bedrooms plus wardens flat; restoration of the lower lawn and landscaping with removal of 26 trees (including tree and hedge groups, 13 of which are covered by a preservation order) and planting of 19 trees; formation and alterations to boundary treatment and pedestrian access from Roehampton Lane and alterations to car parking.

2014/3330: Digby Stuart Construction of a part four-, part five- storey building to provide student accommodation, conference suite, academic and support space; construction of a part four-, part five- storey library building to the west of Digby Stuart lawns; associated landscaping and tree works, closure of existing main vehicular access onto Roehampton Lane, alterations to existing southern pedestrian and vehicular access including boundary walls; formation of new pedestrian and vehicular access onto Roehampton Lane; relocation of car parking; alterations and extension to internal road layout and new pedestrian footpath.

APPLICATION DETAILS:

Existing Uses

The Application Site contains 158 (55%) Council tenanted (social rent) homes and 130 (45%) leasehold and freehold (private) properties within a range of buildings. The existing residential units by unit mix and habitable (Hab.) rooms are set out in the tables below.

Unit Total	Hab. Room Total	Unit Size Mix	Social Rent			Private		
			Units	Hab. rooms	NIA sqm	Units	Hab. rooms	NIA sqm
288	1,064	1 bed	20	40	11,158	4	8	10,602
		2 bed	34	102		8	24	
		3 bed	103	412		118	472	
		5 bed	1	6		0	0	
		Total	158	560		130	504	

In addition to residential uses, the Application site incorporates several other land uses, including:

- Community facilities, including the Roehampton Library, Eastwood Children's Nursery and Children's Centre, 'Regenerate', the 'Base' and Roehampton youth centres, the Danebury Doctor's Surgery at 351 Danebury Avenue and the Alton Medical Practice at 208-210 Roehampton Lane.
- Commercial floorspace, located within the Roehampton Local Centre on Danebury Avenue and in Portswood Place. The Roehampton Local Centre includes shops, cafes, fast food takeaways, services and a launderette together with the Council's area housing office and the former MET police office. Portswood Place includes seven retail units. There is vacant office space at 166 Roehampton Lane previously occupied by the Citizens Advice Bureau.

Planning Use Class	Existing Floorspace GIA
Class A1,A2,A3,A5	2,830 sq.m
Class B1	426 sq.m
Class D1	6,083 sqm (3,737 sq. m in use)
Total	9,339 sq. m

Proposed Development

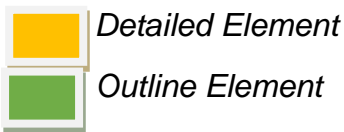
The proposed mixed-use development involves the phased demolition of all existing buildings and structures on the site with the exception of the Alton Activity community building (including the existing 288 residential units, Roehampton Library and retail units on Danebury Avenue and at Portswood Place). The development will require the decanting of existing buildings prior to demolition. Decant will take place over three phases and demolition over two phases. A total of 21 buildings will be demolished. Further details are provided in section 3 under Planning Considerations.

The planning application comprises two parts (i) The Detailed Application (10.64 ha) and (ii) the Outline Application (1.88 ha) which together create the Hybrid Application.

The proposed buildings would range in height from 1 – 9 storeys and provide up to 1,108 residential units and up to 9,377 sq. m. of non-residential uses comprising new and replacement community facilities (5,368 sq. m.); retail and flexible commercial floorspace (3,305 sq. m.), offices (704 sq. m.); landscaping; removal and replacement of trees; the relocation of the bus turning area and bus driver facility; public realm improvements; access improvements; provision of energy centre; car and cycle parking and highways works.

Figure 2 provided below shows the Planning Application Boundary and the extent of the detailed and outline phases.

Figure 2: Outline and Detailed Phases



The proposed development may be summarised as follows:

Residential

- A total of up to 1,108 dwellings, of which 24% will be affordable (28% by habitable rooms);
- Up to 261 affordable units comprising 201 social rented (including 158 replacement social rented homes), 29 shared equity, and 31 shared ownership units;
- 10% of new dwellings will be built as wheelchair accessible or easily adaptable for wheelchair use.

Summary of accommodation and floorspace

**Proposed Floorspace by Use
Residential**

Use	Floorspace sq. m Net Internal Area		
	Existing	Proposed	Net Increase
Market Housing	10,602	56,847	46,245

Use	Floorspace sq. m Net Internal Area		
	Existing	Proposed	Net Increase
Affordable/Social Housing	11,330	21,201	9,871

Proposed Dwellings (Gross) by Tenure and Size (Detailed and Outline Elements)

Tenure	Unit Size					Total
	Studio	1 bedroom	2 bedroom	3 bedroom	4+ bedroom	
Market	1	228	566	52	0	847
Social Rent		43	70	63	25	201
Intermediate		14	19	27	0	60
Total	1	286	655	142	25	1108

Non-residential uses

Community Uses

- Multi-purpose community building including a new library, health facilities, youth facilities and a community hall
- A new community hub at Portswood Place including a Nursery and Children's Centre, a shared community space, a replacement club room for older residents and health uses
- Replacement meeting room for elderly residents in Minstead Gardens
- GP surgery or other community space at Portswood Place

Retail and commercial

- New and replacement retail and business space including a food store and other retail units in the Roehampton Local Centre and at Portswood Place
- Flexible commercial (A12-A3, A5, B1 and D1)
- Offices

Use	Floorspace sq ms GIA		
	Existing	Proposed	Net
Office (A2, B1)	426	704	278
Retail (A1, A3-A5)	2830	2830	0
Community (D1)	6083*	5368	-715
Flexible Commercial (A1-A3, A5, B1 and D1)		475	475
Total	9,339	8,951	-388

* 3,737 sq. m in use

Open Space, Play Space and Public Realm

- The enhancement of Downshire Field
- New and replacement play facilities including works to existing play space and facilities at the Alton Activity Centre and Downshire Field
- Doorstep play space for under five-year olds: Up to;
- Accessible play space for five to 12-year olds: Up to; and
- Play space for children aged over 12: Up to 0.96 ha (9,619sqm).

Amenity Space- Detailed Element (Policy DMH7 requirement = 7,090 sq.m)

<u>Type</u>	<u>Area (sq.m)</u>
<u>Private amenity space</u>	<u>5,128 sq.m</u>
<u>Communal garden</u>	<u>5,134 sq.m</u>
<u>Total</u>	<u>10,262 sq.m</u>

CO2 Emissions

<u>Type</u>	<u>Total Percentage Reduction Compared to Part L 2013 Building Regulations after Energy Demand Reduction, Heat Network and Renewable Energy</u>
<u>Domestic</u>	<u>37.4%</u>
<u>Non-Domestic</u>	<u>36.9%</u>

Detailed Element:

654 residential units (458 private and 196 affordable (136 social rent, 29 shared equity and 30 shared ownership))

Proposed Dwellings (Gross) by Tenure and Size (Detailed Element)

Tenure	Unit Size					Total
	Studio	1 bedroom	2 bedroom	3 bedroom	4+ bedroom	
Market		128	316	14	0	458
Social Rent		33	41	43	19	136
Intermediate		14	19	27	0	60
Total	0	175	376	84	19	654

D1 Community uses- 2,827 sq.m (Library, youth, community uses, health centre)
Retail - 1,627 sq.m
Offices - 704 sq.m

The Detailed Element comprises Blocks A, K, M, N, O, Q, Portswood Place Nursery and Community Centre and the highway, public realm and landscape improvements across the application site.

Block A

A 7 storey building located at the south-eastern boundary of the Application Site, adjacent to Holybourne Avenue and Hersham Close comprising:

40 residential units (35 social rent + 5 shared equity)

Community hub- Library, community hall, youth base and health centre-2,827 sqm

Block O

A 7 storey building fronting onto Danebury Avenue at the junction with Roehampton Lane comprising:

35 residential units (29 social rent+ 6 shared equity)

Retail- 637 sqm

Offices- 704 sqm

Block M

Block M is located on Roehampton Lane and ranges in height from 7-9 storeys comprising:

107 residential units (private)

Block N

Block N consists of four linked blocks- Block N1 (7 storeys), Block N2 (6 storeys), Block N3 (6 storeys) and Block N4 (7 storeys) comprising:

121 residential units (private)

Retail- 990 sqm

Block K

Block K consists of three blocks- Block K1 (5-9 storeys), Block K2 (5-9 storeys) and Block K3 (5-7 storeys) comprising:

230 residential units (private)

Block Q

Block Q consists of three blocks block Q1 (8 storeys), Block Q2 fronting Roehampton Lane (6 storeys) and Block Q3 (8 storeys) comprising:

121 residential units (72 social rent, 18 shared equity and 31 shared ownership)

Portswood Place

Two buildings comprising:

Nursery and children's centre- 1,940 sq.m

Retail - 85 sqm

Minstead Gardens Club room- 123 sq.m

Health centre/ D1 community use- 473 sq.m

Outline Element

The Outline Element comprises 8 plots for which plot size, access routes, siting, maximum height, the usage of ground floor frontages, areas of open space and street hierarchy are controlled by the Parameter Plans. The Design Code provides

further 'control' of the detailed design of any future buildings proposed on these plots. The outline element will deliver:

Residential- up to 454 units (389 private and 65 social rent)

Retail- 1,118 sqm

Flexible commercial space- 475 sqm

The dwelling sizes for the outline element have not been specified although an indicative mix has been provided in the application.

Proposed Dwellings (Gross) by Tenure and Size (Outline Element)

Tenure	Total	Habitable Rooms
Market	389	1,104
Social Rent	65	219
Intermediate	0	0
Total	454	1,323

The following parameters will be applied to the market tenure homes in the Outline element. The mix of the affordable units will be determined in consultation with the Council's housing team to reflect housing needs:

- Studios – no more than 5% of the total quantum of private units
- Two Bedroom or larger – at least 50% of the total quantum of private units
- At least 10% of units being family size housing (three bedrooms or more)

Reserved Matters submissions for the Outline Element of the Application Site are to conform to the following parameter plans, which have been submitted for approval as part of the planning application:

- Parameter Plan (drawing ref: 9028-A-Z-M-100-04-0030 P02) Development plot edges:** Identifies the extent of the development plots. A tolerance for a setback of up to 0.5m from the marked position has been included for the east/west plot edge and up to a 3m setback on the north/south edge to provide scope for articulation in the building frontage.
- Parameter Plan (drawing ref: 9028-A-Z-M-100-04-0031 P02) Access and circulation:** This plan establishes the vehicular and pedestrian access routes within the Outline Element.
- Parameter Plan (drawing ref: 9028-A-Z-M-100-04-0032 P02) Maximum plot heights:** confirms the maximum building heights in the Outline Element as being +54.61 AOD (to MEP) for plots H-J and +57.02 (to MEP) for plots B-G.
- Parameter Plan (drawing ref: 9028-A-Z-M-100-04-0033 P02) Ground floor frontage:** Confirms the extent of residential and non-residential frontage within the Outline Element.
- Parameter Plan (drawing ref: 9028-A-Z-M-100-04-0034 P02) Public realm:** Sets the hierarchy of streets and locations of areas of green space.

Each Reserved Matters application will be required to accord with the Parameter Plans and the Design Code. The Proposed Development will also be controlled by planning conditions and a planning obligation prepared in accordance with Section 106 of the Town and Country Planning Act 1990

Amendments made during application

Revisions were submitted to Council on 17th March. The validation of the amendments and start of the consultation period was delayed until 20th May due to the Council's resolution not to commence consultation on major development proposals during the height of the Covid-19 pandemic. The principal revisions to the application – and the basis on which the Committee is asked to consider the application – may be summarised as follows:

1. Housing mix, tenure and layouts:

- a. An increase in the total number of homes from up to 1,103 to up to 1,108.
- b. An increase in the total number of affordable homes from 256 to 261 (24% of the total number of homes) and the total number of affordable habitable rooms from 906 to 909 (28% of the total number of habitable rooms), including increasing the amount of social rent housing from 188 to 201 homes (77% of the affordable homes).
- c. Increase the amount of social rent floorspace on the Application Site from 11,158 sqm to 16,372 sqm, an increase of 47%, with replacement housing for Council tenants remaining on the Application Site sized to meet their needs.
- d. Enable the early delivery of more affordable housing by increasing the number of affordable homes in the Detailed Element from 156 homes (24% of the total in the Detailed Element) in the originally submitted proposals to 196 homes (30% of the total in the Detailed Element). The number of affordable habitable rooms has increased from 583 (30% of the total in the Detailed Element) to 690 (35% of the total).
- e. Alterations to Block O's housing mix and tenure to deliver 35 affordable homes (social rent and shared equity), instead of 40 private tenure homes as originally proposed, along with corresponding minor revisions to the building elevations.
- f. Increase the number of affordable homes in Block Q from 116 to 121 along with corresponding alterations to apartment layouts, affordable housing tenures (comprising social rent, shared equity and shared ownership homes), minor revisions to the building elevations and landscape design.
- g. Internal alterations to residential apartment and non-residential floorspace layouts in Block A and alterations to the wheelchair accessible route from Holybourne Avenue to Hershams Close to the rear of the building.
- h. Adjustments to the alterations to internal layouts of Blocks K, M, O and N and corresponding minor adjustments to building elevations to improve accessibility and waste collection arrangements.
- i. Adjustments to the outline housing mix and tenure to reflect an earlier delivery of affordable housing through Block O and provide 65 social rent affordable homes.

2. Non-residential accommodation:

- a. The updated configuration of several of the blocks has altered the maximum amount of non-residential floorspace from 9,572 sqm to 9,377 sqm, which would comprise up to 3,305 sqm of flexible commercial uses (Classes A1-A3, A5, B1 &

D1), 704 sqm of office (Class B1) floorspace and 5,368 sqm of community (Class D1) floorspace.

3. *Landscape design and public realm:*

- a. Minor adjustments to the road alignments and design of the proposed village square in response to service coordination issues and revised landscape design on the traffic island at the junction between Danebury Avenue and Roehampton Lane.
- b. Revisions to landscape design to retain the existing trees in a refurbished streetscape along Harbridge Avenue.
- c. Provision of a bus driver toilet facility adjacent to the proposed bus turnaround next to the junction of Danebury Avenue and Tunworth Crescent and repositioning of bus stop on south side of Danebury Avenue adjacent to the junction with Minstead Gardens.

4. *Revised energy strategy*, including provision of plant enclosure on the roof of Block N.

The application drawings have been updated, where necessary, to reflect the revised scheme. These include a full set of replacement detailed floor plan drawings for Blocks A, K, M, N, O, Q and the Portswood Place Community Centre together with those elevations and section drawings that are consequently altered. New drawings are also provided for the bus driver toilet facility which has been added adjacent to the proposed bus turnaround next to junction of Danebury Avenue and Tunworth Crescent.

A revised set of site wide masterplan drawings and Parameter Plans have been submitted to ensure that changes to the public realm, access arrangements and tree strategy remain properly coordinated with the updated illustrative masterplan and landscape drawings. Where necessary, the application documents have been revised to reflect the proposed amendments to the scheme and/or address matters raised as part of the statutory planning consultation. These documents are provided either in the form of a full revision, or in the form of an addendum document. The ES Addendum is supported by the following information:

- Population and Human Health technical note.
- Air Quality technical note (updates to air quality neutral calculations).
- Updated Bat Survey Report (Phase 1a) undertaken by Aspect Ecology.

Supporting Documents

The following suite of documents were submitted in support of the application:

- Revised Development Specification
- Revised Parameter Plans
- Design and Access Statement
- Design and Access Statement Addendum
- Access Statement
- Environmental Statement
- Environmental Statement Addendum (March 2020)
- Environmental Statement Addendum (June 2020)

- FRA and Drainage Addendum
- Revised Energy Strategy
- Sustainability Statement Addendum
- Transport Assessment Addendum
- Verified Views
- Heritage Statement Addendum
- Aboricultural Addendum
- Revised Financial Viability Assessment
- Affordable Housing Addendum
- Revised Decant Strategy
- Non-residential Management and Governance Statement
- Framework Wider Estate Management Structure
- Revised Equalities Impact Needs Assessment
- Statement of Community Involvement
- Statement of Community Involvement Addendum
- Operational Waste Strategy
- Operational Waste Strategy Addendum
- Revised Internal Daylight, Sunlight and Overshadowing Assessment
- Fire Safety Strategy
- Fire Safety Strategy Addendum

COMMUNITY INFRASTRUCTURE LEVY ESTIMATE

CIL Estimate	
Mayoral	Borough
£7,921,708	N/A

The actual amount of CIL can only be confirmed once all relevant details are approved and any appropriate relief claimed. The application site is located within the ‘Roehampton Charging Area’ on the ‘Community Infrastructure Levy Charge Zones’ map (within the adopted Borough CIL Charging Schedule) where there is zero charge for all new floor space.

CONSULTATION:

There have been three rounds of consultation on the application:

1. The Application was validated on 7th June 2019. A 30-day statutory public consultation following the submission of the application concluded on 26th July 2019.

Number of letters sent	Leaflet drop of 6773 leaflets between 11 and 18 th June 2019
Site Notice	Y
Press Notice	Y
Number of responses received	127

Number of neighbour objections	112 (from 56 individuals)
Number of neighbour support	5
Number of neighbour comments	10

Petitions

1. St Joseph's Catholic Church – 'We register objection to the total demolition of the buildings at the centre of the Alton estate, obliteration of the Village Green and re-building as set out in this planning application. We request a refusal- **99 signatories**
2. Make the Alton Estate regeneration a better deal for Roehampton: Build more Council homes; we want more and better youth facilities; we want dedicated space for local community groups; we want better transport connections including more buses- **363 signatories**

Neighbour Consultation Summary

OBJECTIONS:

Housing

- The proposed level of social/affordable housing is insufficient for a scheme of this nature and should be increased- imbalance between private homes and council homes.
- The affordable housing is considered to be segregated on the periphery of the Application Site and must be better integrated throughout the scheme to create a more mixed community.
- Insufficient number of larger family units.
- Insufficient housing for people to stay in area
- No suitable homes for freehold residents in Kingsclere Close- family homes were included in original masterplan.
- Replacement homes to be built to minimum standards.
- Development will result in social cleansing.

Impact on Tenants/leaseholders

- Increased costs to residents due to higher service charges.
- Lack of consultation.
- No benefits for existing residents and businesses.
- Requests from tenants for second move if desired should be allowed to enable move to desired location in later stages of development
- Residents should be well informed and given right of ballot before works commence.
- Costs to leaseholders- little evidence of any improvements
- Timing of consultation at start of summer holiday- extra time required.
- No evidence of local support.
- Council has deliberately run down area and businesses have suffered. Loss of long standing residents and replacement by new temporary residents.
- Decline in property values.
- Offer to existing property owners is unfair- not like for like replacement.

Transport

- Lack of provision of parking- scale of development will exacerbate existing problems in area.

- Need to do more to improve public transport services- assurances needed that adequate provision will be secured. Existing services already under pressure due to University and Hospital. If services are not improved there will be an increase in level of car usage and additional pressures on parking provision
- Surveys out of date- need to take account of closure of Hammersmith Bridge.
- Kingsclere Close will become a rat run with problems of noise, pollution and road safety.
- Impacts of traffic generation during construction.
- Problems of servicing/unloading.
- Impact of increased traffic/activity on Holybourne Road.
- Narrow width of streets.
- Need better provision for cycling to link Estate to Barnes station and improved storage facilities at station

Bus Turnaround

- Too close to residential properties- will result in loss of trees, noise and pollution

Design

- Impact on character of area and townscape
- New blocks are characterless and not in keeping with estate's architecture
- Scale of Portswood Place out of proportion to surroundings.
- Impact on visual amenities of properties in Roehampton Lane not considered.

Height and Density

- Development is too tall- increase in height from original masterplan and creation of canyon with tall buildings on Danebury Avenue.
- Social impacts of increase in density and overdevelopment.
- Detrimental impacts of tall buildings on crime and anti-social behaviour.

Heritage

- Impact on setting of Conservation Area and heritage assets.
- Allbrook House and Library should not be demolished.
- Conservation Area should be extended to include Allbrook House.
- Impact of development on skyline and views from Richmond Park.

Community Facilities

- Need more affordable space for community groups.
- Need stronger commitment to community and youth facilities.
- Reduction in provision of youth facilities and lack of choice and range.
- Play area in Downshire Field should be located closer to Nursery.
- No mention of CAB community development project- should be funded for full period of regeneration project.
- Consideration should have been given to provision of Mosque.
- Community facilities located at most constricted junction of Roehampton Lane and Danebury Avenue.
- Loss of shops and services during construction
- Affordability and type of new shops
- Businesses are declining due to decline of area.

Impact on Amenity

- Loss of light- impact on individual properties including properties on Roehampton Lane and Hersham Close: criteria not met on a number of windows.
- Loss of privacy/overlooking
- Loss of views of Richmond Park.

- Impact on amenity- pollution, noise and traffic.
- Effect on air quality

Noise

- Noise from traffic and demolition/ construction works over 10 year construction programme.
- Increased noise due to visitors/ activity in Portswood Place community hub.
- Impact of activities in village square on residential amenity

Infrastructure

- Water supply/ sewerage capacity inadequate to handle existing pressures. Existing situation will be made worse by development- evidence of water leaks and burst mains on Holybourne Avenue and Danebury Avenue.
- Nothing innovative in waste strategy.

Demolition of Existing Buildings

- Environmental, health and social impacts of demolition.
- Estate should be refurbished not demolished.

Open Space

- Loss of Village Green outside Library
- Loss of existing green spaces
- Design of Village Square- does not integrate with Roehampton Village, token grassed space, impact on security of St Joseph's Church.
- No example where Council has maintained podium landscaping/ communal open space.
- Inadequate provision of new green spaces.

Trees

- Loss of trees on Harbridge Avenue and Danebury Avenue
- Lack of new tree planting
- Question no net tree loss- not a like for like replacement in terms of size and maturity

Biodiversity

- Impact on biodiversity and protected species e.g. bats
- Habitat clearance should be compensated for on like for like basis- including provision for bat boxes on buildings and trees
- No details provided of green walls and green/brown roofs
- No Habitats regulation License to undertake works that will affect bats

Sustainability

- Climate emergency has not been addressed- further consideration required of energy efficiency and use of new technologies
- Need to future proof development in relation to future guidelines

Inclusive Design

- Lack of provision for disabled access.

Crime Prevention

- No provision for crime prevention/ designing out crime- should be a key driver for regeneration
- Failure to address drug dealing on estate

Relationship to Policy

- Contrary to Roehampton SPD which seeks to strengthen and repair special qualities of estate, limit height and protect trees

- Contrary to London Plan- high density housing should only be allowed within 800m of transport hub
- Changes to SPD were not subject to consultation.

Relationship to Masterplan

- The vision is different to that presented at Consultation events
- Proposals depart from earlier plans.

Development Costs

- Development is driven by developer profits
- Costs of decant have not been explained

SUPPORTS: summarised as Proposals will enhance the Alton Estate and provide new housing and further amenity for residents

- Same rent and still living in Roehampton deal is welcomed
- Endorse the plans and encourage the Council to proceed as quickly as possible
- Removal of unsightly buildings will be a significant improvement
- Changes will have aesthetic and cultural benefits and improve the area
- Danebury Avenue is unattractive- flats seem to have been built backwards with gardens looking out onto main road
- Businesses have been given due regard and will be able to operate during regeneration
- Overcrowding will be addressed
- Improved bus services will benefit residents
- Elderly residents will be moved together and maintain support network
- There will be no gated communities

COMMENTS: summarised as:

- Request for bus stop where the bus currently terminates on Bull Green plus two benches and extended bus route up Highcliffe Drive to connect local services such as Queen Mary Hospital with Kingston Hospital, ASDA and Barnes Station.
- The regeneration of the Alton Estate is committed to a pedestrian gate into Richmond Park
- Further details requested of construction traffic routes
- Demolition area includes many people in temporary accommodation- what is being done to help them move. Families with children should receive help to stay in local schools
- The design of the new blocks could be improved
- Balconies should have access to sunlight and not be in shadow
- The Alton Community Centre in Petersfield Road should be renovated to provide space for community groups
- Children's play areas should not be segregated
- More cycle hangars should be provided together with a cycle hire hub
- Each new block should be encouraged to form a resident's association to help with maintenance, new initiatives and building a sense of community
- Concern about parking and traffic in Putney Heath which will be made worse if construction traffic uses these routes.
- In favour of area being improved but worried this involves privatisation
- Block A could be used by a charity to help young people with provision of bedsits
- Other parts of Alton Estate should benefit from improvements.

- Support for community spaces and better use of Downshire Field for recreation
- Need to consider wildlife e.g. bat and bird boxes
- Concerned about environmental impact and need more details about use of renewable energy.

Other consultation responses: summarised as

Putney Society- Objection:

- **Environmental cost-** existing buildings are not unfit but suffer from lack of maintenance and can be upgraded as in case of identical blocks in Sherfield Gardens and across Alton East. Demolition and replacement by concrete framed blocks will release CO2, create over 200,000 HGV trips, ten years of dust, pollution and wasted energy on a scale that will not be offset by energy savings and result in loss of mature trees. Ignores climate emergency and will make it impossible for Council to achieve its ambition to be carbon neutral by 2030.
- **Transport-** high density development should be directed to locations well served by public transport and local amenities. Poor transport connections make area unsuitable for high density development - isolation accounts for deprivation in area and redevelopment won't cure this. Existing services lack capacity to accommodate increased demand. Need to secure bus service enhancements especially links to Barnes Station. Poor transport leads to car dependency. Parking provision inadequate and need for highway improvements to accommodate traffic movements.
- **Social facilities-** new facilities only replace existing and there is no expansion to cater for extra population or flexibility to meet changing needs/ approach is wasteful. Phasing plan requires co-op and chemist to move twice.
- **Layout -** village green is smaller and less green than in illustrations and located next to busy polluted road and in shadow of library for most of day. Requirement for barrier block between the village green and road. Lack of pedestrian friendly streets and green space.
- **Not in accordance with policy-** The current scheme is more dense than envisaged by the SPD (and not in conformity with policy) and was first seen at an exhibition in 2018. It has not been developed in consultation with local community and has not addressed previous feedback. 23% affordable housing is not enough. 33% should be provided on Council owned land in accordance with policy.
- Only 33 additional affordable units will be provided at huge cost.
- Wholesale demolition is not socially, economically or environmentally viable.

Justine Greening MP for Putney, Roehampton and Southfields- Welcomes investment which is long over-due. Key to achieve maximum impact of funding whilst preserving the heritage of the area. Consideration should be given to following:

- **Housing-** urge the Council to ensure it is maximising the amount of affordable housing that scheme has potential to unlock. Additional steps would be welcome to improve integration of private and social rented housing. Need to consider height of buildings and how to minimise impacts on residential amenity in terms of daylight and overlooking and to ensure new homes are of a high quality and

complement existing estate. Welcome the focus on ensuring people can stay on estate whilst regeneration takes place.

- **Wider community facilities provision-** level of provision is crucial. New library should incorporate community meeting space so that it encourages the maximum number of residents to use it. Welcomes play areas and Nursery and Early Years provision. The investment in youth facilities as part of the regeneration is crucial, and council should continue to look at whether more can be invested in this area.
- **Environment-** welcomes extra investment in outside areas. Support for a clear plan to be developed with the Royal Parks to improve pedestrian access to Richmond Park from the Alton Estate. Managing the disruption to residents on the estate will be vital in terms of traffic disruption, and noise and air pollution to minimise impacts on residents. Pledge to replace the trees in greater numbers is welcome. The new square and green will be important to get right and can be a real community focal point and hub for community activities. Local residents should be engaged in detailed plans.
- **Transport-** Given the extra pressure that will be put on public services and transport with extra residents in the area, it is very important that Council works with TfL to improve transport links in tandem with the regeneration plans. Also, an opportunity to work with the Royal Parks and TfL to help cut down on car journeys to Richmond Park and the Roehampton area, reducing congestion and pollution.
- **Economic Development-** need to ensure local people can benefit from jobs created- JobCentre Plus should be located on site
- The Council should ensure that whilst development underway, rest of Alton Estate and wider community can benefit from further improvements and wider investment.

Councillor Ambache, Ward Councillor- Objection:

- **Affordable housing-** the 23% provision does not match policy requirements- should be at least an extra 100 council homes. Developers profit should be reduced in the FVA to increase level of affordable housing as on other regeneration schemes
- **Segregated housing-** Not addressed in EINA and tenures should be mixed in blocks. Segregation will not help community cohesion.
- **Housing offers-** many tenants would like to make a second move and request a move back when latter parts of scheme are completed- this should be considered by Council.
- **Community use of Library-** The new library building should have rooms for community use at affordable rents. No mention of the CAB community development project. Should be an integral part of regeneration programme and funded for 8 years.
- **Youth facilities-** concern that youth services are being reduced with 2 facilities being moved into a shared facility, Need commitment to improvement of services. Need to reconsider play space on Downshire Field- should be near Nursery.
- **Transport-** need for stronger commitment to improving bus services; easier access to car sharing/ car clubs; better use of cycle lanes and provision of bicycle storage at stations. Car parking figures should be reviewed and ensure right provision is made for additional population.

- **Shops-** support for stronger local retail offer, local bank; incubation unit for local start-up businesses and a health and wellbeing café
- **Jobs and training-** high levels of training and apprenticeships should be secured from development.

Councillor S McKinney, Ward Councillor- **Support:**

- Residents support the regeneration and improved housing
- Danebury Avenue is unattractive
- Continuity of businesses
- Problems of overcrowding will be addressed
- Support for pedestrian gate into Richmond Park
- Development will deliver extended bus route and connections to ASDA, Barnes Station and Kingston Hospital
- No gated communities
- Elderly can be moved together and maintain internal support network
- Importance of management of construction traffic and identification of suitable routes
- Potential for improvement of block design
- Segregation of play spaces should be avoided
- Need for improved cycle provision
- Importance of maintenance and encouragement of resident participation to build sense of community

External Consultation Responses:

Cadent Gas- **No Objection:** request informative regarding considerations in relation to gas apparatus within application site

Council for British Archaeology- **No Comments**

Environment Agency- **No objection** subject to imposition of conditions relating to contamination concerned with the installation of sustainable drainage systems and protection of underlying groundwater from pollution. The site has a low contamination potential (mostly residential since the 1950s) and is located in an area of low sensitivity with respect to Controlled Waters.

GLA- The application does not yet comply with the London Plan and the draft London Plan:

- **Estate regeneration:** The proposals do not comply with London Plan Policy 3.14 and draft London Plan Policy H10 or the GPGER as would not deliver like for like replacement of social rented units; shortcomings in the consultation process; the decant strategy lacks detail and does not take account of the impact of CPO process. The principle of estate regeneration would only be accepted once these issues are addressed.
- **Affordable housing:** Affordable housing segregated in single tenure blocks on periphery and must be better integrated. Offer itself is unclear. and shared equity not recognised by the GLA as a genuinely affordable housing product. The offer, excluding shared equity is 8% affordable housing on the uplift generated on site (64:36 split between social rent and shared ownership), No clear commitment to

providing the additional 20 social rent units and shared ownership units within the estate/ satellite sites. The applicant's FVA to be robustly interrogated to ensure that the maximum reasonable affordable housing offer is secured. Level of Council funding (and other government funding) unclear and the impact of GLA grant funding should be considered. Early and late stage reviews must be secured in the s106.

- **Community and commercial uses:** The applicant must demonstrate retail units are fit for purpose and would meet retained tenant's needs; the affordable office space in relation to management and affordable terms; and confirmation the community floorspace improves upon the existing and would be managed.
- **Equalities:** The negative temporary impacts relating to construction and phasing not fully addressed. A number of the positive, long-term impacts identified and disproportionate impact of the rehousing of non-secured social tenants on women and BAME of concern and the applicant should provide further comfort that the rehousing of these residents would be managed to minimise harm including confirmation that replacement accommodation would be provided in the form of social rent or LAR.
- **Urban design:** Barriers to access must be addressed. The scheme must be tenure blind and fully integrate affordable housing. An additional core should be provided in block M and direct front door access should be provided where possible. The entrance to the core of block Q should be provided from the street rather than the car park.
- **Heritage:** The impact of the scheme on designated heritage assets is limited would not result in more than less than substantial harm. The public benefits arising from the scheme in terms of housing and affordable housing delivery and regeneration of the estate more generally could be considered as outweighing any identified harm if all other issues resolved.
- **Inclusive access and fire safety:** The proposed access arrangements are generally poor and not inclusive. The access strategy should be fundamentally revised to demonstrate a clear improvement over existing. The proportion of wheelchair units for the replacement units should be confirmed and the remaining units should comply with Building Regulations M4(3). Fire lifts should also be provided.
- **Energy:** Further information has been requested including the GLA's Carbon Emission Reporting spreadsheet; SAP 2012 emissions factors; original supporting documents; overheating; site wide network; phasing programme; alternatives to CHP; maximisation of PV; and clarification of CO2 savings.
- **Sustainable drainage and flood risk:** Further details required on how SuDs measures at the top of the drainage strategy will be included in the development and water harvesting and reuse should be considered.
- **Urban greening:** The bus turning facility relocation should be reconsidered given the loss of mature trees and adequate replacement of trees necessary. Confirmation that the scheme would achieve an urban greening factor of 0.4 is required.
- **Transport:** Car parking provision should be reduced; and a Controlled Parking Zone should be implemented on the estate roads. The relocation of the bus turnaround facility should be fully justified. A contribution will be sought for bus capacity improvements.

Environment Agency-**No objection** subject to conditions relating to contamination, the installation of sustainable drainage systems and protection of underlying groundwater from pollution. Without these conditions, the proposed development on this site poses an unacceptable risk to the environment and the EA would wish to object to the planning application. The site has a low contamination potential (mostly residential since the 1950s) and is located in an area of low sensitivity with respect to Controlled Waters.

Historic England- **No Objection:**

- Strongly recommend that the details of the surgery and community building are revisited.
- The replacement of the undesignated buildings to the east side of Alton West will make a change to the setting of the Alton Conservation Area and the listed buildings within it.
- New Block Q introduces larger structures in the Alton Conservation Area in the setting of the Grade II* Downshire House whilst it is well buffered and sits in the context of taller grade II listed point blocks.
- Longer-range impacts on the Grade I Registered Park and Garden of Richmond Park are very limited.
- Some harmful impact on the historic environment towards Roehampton Lane and Danebury Avenue would be less-than substantial. Scheme to be weighed against public benefits. Some elements of the scheme could be improved to limit this harm.
- Disappointed some of works proposed at pre-application and in SPD to enhance the designed landscape of the conservation area not realised and the intention to reopen views across the Estate, not included.
- The Lime trees in Harbridge Avenue should be retained to limit harm to designated assets. The lime trees replaced an historic lime avenue, which was retained from the historic Manresa House estate and was included as a spur of the Alton Conservation Area to recognise this value and no justification provided for its loss.
- No objection to the replacement of the new community building to the north end of Minstead Gardens but note the new design must be as low as possible and should complement the bungalows in form and materiality. The visual counterpoint of the bungalows with the Grade II* slab blocks will be somewhat interrupted by this very different interjecting structure, and strongly suggest a return to the earlier suggestions of cleaner lines, greater solidity and more complementary materials, and that further detail on the relationship with the bungalows is sought.

Historic England (Archaeology)- **No Objection:** The application lies in an area of archaeological interest and the development could cause harm to archaeological remains. The significance of the asset and scale of harm is such that it is recommended that the on-going archaeological interest be considered and secured by condition. Given the scale of the site, the status of the land and lack of geotechnical data, the evaluation will consist of two elements: monitoring any geotechnical site survey work and geo/archaeological evaluation. The results will confirm if any on-going archaeological interest and if mitigation necessary.

LB Hammersmith & Fulham- No objection

LB Merton- No objection

LB Richmond- No objection subject to following:

- Follow up surveys will be required as per local biodiversity policy.
- External lighting should be minimal, only where needed, should be no upward light spill. Lamps, specs, locations and lux contour plans should be provided as evidence of minimal lighting (0.5lux) to be agreed by the Wandsworth Ecology Officer
- Green roofs/SUDS/Green walls should be included wherever possible to be agreed by the Wandsworth Ecology Officer
- A Biodiversity Policy for the site should be devised (and revised at appropriate periods in time for perpetuity) in collaboration with the Wandsworth Ecology Officer.
- A Landscape and Environmental Management plan should be devised for the site (and revised at appropriate periods in time for perpetuity) in collaboration with the Wandsworth Ecology Officer. This should prioritise priority species and habitats.
- A full Landscape Plan should be seen and agreed by the Wandsworth Ecology Officer and should consist of proposed species, spec and maintenance.
- A full ecological enhancement plan should be devised as per the recommendations from the WSP PEA and Species surveys, along with maintenance programme. And should be evidenced by a plan showing enhancement type, spec, species, location, aspect, height (where necessary) to be agreed by the Wandsworth Ecology Officer

London Fire Brigade- No Objection: no additional hydrants required.

Metropolitan Police Service- No Objection

- The designs have taken on board some of our earlier comments however there are some persistent issues remaining such as entrance lobby arrangements, refuse strategy, and cycle storage and fire escapes which are constant between blocks and could have potential to be troublesome for residents and managing agents.
- If a redesign is not possible, to provide additional security we will have to mitigate any design issues to ensure it meets Secured by Design part 2 with additional fob doors and CCTV and this has a cost uplift in implementation and maintenance. In our experience it can be difficult for DDA users as residents find 3 secure doors as the maximum, they typically wish to negotiate

Sport England - No objection: encourage the Council to consider the sporting needs arising from development and to direct CIL monies to deliver new and improved facilities for sport. Recommend the use of Active Design guidance in interests of health and wellbeing. Welcome measures to improve walking and cycling. Retention of open space that can serve whole development is welcomed and Council should consider whether or not a ball court/MUGA or skate park should be included within this space to benefit local young people.

Natural England - No Objection: The proposed development will not have significant adverse impacts on statutorily protected nature conservation sites or landscapes

Thames Water - No objection on grounds of foul water sewerage or surface water network infrastructure capacity. Thames Water has identified an inability of the existing water network infrastructure to accommodate the needs of the development and request a condition to effect that no properties shall be occupied until confirmation has been provided that all water network upgrades required to accommodate the additional flows have been completed or a housing and infrastructure phasing plan has been agreed and no occupation shall take place otherwise than in accordance with this. Informative recommended as development is within 15m of underground water asset and highlighting that building over or within 3m of water mains is not permitted.

Transport for London - Further information requested.

- Changes are proposed at the junction of Danebury Avenue and Roehampton Lane, the Kingsclere Close approach to Roehampton Lane and 166-168 Roehampton Lane. Further work is required before the principle of the changes proposed along with Stage 1 Road Safety Audits can be agreed. A Healthy Streets Check for Designers of the revised Danebury Avenue arrangement is required.
- The proposed development will see an increase in pedestrian and cycle trips to/ from the site and the local area. A Healthy Streets Check (HSC) has been provided and concludes there have been improvements to the walking and cycling environment within the proposed development. Further work is required to demonstrate how the scores have been improved and how the scheme will contribute to the Mayor's Healthy streets agenda.
- Accident analysis has been provided but it fails to identify measures which can be used to eliminate accidents and should demonstrate how the scheme will contribute towards the Vision Zero approach.
- Given the congested nature of the surrounding highway network and Intend to Publish London Plan Policy T6.1, the car parking proposed should be significantly reduced.
- The only way to reduce car use at this location is by restrained car parking provision and the implementation of a Controlled Parking Zone (CPZ) within the estate. It is therefore recommended that the Council implement a CPZ and should seek a financial contribution towards its implementation.
- The proposed development is predicted to generate 246 two-way bus trips within the AM peak hour and 144 in the PM peak hour. There are currently two routes in proximity to the development site which are full or close to being full. A bus contribution of £650,000 is sought to enhance capacity.
- The principle of the design of the relocated bus turnaround area to the Tunworth Crescent junction with Danebury Avenue has been agreed in principle however justification is required for moving the existing bus standing on Danebury Avenue in order to maintain views. The relocated bus turnaround is located next to residential properties which has the potential to generate noise and other impacts. It will also require bus drivers to have to walk 180 metres east to use the bus driver facilities at Portswood Place.

Given the stand will be used by night bus route 74, this also raises security issues for drivers using the bus driver facility.

- A Road Safety Audit should be undertaken and submitted for review prior to determination for the proposed turnaround facility.
- Further detail must be submitted to demonstrate that the cycle parking proposed accords with draft London Plan standards and of the London Cycling Design Standards (LCDS).
- Electronic copies of the highways models for review and will provide a more detailed response concerning the highways impact once this is complete
- The overall trip generation assessment is acceptable, but further work is required concerning service vehicle trip generation
- Full Travel Plan to be secured, monitored, reviewed, and enforced through the s106. A Delivery and Servicing Plan to be secured by condition. A Construction Management must also be secured by condition.

Twentieth Century Society - **Objection**

- Unjustified loss of multiple non-designated heritage assets, and the harm these losses and the proposed development will cause to the adjacent Conservation Area and the setting of a number of listed buildings in Alton West.
- Allbrook House and the Library are worthy of retention. First requested that the eastern end of Danebury Avenue be included in the surrounding Conservation Area designation, and later applied for Allbrook House and the Library to be listed.
- The cluster of buildings at the eastern end of Danebury Avenue should not be demolished. Allbrook House and the Library in particular are of major importance and consider both buildings to be non-designated heritage assets which should be retained owing to both their importance and the harm their demolition will cause to the setting of the conservation area and the listed buildings across the Estate.
- The application is in conflict with the Local Plan (March 2016). The NPPF specifies that a balanced judgement must be found when weighing up applications affecting non-designated heritage assets. Insufficient justification for the demolition of the buildings at the eastern end of Danebury Avenue.
- The applicants have stated that Allbrook House forms a barrier between Alton West and the wider area, however the proposals include replacing it with a number of buildings of a similar height and increased density.
- The Society's pre-application comments considered the design of the new buildings in this area to cause harm to the conservation area and listed buildings, as the increased height and density will greatly alter the character of the wider area, compromising the celebrated design principles of the original Estate plan.
- The increased height and density would reverse the conscious efforts of the LCC architects and planners to create a comfortable junction between the Estate and the wider Roehampton area, achieved through permeability and generous landscaping.
- Major concern that the massing and scale of the proposed development would result a loss of relationship between this and the other areas within the Estate and would seriously impact views into and out of the designated Alton West estate.

Internal Consultation (and external consultants on behalf of Council)

Waste Manager

Comments on operational aspects of proposed waste strategy

- The difficulties of designing a development that would achieve targets should not be underestimated and would likely require the introduction of recycling collection services for food and garden waste along with measures to restrict residual waste and/or encourage higher participation in recycling services. Overall recycling performance for households using communal recycling bins is currently around 14% and overall recycling performance as measured has not improved in 10 years.
- Difficulties of designing a development and/or management strategy that would significantly reduce household waste arisings should not be underestimated as the Council/developer/managing agents will only have limited influence.
- Waste volume calculations for storage requirements should be based on SPD requirements i.e. 150 litres refuse plus 70 litres recycling capacity per household. 654 additional households require suitable space for a refuse storage capacity of at least 98,100 litres (90 x 1100 litre bins) plus 45,780 litres for recycling (36 x 1280 litre recycling bins). In practice, all bin stores should meet these minimum requirements which may increase the total space requirement for bins. Commercial waste storage requirements should assume weekly collections except where there is a commitment to having more frequent collections in perpetuity.
- Whilst the Council has no plans to introduce separate food waste collections the National Waste Strategy published Dec 2018 included a requirement for all households to receive this service (legislation required to implement). It may be advisable to consider this potential future requirement in kitchen and/or bin room design for households without gardens.
- The bin numbers look good.
- Consideration should be given to managing/controlling the depositing of bulky items in the designated space for this to avoid the dumping of items for which a bulky waste collection has not been booked.
- The Council doesn't currently provide a separate collection service for garden waste but does collect it with residual waste for disposal.
- Any purchased bins must conform to the Council's requirements. As towing hitches are required, this confirms that these bins will need to be purchased privately. Also, Space for additional bins will be required in order to enable occupants to continue to use the bin store on collection day.
- The Council is currently in the process of formulating a strategy to remain in general conformity with the waste chapter of the Mayor of London's Environment Strategy in line with legal requirements.
- Management arrangements may be required to rotate full & empty bins or by widening corridors between bins.

Enable (Ecology) - No Objection: further survey work required, and conditions recommended to protect and enhance biodiversity

Enable (Parks and Leisure) - No Objection

- The row of 6 Purple Plums running parallel with Roehampton lane on the eastern boundary of the site consist of which x 2 will be lost leaving x 4 trees which in the circumstances is not unreasonable;
- Trees that currently stand in the vicinity of the Library will be lost which includes a Norway Maple T9 and an Irish Yew T6, both are recorded as C grade by Tim Moya Associates which I would not disagree with.
- A site inspection of groups of trees on the site was undertaken, none were A grade specimens that might be regarded as special.
- A replacement tree should be considered for planting in the gap between T181 and T183, will need to be of semi-mature size (20/25 cm stem circumference) such as an appropriately sized Maple or Hornbeam.
- The majority of the tree losses do not include high value trees and the number has been kept to a minimum. It should be noted that as a result of significant pressure from Planning Officers, positive progress has been achieved in tree replacement discussions including on species and sizes.

Enable- Leisure and Culture - No objection: Welcome the approach adopted. The Cultural Strategy is aligned with the borough's existing Cultural Strategy, and aims to ensure that everyone has opportunity to participate / celebrate culture through a variety of activities to skills and talents; widen horizons and increase well-being; promote community engagement and cohesion through an appreciation of Wandsworth's diversity and foster a sense of place and belonging within the neighbourhoods and communities of the borough. Welcome the commitment to:

- Set up a Cultural Advisory Panel as part of the creation of the cultural action plan, to enable projects to be shaped by local people. Projects identified will develop partnerships with local schools and businesses and create proactive routes into creative industries and learning to raise the aspirations of residents. Embedding of culture in the heart of the vision for the regeneration of Alton will increase the opportunities to improve the quality of life for local people.
- Work in partnership with Wandsworth Borough Council to create a long term and varied programme of culturally and creatively engaging activities, that are sustainable once the regeneration has finished, and that builds upon community engagement and programmes that have been taking place in the area since 2011
- Integrate cultural projects into wider borough and London initiatives, such as supporting creative activities in schools and developing/supporting creative career pathways.
- Appoint a Culture Projects Coordinator, who will oversee the delivery of the programme of events and initiatives from a wide range of artforms (such as dance, music, drama, art and creative writing etc), and work with local groups to ensure that future sustainability is planned in from the outset.
- Develop shared spaces within the Library Hub, Portswood Place, Alton Activity Centre, as well as providing an open, co-working and play environment, to ensure that the Alton community hub(s) provide spaces for a wide range of structured cultural activities accessible to all residents.

Environmental Services - Air Quality No objection: Dust risk assessment for demolition works is classified as medium. Therefore, a continuous PM10 monitor

should be in place in accordance with “The Control of Dust and Emissions during Construction and Demolition”, SPG 2014. Recommends conditions requiring a Dust Management Plan (DMP); Non-Road Mobile Machinery (NRMM); PM10 Monitoring; Gas Boilers and subject to the air mitigations previously set out for the Alton Estate.

Social Services & Education- No Objection: the timing of demand cannot be projected until the exact timing and number of units is known, but based on our experience at Nine Elms, it is unlikely additional school places will be required at the same time. The schools within the planning area have surplus places so demand within the area should be able to be met without the need for additional spaces.

Wind (Consultant)- **No objection:** The Wind microclimate assessment of the Proposed Development showed satisfactory wind conditions and no additional wind microclimate assessment is required.

Climate Integrated Solutions (Independent Sustainability Consultant)-

- The Sustainability Statement states “a minimum of ‘Excellent’ will be achieved for all non-residential element of the development.” 2019 applicants are expected to achieve Outstanding by BMS 3a – need to commit to achieving BREEAM Outstanding
- The updated energy strategy demonstrates that the energy hierarchy has been followed in line with relevant policies with reductions at each step of the hierarchy.
- Recommend condition(s) requiring proof that the domestic units have been constructed in accordance with the sustainability statement

2. The Application was formally amended by submission on 18 March 2020. Due to the COVID-19 pandemic, public consultation did not commence until 20th May 2020. The expiry date of 1st July was extended to 7th August 2020.

Number of letters sent	4,245
Site Notice	Y
Press Notice	Y
Number of responses received	146
Number of neighbour objections	127 (92 individuals)
Number of neighbour support	7
Number of neighbour comments	12

Neighbour Consultation Summary

OBJECTIONS:

General concern about the consultation on the revised application taking place during the Covid-19 restrictions which have excluded the opportunity for face to face meetings and the availability of copies of documents for inspection in the Library as in the case of original application. Similar objections to original consultation. Whilst acknowledging that some issues addressed, generally felt that changes are minor and do not meet fundamental objections to previous proposals. Principal objections relate to need for more council homes, better youth facilities, more transport and buses and more community space for local groups in the library.

Affordable Housing

- The proposed level of social/affordable housing is insufficient for a scheme of this nature and should be increased- imbalance between private homes and council homes.
- 76% unaffordable housing and 24% affordable unacceptable. Other developments have 50%.
- New housing and £100m investment is welcome- but £13m grant for subsidising affordable homes from mayor rejected as well as ballot.
- Other investment is available through council and borrowing at low interests.
- Public land developments should aim for 50% affordability target subject to viability.
- Reduction in number of 3 bed or larger units- doesn't fit with statement that all existing tenants can stay on estate in comparable property at existing rent
- Urgent need to significantly increase not just maintain or slightly increase social housing
- Social housing needs to be properly integrated in development
- Should not approve development to avoid locking in inadequate amount, distribution and integration of proposed social housing
- Other developments doing better- Grahame Park- 50%; Clapham park 38%
- The affordable housing is considered to be segregated on the periphery of the Application Site and must be better integrated throughout the scheme to create a more mixed community.
- Need mixed community in each block so children especially feel neither advantaged or disadvantaged
- Scheme fails to address problem of divided communities
- No suitable homes for freehold residents in Kingsclere Close- family homes were included in original masterplan.
- 94% private flats are 1 and 2 beds- will lead to high turnover of occupancy and will not create a stable community
- Limited increase in social housing is insufficient to meet needs of key workers
- Social housing is segregated- will prevent community cohesion. This is not best practice and is not appropriate for a development in 2020.
- Changes fail to address mayor's demand for integrating affordable housing- private blocks are still segregated.
- Problems of homelessness and overcrowding- increase in Council Housing and Affordable Housing is inadequate. Social housing will be isolated and not properly integrated- should be moving away from segregated communities not towards them.
- Increase in Council and affordable housing is inadequate in context of 847 new private housing units given problems of homelessness and overcrowding. Will do little to address inequalities- no improvement in floorspace increase in Council homes at expense of other affordable housing

Impact on Tenants/leaseholders

- Increased costs to residents due to higher service charges.
- Lack of consultation.
- Existing owner occupiers and tenants with private garden should be accommodated with similar sized garden. Valuation does not take into account value of gardens

- Requests from tenants for second move if desired should be allowed to enable move to desired location in later stages of development
- Residents should be well informed and given right of ballot before works commence.
- Community should agree on improvements and be clear about impacts
- Council has not spelt out impact on existing leaseholders. Alton Estate service charge is made up of estate costs and block costs. Will service charges go up- will new private units be subject to estate service charging regime?
- Decline in property values.
- Offer to existing property owners is unfair- not like for like replacement.
- Existing property owners- existing property owners should be able to buy new units within budgets of their existing homes

Transport

- Increase in traffic – too large a project at such a distance from a major transport hub
- Lack of provision of parking- scale of development will exacerbate existing problems,
- Bus services are barely adequate- already full a short way into route. Good public transport links are essential if reliance on cars to be minimised. Existing parking problems will be exacerbated in area.
- All bus routes lack capacity- need to review bus provision on all routes
- Need to do more to improve public transport services- assurances needed that adequate provision will be secured. If services are not improved there will be an increase in level of car usage and additional pressures on parking provision
- Impacts of traffic generation during construction.
- Problems of servicing/unloading.
- Need better provision for cycling to link Estate to Barnes station and improved storage facilities at station
- No parking in Block A for residents or doctors- bike store an improvement with own entrance

Bus Turnaround

- Badly thought out introduction of new bus turnaround- loss of 30 car parking spaces and no provision for replacement parking. No assessment undertaken. Impact on school drop off
- Relocation will impact on access to public transport for large section of estate
- Impact on property value
- Impact on older residents
- Impacts on adjoining properties due to noise and pollution
- Loss of trees
- Impact on adjoining residents who currently enjoy parkland views

Design

- Overdevelopment with dense and rigid character; not an appropriate location for a high density redevelopment
- Impact on character of area and townscape
- New blocks are characterless and not in keeping with estate's architecture
- Design has been misleading- original scheme had low rise blocks and spacious greenery. Now Danebury Ave will be a dark wind tunnel full of unaffordable shops
- Scale of Portswood Place out of proportion to surroundings.

- Impact on visual amenities of properties in Roehampton Lane not considered.
- Courtyard gardens at first floor level do not form part of landscape- poor replacement for 81 private gardens and shared private outdoor space
- Block M is an architectural failure- too tall, poor daylight/sunlight conditions
- Plan takes no account of pandemic and economic consequences
- Development would result in denser concentration of housing with less open space
- Need to consider public health consequences
- Plan should retain estate's characteristic open spaces- have been crucial to maintaining health and wellbeing during lockdown
- Design is not sympathetic to local environment and pays limited regard to existing library. Blocks are too dense and high
- Landscaping proposals are not credible. Streets will not be greener due to loss of mature trees and replacement with small ornamental trees. Urban Quarter will be dominated by tall buildings- majority of trees will be removed. Assurances requested regarding maintenance of landscaping on highways and podiums.
- Importance of Alton estate in architectural terms- under threat from demolition and large very dense inappropriate form of development- changing views from Richmond Park
- Block O- siting, height and loss of existing trees and impact on Grade II Kings Head which relates to existing public space.
- Density, size and appearance of blocks with raised courtyards are out of keeping with design of towers in green landscape at two ends of estate
- New buildings will fill an area which currently appears from park to be dominated by trees. Density and size of blocks out of keeping with two ends of estate and destroy their character as 'a single vast showpiece of innovative housing and great architecture'. Proposals will destroy community and character of Roehampton
- Change to character of Roehampton – replacement of flagship development with characterless buildings
- Object to proposals for Village Square- impact of busy road/ air quality and main elevation of Library will cast shadow over square; passageway will attract undesirable behaviour and is not practical for prams and mobility
- 8-9 storey buildings on site of 266 Roehampton Lane will not fit in with present buildings and landscape

Height and Density

- Overdevelopment- increase in density, less public open space, limited benefits
- Too high- only 6 storeys in initial proposals now increased to 8/9 storeys
- Development is too tall- increase in height from original masterplan and creation of canyon with tall buildings on Danebury Avenue.
- Social and health impacts of increase in density and overdevelopment.

Heritage

- Impact on setting of Conservation Area and heritage assets.
- Allbrook House and Library are heritage assets and should not be demolished.
- Conservation Area should be extended to include Allbrook House.
- Impact of development on skyline and views from Richmond Park.
- Value of conservation area is as much about setting as fabric. Alton Conservation Area designated so landscape, setting and other positive buildings in area could be conserved and enhanced.

- Original proposals for Downshire Fields and other green spaces not compatible with current listing. Need a more sensitive plan.

Community Facilities

- Quality of health and youth facilities worse than existing
- 166 Roehampton lane would make an ideal youth centre
- Need more affordable space for community groups.
- Need stronger commitment to community and youth facilities.
- Reduction in provision of youth facilities and lack of choice and range.
- Youth and children's services - reduced through closure of youth centre and outside sports area. Space in Library replaces two very well used youth facilities – Roehampton Youth Club and Base- 556 sqm: replacement provision is only 321 sqm dedicated space. Need more space to reflect larger numbers of young people and increasing need for youth support.
- Plans do not explain how youth services will use the Alton Activity Centre
- Play area in Downshire Field should be located closer to Nursery.
- No mention of CAB community development project- should be funded for full period of regeneration project.
- Consideration should have been given to provision of Mosque.
- Community facilities located at most constricted junction of Roehampton Lane and Danebury Avenue.
- No guarantee of shops that will be available during and after development

Impact on Amenity

- Large proportion of north facing units
- No modifications made to alleviate breach of right to light
- Overshadowing of existing properties on Roehampton Lane due to height of Blocks K and M- height should be reduced
- Light criteria are not met in a number of windows on first-eighth floor of Woodcott House. Some windows would experience a major adverse effect- overall impact would be long term, local adverse of moderate significance. Council should engage directly with affected leaseholders.
- The Proposed Changes do not address any of the previous objections: - The height of blocks K1, K2 and K3; The retention of the trees and grass space on Roehampton Lane; The density of building opposite our house; The loss of view over Kingsclere Close to Richmond Park; The overshadowing and overlooking of our house and garden.
- No allowance in the plans for the extra number of vehicles entering and leaving Kingsclere Close onto Roehampton Lane and vice versa, especially during the demolishing of existing buildings and building of new buildings.
- No mention of the duration of the time scale involved in the development.
- Impacts of overshadowing on Woodcott House and 73-95 Hersham Close and lack of information about what rooms are used for
- Loss of light- impact on individual properties including properties on Roehampton Lane and Hersham Close: criteria not met on a number of windows.
- Loss of privacy/overlooking
- Loss of views of Richmond Park.
- Impact on amenity- pollution, noise and traffic.
- Effect on air quality

Noise

- Noise from traffic and demolition/ construction works over 10 year construction programme.
- Village Square will be subject to traffic noise- impact on amenity

Infrastructure

- Utilities at capacity- problems of overflow
- Water supply/ sewerage capacity inadequate to handle existing pressures. Existing situation will be made worse by development- evidence of water leaks and burst mains on Holybourne Avenue and Danebury Avenue.

Demolition of Existing Buildings

- Wrongly assumes that buildings “are at the end of their useful life” (especially having lived in a maisonette for 10 years which is of the same type being demolished).
- There is no evidence that the buildings are at the end of their useful life and evidence was not provided for this under a Freedom of Information request
- Demolition of sound buildings at time when global warming is critical
- Environmental, health and social impacts of demolition.
- Pollution and transport impact of waste
- Estate should be refurbished not demolished.
- Council should be focussing on maintenance and refurbishment of existing properties- not on scheme that are vulnerable to fluctuations of housing market.
- No clear need for demolition and no analysis to show large scale demolition/re-build is best option to improve living conditions for people currently living on Alton Estate
- Many of existing homes have been poorly maintained by Council- a programme of renovation should be fully explored as it would be less costly and disruptive to local people
- Process will cause disruption, uncertainty and anxiety for occupiers of blocks marked for demolition- application does not demonstrate that benefits will outweigh harm.
- Refurbishment will result in less waste and emissions- allow residents to stay and avoid breaking up local support networks.

Open Space

- Application underestimates value of open space to people living in flats. Village Square nor community courtyards will compensate for loss of green area and trees next to Library
- Quality of life of residents could be enhanced by direct access to Richmond Park
- Loss of Village Green outside Library
- Loss of existing green spaces
- Design of Village Square- does not integrate with Roehampton Village, token grassed space, impact on security of St Joseph’s Church.
- No example where Council has maintained podium landscaping/ communal open space.
- Inadequate provision of new green spaces.
- Issue of whether there is a net loss of green space and loss of trees by Library- must be balanced against other gains if these are to be acceptable

- Loss of public space and trees and privatisation of public space through redevelopment of green space outside library
- Village square does not read as a village green- protective wall cuts off views of church. Existing village green should have been retained.

Play provision

- Reduction in play space- provision for under 5s designed out of Alton Activity Centre. No additional provision to compensate for this. Play equipment including provision for children with disabilities not included. No suitable equipment for small children in Downshire Fields Play Area- appropriate for older children. Need secure fenced off area for under 5s- will contribute to community development- ideal location would be opposite the new nursery
- Increased landscaping for outside sports provision for young people. Concern about reduction in indoor and outdoor space. No details about improvements to Alton Activity Centre. Need for under 5s play close to Nursery
- Restrictive covenant on Downshire Field- more appropriate to keep it in good order

Trees

- Loss of mature trees- too many trees are lost: in carbon terms will take 20-50 new saplings to replace a mature tree. Importance of trees to mental health
- Loss of trees on Danebury Avenue
- Lack of new tree planting: Question no net tree loss- not a like for like replacement in terms of size and maturity
- Air quality for people living on Roehampton lane should be enhanced by a green corridor of trees.
- Reduction from 189 mature trees to 160- to be replaced with 733 ornamental trees which will not compensate for loss of mature limes and horse chestnuts. Vital loss of canopy cover at time when we should be meeting challenges of climate emergency.
- Many of new trees will be small pavement trees

Biodiversity

- Impact on biodiversity and protected species e.g. bats
- Habitat clearance should be compensated for on like for like basis- including provision for bat boxes on buildings and trees
- No details provided of green walls and green/brown roofs
- Impact on wildlife- 3 protected species of bats in demolition zone: no evidence that necessary actions undertaken
- impact of reduction of green space on flooding risk, biodiversity

Sustainability

- Climate emergency has not been addressed- further consideration required of energy efficiency and use of new technologies
- Need to future proof development in relation to future guidelines
- Climate change- all buildings should be built to passivhaus standards. LBW has recognised climate emergency- opportunity to do something positive about it
- Waste, pollution and hazardous materials- no evidence of sustainable building processes or innovation in waste strategy in view of climate emergency

Equalities

- Lack of provision for disabled access.

- Lack of social housing will exacerbate social inequality: other appropriate models of social housing should be considered
- Proposals will improve quality of life of existing residents but do little to help low income households.
- Impact of relocated bus turnaround on adjoining residents who currently enjoy parkland views

Relationship to Policy

- Contrary to Roehampton SPD which seeks to strengthen and repair special qualities of estate, limit height and protect trees
- Contrary to London Plan- high density housing should only be allowed within 800m of transport hub
- Changes to SPD were not subject to consultation.

Relationship to Masterplan

- The vision is different to that presented at Consultation events
- Proposals depart from earlier plans.
- Plans have extended beyond area identified in 2012 as needing regeneration
- No evidence that scheme has support of local community

Development Costs

- Development is driven by developer profits
- Costs of decant have not been explained
- Economic forecasts cast doubt on financial assumptions that informed proposals. Viability report is full of caveats- proposal isn't viable in current conditions.
- Wise to postpone and review the development- opportunity for longer term thinking to meet future needs of community

Consultation

- Consultation during lockdown does not allow residents chance to collectively understand the plans- many residents reliant on each other for help due to language barriers or lack of access to technology.
- No engagement with key stakeholders. Consultation period should be extended

SUPPORTS:

- Proposals will enhance the Alton Estate and provide new housing and further amenity for residents
- Proposals will open up Roehampton more, create a lot more usable space for the neighbourhood and make it a much nicer place to live
- Needs to be implemented without delay due to need for affordable housing, problems of affordability and shortfall in house building.
- The area needs and deserves, changes and improvements
- Support the proposal so long as the residential units are public housing units for the benefit of the current tenants/owners who can be temporarily rehoused while the development is taking place. Alton Estate is a multi-cultural area that is of great benefit to the local community. Development will provide better and more up-to-date accommodation, and this is to be encouraged
- Support the overall development of the estate and its modernisation. But would like to see more affordable housing and green spaces. Roehampton village needs a heart, and this could be that.
- Vision is for a successfully integrated private / social scheme with plenty of open space which will hopefully bring much needed regeneration to the area. Area

needs regeneration. Scheme links well with the High street and will assist its regeneration. It now needs to be delivered.

- Endorse the plans and encourage the Council to proceed as quickly as possible
-

COMMENTS:

- Pleased to see some trees have been retained
- redevelopment proposals provide ideal opportunity to improve health and wellbeing of families and make positive improvements to existing health inequalities
- Concern about loss of facilities the Danebury Avenue Medical Practice offers. Request further time for patients to share their views.
- Community groups access to meeting rooms and buildings- some provision should be made in new building housing new library, GP practice and Youth Services for local community groups to have access to shared offices at affordable rates. Local groups have very few places where they can afford to take up space and create new projects. Many local people need more provision of community space.
- Same quality of design achieved by project architects on other sites should be ensured to provide a legacy for future generations
- Landscape should be managed to maximise foraging opportunities for wildlife; installation of green walls and green/brown roofs; Maximising hedge and ground cover; using SuDS; creating ponds; planting flower rich meadow; increasing connectivity in landscape eg: filling gaps in lines of mature trees. Features suitable for roosting bats could be incorporated into new buildings; provision of bat boxes
- Need a stronger commitment to supporting local young people and a clear strategy to provide improved facilities to meet the need
- Need for community group access to meeting rooms and buildings including shared office space at affordable rents
- Currently very few accessible spaces for community meetings and activities. Need a dedicated space where community organisations can establish offices at affordable cost and where meetings can be held. Or a clear plan to improve and make available other facilities on estate
- Roehampton is cut off and young people need access to space and local opportunities for leisure, education and community projects. Children and young people have suffered a lot recently and deserve the facilities and opportunities to increase their life chances
- Disappointing that community space and outdoor play areas for young children have been reduced. Eastwood Children's Centres provide a vital facility and should be extended. In addition, need a cross- purpose community space for different groups and activities to create sense of community. Opportunity for inspirational outdoor play areas for children of all areas
- Opportunity to make active forms of travel more accessible such as walking and cycling- including secure cycle storage
- Roehampton remains car dependent due to its isolation- could be improved by better and more wide-ranging local facilities and by increased public and active forms of transport

- Welcome investment but want to see a better deal for local community in terms of housing and youth facilities. Need to reconsider amount of space for services for young people with increase in population
- The Alton estate, whilst architecturally lauded in its time, has been left to decay and not aged well. I
- Regeneration is welcome and long overdue, but level of affordable homes is very low and must be increased
- Recognise need for regeneration of parts of estate and appreciate some improvements made in revised application especially in relation to environmentally friendly heating and retention of more trees
- Changes to new homes a big improvement on previous plans
- Benefits of a community garden to create a sense of community cohesion and wellbeing- original plans included access into Richmond Park from estate
- Other parts of Alton Estate should benefit from improvements.
- Support for community spaces and better use of Downshire Field for recreation
- Need to consider wildlife e.g. bat and bird boxes
- Concerned about environmental impact and need more details about use of renewable energy.

Other consultation responses:

Putney Society - Objection:

- Changes do nothing to address outdated premise of slum clearance which drives proposals. Problems with existing buildings largely stem from lack of investment by LBW. Space standards are good- increase in number of flats achieved by reducing size at time when LBW meeting targets for small dwellings but failing to provide family homes. Identical blocks have been renovated. Could upgrade and add storeys on top.
- Allbrook House could be transformed.
- Demolition will lead to 10 years of noise and heavy construction traffic, pollution and congestion (250,000 vehicle movements). Traffic will increase due to failure to address transport needs.
- The i-tree Report by Treeconomics should be a material consideration.
- Use of electric heat pumps may just meet 2020 Building Regs but will not achieve 2030 CO2 targets or net zero by 2050. Impact of concrete use. LBW should seek to do better- no consideration of MMC.
- Concern about financial implications- on public record that LBW committed to paying £108m public money and donating land to development in return for increase of 35 council homes. Viability assessment shows a deficit of £70m to achieve this. Development costs unclear.
- No requirement for CIL- unique in Borough.
- Council's determination to redevelop the Alton has led to procedural failures that call into question the validity the current application. These include: 1. A defective initial 'Preferred Options' consultation process; 2. A defective consultation over the Supplementary Planning Document (SPD); 3. Failure to hold Redrow to the adopted SPD; 4. Refusal to hold a ballot on the scheme; 5. Holding of revised application consultation during COVID-19 lockdown

Fleur Anderson, MP for Putney, Roehampton and Southfields- Whilst No objection to a regeneration scheme in general, **Object** to current proposals:

- Increase in private homes is at expense of adequate levels of social and affordable housing
- Scheme fails to address problem of divided communities
- Need mixed community in each block so children especially feel neither advantaged or disadvantaged
- Reduction in replacement youth facilities including outdoor sports area despite increased level of demand- need to revisit especially provision for under 5s
- Problems of private and public transport- increased services needed to cater for increased demand
- Need to gauge majority estate opinion by door to door canvas as some residents are unable to grasp importance of changes
- Nothing about improvements to transport connections and buses in plans- need clear commitment from TfL to increase level of bus services- poor transport will impact on employment opportunities and success of regeneration
- Need more dedicated community space in Library.
- Request more info about who will be running Minstead Gardens Club room to ensure it will be a community provider
- Request more assurances about community space opening hours in Library- needs to be affordable to all residents and available in evenings and at weekend: shortage of affordable venues
- No improvement in four areas identified by local people: More affordable housing and mixed community- no overall increase in % affordable. Only 5 additional affordable units. No increase in affordable floorspace. Freeholders and private tenants of leasehold and freehold properties may not be able to afford new housing
- Segregated housing- welcome that Blocks o and A are at centre of development and are now affordable, but development remains segregated between private and affordable blocks- increases risk of some blocks being better maintained. Not a good start for achieving aim of mixed community- blocks should all be mixed tenure
- Need more and better youth facilities- not less youth space in new development. Existing two facilities were 556 sqm- replacement provision only 321 sqm of dedicated space in library. Need for outdoor sports areas- no sign of youth bus
- Welcome some changes but no improvement on areas of biggest concern to local people- must be more than 24% affordable, more youth services and better transport
- Problem of consultation- request extension to consultation period and participative methods due to COVID-19 restrictions. Disregard for local community leaders.
- Welcome positive changes- retention of trees on Harbridge Ave; Better family design in flat layouts and landscaping of wider estate; Green improvements- more use of natural energy, environmentally friendly heating.

- Positive Equalities impacts- but also temporary and permanent negative impacts disproportionately on residents in temporary accommodation from BAME groups, disabled and elderly

*Councillor S McKinney, Ward Councillor- **Support:*** welcomes changes to address some of GLA's requests. Many residents living in the regeneration areas want to be moved into new accommodation and many are elderly. Concern about further delays or if regeneration does not go ahead.

*Councillor J Ambache, Ward Councillor- **Objection:***

- Problems of consultation- should be extended.
- Affordable housing and need for mixed tenure blocks. One move policy should not preclude second move
- Need for improved transport infrastructure/bus services
- Community groups access to meeting rooms and buildings
- Youth and children's services- reduction in space and no details of Alton Activity Centre
- Air quality, green spaces and trees
- Residents not invited to give feedback in January 2020 as stated on p7 of SCI

External Consultation Responses:

*CAA- **No objection**,* subject to informatives providing guidance for crane operations and the lighting of obstacles.

Environment Agency- Previous comments apply. No objection subject to conditions. The site has a low contamination potential (mostly residential since the 1950s) and is located in an area of low sensitivity with respect to Controlled Waters.

Historic England-

- No changes to the design of the proposed surgery and community building, nor any redistributing of trees at Downshire Hill to enhance views as previously advised.
- Revisions address concerns regarding Harbridge Avenue. Understand that the existing road alignment and majority of the existing trees would now be retained and reinforced through additional planting of lime trees. This is considered to be a positive change to the scheme.
- The proposed development in terms of its distribution, scale, massing and design appears broadly in line with the scheme previously reviewed. Fundamental principles behind concerns remain, and position as previously set out.

The Listing of Alton West as Grade II on the Register of Historic Parks and Gardens affords additional statutory protection to the Alton Estate, and will be a material planning consideration in the determination of this application.

London Fire Brigade- an undertaking should be given that access for fire appliances and adequate water supply for fire fighting purposes will be provided. Request consultation when process reached building construction phase.

*Royal Parks - **Objection***

- In our opinion, this proposal would cause harm to Richmond Park's open sky space as certain buildings within the development would be visible in longer views from within the park.
- Suspect that the use of artificial lighting at high level would merely serve to increase the light pollution from the surrounding built environment into the dark spaces of the park that are essential for a range of species that rely on darkness for their survival.
- Request sight of the developer's specific assessment that demonstrates how no harm will be caused by the development to the features of interest for which Richmond Park is designated.
- Would welcome any reduction in the height and massing of the proposed buildings to minimize any negative impacts upon the open sky space (and potentially the habitat) within and around Richmond Park.

Sport England- Comments as before. Note that half MUGA has been proposed and regrettable it is not a full size MUGA as per Sport England guidance as this would allow a range of sports to be played and increase its flexibility.

Thames Water

- Unable to determine waste water infrastructure needs or agree position on surface water. Request appropriate conditions and agreement on infrastructure phasing plan in advance of occupation
- Existing water network infrastructure unable to accommodate the needs of this development proposal and water network upgrades will be required.
- Water mains cross or are close to development. No development will be permitted over or within 3m of water mains
- The proposed development is located within 15m of underground water assets and informative required.
- Wastewater information is too complex. Need clear information to undertake a sewer assessment to avoid issues pre and post construction

TfL Underground Infrastructure Protection- **No Comments**

Internal Consultation (and external consultants on behalf of Council)

Assistant Director of Housing Strategy and Development

- Welcomes the fact that since the original application was submitted the applicant has increased both the social rent and overall affordable housing to be provided and also brought a significant number of affordable homes forward from the outline application to the detailed application which will accelerate the delivery of the affordable housing element. He particularly welcomes the conversion of Block O in the detailed application from market to social rent to now provide 35 affordable homes, which means 75% of the affordable housing will now be delivered as part of the detailed application. The conversion of Block O from market to affordable provides better integration of the affordable housing into the detailed application which the ADHS&D welcomes as a key element of the regeneration is the cohesion of the regeneration plans with the remaining estate and wider area.

- Triggers will be required based on market sales completions to secure the delivery of the affordable housing in both in the detailed and outline applications by units and habitable rooms and for these to be secured in the Legal Agreement.
- Welcomes the overall affordable housing replacement offer in that the provision of larger units will specifically address identified housing needs and demands of existing social renters as well as providing high quality accommodation for those looking to downsize.
- The applicant has committed that the shared equity will not be sold at no more than 80% of Open Market Value with the Council holding the retained equity with no rent charged to the purchaser. Should at any stage the owner elect to staircase to 100% ownership and the Council receive a capital receipt, it will be a requirement set out in the Section 106/and or condition that receipts will be ringfenced for affordable housing purposes. Further, the applicant has committed that any shared equity homes that are not purchased by returning leaseholders, will be sold on a shared ownership basis or be let as affordable rent levels as agreed with the Council. These commitments and requirements will be clearly set out in the Section 106 signed by the Applicant. Any shared ownership housing provided will need to meet the Council's affordability criteria.
- The ADHS&D is aware that in strict regional planning terms the Shared Equity may not be seen as affordable housing. However, it is his view that this form of housing would meet affordable housing requirements given the cap on the equity that can be purchased (noting this would enable CIL relief to be claimed) and that any staircasing receipts would be fully reinvested for affordable housing purposes.
- All the affordable housing homes will be owned and managed by the Council. This is welcomed in that such a commitment provides comfort to local residents in relation to continuity of service albeit it does provide particular challenges, including management of cash flow, in that no receipt is available as would be the case if the affordable housing were sold to a housing association.
- The decant requirement is currently 80 tenants and 29 leaseholders. This leaves 56 social rents properties in the detailed application and 65 in the outline application i.e. 121 social rent homes not required for decanting. The applicant has stated these would indicatively be provided as 37 x 1 bed, 47 x 2 bed, 31 x 3 bed, 4 x 4 bed and 2 x 5 bed. The proportion of 1 beds (30%) is above the guidance in DMH3a for 1 bed affordable rent properties and therefore the ADHS&D would welcome further discussions with the applicant on the bedsize mix of these homes. In respect to replacement the Applicant would need to identify the social housing rent that would be charged on these homes. The current assumption is that the homes would be let at formula social rents and if this is revised the ADHS&D would wish to see provisions made within the Section 106/MOU to secure any additional benefit arising to support increased provision of affordable homes.
- It must be a requirement of any planning permission subsequently granted that whatever is the outturn of the number of homes in the final scheme, that the percentage of affordable housing by unit, habitable room and floorspace provided in this hybrid application, split in similar tenure proportions to those in the outline scheme (unless agreed otherwise by the Council) having ensured first that all social housing and leaseholder replacement units have been delivered.

- The applicant has submitted a financial viability appraisal (FVA) which has been comprehensively assessed by the Council's independent consultants, Carter Jonas. Despite the applicants assumed deficit they have stated they are committed to delivering 24% affordable housing and this will be secured by way of S 106 agreement and or condition. Although the scheme is not eligible for GLA funding, Carter Jones have also modelled notional grant that might be applied should the scheme have been eligible for grant funding but have again determined that the scheme would remain in deficit by £63m. On the basis of this advice, the ADHS&D is clear that the current proposals represent the maximum level of affordable housing the scheme can support and welcomes the applicants undertaking to deliver this quantum of affordable housing despite the level of deficit that is being shown at this current time.
- It is understood that the Council has committed, through any arrangement subsequently put in place to deliver the scheme, to provide gap funding in order that the social housing and wider objectives of the regeneration can be delivered. The ADHS&D recognises that regeneration and improvement of this nature relies upon a hope value being achieved which over the term of the development may significantly shift in terms of original assumptions on benefit being achieved. It is clearly anticipated that any benefit over and above assumed profit levels will be captured and utilised to provide additional affordable homes as part of this regeneration. However, the ADHS&D would anticipate that sufficient assurance can be provided by Wandsworth Council's commitments to support this regeneration (to the extent it can with the resources available) through its phases to be confident of its delivery.
- The ADHS&D would require early, phase/mid and late review mechanisms to be secured within the Section 106 legal agreement and additional on site affordable housing provided or a commuted sum for affordable housing to be paid, should the scheme enter into surplus.
- The GLA will also require any review mechanism to follow and align with relevant supplementary planning guidance. However, he also recognises and appreciates that parties may wish to consider and negotiate more bespoke and comprehensive review mechanisms which takes account of the full range of inputs including, if relevant, financing arrangements (which it is recognised may change over time as phases are delivered) as well as other inputs such as values and costs. The ADHS&D would also expect the Carter Jonas advice and guidance on the deficit level to be utilised to establish the baselines for those reviews in order that the Council fully realises any additional benefit arising from the scheme.
- Given the inevitable complexity of such financial appraisals and the inherent risks and variables involved in establishing an attractive and deliverable scheme (for the market) that early and continued engagement with the GLA is required to understand the approach taken in undertaking the FVA and in turn the approach to review and seeking in this case to over the course the scheme deliver the maximum level of affordable housing.
- In respect of affordable tenures, the following criteria must be secured in the S 106 Legal Agreement
 - Shared ownership – 50% of all 1 bedroom units to be affordable to gross annual household incomes of no more than £ 48,500 pa; 50% of all 2 bedroom units to be affordable to gross annual household incomes of no more than £ 58,500 pa; 50% of all 3 bedroom or greater units to be affordable

to gross annual household incomes of no more than £ 65,000 pa. For the remaining units of all bedsizes to be affordable to gross annual household incomes of no more than £ 90,000 pa. Household costs (rent, service and mortgage costs) should be no greater than 40% of net household income and net income to be assumed as 70% of gross household income. If the applicant proposes and the Council agrees if any or all of the shared ownership were to be delivered as intermediate rent, they should be affordable to those on gross household incomes of no more than £ 60,000 pa in line with the GLA's household income thresholds for intermediate rented housing

- Social/Affordable Rent – To be let on similar rent and terms and conditions as existing tenants and in accordance with the Council's decant and rent setting policies or at London Affordable rent levels as agreed by the Council.
 - Replacement Council Rented Housing – To be let on similar rent and terms and conditions as existing tenants and in accordance with the Council's decant and rent setting policies
 - Shared Equity – To only be offered to existing leaseholders/freeholders on the estate and to be purchased at no more than 80% of open market value, with any unsold equity being retained by the Council with no rent charged. In the event of the unsold equity being purchased after initial sale, any receipt arising to be ringfenced and used by the Council for affordable housing purposes. If these criteria are met this housing should and can be identified as affordable housing that would provide benefit for future residents with a housing need.
- 10% of all homes will be for M4 (3) Category wheelchair accessible and adaptable housing, with each block having two lifts and expects these to be delivered at least proportionately by tenure, unless otherwise agreed by the Council. For any social/affordable rent homes, the ADHS&D would require these to be built in accordance with Part M4 (2b) of the building regulations and for any intermediate housing to Part M4 2 (a). The ADHS&D welcomes that the applicant has already had early engagement with the Council's dedicated Specialist Housing Occupational Therapist in the design of these units and would require the applicant to ensure the wheelchair housing and related amenity space (including refusal disposal arrangements, entry and exit from blocks) meets the Occupational Therapist required standards prior to commencement of development.
 - The ADHS&D will require to see how the car parking spaces are proposed to be allocated across the tenures and how any service charge will be levied for their maintenance.
 - No plans have been presented as to an estate management strategy or in turn what amenities and infrastructure affordable housing residents will need to pay for and support. The Council will need to understand what access and at what service charge cost for any facilities provided, for existing residents of the estate, the new affordable residents and the private residents will be given/cost. The Council would therefore require as early as practicable and before occupation an estate management strategy to be provided for approval to the Council. This would include how for the intermediate and low cost rent housing, service charges would be managed to meet the affordability requirements of the Council (noting for affordable rent housing the benchmark for affordable service charges would be existing service charge levels applied to similar estates in the Council's

ownership). Any estate management strategy must also set out how the management of blocks, shared space, infrastructure including roads and amenities will be managed and where responsibilities (e.g. for maintenance, fire safety) will lie. This will need to include how service charge liabilities for all occupiers will be minimised and to clearly differentiate what are service chargeable elements to the residential occupiers.

- The ADHS&D would wish to see a clear strategy as to how this mixed tenure new development would not only integrate with and stitch in with the existing estate but do similar with the wider Alton area and in turn ensure that the shared amenity spaces and facilities of the new development and scheme encourage and promote use across the area by existing and future residents.
- Recognises the benefit of other non-residential and sustainability aspects of the proposals, including the proposed community facilities, the village green and landscaping and public realm enhancement with the intention of opening up the estate to the wider Roehampton area with the network of proposed new streets that create links and connections through the new development. The introduction of pocket squares between blocks with blocks having public/private courtyards is also welcomed.
- The incorporation of sustainable urban drainage and biodiverse and blue roofs as well as 770 new trees to be planted across the development. Also welcomes fact that the majority of dwellings will be dual or triple aspect and where there are single aspect, none are to be north facing.

Emergency Planning - No Comments

Enable (Ecology) - **No objection** subject to conditions

- Contacted throughout the process by the project ecologists, but still have some concerns about gaps in what has been provided with regard to ecology and ecological implications of development.
- Anticipate that there may a significant time delay before details are finalised on this scheme – with a strong possibility that the ecological “base line” could change in the interim.
- Recommends that it would be more appropriate to finalise and secure mitigation and enhancement for biodiversity via a series of conditions that deal with what is required prior to demolition and site clearance & pre commencement of construction.

Waste Manager - **No Objection** to waste provision and Waste Addendum

- In my comments on the capacity of bin stores I have not allowed for the additional refuse & recycling bins required to enable occupants to continue using stores on collection day(s) for stores where bins will have to be presented to a separate collection point. Holding back one refuse store plus one recycling bin for this purpose at each of the affected stores will typically reduce the number of households that can use it but if the additional bins can be stored at the collection points on non-collection days the capacity of the stores is unaffected.

- Where towing hitches will be required, suitable bins would need to be purchased privately and be maintained in a serviceable condition. It may be advisable to have a spare tug for use in the event of breakdown.
- Some residents may require assistance moving bulky items to the bulky waste area which could potentially be provided using a suitable trailer for the electric bin towing truck.
- Bins should not be presented in advance onto the highway.

Environmental Services - Air Quality The dust risk assessment for demolition works is classified as medium. Therefore, a continuous PM10 monitor should be in place in accordance with “The Control of Dust and Emissions during Construction and Demolition”, SPG 2014.

Emergency Planning- No Comments

Head of Arts and Culture

- Welcomes the approach in the Cultural Strategy to utilise culture as a means to support the Council’s overall vision for the regeneration of the Alton “to create new opportunities for local people to raise their quality of life and aspirations”.
- Applicant is committing to fund the delivery of a cultural strategy for the area that “celebrate(s) what is special about the Alton Estate by providing a programme of inspiring and engaging creative activities that will give everyone the opportunity to participate.
- Confirmation of the cultural contribution for this scheme and the phasing of when this funding will be made available required, so that work can commence on developing the culture action plan. This also requires the appointment of the Cultural Projects Co-ordinator and the establishment of the advisory panel (made up of local residents, local arts professionals, arts and cultural groups/organisations from Roehampton and Wandsworth, representatives from the Council and developer and key design and delivery teams). Advisory panel is critical in determining the immediate and longer-term priorities and phased delivery of the cultural strategy.
- Adoption of the Council’s Resident Participation and Engagement Strategy on 20th January 2020 offers a good framework for both residents’ engagement in the Cultural Strategy and also how arts and culture can be used as part of the resident participation strategy for regeneration scheme.

Carter Jonas (Independent Viability Consultant)

Carter Jonas advise that the scheme cannot provide any additional affordable housing units above the current offer of 24%. In terms of review mechanisms, in accordance with the GLA’s SPG, early, mid and late stage reviews of the scheme are recommended, with details to be agreed in due course. Following the submission of the new FVA in May 2020, agreement has been reached between Carter Jonas and Montagu Evans on all inputs. The agreed position is a residual land value of £3,566,945. Set against the agreed Benchmark Land Value of £77,267,580, the deficit is £73,700,635.

Climate Integrated Solutions (Independent Sustainability Consultant)

- The updated energy assessment demonstrates efficient design with 11.4(domestic) and 40.6% (non-domestic) reductions in CO2 at be Lean stage.
- CHP has not been included at planner request. District heating is proposed. Producing a cumulative 34.8%(domestic) and 41.5%(non-domestic) carbon saving at Be Clean stage
- The updated energy report demonstrates that the zero carbon target cannot be met on site. It also demonstrates that the 35% minimum reduction on site as laid out in the GLA guidance and draft London plan on preparing energy assessments has been met including the fabric efficiency targets.
- Renewables are included after an appropriate feasibility study resulting in cumulative carbon savings of 37.4%(domestic) and 36.9% (non-domestic) at be Green stage.
- The updated carbon offset payments are agreed. These should be updated based on As Built calculations. The energy report demonstrates compliance with the hierarchy for both domestic and non-domestic units. Updated energy strategy includes appropriate steps at each stage
- The proposal includes details of potential to connect to area wide network if required in the future. There is a site wide network proposed which runs off heat pumps which are now recognised as superior to CHP in such situations by the GLA

3. An ES Addendum was submitted on 7th June 2020 following the inclusion of the Alton Estate on the Register of Historic Parks and Gardens. This necessitated a further 30 day consultation which ended on 7th August.

Transport for London - Requests further information and specific mitigation measures:

- Confirmation that the raised entry treatment at Danebury Avenue is 6m and the cycle reservoir 5m.
- An electronic version of the HSC for Danebury Avenue, for TfL to audit.
- Swept path analysis for the right-turn movement out of Holybourne Avenue.
- Further work required to find a design solution that will remove any zero scores from the Healthy Streets Check.
- Car parking provision proposed to be significantly reduced.
- Car Parking Management Plan to be secured by condition.
- A financial contribution to undertake a CPZ feasibility study and consultation to be secured.
- Three year's free car club membership for all new residents to be secured by condition.
- TfL recommend that the Danebury Avenue junction is regularly monitored throughout the phased redevelopment and changes to this junction should only be implemented during the final phase if the monitoring indicates an adverse impact on bus journey times and performance only; this should be secured through the s106 agreement.
- A contribution £650,000 to be secured through the s106 for bus capacity enhancement.
- A condition for the protection against external noise is required to mitigate noise impacts and to ensure that the proposed bus turnaround is able to remain operational and viable.

- The full costs to deliver the relocated bus turnaround facility, bus driver facility and any associated bus infrastructure will be met by the applicant.
- TfL access to the bus facilities in perpetuity will need to be included within the s106 agreement.
- Further work is required to demonstrate that the cycle parking proposed accords the London Cycling Design Standards (LCDS).
- Shower and locker facilities for non-residential uses to be secured by condition.
- More ambition targets required in the framework Travel Plan along with robust measures which will achieve these.
- Travel Plan to be secured, monitored, reviewed, and enforced through the s106.
- Further information required concerning servicing.
- A Delivery and Servicing Plan to be secured by condition
- A Construction Management Plan (CMP) to be secured by condition and discharged in consultation with TfL.

London Gardens Trust - Objection:

- The destructive cut and fill approach levels out the undulating character of the original parkland and obliterates the snippets of sight lines between blocks from Roehampton Lane which allow appreciation of the original more undulating character and leads to the excessive use of podium decks and poor streetscape.
- The complete divergence from any existing architectural character or streetscape will destroy the link between the listed landscapes to the East and West.
- The loss of the mature Lime trees along Harbridge Avenue which were themselves planted to replace an historic Lime tree allee from the historic Manressa House Estate upon which Alton Estate was built. The trees are included as part of Alton Conservation Area in recognition of their importance.
- The imposition of a grid like path through Devonshire Field completely undermines the original landscape approach to setting the slab blocks (Grade II*) in the undulating parkland landscape. The new path does not follow any kind of desire line and instead cuts through the original undulating grassland. The proposed routes force in some locations, force through shallow mounds in one case destroying a small stand of trees and completely altering the relationship of the surrounding parkland to the buildings.
- The new path is part of the 'play strategy for Downshire Field' which is harmful to the listed character as it imposes a cluttered trim trail and alien incidental planting
- The design of the proposed play centre at the bottom of Minstead Gardens is incongruous and alien and its height will damage sight lines between Mount Clare and Devonshire Field which even now are reminiscent of the original estate and were carefully planned by the LCC architects to give the impression of 'endless grassland' and links with the wider historic context.
- The southern elevation of Block Q is overbearing and destructive pushed as it is to the very limits of the listed parkland. Veteran pines on a small mound adjacent, saved during earlier construction phases, appear lost to a needlessly destructive and unnecessary path.
- Cutting into the open parkland to create a road-way and bus waiting area will be yet another cumulative loss of character and therefore significance.

- Wider views from Richmond Park of the listed estate will be spoilt by the large bulky buildings wrapping around the point blocks in particular. The present iconic view of elegant listed blocks set against a spacious sky will be destroyed.
- The large window 'penthouse' design of the new blocks will also be highly intrusive at night when they are lit up and highly visible across the wider area.

In addition to formal consultation on the application, the application was advertised for a 30 day period commencing on 15th September as a Regulation 3 application following assignment to Wandsworth Borough Council.

RELEVANT PLANNING POLICIES:

National Planning Policy Framework (NPPF) (2019)

Section 4: Decision-making

Section 5: Delivering a sufficient supply of homes

Section 6: Building a strong, competitive economy

Section 7: Ensuring the vitality of town centres

Section 9: Promoting Sustainable Transport

Section 11: Making effective use of land

Section 12: Achieving well-designed places

Section 15: Conserving and enhancing the natural environment

Section 16: Conserving and enhancing the historic environment

Other National Guidance

PPG

National Design Guide (2019), Secured by Design Homes 2019 (version 2, March 2019)

Secured by Design Commercial Developments 2015 (version 2)

Technical Housing Standards – nationally described space standard

London Plan (Adopted)

London Plan (adopted 2016):

Policy 1.1 (Delivering the strategic vision and objectives for London);

Policy 2.18 (Green infrastructure: the multi-functional network of green and open spaces); Policy 3.1 (Ensuring life chances for all);

Policy 3.2 (Improving health and addressing health inequalities);

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 3.12 (Negotiating affordable housing on individual private residential and mixed use schemes);

Policy 3.13 (Affordable housing thresholds);

Policy 3.15 (Co-ordination of housing development and investment);

Policy 3.16 (Protection and enhancement of social infrastructure);

Policy 4.1 (Developing London's economy);

Policy 4.3 (Mixed use development and offices);
Policy 4.7 (Retail and town centre development);
Policy 4.8 (Supporting a successful and diverse retail sector and related facilities and services);
Policy 5.1 (Climate change mitigation);
Policy 5.2 (Minimising carbon dioxide Emissions);
Policy 5.3 (Sustainable design and construction);
Policy 5.5 (Decentralised energy networks);
Policy 5.7 (Renewable energy);
Policy 5.9 (Overheating and cooling);
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 5.15 (Water use and supplies);
Policy 5.17 (Waste capacity);
Policy 5.21 (Contaminated land);
Policy 6.1 (Strategic Approach);
Policy 6.3 (Assessing effects of development on transport capacity);
Policy 6.5 (Funding Crossrail and other strategically important transport infrastructure);
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 7.7 (Location and design of tall buildings);
Policy 7.8 (Heritage assets and archaeology);
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 7.18 (Protecting open space and addressing deficiency);
Policy 7.19 (Biodiversity and access to nature);
Policy 7.21 (Trees and woodlands);
Policy 8.2 (Planning obligations);
Policy 8.3 (Community infrastructure and review).

London Plan (2019 - Intend to publish)

Policy SD10 Strategic and local regeneration
Policy D1 London's form, character and capacity for growth
Policy D2 infrastructure requirements for sustainable densities
Policy D3 Optimising site capacity through the design-led approach
Policy D4 Delivering good design

Policy D5 Inclusive design
Policy H6 Housing quality and standards
Policy D7 Accessible housing
Policy D8 Public realm
Policy D9 Tall buildings
Policy D11 safety, security and resilience to emergency
Policy D12 Fire safety
Policy D14 Noise
Policy H1 Increasing housing supply
Policy H4 Delivering affordable housing
Policy H6 Affordable housing tenure
Policy H8 Loss of existing housing and estate redevelopment
Policy H10 Housing size mix
Policy S1 Developing London's social infrastructure
Policy S2 Health and social care facilities
Policy S4 Play and informal recreation
Policy E4 Affordable workspace
Policy E9 retail, markets and hot food takeaways
Policy HC1 heritage conservation and growth
Policy HC5 Supporting London's culture and creative industries
Policy G1 Green infrastructure
Policy G4 Open space
Policy G5 Urban greening
Policy G6 Biodiversity and access to nature
Policy G7 Trees and woodlands
Policy SI1 Improving air quality
Policy SI2 Minimising greenhouse gas emissions
Policy SI3 Energy infrastructure
Policy SI4 Managing heat risk
Policy SI5 Water infrastructure
Policy SI7 reducing waste and supporting the circular economy
Policy SI13 Sustainable drainage
Policy T2 Healthy streets
Policy T3 Transport capacity, connectivity and safeguarding
Policy T4 assessing and mitigating transport impacts
Policy T5 Cycling
Policy T6 Car parking
Policy T6.1 Residential parking
Policy T7 Deliveries, servicing and construction
Policy T9 funding transport infrastructure through development
Policy DF1 Delivery of the plan and planning obligations

Mayor of London's Supplementary Planning Guidance (SPG's):

Housing (2016)
Shaping Neighbourhoods: Play and informal recreation (2012)
Homes for Londoners: Affordable Housing And Viability (2017)
Character and Context (2014)
Sustainable Design and Construction (2014)
The Control Of Dust And Emissions During Construction And Demolition (2014)

Mayor of London's Guidance

Better Homes for Local People: The Mayor's Good Practice Guide to Estate Regeneration (February 2018)

Wandsworth's Local Plan:

Wandsworth's Core Strategy (2016):

PL1 (Attractive and distinctive neighbourhoods and regeneration initiatives);
PL2 (Flood risk);
PL3 (Transport);
PL4 (Open space and the natural environment);
PL5 (Provision of new homes);
IS1 (Sustainable development);
IS2 (Sustainable design, low carbon development and renewable energy);
IS3 (Good quality design and townscape);
IS4 (Protecting and enhancing environmental quality);
IS5 (Achieving a mix of housing including affordable housing);
IS6 (Community services and the provision of infrastructure);
IS7 (Planning Obligations).

Wandsworth's Development Management Policies Document (2016):

DMS1 (General development principles),
DMS2 (Managing the historic environment);
DMS3 (Sustainable design and low-carbon energy);
DMS4 (Tall buildings);
DMS6 (Sustainable drainage systems);
DMS7 (Consultation with the Environment Agency);
DMH3 (Unit mix in new housing);
DMH4 (Residential development including conversions);
DMH6 (Residential space standards);
DMH7 (Residential gardens and amenity space);
DMH8 (Implementation of affordable housing);
DMTS1 (Town centre uses);
DMTS9 (Shopfronts and signs);
DMO3 (Open spaces in new development);
DMO4 (Nature conservation);
DMO5 (Trees);
DMO8 (Focal points of activity);
DMC2 (Provision of new and improved community facilities);
DMT1 (Transport);
DMT2 (Parking and servicing).

Site Specific Allocations Document (March 2016)

- Area Spatial Strategy for Roehampton and Site Allocations: Roehampton, Danebury Avenue, SW15 (Policies Map Ref:86)
- 166-170 Roehampton Lane, SW15 (Policies map Ref: 86D)

Wandsworth's Employment and Industry Document (December 2018):

EI1 (Encouraging sustainable economic growth);
EI2 (Locations for new employment floorspace);
EI4 (Affordable, flexible and managed workplaces);

E15 (Requirements for new employment development).

Wandsworth's Supplementary Planning Documents (SPD's):

Roehampton SPD (October 2015)

Statement of Community Involvement (February 2019)

Housing (2016)

Planning Obligations (2015)

Refuse and recyclables in developments (2014)

Local Views (2014)

PLANNING CONSIDERATIONS:

1. Introduction and Background

1.1 The Alton Estate was constructed by the London County Council in the 1950s to respond to the urgent need for housing in the aftermath of the second world war. In 2012, the LB Wandsworth's Executive agreed to a programme of work to improve the physical environment and raise the aspirations and life chances of those living in the most deprived areas of Latchmere and Roehampton and Putney Heath. The Alton Area Masterplan was published in October 2014 to address and resolve the deficiencies of the existing estate by utilising place-making principles combined with the delivery of high-quality community and economic infrastructure. The study identified that the issues facing the estate were not uniform across the wider estate but localised within what is now the application site. A number of socio-economic and physical challenges were identified in the study including.

- a lack of tenure diversity in the Alton area including different forms of affordable housing;
- poorly sited and constructed residential buildings that included poor quality entrances to blocks, spaces not being overlooked or overlooking unsightly refuse and service areas and housing that fall considerably short of modern expectations and the space standards set out in the London Plan;
- much of the existing community floorspace within the estate is poor quality, undersized or perform 'back of house functions' rather than deliver services directly to residents.

1.2 The Alton Area Masterplan concluded that these physical and socio-economic challenges could not be resolved by simply refurbishing the existing buildings. These issues were considered to be more fundamental and to require comprehensive regeneration of parts of the estate to be able to deliver better quality homes for residents that meet modern housing space and quality standards, improve community and retail services, enhance employment and training opportunities, and address the accessibility and design flaws with the existing estate. Without intervention, the Alton Area Masterplan concluded these issues will become more acute, and the quality of life of residents will suffer.

- 1.3 The analysis within the Alton Area Masterplan was translated into planning policy by the Council in the Roehampton SPD which was adopted by the Council in October 2015. The purpose of the SPD is to positively support the council's regeneration programme for Roehampton by providing guidance to prospective developers, stakeholders, and the community on the nature and form of development that the council is likely to find acceptable in the SPD area.
- 1.4 Redrow Homes Limited was appointed as the Council's development partner for the Alton Estate Regeneration in June 2017 following an EU procurement using the GLA London Development Panel. Redrow Homes was detailed as 'the applicant' when the planning application was submitted in June 2019.
- 1.5 On 6th August 2020, Redrow Homes Ltd announced in a joint statement with the Council that it would be scaling back its operations in London and stepping away from the redevelopment of the Alton Estate to focus on its regional businesses. Redrow has agreed terms with the Council to affect its exit from the scheme and has requested that Redrow is removed as the applicant for the scheme and replaced with Wandsworth Borough Council. The Council's agreement to the proposed assignment of the application was confirmed in a letter from the Assistant Director, Regeneration to the Assistant Director, Planning and Transport on 14th September 2020. This letter confirms that the Council as applicant stands behind the documentation and plans submitted in support of the application by Redrow and intends to secure a new development partner to deliver the scheme.
- 1.6 As a result of the application being assigned to the Council, the application becomes a Regulation 3 application. In effect this means it becomes the Council's own planning application and this triggered the requirement for a further 30 day advertisement period from 15th September in relation only to this technical change. As a Council own application there would be no right of appeal should planning permission be refused.
- 1.7 Planning officers worked closely with the applicants at pre-application stage in the evolution of the masterplan and accompanying parameter plans and design codes. Since the submission of the application, planning officers have continued to work pro-actively with the applicants to address the representations and feedback received from statutory consultees, including the Greater London Authority (GLA), Transport for London (TfL) and Historic England; other organisations and the local community. The revised proposals submitted in May 2020 seek to address the issues raised.
- 1.8 The planning application must be assessed against the Council's Development Plan and any other relevant material planning considerations must be taken into account in reaching a decision. Officers consider that the measure of a successful regeneration should be based on "sustainability", which requires a balance of social, economic and environmental outcomes, and to satisfy a diverse range of housing needs and deliver community benefits. It is these outcomes which inform the planning issues and are the golden thread that runs through the assessment of the complex and detailed reports that have accompanied the planning application.

1.9 A key challenge in housing estate regeneration, is managing the competing demands that need to be balanced to promote and deliver a financially viable scheme and one that creates a successful community and sense of place. The current planning application has evolved over several years and other significant planning issues which are addressed in this report include the following:

- (i) the principle of development which includes the proposals consistency with the Development Plan for the area and with the National Planning Policy Framework (2019);
- (ii) whether the development would provide the maximum reasonable level of affordable housing in accordance with the development plan;
- (iii) the effect of the proposal on the character and appearance of the area including heritage assets and protected views;
- (iv) the impact of the development on the amenity of adjoining and existing residents;
- (v) whether the proposal is considered a sustainable form of development;
- (vi) the effect of the development on the environment; and
- (vii) the effect of the development on residents with protected characteristics.

1.10 The Local Planning Authority has been assured that the assignment of the application to the Council has not changed the basis of the regeneration proposals which have been developed over an extended period of time by the applicants in consultation with stakeholders and the local community. Subject to planning permission being granted for the current proposals, if the approved scheme or the approach to delivery were to subsequently be changed as a result of the procurement of a new development partner by the Council, it would be necessary to amend the planning permission through a section 73 application or for a new planning application to be submitted. The submission of a section 73 application would require a new Financial Viability Assessment (FVA) and for a Deed of Variation to be agreed to any legal agreement under section 106 and the Heads of Terms therein.

1.11 An unaccompanied site visit with Members of the Planning Applications Committee took place on 13th October 2020, where Members were invited to view the Alton Estate with Officers. The Councillors in attendance at the site visit were Cllr Humphries, Cllr Belton, Cllr Critchard, Cllr Ellis, Cllr Loveland and Cllr Mowatt.

2. Principle of Development

2.1 The desire for regeneration of the Alton Estate is multi-faceted and has arisen directly from the local community response to existing estate and property conditions. Regeneration of the estate also provides the opportunity to increase local housing supply and deliver benefits to the wider community through the provision of new and improved community facilities, an improved local retail offer, affordable workspace for local businesses and enhanced open space and play facilities.

- 2.2 The proposals provide the opportunity to realise benefits for the local area and to address issues such as poor housing conditions, overcrowding, unemployment and deprivation. Redevelopment of the estate has the potential to create a wide range of accommodation to meet local housing need and market demand by optimising the density, housing re-provision and other community benefits.
- 2.3 The proposed development reflects the Government's stated priorities for estate regeneration of tackling deprivation and increasing housing supply. The application site is a relatively low-density estate located in an area of high housing need, and therefore represents an opportunity for densification and optimisation.
- 2.4 The Mayor's Good Practice Guide to Estate Regeneration (GPGER) supports these aims and provides additional practical advice to developers on how to deliver the best possible outcomes on regeneration schemes. The key principles being full and transparent consultation and involvement; an increase in affordable housing; a full right to return or remain for social tenants and a fair deal for leaseholders or freeholders. The GPGER emphasises that extensive, responsive and transparent public consultation is fundamental to the success of regeneration schemes.
- 2.5 Both Policy 3.14 of the London Plan and Policy H8 of the Intend to Publish London Plan 2019 recognise the importance of estate regeneration in meeting the housing needs of London. It has been noted through the public consultation process that the existing units are of poor and declining physical quality and no longer fit for purpose.
- 2.6 The principle of regeneration of the Alton Estate is established in the Core Strategy (Policy PL15), the Area Spatial Strategy for Roehampton as set out in the Site Specific Allocations DPD and the guidance in the adopted Roehampton SPD. The provision of new residential housing on the site as well as the replacement of the existing housing stock is supported as part of the comprehensive regeneration of the area. The planning application is accompanied by a masterplan which covers part of the wider masterplan boundary shown on the Roehampton Area Spatial Strategy.
- 2.7 The Core Strategy (Policy PL1) states that deprivation and inequalities will be tackled through regeneration initiatives and the focusing of mainstream services and resources on the highest priority areas, including Roehampton. Core Strategy Policy PL15 states that comprehensive regeneration and new development will be supported within the Roehampton masterplan area to deliver improvements to housing, business floor space, shops, community facilities, and environmental improvements to the landscape, as well as improved employment opportunities for residents and new transport linkages.
- 2.8 The Roehampton SPD identifies four principle intervention areas which correspond to the application site:
- Key intervention area 1 – Roehampton Local Centre

- Key intervention area 2 – Portswood Place Important Local Parade
- Key intervention area 3 – Danebury Avenue Housing
- Key intervention area 4 – The Central Landscape (Downshire Field)

2.9 The Site Specific Allocations Document (March 2016) allocates four sites for development within the SPD boundary. Two of these sites are located within the application site boundary:

- Roehampton, Danebury Avenue, SW15 (Site Ref 8.1.1)
- 166-170 Roehampton Lane, SW15 (Site Ref 8.1.5)

2.10 In addition to the four principal intervention areas, the Roehampton SPD identifies 9 overarching strategic objectives (“the Strategic Objectives”) that have been designed to deliver the vision for the regeneration. These Strategic Objectives are:

1. Create a more mixed and balanced community with new and improved high-quality housing that will raise the living conditions and widen housing choice.
2. Improve the quality of the retail, service and community facilities. Improve existing community buildings and create new facilities within existing Local Centre and Important Local Parade.
3. Provide improved job and training opportunities for Roehampton residents.
4. Adopt a place-making approach which protects, strengthens and repairs the special qualities of the estate through bespoke and sensitive intervention.
5. Improve or replace poor-quality buildings.
6. Improve pedestrian, cycle and vehicular connections within the site and to the surrounding streets, centres, communities and open spaces.
7. Upgrade existing and create new streets, public spaces and pedestrian links to make them more attractive, convenient and usable.
8. Create a more attractive area with a high-quality and active landscape by upgrading existing open spaces and creating new ones.
9. Conserve and enhance existing heritage assets, including those on the Heritage at Risk Register, and their settings, to better reveal the qualities of the estate

Summary on principle of development

2.11 The principle of development is acceptable taking account of national, strategic and local planning policies, a principle which is generally welcomed

by those who have made representation. The Alton Estate has been identified for regeneration to deliver improvements to housing, business floor space, shops, community facilities, and environmental improvements to the landscape, as well as improved employment opportunities for residents and new transport linkages

3. Consultation

- 3.1 A key principle underpinning the Mayor's Good Practice Guide to Estate Regeneration (GPGER) relates to the full and transparent consultation and involvement of the community and responsive and transparent public consultation in the development of proposals.
- 3.2 An extensive and wide-ranging programme of consultation and engagement has been undertaken with the local community and key stakeholders. The Council as owner developed a masterplan for the Alton Estate in 2014 following consultation on three potential development options. The resulting Alton Area Masterplan was then developed into the Roehampton SPD, which was adopted in October 2015.
- 3.3 The Council commenced engagement with residents and local stakeholders in June 2013 on the development of the Alton Masterplan including consultation on masterplan options. Consultation on the proposals took place between July 2017 and March 2019 prior to the submission of the planning application in June 2019. This included workshops, focus groups, targeted consultation events, stalls at festivals and public exhibitions. Thirteen issues of the Alton Area regeneration news have been published and delivered to more than 4,500 addresses between 2017-2020 and details of the proposals have been published on the Council's web site (www.wandsworth.gov.uk/roehampton) and the Alton Estate Regeneration website (www.altonestateregen.co.uk). Information has been delivered to every tenant and homeowner in the intervention areas and posted to non-resident leaseholders/freeholders. In addition, all directly affected households have received home visits in the form of Housing Needs Survey meetings and tailored booked appointments. Details of consultation and engagement with the local community are set out in the submitted Statement of Community Involvement.
- 3.4 According to the applicant's Statement of Community Involvement (SCI), key changes arising from public consultation were:
 - The design of the u-shaped and courtyard blocks;
 - The design of amenity areas;
 - The provision of secure parking in the form of undercroft parking;
 - The protection and enhancement of existing open space which has resulted in the scaling back of interventions to Downshire Field in particular;
 - The provision of new retail facilities on Danebury Avenue and continued provision of retail facilities throughout construction;
 - Increased active frontage along Danebury Avenue and concealment of servicing and refuse provision;
 - The Portswood Place development should provide health and retail facilities for the immediate community who are unable to access the main community hub;

- The library should be more accessible and associated play area provided at ground floor;
 - The provision of the village square at the junction of Danebury Avenue and Roehampton Lane;
 - Retention of on-street parking.
- 3.5 This is a proposal which is referable to the Mayor at key stages due to the scale of it. Concerns were raised on behalf of the Mayor by the Greater London Authority (GLA) in its Stage 1 report about the adequacy of the consultation which had been undertaken and its compliance with best practice. In particular, it was noted that the SCI indicated that no further public exhibitions on the scheme were held post September 2018 and the SCI did not specifically set out how the applicant had sought to engage non-English speaking residents and those with disabilities who might not be able to attend meetings. Furthermore, confirmation was requested that residents had been given an opportunity to select an independent tenant and leaseholder adviser to support their involvement in the development of proposals for the estate.
- 3.6 An SCI addendum was submitted with the revised proposals in March 2020 which provided further details on resident consultation and engagement and responded to the issues raised by the GLA.
- 3.7 *Consultation since September 2018* - The fundamentals of the masterplan have remained unchanged since June 2018 and from September 2018 onwards, consultation events focussed on specific issues identified by stakeholders- including those who attended the 'Let's talk' public meeting in May 2019. Events included consultation on the play strategy, bus turnaround and Alton Activity Centre. One to one conversations have continued with directly affected residents and Alton regeneration newsletters have continued to be published quarterly. In January 2020, the Regeneration Team sent out a brochure to all affected residents in the intervention area explaining the proposed changes to the tenure and location of the affordable housing blocks and how this might impact on their choices and timings of moves. Those residents who may now move sooner received individual home visits and all affected residents were invited to attend one of three drop-in sessions run by the Regeneration Team to explain the revised proposals.
- 3.8 *Engagement with non-English speaking residents and those with disabilities* - Wandsworth Council translates written information on request and establishes the need for translation at one-to-one housing needs visits. In addition, the Council offers a language line. People with disabilities are always offered a one to one housing needs survey and a bespoke housing offer is made that reflects their needs. Provision has been made for access to exhibitions.
- 3.9 *Independent tenant and leaseholder adviser* - The Mayor's Good Practice Guide to Estate Regeneration which includes the practise of engaging an Independent resident Adviser was published in February 2018 by which time the options appraisals and masterplan had been completed after consultation with residents. For resident leaseholders and freeholders, in addition to their allocated case officer for discussions on acquisition and moving, the Council

directly funds residents to obtain their own valuation advice and has built in an appeal mechanism if the resident is unhappy with the offer received. The Council is committed to making a number and range of reasonable offers to secure tenants and these are reviewed with the tenants by an allocated case officer. Should the tenant not be happy with their rehousing offer or their compensation package, they would be referred to the CAB for further free advice and support. The applicant is of the view that introducing an independent tenant and leaseholder adviser at this late stage in the masterplanning and design process would complicate the established and understood lines of communication and could confuse tenants and leaseholders.

3.10 The timeline and scope of the consultation undertaken by the Council and Redrow Homes Ltd is summarised in the following table which has been provided by the applicant.

Table 1: Consultation undertaken by the applicant

Sept/Oct 2013	Options Stage Consultation <ul style="list-style-type: none"> • Public meetings • On-site opening presentation and exhibition • Exhibition at the local library • Drop-in sessions for residents with council staff • Presentations to stakeholder groups and service providers 	207 feedback forms completed 7 responses from local organisations and Council departments
Feb/Mar 2014	<ul style="list-style-type: none"> • Preferred Options Consultation • 8 evening drop-in sessions at Roehampton library • Door knocking exercise of all properties proposed for redevelopment • 37 community groups, stakeholder meetings and forums • Meeting with 10 local retail businesses • 254 postal or online questionnaires • Regular updates about the Masterplan process via: <ul style="list-style-type: none"> ○ Roehampton Voice ○ Brightside ○ Homelife ○ E-Newsletter to those on consultation database 	More than 800 residents and stakeholders spoke directly to the masterplanning team
July 2017	Commencement of design workshops	Minstead Gardens Residents Eastwood Nursery and Children's Centre Danebury Surgery Young people from the Base
July 2017	Roehampton "Feel Good" Festival, Downshire Field	Around 350 people spoke to the project team

Sept/Oct 2017	<ul style="list-style-type: none"> • Exhibition in Roehampton Library • Series of 14 workshops • Open consultation sessions in Roehampton Parish Hall • Workshop for young people • Community groups, stakeholder meetings and forums 	88 workshop participants 120 consultation session attendees
Mar-Nov 2018	Schools engagement programme	5 local schools
June 2018	Series of consultation events	287 participants
Sept 2018	“Get Active” Roehampton Festival	N/A
Sept 2018	Play strategy workshop for young people	86 young people
Nov 2018	Bus turnaround consultation event	18 attendees
Nov 2018	Alton Activity Centre consultation event	25 attendees
Sept 2019	“Get Active” Roehampton Festival on Downshire Field explaining changes to the masterplan, providing information about the cultural strategy and phasing/rehousing plans.	N/A
Jan 2020	Drop-in information events at the Base and Minstead Gardens clubroom to discuss changes to the phasing plan/tenure mix.	Residents of the intervention area
Jan 2020	One-to-one meetings to discuss changes to the phasing plan and invite them to provide feedback on changes set out in a letter, brochure and newsletter	Residents of phase 1
Feb 2020	Telephone one-to-ones	Residents of 53 households from Allbrook House, Harbridge Avenue (evens), 31-115 Danebury Avenue Kingsclere Close, Portswood Place
May 2020	Guide to the proposed changes and FAQs about the proposed amendments distributed to residents.	4,500 addresses as per newsletter distribution
May 2020	“Curated” version of the revised planning application made available on the www.altonestateregen.co.uk website	

3.11 It is acknowledged that the planning application is complex and involves a large amount of documentation. In addition to consultation by the applicant, the Local Planning Authority has provided additional support and advice to the local community on the planning application over and above what it is legally required to do. A leaflet was distributed with details of the planning application and development proposals to 7,500 residential, businesses and community organisations in June 2019 and a full set of the planning application documents were made available for public inspection in Roehampton Library. In addition, three drop-in sessions were held in the Library in June/July 2019 when planning officers were present to answer questions about the planning application and the submitted plans and supporting documentation. An officer was also available by telephone to answer questions throughout the consultation period and thereafter.

- 3.12 The intention had been to undertake further drop-in sessions after the submission of the revised planning application. This was not possible due to the legal restrictions placed on public events and the closure of public libraries as a result of the COVID-19 pandemic. Concerns have been expressed in representations made by the public that the consultation has excluded some members of the community due to the necessary reliance on digital technology and the inability to lawfully hold meetings or drop-in sessions during the consultation period. The Local Planning Authority has taken all possible steps to address this. The start of public consultation on the amendments to the application now being considered was delayed until the lockdown restrictions were lifted in May and a dedicated planning officer has been available by phone to assist members of the public and to answer any questions about the revised proposals. Further, the consultation period was extended to 7th August and representations have continued to be taken into account up to the date of this Planning Committee to ensure that as much time as possible has been available to the public to comment on the revised proposals. The Local Planning Authority also advertised the change of applicant by site notice and advertisement.
- 3.13 The importance of good public engagement is fully acknowledged by the Council, both in its capacity as applicant and as planning authority. A review is being undertaken by the applicant to ensure that the best possible engagement processes are in place for the residents and stakeholders affected by the Alton Estate regeneration taking account of best practice elsewhere. In March 2020 a paper was submitted to the Roehampton partnership seeking views on future engagement arrangements and a revised engagement strategy is being prepared based on the key themes emerging from these responses including a greater emphasis on grass root engagement; greater support for community led initiatives and increased interaction and support for existing community groups. In a report to the Housing and Regeneration Overview and Scrutiny Committee on 17th September, the Director of Housing and Regeneration stated that a revised engagement strategy 'should enable existing community spirit to be harnessed and encourage the widest spectrum of the community to celebrate the Alton Estate's many positive features thereby improving community cohesion and boosting the wellbeing of all residents'. It is considered that a greater emphasis on supporting community-focused initiatives, particularly involving groups who may struggle to reconvene their activity following the COVID-19 pandemic or who are traditionally less likely to participate, and engaging directly with existing community groups, will enable the Council to better understand and support the interests of various groups. A detailed engagement strategy is to be considered by the Housing and Regeneration Overview and Scrutiny Committee in November 2020.

Summary on public consultation

- 3.14 An extensive and wide-ranging programme of consultation and engagement has been undertaken by the applicant with the local community and key stakeholders in the development of the masterplan and planning application proposals. However, it is important that effective public engagement is

undertaken to inform the detailed proposals and to ensure the community continue to be fully engaged in the phased regeneration of the estate. The proposals for the development of a new and more community focused engagement strategy are therefore timely and will help to ensure the community are fully engaged in the delivery of the proposed development, in particular, the development of detailed proposals for the new community hubs, youth facilities, play spaces and enhancement of Downshire Field and the implementation of the cultural strategy which form key elements of the regeneration benefits for the existing community.

- 3.15 The planning authority has fulfilled the legal requirements for consultation, notification and advertisement of the application.

4. Principle of Demolition

- 4.1 The Alton Estate has been experiencing increasing levels of anti-social behaviour as a result of the physical decline of buildings and isolated nature of the site. Wandsworth Council commissioned a study into the estate which identified that the issues facing the estate was not uniform across the wider estate but localised within the application site. As a result of the study, and a public options consultation report, it was concluded that the maintenance of the buildings within the area, refurbishment or targeted redevelopment would not be sufficient and that redevelopment would be the only long-term viable option.
- 4.2 The Roehampton SPD establishes the principle of regeneration of the Alton Estate and provides a full list of the residential blocks proposed for demolition. All of the existing buildings and structures within the Application Site (with the exception of the Alton Activity Centre community building), will be demolished to enable existing secure tenants and resident homeowners to be rehoused on the estate and only move once. A total of 21 buildings will be demolished to accommodate the proposed development and a block by block phasing plan has been submitted with the planning application. The phasing of development will ensure that all community facilities and services, including the library, health uses, youth facilities and Eastwood Nursery and Children's Centre, can move into new facilities without a break in service provision. The phasing also allows for the re-provision of some of the existing retail uses to ensure there always remains a retail offer for residents on the estate. The phasing will be governed by the principle to minimise disruption for existing tenants on the Application Site, all of whom will be given the opportunity to return to the Site once development is completed.
- 4.3 Existing buildings are identified in the following plan and cross-referenced in the accompanying table. The decant of properties in Phase 0 has commenced with the relocation of the Co-op convenience store into vacant shop units on Danebury Avenue.

Plan 1: Existing Buildings

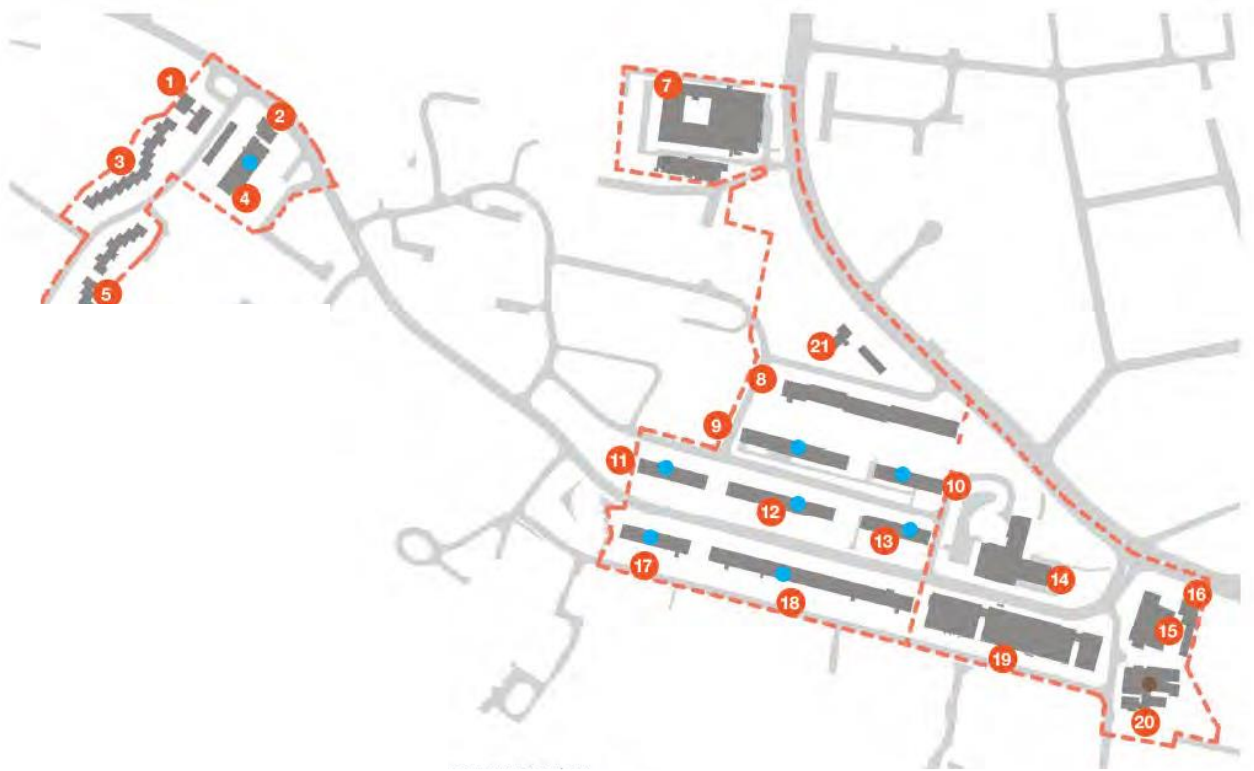


Table 2 Existing Buildings to be demolished

MAP REF	Property	Type	use	Height/ storeys	Tenure/ ownership	units	Indicative Demolition Phase	Indicative Decant Phase
15	1-29 Danebury Ave	Flats/GF Commercial	Residential/ Commercial	4	Mixed	10	1	0
4	1-14 Portswood Place	Flats/GF Commercial	Residential/ Commercial	3	Mixed	7	1	0
1	2A Minstead Gardens	Bungalow	Residential	1	Council	1	1	0
21	190 Roehampton Lane	Flats	Residential	2	Council	1	1	0
20	Roehampton Boys Supporters Club	Community	Social Club	2	Council	0	1	0
20	Roehampton Youth Club	Community	Youth	2	Council	0	1	0
16	Alton Medical Practice	Community	Medical	2	Private	0	1	0
1	Minstead Gardens Club Room	Community	Older people's meeting Room	1	Council	0	2	2
2	Danebury Avenue Surgery	Community	Medical	2	Private	0	2	1
19	31-115 Danebury Avenue	Flats/GF Commercial	Residential/ Commercial	4	Mixed	32	2	1
19	Roehampton Base	Community	Youth	1	Private	0	2	1
9 & 10	2-84 Harbridge Avenue (even)	Flats	Residential	4	Mixed	42	2	1
14	1-45 Allbrook House	Flats	Residential	10	Mixed	45	2	1
8	1-28 Kingsclere Close	Houses	Residential	3	Mixed	28	2	1
14	Library	Community	Library	1	Council	0	1	1
7	166 Roehampton Lane	Community	Nursery	3	Council	0	2	2
7	168 Roehampton Lane	Community	Children's Centre	3	Council	0	2	2
11-13	1-115 Harbridge Ave (odds)	Flats	Residential	4	Mixed	58	3	2
17&18	117-243 Danebury Ave (odds)	Flats	Residential	4	Mixed	64	3	2
	Total					288		

- 4.4 Policy H8C of the Intend to Publish London Plan 2019, given significant weight as a material planning consideration, addresses the issue of demolition and replacement of existing affordable housing. It states that before considering the demolition and replacement of affordable homes, boroughs, housing associations and their partners should always consider alternative options first and balance the potential benefits of demolition and rebuilding of homes against the wider social and environmental impacts. In the development of the masterplan, consideration has been given to options and it has been concluded that demolition is necessary to deliver the wider objectives for the regeneration of the Alton Estate.
- 4.5 Objections have been raised to demolition of the existing buildings and a preference has been stated in representations received for a scheme of refurbishment rather than demolition and redevelopment citing concerns about the environmental impacts of demolition and the impact on the existing community in terms of noise, disruption and environmental quality.
- 4.6 Whilst Portswood Place is located within the conservation area boundary, none of the buildings to be demolished are statutorily or locally listed or identified as being of special architectural value. It is expected that demolition, construction and occupation will take place in phases with the entire demolition and construction programme lasting approximately 10 years. Given the proximity to designated and non-designated heritage assets, it is however, necessary to demonstrate that the replacement buildings make an equal or better contribution to the significance of affected heritage assets. Comprehensive assessments have been undertaken of the significance of the statutory (designated) and non-statutory (non-designated) heritage assets affected by the proposed demolitions on the Application Site. This is considered in further detail in Section 12 and in the Planning Balance which considers the harm caused and the suitability of the replacement buildings and the wider public benefits of the regeneration scheme.
- 4.7 Objections have been raised to the demolition of Allbrook House and the Library stating that they are important non-designated heritage assets and are integral to the architectural and heritage value of the Alton Estate. The Twentieth Century Society is of the view that Allbrook House and the Library are of major importance and are worthy of retention as part of this scheme. It considers Allbrook House and the Library to be non-designated heritage assets, which should be retained owing to both their importance and the harm their demolition will cause to the setting of the surrounding conservation area and the listed buildings across the Estate. It is noted that an application was made in July 2015 to Historic England to add Allbrook House and Roehampton Library to the List of Buildings of Special Architectural or Historic Interest. In November 2015, Historic England informed the Council that the Secretary of State for Culture, Media and Sport had decided not to add Allbrook House and Roehampton Library to the Statutory List. This is considered further in Section 12 which assesses the impact of the proposals on designated and non-designated heritage assets.

Summary on the principle of demolition

- 4.8 The principle of demolition is established in the Roehampton SPD and is necessary to achieve the wider regeneration objectives for the Alton Estate. The 'vision' which underpins the Alton Area Masterplan was formulated to address and resolve the deficiencies of the existing estate by utilising place-making principles combined with the delivery of high-quality community infrastructure and improvements to the public realm. The principle of demolishing poor-quality housing stock has been agreed through the site allocation and consultation with existing estate residents.
- 4.9 It is considered that the proposed demolition is appropriate and necessary to facilitate the wider redevelopment, in the context of the poor quality of the majority of the housing stock which is proposed for demolition. Based on the available information, the demolition of existing buildings is necessary to deliver improved housing and to achieve the wider regeneration objectives and public benefits set out in the Roehampton SPD. Refurbishment of existing buildings would not guarantee that these objectives could be achieved. The proposals would not require the demolition of any listed buildings, but objections have been raised in particular to the demolition of Allbrook House and the Library. This is considered further in Section 12.

5. Replacement of Existing Housing

- 5.1 The strategic policies relating to the replacement of existing housing and estate regeneration are set out within London Plan Policy 3.14, Policy H8 of the Intend to Publish London Plan 2019 and the Mayor's Affordable Housing and Viability SPG. These policies seek to resist the loss of existing housing unless it is replaced at existing and higher densities with at least equivalent floorspace. For estate regeneration schemes, the existing affordable housing floorspace should be replaced on an equivalent basis, i.e. where social rented floorspace is lost, it should be replaced by general needs rented accommodation with rents at levels based on those in the homes that have been lost.
- 5.2 The proposed development presents an opportunity to deliver sustainable new housing through estate renewal. The redevelopment includes proposals to demolish and re-build substantial areas of housing. There are currently 288 existing residential units on the site, and it is proposed to build up to a maximum of 1108 units representing an uplift of 820 units. The existing 288 units comprise 158 social rented homes and 130 privately owned homes.
- 5.3 London Plan Policy 3.14, policy H8 of the Intend to Publish London Plan 2019, the Good Practice Guide to Estate Regeneration and the Mayor's Affordable Housing and Viability SPG also make clear that in the redevelopment of sites any loss of affordable housing must also be replaced by better accommodation and at least an equivalent amount of floorspace on a like-for-like basis. Policy H8D, which has significant weight as a material planning consideration, states that 'Demolition of affordable housing, including

where it is part of an estate redevelopment programme, should not be permitted unless it is replaced by an equivalent amount of affordable housing floorspace. Affordable housing that is replacing social rent housing must be provided as social rent housing where it is facilitating a right of return for existing tenants. Where affordable housing that is replacing social rent, housing is not facilitating a right of return, it may be provided as either social rent or London Affordable Rent housing. Replacement affordable housing should be integrated into the development to ensure mixed and inclusive communities’.

- 5.4 All existing 158 social rented units will be replaced as part of the development proposals in accordance with policy requirements in terms of unit numbers, habitable rooms and floorspace whilst the existing mix in terms of unit sizes has been amended to reflect current housing need. This is critical in establishing the acceptability of the proposals.
- 5.5 A total of 201 social rented units will be provided as part of the proposed development representing a 27% increase or an uplift of 43 units over existing provision. The number of habitable rooms will increase by 27% and the floorspace by 45% as summarised in the following table.

Table 3: Comparison of Existing and Proposed Social Rent Units

	Existing Social rent Units	Proposed social rent Units
Number of Units	158	201
Number of habitable rooms	560	773
Floorspace (sqm)	11,330	16,372

Summary on replacement of existing housing

- 5.6 The scheme makes provision for an increased number of dwellings at a higher density and for the replacement of existing social rent units on an equivalent basis in terms of unit numbers, habitable rooms and floorspace in accordance with policy requirements. It also provides for an uplift in the provision of affordable housing and this is considered in further detail in Section 7.

6. Residential Uses

- 6.1 The NPPF requires local planning authorities to significantly boost the supply of housing to meet the full objectively assessed needs for housing in their area and to maintain a supply of deliverable sites to meet housing requirements.
- 6.2 London Plan Policy 3.3 (Increasing Housing Supply) recognises the pressing need for more houses in London and encourages Boroughs to identify and seek to enable additional development capacity to be brought forward to

supplement the Mayors targets. The potential to realise brownfield housing capacity through the spatial structure it provides, including by intensification" and the sensitive renewal of existing residential areas, especially in areas of good public transport accessibility. Policy H1 'Increasing Housing Supply' and Table 4.1 of the draft London Plan sets Wandsworth an increased annualised average housing completion target of 2,310 units per year between 2019/20 and 2028/29. The delivery of up to 1108 residential units will help meet the borough wide targets for new housing as set out in Core Strategy Policy PL5 and PL13, this is a significant benefit of the scheme considered further in the planning balance. CS Policy PL 5 (provision of new homes) states that the Council will make provision for at least 25,860 net additional homes from conventional supply between 2015/16 and 2029/30. The conventional supply will include the development of sites identified in the Site Specific Allocations Development Plan Document. The policy states that this can be achieved by development which achieves higher densities compatible with the local context, the principles of good design and public transport capacity.

- 6.3 London Plan Policy 3.8 and Core Strategy Policy IS5 seek new development to contribute towards the creation of mixed and balanced communities and reflect the varying needs of the Borough, having regard to the location and nature of the individual sites concerned. This policy drive would be more acute in estate regeneration schemes where social inclusion would be paramount to achieve the objectives of successful regeneration, as espoused in the Mayors SPG. In areas such as this where there is a high concentration of social housing, it is appropriate to achieve this through the introduction of new private homes to create a mixed community. As social rent tenures dominate the current housing provision on the site (estimated at 60 per cent of the current stock) and the area suffers from high levels of deprivation, the mix of additional housing should be considered in the context of the key objective of creating a more mixed and balanced community, where the design approach is to deliver a tenure blind scheme. At both a strategic and local level to achieve mixed and balanced communities the design of housing development is encouraged not to differentiate between housing tenures. The Local Plan seeks to create mixed and balanced communities.
- 6.4 The application site is identified within the SSAD (Roehampton Area Spatial Strategy) which supports the provision of new housing at appropriate densities compatible with the local context, the principles of good design and public transport capacity. The SPD area is identified for comprehensive regeneration and new development (Core Strategy Policy PL15), including housing. The Core Strategy and SSAD policies aim to improve the quality of homes in the SPD area and the masterplan baseline study identifies that some existing housing is unsuitable.
- 6.5 Housing is expected to be the principal land use in the SPD area. Core Principle 1 in the Roehampton SPD seeks to deliver high quality homes within a mixed and balanced community. A primary objective is to replace existing poor-quality homes with high-quality new living accommodation with at least equivalent floor space (and no net loss of homes, including affordable homes). The introduction of additional new homes in appropriate locations

across the site will be supported (including Roehampton Local Centre, Portswood Place Important Local Parade, and in the area between Roehampton Lane and Danebury Avenue) in the context of achieving a more mixed and balanced community and meeting local housing needs. The SPD states that a design-led approach should be taken to determine the appropriate quantum and density of additional housing, having regard to access to transport and community services, the impact on heritage and open space, infrastructure capacity and design quality. The SPD states a more mixed and balanced community could be achieved through the introduction of a significant proportion of market for sale homes alongside the maximum viable proportion of affordable housing.

- 6.6 The expectation is that in accordance with Policy DMH3 any additional affordable housing above the required re-provision, will be structured to meet a broad range of local housing needs and specifically to meet requirements for low-cost housing targeted to the intermediate market. The provision of shared equity units will allow leaseholders, who would otherwise be forced to relocate, the opportunity to stay in the area. Affordable housing policy applies subject to viability, taking into account any intermediate provision for existing leaseholders.
- 6.7 The area is considered to be appropriate for a mixture of unit sizes including family homes given the characteristics of the location, the access to community facilities and open space, the high proportion of student accommodation in the area and the core driver of creating a more balanced community. The Roehampton SPD advises that a significant proportion of units that are capable of accommodating families should be sought within the overall mix

Private Housing Mix

- 6.8 London Plan policy 3.8 (Housing Choice) seeks to deliver a wide range of homes of varying size, type and tenure. Policy DMH3 states that planning permission will be granted where studio accommodation does not exceed 5% of all market units, the overall provision of all 1-bedroom market units (including studios) does not exceed 20% and at least 5% of total market units provide family accommodation (3+ bedrooms).
- 6.9 The private housing mix which would be delivered in the detailed element of the scheme is summarised in the following table. This indicates a higher proportion of 1 bedroom units (28%) and a lower proportion of family units (3%) in terms of numbers of units than would normally be permitted under Policy DMH3.

Table 4: Housing Size Mix (Detailed Element)

Unit Size	Number of units	% of total units	Habitable Rooms	% total habitable rooms

studio	1		1	
1 bed	127	28%	254	20%
2 bed	316	69%	954	75%
3 bed	14	3%	62	5%
	458	100%	1271	1271

- 6.10 It is acknowledged that the percentage limits for unit mix in the Detailed Element would not strictly align with those set out in policy DMH3. However, criterion (d) of policy DMH 3 states ‘when considering proposals, the dwelling mix will be applied flexibly in light of the site circumstances, including location, site constraints, sustainable design, the need to provide mixed and balanced communities and viability’. The Detailed Element contains a higher proportion of affordable housing, the majority of which is social rent tenure to facilitate the rehousing of existing tenants. The applicant advises that in order to maintain the financial viability of the proposed development it is therefore necessary to maximise the number of private homes to be brought forward in the first phases of the regeneration to cross subsidise the early delivery of affordable homes and community facilities.
- 6.11 To address the balance in unit mix size, the Outline Element will apply an adjustment to the proportion of private tenure 1 bedroom and family sized properties to better align the development with the unit mix size set out in Policy DMH3. By ensuring that a minimum of 10% of the private tenure homes to be delivered in the Outline Element are family sized homes with 3 or more bedrooms, a minimum of 5% family homes would be achieved across the development in accordance with policy DMH3.

Summary on Housing provision

- 6.12 The proposed development comprises a net addition of 820 residential units, to be delivered across a phased period of 10 years, contributing to Wandsworth’s annual housing target across these years. It is considered that the provision of additional residential units accords with policy objectives and would contribute to maximising the delivery of new housing in Wandsworth and meeting the annual housing target (1,559 homes) across the phased implementation period. This is a significant benefit of the scheme which is considered further in the planning balance. The scheme therefore complies with London Plan Policies 3.3 (Increasing Housing Supply) and 3.4 (Optimising Housing Potential) and Local Plan Policies.
- 6.13 The private housing mix proposed in the Detailed Element does not comply with policy DMH3, with a higher proportion of 1 bedroom units and a lower proportion of 3+ bedroom units. Whilst it is recognised that the dwelling mix can be applied flexibly and that given the relatively low existing number, the provision of a higher proportion of 1 bedroom units could assist in the creation of a mixed and balanced community, it is considered important to ensure that the need for family sized units is met. It will therefore be necessary to ensure that a *minimum* of 10% of the units to be provided in the Outline Element would be family sized units in order to ensure the proposed development

delivers an appropriate level of provision in accordance with policy requirements.

7. Affordable Housing

7.1 The Mayor's Good Practice Guide to Estate Regeneration: Better Homes for Local People sets out principles for undertaking estate regeneration schemes. The key principles, inter alia, are:

- an increase in affordable housing, comprising like-for-like replacement and the maximisation of additional genuinely affordable housing;
- full rights to return or remain for social tenants;
- a fair deal for leaseholders, including home loss payments, and independent valuation for residents (paid by applicant);
- full and transparent consultation, with identified direct engagement and consultation events; and
- a ballot is required if the total number of new homes is greater than 150 units and the application benefits from GLA funding (it should be noted that no ballot was required for this development as it predated the Mayors guidance).

7.2 As set out in London Plan Policy 3.12, policy H8 of the Intend to Publish London Plan 2019, Mayor's Affordable Housing & Viability SPG and the Good Practice Guide to Estate Regeneration in addition ensuring no net loss of affordable homes, estate regeneration schemes must provide as much additional affordable housing as possible. Policy H8 states that estate regeneration that involves the loss and replacement of affordable housing should deliver an uplift in affordable housing wherever possible. Therefore, all such estate regeneration schemes must go through the Viability Tested Route to demonstrate they have maximised the delivery of any additional affordable housing. Policy H6 of the Intend to Publish London Plan 2019 sets out the Mayor's preferred tenure split of at least 30% low cost rent, at least 30% as intermediate products and the remaining 40% to be determined by the Council. Furthermore, the existing social rent floorspace would need to be replaced on a like for like basis under the provisions of London Plan Policy 3.14 and Policy H8.

7.3 The core strategic planning objective for this area is estate renewal, with a primary focus on meeting the needs of the existing community. In accordance with Policy DMH3 any additional affordable housing should seek to rebalance the community through the provision of intermediate tenures, including shared ownership, intermediate rent and discounted market sale. The provision of shared equity units will allow leaseholders, who would otherwise be forced to relocate, the opportunity to stay in the area. Affordable housing policy applies subject to viability, taking into account any intermediate provision for existing leaseholders. The masterplan identified a principle of providing new homes for

all council tenants and the opportunity for all resident leaseholders to buy back into the development and the council is committed to delivering this.

7.4 A number of issues relating to the affordable housing provision were raised in the GLA Stage 1 referral:

- The decant strategy is lacking in detail and does not take into account the impact of the Compulsory Purchase Order (CPO) process;
- The affordable housing is segregated in single tenure blocks on the periphery of the site which is unacceptable and must be better integrated throughout the scheme.
- The affordable housing offer itself is unclear. The intermediate offer includes shared equity which is not recognised by the GLA as a genuinely affordable housing product. The offer, excluding shared equity is 8% affordable housing on the uplift generated on site (64:36 split between social rent and shared ownership).
- No clear commitment to providing the additional 20 social rent units and shared ownership units within the estate/satellite sites has been indicated.
- The applicant's Financial Viability Appraisal (FVA) is being robustly interrogated to ensure that the maximum reasonable affordable housing offer is secured. However, it is currently unclear what level of Council funding (and other government funding) has been relied upon to support the development.
- The applicant is required to model the impact of GLA grant funding. Early and late stage reviews must be secured in the section 106 to ensure any improvement to viability which might deliver further affordable homes can be captured.

7.5 Objections have been raised to the proposed level of affordable housing and to the segregation of the affordable housing in single tenure blocks on the edge of the application site.

7.6 These issues have been addressed by the applicant in the amended proposals as set out in the assessment below.

Segregation of Affordable Housing

7.7 The scheme has been amended to address concerns raised by the GLA and the public to the segregation of the affordable housing to accelerate the delivery of the affordable housing earlier on in the regeneration and to provide a more integrated scheme. Under the original application, the affordable housing was located in Block A and Block Q which, whilst being on the edge of the application site boundary, are integrated within the wider Alton Estate.

7.8 As part of the revised proposals, alterations are proposed to the tenure and housing mix of Block O which is to be delivered in the first Phase of

development. By altering the tenure of Block O to affordable housing, an additional 35 affordable homes (social rent and shared equity) will now be delivered earlier in the Detailed Phase.

- 7.9 The affordable housing will therefore be provided in 3 blocks - Block A which offers direct access to a broad range of community facilities at the centre of the estate; Block O at the entrance to the estate adjacent to the new village square and local centre and Block Q which offers family accommodation adjacent to Downshire Field and in close proximity to the new nursery and children's centre and other community facilities at Portswood Place. All of the blocks provide mixed social rent and intermediate tenures.
- 7.10 Within the Outline Element, it is currently envisaged that Block F will accommodate 65 affordable homes, thereby ensuring affordable housing is integrated within the affordable blocks delivered in this phase of the development.

Level of Affordable Housing

- 7.11 A total of 261 affordable units are proposed. The overall level of affordable housing equates to 24% of the total number of residential units (28% by habitable rooms). Setting aside the necessary replacement of the existing social rented units on the site (158 units), this represents an increase of 103 affordable units or 13% of the uplift in the total number of residential units to be delivered by the proposed development. This is below the target level of affordable housing in the London Plan and Core Strategy.
- 7.12 Core Strategy Policy IS5 states that a proportion of at least 33% of new homes should be affordable taking into account individual site costs, the availability of public subsidy, other scheme requirements and economic viability. The strategic target set in Policy H4 of the Intend to Publish London Plan (December 2019) is for 50 per cent of all new homes delivered across London to be genuinely affordable with public sector land delivering at least 50 per cent affordable housing on each site. However, the policies do not specify a target for estate regeneration but state that in addition to ensuring no net loss of affordable homes, estate regeneration schemes must provide as much additional affordable housing as possible.
- 7.13 Since the original application was submitted, the applicant has increased the overall level of affordable housing to be provided from 256 to 261 units including an increase in the number of social rent units from 188 to 201 units (equivalent to 77% of the affordable housing).
- 7.14 A significant number of affordable homes have also been brought forward from the Outline Element to the Detailed Element. As a result of the conversion of Block O from market to affordable homes, the total number of affordable homes in the Detailed Element has been increased from 156 to 196 (75% of the total affordable housing to be delivered by the scheme). As a result, the proportion of affordable housing in the Detailed Element on a unit

basis has increased from 24% to 30% and by habitable room from 30% to 35%.

- 7.15 The development makes provision for the replacement of all existing social rent units. 136 social rent units will be reprovided in the detailed element of the scheme. The remaining 22 social rent units will be reprovided in the Outline Element.

Tenure

- 7.16 Draft London Plan Policy H7 (Affordable Housing Tenure) states the following split of affordable products should be applied to development: (1) a minimum of 30 per cent low cost rented homes, allocated according to need and for Londoners on low incomes (Social Rent/ London Affordable Rent); (2) a minimum of 30 per cent intermediate products which meet the definition of affordable housing, including London Living Rent and London Shared ownership; (3) 40 per cent to be determined by the relevant borough based on identified need, provided they are consistent with the definition of affordable housing. Policy IS5 states that the affordable housing to be provided should include a tenure split of 60% social/affordable rent and 40% intermediate. Of the intermediate units, a significant number should be priced to so that they can be purchased by households of low to medium incomes.
- 7.17 The Council currently owns the affordable housing which is on the estate and is the freeholder of the units which have been purchased under the Right To Buy scheme. It will retain ownership of the replacement homes for existing tenants and will retain the freehold of the units purchased by leaseholders under the proposed shared equity scheme.
- 7.18 The promise made to the existing tenants is that they will be rehoused in the newly developed properties on the estate according to their needs. As the development will be built out over a period of time, circumstances will change and the housing mix for the outline element at the time of the submission of reserved matters will reflect the results of the housing needs surveys. Those surveys will be carried out periodically throughout the life of the development and the resultant mix will need to be Policy compliant (Policy DMS3). Existing tenants have been given a guarantee that they will pay the same rent as they are currently being charged for the same size of property. The remaining units will be let in accordance with the Council's rent setting policy. The mix of the social rent units for the Detailed Element has been developed to meet the housing needs identified in consultation with existing residents. Further housing needs surveys will be completed and will inform the proposals to be submitted at the reserved matters stages for the Outline Element.
- 7.19 Council secure tenants will be offered an alternative home on a social rent with the same security of tenure that they currently have and with the retention of the right to buy if applicable. Additionally, if they move into a home which has the same number of bedrooms as they currently have, their rent will be the same. Home loss and disturbance payments will be made to tenants who at the relevant date have lived in their homes for more than a year, to compensate for the move.

- 7.20 Existing homeowners on the estate have been given the opportunity to purchase a new property on an ‘equity share’ basis. The homeowner will initially purchase a percentage, up to a maximum of 80% of the open market value of the property depending on what they can afford, and in many cases using the equity from their current homes, with the council retaining ownership of the remainder. No rent will be charged on the remainder and the council will realise their equity stake at the point of resale of the units.
- 7.21 In affordable terms, shared equity is an intermediate tenure. Resident homeowners, who will not be means tested, will be able to purchase a new property with the equivalent number of bedrooms and will be able to purchase a percentage share with the council retaining ownership of the remainder, with no rent being charged, up to a maximum of 80% of the open market value at initial sale. The Council’s equity stake will be a second charge on the property with the Council’s interest only being realised on sale of the property to the open market. The offer to leaseholders also includes the ability to pass on the equity share through inheritance on one occasion. The mix of shared equity units has been developed to meet the needs of the existing owner occupiers on site who have expressed a desire to remain living on the estates after the redevelopment.
- 7.22 The Shared ownership properties will be owned by the Council and are a way to facilitate house purchases for people who may not otherwise be in a position financially to do so. The Council will own the freehold or long leasehold interest in the property and a potential purchaser, should they meet certain qualification criteria, can purchase a leasehold interest in the property. Unlike a traditional lease, a shared ownership lease will specify that the leaseholder owns a given percentage of the property. Typically, the leaseholder also pays a rent to the Council in respect of the share of the property which it does not own. The Council has their own adopted intermediate housing policy which sets out the affordability criteria for all new intermediate housing in the borough.
- 7.23 In terms of tenure, it is proposed that 77% of the affordable housing will be social rent tenure and 23% will be intermediate tenures (shared equity (11%) and shared ownership (12%)). The level of social rent exceeds policy requirements and reflects housing needs and the requirement to provide replacement housing at equivalent tenure. The tenure mix in the Detailed Element is summarised in the following table. In addition, a further 65 social rent units will be provided in the Outline Element

Table 5: Detailed Element Tenure Mix

Bedsizes	Social Rent	Shared Equity	Shared Ownership	Market sale	Total
1 bed	33	2	12	128	175
2 bed	41	5	14	316	376

3 bed	43	22	5	14	84
4 bed	19	0	0	0	19
Total	136	29	31	448	654

- 7.24 In addition to the replacement social rented housing (158 units), an uplift of 103 affordable units will therefore be provided comprising an additional 43 social rent units and 60 intermediate units (29 shared equity and 31 shared ownership). The Council will retain ownership of the social rented units and the freehold of the shared equity homes for the leaseholders and will market the shared ownership units.

Decant Requirements

- 7.25 The Council has pledged that all secure council tenants and resident homeowners who currently reside within the application site and wish to remain living within the Alton Estate will be able to move into appropriately sized new housing according to their need and that they will only need to move once. In order to understand the likely demand for replacement affordable housing and the quantity and tenure mix required, housing needs surveys were undertaken in 2017/2018. A further housing needs survey was undertaken in September 2019 and this has provided the basis for the revised proposals submitted in March 2020. This survey recorded any changes to housing need either due to an increase/decrease in household size or reduction in decant need due to residents having undertaken an early move.
- 7.26 Whilst the proposed development will replace and increase the amount of social rent tenure homes on the application site, all secure tenants are being given the opportunity to register for an early move to elsewhere in the borough or further afield. In March 2020, of the 158 social rent homes within the application Site, 91 are secure Council tenants that require relocation under the Decant Strategy. This has reduced from 102 households since the submission of the planning application in June 2019. All secure tenants are being given the opportunity to register for an early move and to date 19 tenants have moved. A further 33 have registered an interest to move but have been accounted for as part of the 91 secure tenants who have been assumed as needing to be rehoused as part of the redevelopment.
- 7.27 In March 2020, 45 resident homeowners had already undertaken an early move, one had instructed the sale of their property back to the Council and there were 44 remaining resident homeowners within the application site.
- 7.28 The current identified decant demand for accessible housing is minimal with one secure tenant requiring accessible housing.
- 7.29 The revised Decant Strategy submitted in March 2020 demonstrates how the total residual decant requirement is expected to be resolved. Upon completion of the final phase in the Detailed Element, all secure tenants that wish to

remain living on the Application Site can be relocated within the Alton Estate, either on one of the two satellite sites or within the main development area in accommodation suitable to their needs. The majority of tenants will only need to move once from their existing properties to the new properties. Alongside this planning application, the Council is bringing forward proposals for a further 24 affordable homes on satellite sites within close proximity to the Application Site to facilitate the development through the rehousing of existing residents during the early phases of delivery. These sites are located outside of the scope of this application. Planning consent was granted for the development of land at the junction of Bessborough Road and Petersfield Rise for 10 affordable homes in November 2018 and a planning application has been submitted in respect of land in Fontley Way for a development of 14 affordable units, which was reported to PAC in September.

- 7.30 A summary of decant requirements and the residual supply of social rented units that would remain at the end of the final phase of the Detailed Element after all decant requirements met is provided in Table 6. This indicates that on completion of the Detailed Element there would be 54 social rented units available for allocation to additional households in the area and that on completion of the development there would be a total of 119 units surplus to decant requirements.

Table 6: Summary of Decant Requirements and Residual Affordable Units (Detailed Element)

	Decant Requirement (March 2020)	Residual Decant Requirement (after decant to Phase 0 Satellite sites)	Residual Decant Requirement (with adjustments to allow for subsequent changes to resident decant requirements) **	Residual supply in Detailed Element after Decant Requirement met	Residual supply in detailed and Outline Elements
Social Rent					
1 bed	6	6	6	27	37
2 bed	26	23	24	17	46
3 bed	38 *	32	33	10	30
4 bed	21	19	19	0	4
5 bed	1	1	0	0	2
Total					
Social Rent	92	81	82	54	119
Resident Homeowners	44	33	29	0	
Total	136	114	111	54	119

* includes 1 x 3b accessible unit

**5 bed household has requested tenancy is split into 1 x 2 bed unit and 1 x 3 bed unit and Four existing resident leaseholders have confirmed they do not intend to remain living on Alton Estate. The Decant Requirements have been adjusted accordingly

Financial Viability Assessment (FVA)

- 7.31 All estate regeneration schemes are required under the draft London Plan to follow a 'Viability Tested Route' to planning permission in order to maximise the amount of affordable housing to be provided. Delivering more affordable housing is a key strategic issue for London. All schemes are expected to maximise the delivery of affordable housing and make the most efficient use of available resources.
- 7.32 Paragraph 3.75 of the adopted London Plan highlights 'the potential need for re-appraising the viability of schemes prior to implementation in order to take account of economic uncertainties and ensure that maximum public benefit is secured over the period of the development (review mechanism)'.
- 7.33 Redrow submitted a Financial Viability Assessment (FVA) in June 2019 based on the residential mix set out in the planning application to assess the maximum reasonable amount of affordable housing that the proposed development is able to provide. This was updated in May 2020 to reflect scheme amendments. The Council as the (new) applicant has confirmed that it will be seeking a development partner and that the development will be delivered on the same basis as previously proposed and as assessed in the FVA.
- 7.34 The applicants' FVA concludes that the proposed development results in a large viability deficit which is a consequence of the re-provision of affordable housing, CPO costs, uplifted affordable housing offer and other wider planning benefits. In consequence, the development is unable to viably support the level of affordable housing being offered whilst providing the significant other benefits.
- 7.35 Notwithstanding the results of the viability modelling and the assumed deficit, the applicant has stated that a commitment to delivering 24% of the total number of units as affordable housing and to proceed at these levels of affordable housing to deliver the wider benefits of regeneration of the Alton Estate on the basis that the deficit is taken into account within review mechanisms to be captured in the Section 106 agreement (and to be agreed with the GLA). In simple terms, there would need to be a net value increase or cost decrease in excess of the agreed deficit, after taking into account the change in profit requirement (% of Gross Development Value/ cost), before any additional contributions towards affordable housing would become due.
- 7.36 The Council's offer to residents was that all social rent tenants and resident leaseholders (via shared equity) would have a right to remain on the regenerated estate and to keep the community together. The Council as applicant is committed to meeting this and providing a net uplift in affordable

housing on the site. This will be secured by way of S106 agreement and/or condition, as appropriate.

- 7.37 The FVA has been comprehensively assessed by the Local Planning Authority's independent advisors Carter Jonas. After extensive dialogue, the respective assessors have agreed the inputs into the FVA, and concluded the scheme is in deficit by £73.7m. Carter Jonas concludes the scheme cannot provide any additional affordable housing units above the current offer of 24% and advises as follows:

“The Internal Rate of Return is 6%, which is below the normal market threshold we would expect for a scheme of this scale of 12-15%. Whilst, the residual land value position of £3.57m is significantly below the Benchmark Land Value of £77.27m, which gives the impression that the scheme is not deliverable, the results should be viewed in the wider context of the Council's long term liability of managing and maintaining the existing estate for the next 20-30 years. Moreover, the level of deficit is expected for a housing estate renewal project of this scale, given the high existing use value of the property on the site and the costs to acquire this property that forms the overall Benchmark Land Value. This approach follows the guidance within the NPPF/PPG and the Mayoral SPG.”

- 7.38 Following the submission of the new FVA in May 2020, agreement has been reached between Carter Jonas and Montagu Evans (the applicant's adviser) on all inputs. The table below shows this agreed position with a residual land value of £3,566,945. Set against the agreed Benchmark Land Value of £77,267,580, the deficit is £73,700,635. Although the scheme is not eligible for GLA funding, Carter Jones has also modelled notional grant that might be applied should the scheme have been eligible for grant funding but have again determined that the scheme would remain in deficit by £63m.
- 7.39 In terms of review mechanisms, in accordance with the GLA's SPG, early, mid and late stage reviews of the scheme are recommended, with details to be agreed in due course and to be secured through an appropriate mechanism.

Table 7: FVA - Agreed position between Montagu Evans and Carter Jonas

	Gross Development Value	Total Costs	Residual Land Value	Benchmark Land Value	Net position
Agreed position- June 2020	£554.9m	£551.3m	£3.57m	£77.27m	- £73.7m

- 7.40 On the basis of the advice provided by Carter Jonas, the ADHS&D is of the view that the current proposals represent the maximum level of affordable housing the scheme can support Any benefit over and above assumed profit levels will be captured and utilised to provide additional affordable homes as part of this regeneration. Early, phase/mid and late review mechanisms would need to be secured within the Section 106 legal agreement and additional on

site affordable housing provided should the scheme enter into surplus. It is also acknowledged that early and continued engagement with the GLA is required to understand the approach taken in undertaking the FVA and in turn the approach to review and seeking in this case to over the course the scheme deliver the maximum level of affordable housing.

7.41 The GLA Viability Team has reviewed the submitted FVA as part of the Stage 1 process and the report prepared by Carter Jonas on behalf of the Local Planning Authority and advises that a number of aspects of the FVA need further clarification. In particular:

- The approach to assessment of existing use value and the premium in deriving benchmark;
- The splitting of benchmark over the period of development to reflect when the blocks will be required.

7.42 The GLA Viability team has not agreed the finance rate (7%) and profit levels and advises that profit levels need to be reviewed and cross checked on an IRR approach with benchmark land prices as an input phased through the development. Sensitivity testing and an outturn assessment should be also be provided. Given the number of outstanding matters, the GLA Viability Team is unable to say at this stage if additional affordable housing could be justified or whether there is a deficit and what this might be. The FVA will be further appraised by the GLA Viability Team as part of the GLA Stage 2 review should the Committee resolve to grant permission; the Committee should be aware that this could result in further changes to the position set out above which could amend the resolution of the Committee and the requirements of the planning permission (should the GLA resolve to allow the LPA to continue to determine it).

7.43 In terms of the affordable tenures the following should be secured in the Section 106 Legal Agreement

Shared ownership – The following affordability criteria to apply

- 50% of all 1 bedroom units to be affordable to gross annual household incomes of no more than £48,500 pa
- 50% of all 2 bedroom units to be affordable to gross annual household incomes of no more than £58,500 pa
- 50% of all 3 bedroom or greater units to be affordable to gross annual household incomes of no more than £65,000 pa
- For the remaining units of all bed sizes to be affordable to gross annual household incomes of no more than £90,000 pa
- Household costs (rent, service and mortgage costs) should be no greater than 40% of net household income and net income to be assumed as 70% of gross household income.

7.44 If the applicant proposes for any or all of the shared ownership units to be delivered as intermediate rent, they should be affordable to those on gross

household incomes of no more than £60,000 pa in line with the GLA's household income thresholds for intermediate rented housing

- Social / Affordable Rent – To be let on similar rent and terms and conditions as existing tenants and in accordance with the Council's decant and rent setting policies or at London Affordable rent levels as agreed by the Council
- Replacement Council Rented Housing – To be let on similar rent and terms and conditions as existing tenants and in accordance with the Council's decant and rent setting policies
- Shared Equity – To only be offered to existing leaseholders/freeholders on the estate and to be purchased at no more than 80% of open market value, with any unsold equity being retained by the Council with no rent charged. In the event of the unsold equity being purchased after initial sale, any receipt arising to be ringfenced and used by the Council for affordable housing purposes. If these criteria are met this housing should and can be identified as affordable housing that would provide benefit for future residents with a housing need.

- 7.45 Furthermore 10% of all homes will be for wheelchair accessible housing and should be delivered at least proportionately by tenure, unless otherwise agreed by the Council. For social/affordable rent homes, these are required to be built in accordance with Part M4 (2b) of the building regulations and for any intermediate housing to Part M4 2 (a).
- 7.46 The applicant proposes the provision of on-site car parking spaces as part of the redevelopment which will be allocated to residents and also the provision of wheelchair car parking spaces. Further details as to how the car parking spaces are proposed to be allocated across the tenures and how any service charge will be levied for their maintenance are required to be submitted to the Council for approval as part of a Car Parking Management Strategy to be secured by condition.
- 7.47 To date no details have been presented relating to an estate management strategy or in turn what amenities and infrastructure affordable housing residents will need to pay for and support. To understand what service charge cost for any facilities provided, for existing residents of the estate, the new affordable residents and the private residents will be given/cost. A planning condition will therefore require an estate management strategy to be provided for approval to the Council. This would include how the intermediate and low cost rent housing, service charges would be managed to meet the affordability requirements of the Council as housing authority (noting for affordable rent housing the benchmark for affordable service charges would be existing service charge levels applied to similar estates in the Council's ownership). Any estate management strategy must also set out how the management of blocks, shared space including areas of informal and formal open space, infrastructure including roads and amenities will be managed and where responsibilities (e.g. for maintenance, fire safety) will lie. This will need to include how service charge liabilities for all occupiers will be minimised and to clearly

differentiate what are service chargeable elements to the residential occupiers. This is particularly important where ownership/management arrangements are likely to be complex.

Summary on Affordable Housing

- 7.48 The scheme is required to maximise the amount of affordable housing in accordance with planning policy. Whilst the proposed level of provision is below the target that would normally be applied to major development schemes, it is acknowledged that the policy in respect of estate regeneration is to ensure the replacement of existing affordable housing and to maximise the level of additional affordable housing that can be secured. Estate regeneration schemes are multi-faceted and seek to deliver a range of community, economic and environmental benefits in addition to the provision of affordable housing. These benefits and the costs of delivering area regeneration must be taken into account in assessing the level of affordable housing that can be reasonably supported.
- 7.49 The level of social rent and overall affordable housing to be provided has been increased in the revised proposals assessed above and the revisions have also brought a significant number of affordable homes forward from the outline element to the detailed element which will accelerate delivery of the affordable housing. The conversion of Block O from market to affordable homes also means that 75% of the affordable housing will now be delivered as part of the detailed application. The conversion of Block O from market to affordable also provides better integration of the affordable housing into the detailed application. Triggers based on market sales completions will be required to secure the delivery of the affordable housing in both in the detailed and outline applications by units and habitable rooms and for these to be secured in the Legal Agreement.
- 7.50 Officers are of the view that the approach adopted in the FVA follows the guidance within the NPPF/PPG and the Mayoral SPG. It will be necessary to include early, mid and late reviews in the s106 agreement to ensure that the level of affordable housing is maximised. Any review mechanism will be required to follow and align with relevant supplementary planning guidance.
- 7.51 The FVA will be further appraised by the GLA Viability Team as part of the GLA Stage 2 review should the Committee resolve to grant permission. Continued engagement with the GLA will be required in the lead up to the Stage 2 process and during that process to understand the approach taken in undertaking the FVA and in turn the approach to review and seeking to deliver the maximum level of affordable housing over the course of the scheme. The Committee should be aware that this could result in further changes which could amend the resolution of the Committee and the requirements of the planning permission (should the GLA resolve to allow the LPA to continue to determine it).
- 7.52 Furthermore, if PAC resolved to grant consent for the proposed development and changes were to come forward prior to the issue of the planning

permission, a revised FVA would be requested to reflect the revised proposals and basis for delivery and the revised proposals would need to be reported back to PAC for approval. Similarly, if changes were proposed via a s73 application following the grant of planning permission, a new FVA would be required to determine the level of affordable housing that could reasonably be supported by the revised proposals and this would be necessitate a deed of variation to any accompanying s106 agreement; this would have to be reported separately to PAC as a fresh planning application

- 7.53 The conversion of Block O from market to affordable provides better integration of the affordable housing into the detailed application and is welcomed as a key element of the regeneration is the cohesion of the regeneration plans with the remaining estate and wider area. 65 affordable homes will be delivered in the outline element of the application and it will be important to secure through the location of these within Block F to ensure the integration of the affordable units with the market housing.
- 7.54 Triggers will be required based on market sales completions to secure the delivery of the affordable housing in both in the detailed and outline applications by units and habitable rooms and for these to be secured in the Legal Agreement; the GLA will want to see those triggers as part of a draft agreement accompanying a Stage 2 referral and the planning team has been seeking feedback from the applicant on proposed triggers which would secure the delivery set out in the planning application, the phasing plan and as detailed in Appendix 3 of the submitted FVA.
- 7.55 It should be noted that the overall tenure and bed size mix detailed the application is indicative as it assumes that 1,108 homes will be built out in total through the detailed and outline elements. It is also possible that the social rent and shared equity homes for returning social rent tenants and leaseholders assumed in the outline application may change over time as household composition changes. It must therefore be a requirement of any planning permission subsequently granted that whatever is the outturn of the number of homes in the final scheme, that the percentage of affordable housing by unit, habitable room and floorspace provided in this hybrid application, split in similar tenure proportions to those in the outline scheme (unless agreed otherwise by the Council) having ensured first that all social housing and leaseholder replacement units have been delivered.
- 7.56 The proportion of 1 beds (30%) in the residual social rent housing is above the guidance in DMH3a for 1 bed affordable rent properties and further discussions with the applicant are recommended. In respect to replacement social rent units, the Applicant would need to identify the social housing rent that would be charged on these homes. The current assumption is that the homes would be let at formula social rents and if this is revised there should be provisions made within the Section 106 / Unilateral Undertaking to secure any additional benefit arising to support increased provision of affordable homes.

7.57 There will be a requirement for the submission and agreement of an estate management strategy prior to the occupation of the development including details of how service charges would be managed and how the management of blocks, shared space, infrastructure including roads and amenities and responsibilities (e.g. for maintenance / fire safety) will be addressed.

8. Non-Residential Uses

8.1 A key objective for the area as set out in the Roehampton SPD is to improve the quality of the retail, service and community facilities, to improve existing community buildings and create new facilities within the Local Centre and Portswood Place Important Local Parade.

8.2 The Proposed Development would deliver a small uplift in the quantity of commercial, business and community floorspace and a significant improvement in the quality of facilities in accordance with the objectives set out in the SPD. A breakdown of the total existing (in-use and overall, including ancillary and vacant floorspace) and proposed non-residential floorspace that would be delivered across the Application Site is set out in the following table.

Table 8: Existing and Proposed Non-residential Floorspace

<u>Use</u>	<u>Floorspace sq ms GIA</u>		
	<u>Existing</u>	<u>Proposed</u>	<u>Net</u>
<u>Office (A2, B1)</u>	<u>426</u>	<u>704</u>	<u>278</u>
<u>Retail (A1, A3-A5)</u>	<u>2830</u>	<u>2830</u>	<u>0</u>
<u>Community (D1)</u>	<u>6083*</u>	<u>5,368</u>	<u>-715</u>
<u>Flexible Commercial (A1-A3, A5, B1 and D1)</u>		<u>475</u>	<u>475</u>
<u>Total</u>	<u>9,339</u>	<u>9,377</u>	<u>38</u>

* 3,737 sqm in use

8.3 A key consideration relates to the apparent reduction in community floor space but it should be noted that a significant amount of existing space is vacant or under-utilised. It is also noted that due to the reconfiguration of several of the blocks the maximum amount of non-residential floorspace in the scheme as revised has reduced from 9572 sqm to 9377 sqm including a reduction in community (Class D1) uses from 5527 sqm to 5368 sqm.

8.4 In order to satisfy the objectives set out in the Roehampton SPD, it will be necessary to ensure that the replacement community facilities will result in an improvement compared to the existing, the retail floorspace is fit for purpose and suitable management arrangements for the use of the new office floorspace are confirmed.

8.5 A Non-Residential Management and Governance Strategy has been submitted with the planning application which provides a broad framework for the future governance and management of the new commercial and community facilities. More detailed management and governance arrangements for the non-residential accommodation in each phase of the redevelopment would need to be secured pursuant to planning conditions attached to any subsequent planning permission.

Retail

- 8.6 There are shops and services within the area that benefit existing residents. However, the quality of the offer fails to cater for the daily convenience needs of the catchment population. As such, the service centres are not fulfilling their roles as a Local Centre (Roehampton) and Important Local Parade (Portswood Place). The lack of suitable modern premises affects the level of services available. Both areas are set within a poor-quality environment which detracts from their attractiveness and appeal to local residents as places to shop and visit. Both areas suffer from a lack of connectivity within and beyond the estate, which compounds the issue.
- 8.7 There is currently 2,830 sqm (GIA) of Class A1-A3, A5 & Sui Generis use floorspace across the Application Site- 2,255 sqm is contained in the Roehampton Local Centre on Danebury Avenue and 413 sqm (GIA) is at Portswood Place a designated Important Local Parade.
- 8.8 Roehampton Local Centre has a number of units containing shops, cafes, services including the Base Youth Centre, a post office and library and provides important facilities and services for the local community; however, the quality of the frontage and buildings is poor. The arrangement of buildings and level changes in this area is such that service areas, building backs, surface car parks, ramps and walls dominate and create unusable spaces with a lack of a public focal point. The area lacks well-defined and good-quality public spaces and pedestrian routes.
- 8.9 Changes of the area's use and relocation of community and educational services have resulted in Portswood Place suffering from a lack of focus and purpose. The retail parade is tired and some of the units have their shutters down in the day, resulting in a lack of activity and footfall. A number of buildings are set in the context of surface car parking and exposed service areas, which detracts from the quality of the environment. There is a lack of green space and planting, which is such a characteristic of the wider area, and a lack of good-quality public gathering space.
- 8.10 A step change in the quality of the service offer in Roehampton Local Centre is required to meet the daily needs of residents. Intervention is also required in Portswood Place to ensure it fulfils its role in meeting daily needs whilst enhancing access to community facilities.
- 8.11 The proposed development provides for the replacement of the existing retail (Class A1-A3 & A5 uses) floorspace (2,830 sqm), principally focused in the Local Centre on Danebury Avenue. There will be a net increase of 475 sqm.
- 8.12 A double sided shopping street, with retail uses as the dominant use and replacement food store, will be created along Danebury Avenue to add vibrancy to currently single sided retail parade. The design and quality of the replacement retail floorspace will be considerably better than the existing that should be more lettable and attract an array of different retailers that will add vibrancy to the Local Centre. Most of the existing retail floorspace in the small parade of shops at the Portswood Place will be re-provided to the Roehampton Local Centre to create a more cohesive retail environment. A small convenience retail store will be retained at Portswood Place to service

immediate local needs. The new retail units have been designed to ensure they meet modern retail standards.

- 8.13 To establish an effective local centre early in the regeneration programme, including the delivery of a replacement food store, the commercial uses in the Detailed Element will be limited to Class A1-A3 & A5 uses only subject to the requirement that there will be no net loss of retail space; due to a change in the use classes order this will now need to also be controlled by condition fixing a minimum of retail floorspace to ensure this is the case. It is proposed that the commercial uses proposed in the Outline Element will be subject to a flexible use designation to allow any floorspace over and above the re-provision of the existing retail uses to potentially be used for other purposes. Any flexible uses could therefore only apply to the additional floorspace, this will also be controlled by condition should the application be approved.
- 8.14 The Council as applicant will retain ownership of the commercial properties, thereby enabling any future uses to be curated according to local needs. Occupancy of the flexible retail floorspace will be subject to a marketing exercise and lettings strategy that will be informed by the following guiding principles:
- Develop a mix of retail uses that will meet the current and future demand from existing and new residents, local workers and students.
 - To identify opportunities to improve the connection between Danebury Avenue and Roehampton High Street and to encourage complementary uses and functions between the two.
 - To ensure that during the redevelopment there remains a significant and accessible retail offer for residents.
 - To deliver new retail space in first phases of the regeneration that can accommodate the re-provision of some of the existing business, with the final mix of uses remaining flexible to meet local need.
 - To explore opportunities for meanwhile uses and to support the wider placemaking objectives of the regeneration throughout the redevelopment as set out in the Cultural and Estate Management Strategies. These should support existing retailers and other local centre uses to ensure the area remains attractive during the construction and re-provision phases. This could include: Events and activities (such as markets and film screenings) at the new village square.
 - The temporary use of any empty shops for “meanwhile” uses.
- 8.15 The Council’s approach as landowner to the retail element of the scheme was considered by the Council Housing and Regeneration Overview and Scrutiny Committee (Paper No. 165) on 17th June 2019 and was approved by the Council’s Executive on 24th June 2019. In summary, the Council’s approach seeks to balance the needs of the community by seeking to meet their preferred convenience uses in the first phase with the needs of traders. The Council’s intention is for the new retail uses on the north side of Danebury Avenue (Block N) to provide convenience shopping that meets the needs of the local community and the balance and nature of those uses will be informed by consultation with residents on which uses they feel should be retained or

provided. Where residents preferred uses matches an existing use in the parade, then those traders will be offered new units. Those traders who are retained will benefit from a rent freeze and support for fitting out their units, those that are not retained will have long notice periods and support to they wish to relocate to another Council owned shop unit in the Borough or elsewhere. This consultation will take place around two years prior to the expected completion of the new shop units.

8.16 Key elements of this approach may be summarised as follows:

- The scheme will be phased to allow continuity of retail provision. The phasing of the development allows for a new supermarket and chemist to be built in Phase 1 in late 2021 (beneath Block O) and for circa 1,000 square metres of new retail units on the north side of Danebury Avenue (beneath Block N) to be completed in Phase 1. This would allow for the relocation of some of the businesses from the existing Danebury Avenue parade.
- A key part of the regeneration's objectives is to improve the commercial and retail offer whilst ensuring continuity of convenience or neighbourhood uses. The re-provision of the supermarket and pharmacy has therefore been in Phase 1.
- The Council wrote to all the existing Danebury Avenue businesses in 2018 and confirmed that for those retailers that do move into the developed scheme, the Council has committed to freezing rents at the same level per square foot as the current unit at the date of the letter for the first three years of the lease; and to discussing any support required for fit-out costs of the new unit including considering any compensation that may be due.
- Each trader will have different needs and drivers for them and their business, and the Council is committed to discussing potential options with each of them. The Council has already committed to a rent freeze and will explore whether any additional measures might be required to support those traders whose uses are identified as being required in Phase 1a.
- The Council will also develop a package of support for those traders that may wish or require to be relocated as part of the regeneration. It is too early in the process to develop these in detail at this stage but the Council's commitment to work with traders to support them is clear.

8.17 The preferred uses will be known 18 months prior to the new units being completed which provides ample time to either negotiate terms for those traders or market the units to see if demand exists for the community's preferred uses.

8.18 The Co-op supermarket and pharmacy beneath 1-29 Danebury Avenue have been relocated to existing units within the Danebury Avenue parade on a temporary basis before relocating permanently to bespoke accommodation on the ground floor of Block O. This will ensure continuity of provision of these uses which recognises the importance of residents having access to a local supermarket.

Community Uses

- 8.19 The strategic objectives for the area, as set out in the Roehampton SPD, seek to consolidate and improve the quality and quantity of community facilities and require up to 5,500sqm of community floorspace (Class D1) across the estate.
- 8.20 The existing community floorspace is inefficiently spread across the Application Site. While a range of services are provided, these include a significant proportion of ‘back of house’ functions to support community uses elsewhere in the Borough, rather than delivering public services to the residents of Roehampton. In addition, only 3,737 sqm of the existing community floorspace on the estate (equivalent to 61% of the total floorspace) is currently being used.
- 8.21 The Proposed Development will deliver additional services to meet the needs of the local community – including:
- Additional ‘front facing’ services
 - Improved health facilities with capacity for additional GP places to meet local needs
 - Enhanced library, cultural and learning offer
 - New flexible community hall and access to new community spaces
- 8.22 The replacement community facilities are integrated into two community hubs that will offer the following enhanced range of services:
- **Block A:** Will deliver replacement youth and library facilities, with the addition of a new community hall space. The service offered from the building will be enhanced by a “joined up” approach to the delivery of youth and library service and an expected expansion of opening hours.
 - **Portwood Place Nursery & Children’s Centre and Pavilion:** The Eastwood Day Nursery and Children’s Centre currently operates from ageing buildings, which were not originally designed for this purpose and is currently split across two buildings. The development would provide an integrated, purpose-built facility which will give children access to a secure, high quality and useable place. This will result in a significantly enhanced experience for children and their teachers and also provide a community space that will be accessible out of hours. The Pavilion will provide a replacement club room for elderly residents and a space to be used as a health centre or for other community uses.
- Block A*
- 8.23 Block A will provide a new library, new youth facilities, a café and community hall with its principal access from the new village square. It will also provide space for a potential six-GP health centre with access from Hersham Close. The building will provide a new focal point for the community offering a range of improved and “joined up” services in a vibrant and inspiring environment. The existing library and Base youth centre will not close until the new buildings are completed and will therefore be subject to one move with continuity of service; this would be controlled by planning condition. The new library will provide more space than the existing building, and will have areas for quiet

study, ICT and for reading. The new library will also open directly onto the new village square, providing the opportunity for linked outdoor activities and events.

- 8.24 In developing the layout of the new building, the Council's Library and Youth Services have worked closely together to ensure that the design of the building enables a seamless offer and it is expected there will be a high degree of flexibility in terms of the use of space. This will enable the services operated from within the building to support and engage with the whole family; providing safe study and leisure space for young people, information and learning opportunities for adults, and strong emotional and educational support for children. The flexible use of the building is intended to help create a sense of local identity and belonging for local people and bring library services to the attention of those who traditionally have not used them. It will also provide for more services to be accessed from the building than the traditional label of a 'library' might suggest; in essence the idea is that the physical building becomes a hub for the local community offering a space for a variety of services and activities to come together in a more cohesive whole which is community focussed.
- 8.25 The Council intends to allow local voluntary organisations to use the space (e.g. the reception) to "sign-post" their services. Whilst space is limited, there will also be scope for voluntary organisations to access shared meetings rooms for meetings with clients or larger meetings. This is a natural adjunct to the flexible workspace above Block O which offers access to "back of house" office space. Voluntary organisation access to both Blocks A & O is designed to be flexible.
- 8.26 The youth elements of the building are part of a wider design of youth services in support of the Council's early help strategy known as Wandsworth THRIVE. The proposed changes in the delivery model for youth services in Roehampton was agreed by the Council's Education & Children's Service Overview & Scrutiny Committee on 20th September 2018. The report explained there was no reduction in service just a changed model. By focusing all the building-based youth provision within Block A is considered to be a preferred option because it:
- i. is consistent with the objective to focus new youth and community facilities within a revitalised Danebury Centre contained within the Alton Area Masterplan (October 2014), which was finalised following a comprehensive master planning process which included two periods of extensive consultation with residents and stakeholders including children and young people;
 - ii. responds directly to the feedback of young people presented to the Council's Executive in February 2018, when approval was given for the Council's strategy for early help, THRIVE Wandsworth;
 - iii. is considered an accessible location that allows young people from Roehampton to go into areas that can be considered as the geographical territory of others and ensures that young people from the entire estate and beyond can access youth provision;

- iv. has good proximity to the main areas where shops and other community facilities are located and to the bus stops which provide accessible transport for young people living in Alton West, Alton East and surrounding areas;
- v. is walking distance from the main transport hub of Danebury Avenue;
- vi. delivers high levels of visibility and footfall, both important factors in safeguarding children and young people;
- vii. has the added benefits of direct access to both the library and a flexible community hall which will enable a range of shared service delivery options to be explored;
- viii. will provide a larger space than currently available at the Base which will be well designed to maximise use;
- ix. the provision of flexible space allows the accommodation of a number of facilities and activities at different times of the day that can be adapted to reflect seasonal variation and demand;
- x. the majority of the indoor offer previously available at Roehampton Youth Club and the Base will be re-provided as part of an integrated offer, facilitating young people's choice and increasing the ability of staff to be flexible and responsive.

- 8.27 Youth facilities to be hosted in the new building, Block A, will include: -
- i. a kitchen linked to the café to support training
 - ii. a flexible multi-media room incorporating film and moving image facilities;
 - iii. an informal space for socialising, relaxing and engaging with peers;
 - iv. space for group work and homework;
 - v. access to the community hall for larger scale activities such as drama, performance and physical activities.
- 8.28 Through strong cooperation between libraries and youth service, this will mean that maximum use of the building will be made to the benefit of all users. One example might be that areas of the library might be used flexibly by the youth service outside library hours or vice versa, under supervision. Similarly, the "community hall" is intended to flexible space that can function both as a traditional community hall but also as, say, exhibition space or a space for youth activities and this complement the library and youth uses rather than a stand-alone community hall. The community hall will have direct access out of hours. All services in the community element of the building will either be run or directly managed by the Council and ultimately the responsibility for the building's management and use will sit with the Council. To secure the vision for this space set out in the planning submission further details will be required and it is recommended to secure those through planning condition/Section 106 obligations as appropriate.

Portswood Place Community Buildings

- 8.29 There will be two new high-quality community focused buildings located at Portswood Place.
- 8.30 *The Children's Centre and Nursery:* The new facility will enable the relocation of the existing Eastwood Nursery and Children's Centre from 166 Roehampton Lane within a single, purpose-built building arranged around a

central courtyard space. There has been extensive stakeholder engagement with the nursery school and children's centre, which has informed the design and resulted in their support for the proposals. The new facilities will offer a significantly improved learning environment for children and teachers. The building will provide a wide range of services that focus on parents and carers supporting their child's learning and development. It will include seven classrooms, one of which has been designed for children with special educational needs and various therapy and treatment rooms. The new building also contains a double height hall with separate access, enabling it to be used for complementary and compatible community use for activities and development outside nursery school hours. The Nursery and Children's Centre will continue to be owned and managed by the Council.

- 8.31 *Pavilion Building*: Next to the nursery school will be a single storey building to accommodate an enhanced Minstead Garden club room, larger and with more storage space, for use by the elderly residents and flexible community floorspace capable of accommodating health/community use. This is an important facility for elderly residents on the estate, specifically for those living at Minstead Gardens. The Minstead Gardens residents and other regular users of the current clubroom will continue to be consulted on the changes to this facility. The pavilion building will be owned and managed by the Council.

Employment

- 8.32 The Proposed Development will increase the amount of dedicated business floorspace (Class B1) from 426sqm to 704sqm, a net increase of 217 sqm. This meets the requirement for 400 sqm gross set out in the Roehampton SPD.
- 8.33 The office floorspace will be delivered on the first floor of Block O, overlooking the new village square. Based on the current layout, it is envisaged that approximately 297 sqm of the space will be utilised by the Council's Western Area Housing Office, which is being replaced through the redevelopment, and 255 sqm made available as flexible workspace. The Alton Regeneration Team also has a presence at this office.
- 8.34 The Council is looking at models adopted for flexible workspace elsewhere (e.g. the Scratch Hub at Battersea Arts Centre, space offered in Richmond libraries, Lambeth Town Hall) and also liaising with the Council's Economic Development Office and Partnerships and Community Team to understand the demands and needs of likely users – expected to be small local businesses, start up and third sector organisations. The aim is to provide sessional space for desks and meeting rooms to support local businesses and other organisations, which by its nature is affordable as it does not require long term commitment and organisations only pay for what they need and use. The Council will prioritise allocation of the space to voluntary organisations that serve the Alton and wider Roehampton area and small businesses and start-up businesses that are either based in or run by people from the local area. A management strategy for the flexible, affordable workspace will be required, this would be secured by planning condition.

- 8.35 In addition, an employment and training programme, linked to the Council's Aspirations Programme, will be secured through the Section 106 Agreement to improve life chances and tackle deprivation in the area and in accordance with the adopted Planning Obligations SPD.

Summary on Non-residential uses

- 8.36 The proposals offer the chance for a step-change in the quality of retail, workspace, educational and community facilities to serve the Alton estate and the wider community. The Council, as applicant, made a clear commitment to engage with the community and service users on the new retail and community units. As landlord, the Council will continue to exert high levels of control and management of these facilities to ensure they meet the needs of the local community, ensuring the continuity of services and ongoing community engagement.
- 8.37 The Roehampton SPD identifies the potential for up to 5000 sqm gross of replacement and new retail floorspace. The proposed development will deliver 3,305 sqm. Whilst the amount of retail floorspace is less than the potential identified in the SPD, the main objective of policies DMTS1 and DTMS3 is to protect existing town centre uses, maintain the primacy of retail uses but avoid substantial increases in the relative attractiveness of any town or local centre to maintain the retail hierarchy across the borough. The quantum of retail floorspace proposed therefore ensures that this objective is met. The Proposed Development therefore complies with the objectives of policies DTMS1 and DTMS3. There will be a reduction in retail floorspace in the Portswood Place Local Parade, but this is considered acceptable given the enhancement of the Local Centre and the retention of a convenience store to meet local needs. The new retail provision includes a convenience store in the Roehampton Local Centre (of sufficient size to meet daily shopping needs); new smaller units in Roehampton Local Centre and a replacement convenience store in Portswood place is in accordance with the SPD.
- 8.38 The Proposed Development will deliver up to 5,368 sqm of new and replacement community facilities within the Detailed Element, within the target of 'up to' 5,500sqm identified in the Roehampton SPD. This could be seen as a reduction in the amount of community floorspace currently on the Application Site, however approximately 2,394 sqm of this floorspace is vacant or comprises inefficient circulation space that offers no community value. The Proposed Development therefore delivers an increase of 1,631 sqm of community floorspace compared to the amount of in use floorspace currently on the Application Site and will also be considerably better quality and of greater value to residents. These new buildings will offer an enhanced service to building users due to their enhanced quality and the provision of two new community spaces. The Youth and Library Services will undertake further engagement with users and the wider community to ensure the new space and services meets community need.
- 8.39 Objections have been received regarding the reduction in dedicated youth floorspace and the detailed arrangements for community access to the new community facilities including the hours of opening and the hire costs. The

application indicates there will be a reduction from 556 sqm to 321 sqm in youth provision and the need for more space to reflect increase in number and need for youth support has been raised in consultation responses. Furthermore, no explanation of how Alton Activity Centre will be used or plans to replace Roehampton Youth Club services. It should however be acknowledged that the community hub will have flexible floorspace including the community hall which will be available for use in association with the dedicated youth space.

- 8.40 It will be necessary for further development of proposals for the use and management of Block A to address these concerns and ensure that public benefits are secured including ensuring that there is an increase in the hours of opening when compared to the existing position in relation to the library; this is the intention. The applicant has committed to working with the community in the detailed design stage to ensure that their input into the provision is sought alongside understanding the specific requirements of the services that will be running the facilities day to day. There will be a requirement for a Community Facilities Strategy and Management Plan to be prepared in consultation with the local community and this should be secured by condition. There will also be a requirement that the new facilities are open for use by the public before the existing facilities can be closed or that an alternative provision is made in the intervening period which is at least of the equivalent level of service, this will be secured by condition.
- 8.41 The re-provision of health facilities must be secured as the proposed development requires the demolition of two existing surgeries which serve the existing community. A Health Delivery Plan will be required by condition and the replacement facilities must be open for use by the public prior to the demolition of existing facilities, this will also be secured by condition.
- 8.42 Whilst the end user or specific use class of the commercial units is not known at this stage, the re-provision of existing retail floorspace and the opportunity to add further diversity to the uses available through the inclusion of Class B1 and D1 uses will strengthen the vitality and vibrancy of the Roehampton Local Centre. Once complete and operational, it is estimated that the development would provide between 243 and 296 jobs from the office, community and commercial uses, which is estimated to represent a net increase of between 50 and 59 jobs which is a benefit of the scheme. The Council will remain freehold owners of the premises, enabling the future provision of retail, office and community floorspace, beyond the re-provision of the existing retail floorspace, to be carefully curated to meet the needs of the community in the future. Details of the future marketing and lettings strategy will be secured through the use of conditions. A management strategy for the flexible, affordable workspace will also be required.

9. Design

- 9.1 Good design is at the heart of a place-making approach to regeneration. This requires an approach that encourages integration and social inclusion, creates places that are safe, and establishes a sense of place.

- 9.2 The NPPF establishes the principle that good design (buildings and the public/private spaces in which they sit) is a key aspect of sustainable development and is therefore necessary for development to be acceptable in planning terms. The London Plan mirrors the NPPF in requiring high-quality urban design and includes a number of specific policies aimed at addressing policy priorities relating to inclusive access, designing out crime, local character/distinctiveness, public realm, and architecture.
- 9.3 A combination of physical factors, including the development layout, along with poorly sited and constructed residential buildings and lack of surveillance of the public realm have been identified. The estate is considered to be isolated from neighbouring areas and has little presence on arrival to the area along Roehampton Lane and a number of existing buildings lack a positive relationship to surrounding buildings, streets and open spaces. Some spaces are car dominated and poor quality with hiding places that encourage antisocial behaviour and fly-tipping.
- 9.4 The Roehampton SPD establishes a set of clear regeneration objectives - to modernise the housing stock and community offer, to reconsider building orientation and layout, to increase the capacity of some sites, to repair edges and interfaces, to frame streets and public spaces, to rationalise car parks and service areas and to create a more people-friendly place.

Evolution of the Masterplan

- 9.5 The masterplan and detailed proposals have been subject to early, extensive and ongoing engagement with residents. This has resulted in a design-led ethos being adopted by the Masterplan architects. This design-led approach has also evolved as a result of feedback from the Wandsworth Design Review Panel (DRP) following two workshop sessions and five full presentations sessions which have included Officers; Officers at the GLA and TfL; Historic England; The 20th Century Society; and other local residents' groups and stakeholders. The DAS and DAS Addendum illustrate how this feedback has helped to shape and inform the masterplan to ensure the quality of the architecture, sense of place and usability of the regenerated estate and the living condition of residents will be of the highest quality
- 9.6 The Masterplan is based on the vision principles established in the Alton Area Masterplan 2014 and the Roehampton SPD. It has been further developed by the applicant in response to public consultation and more detailed viability assessment. A key change has been an increase in the total number of residential units. The Alton Masterplan 2014 identified the potential for approximately 800 new-build homes (including those replaced) across the SPD area, based on the site characteristics, context, heritage and historic landscape and open space sensitivities. A total of up to 1108 units are proposed in the planning application. It is acknowledged that planning policies seek to optimise the use of land and the supply of housing taking into account site characteristics. Another key change has been the relocation of the village green. The key design principles which have been developed in response to community engagement and stakeholder consultation are as follows:

1. Road Retention - Existing road layout to be retained and improved to limit disruption to existing utilities and allow for phased development
2. High Quality Public Space - Visible, focussed, usable, flexible spaces provide a variety of spaces with different functions
3. Green Buffer - Maintain a landscaped frontage along Roehampton Lane and enhance Downshire Field
4. Permeability - Create views, entrances and routes into the site from Roehampton Lane
5. Solar Orientation - Open shared amenity space to southern sunlight and maximise east-west residential aspect
6. Massing - Adopt a subtly varied townscape between Roehampton village and Alton Estate
7. Landmarks - Enhance setting of existing local landmarks and create new landmarks to encourage orientation and character of place
8. Blending Context - Create transitional material treatments between Roehampton Village and Alton Estate
9. Architectural Variety - A mixture of block types creates variety across the site. Visitors move between slab blocks, U-shaped blocks, courtyard blocks, point blocks and special blocks.

9.7 The Masterplan seeks to provide a series of residential and non-residential buildings of high quality which respect the historic character and local context. It encompasses the four principal intervention areas identified in the Alton Area Masterplan and Roehampton SPD:

- Roehampton Local Centre:
- Portswood Place Important Parade
- Danebury Avenue Housing
- Central Landscape-Downshire Field

9.8 The Masterplan seeks to draw on the existing character of the area and seeks to strengthen its existing qualities. It comprises two distinct neighbourhoods connected by Danebury Avenue:

- The Urban Quarter- a network of streets and public spaces incorporating the Local Centre which come together at the new Village Square and main community hub which will serve Alton West, Alton East and Roehampton Village
- The Parkland Quarter- centred around Downshire Field with a second community hub at Portswood Place

The Urban Quarter

9.9 The redevelopment of the Local Centre is a long standing priority of to improve the facilities and to provide a more vibrant and attractive service and shopping centre. Key principles established in the SPD include a range of new and improved shops and services on each side of Danebury Avenue; a range of new and improved community facilities; provision of a variety of housing types and tenures; transformation of the village green to provide a high quality setting for the new library and Local Centre; new children's play facilities;

upgrading of pedestrian crossings and existing streets and public realm and new connections to improve permeability. The SPD proposes a new generation of high quality homes to be introduced in the area between Roehampton lane and Danebury Avenue that address the topography and relate to surrounding streets and buildings. The SPD states that development that makes more efficient use of land providing high quality living accommodation and improving the streetscape and pedestrian environment will be supported. Existing heritage assets will be conserved and enhanced where appropriate.

- 9.10 These principles are reflected in the development proposals which include:
- A new Village Square- relocated to the eastern side of Danebury Avenue at the junction with Roehampton Lane. This will provide a flexible space for a variety of community events, hard and soft landscapes and play areas;
 - A new multi-functional community hub opening onto the Village Square to include a new library, youth facilities, health centre and community hall with affordable housing above located around a central landscaped courtyard;
 - Retail parade to include a new convenience store and a range of new shops and replacement units for existing and new businesses.
 - Office floorspace including affordable workspace for small businesses and the voluntary sector.
 - A variety of housing types and tenures in a series of new blocks between Danebury Avenue and Roehampton Lane between Danebury Avenue and Roehampton Lane

The Parkland Quarter

- 9.11 The Roehampton SPD seeks to transform the Portswood Place Important Local Parade into a vibrant community hub. Key principles that apply to this area including new improved shops and services; the provision of improved community and employment facilities including a new community building at the foot of Downshire Field and a relocated bus turning facility. Existing heritage assets and their settings must be conserved and enhanced where appropriate. The SPD states that development proposals should maintain the openness of and contribute towards improvements to Downshire Field. These principles are reflected in the development proposals which include:
- A new community hub at Portswood Place comprising two buildings. The larger building provides new facilities for Eastwood Nursery School and Children's Centre and a multi-functional community space with a separate entrance. A smaller pavilion building will provide a retail unit, a replacement club room for older people and space for a health centre (if required) or other community use
 - Downshire Fields - The central parkland landscape will continue to serve as a quiet and attractive open space with new biodiversity rich planting and amenity features including a 1km running, walking and cycling loop. It is proposed that the play area will be improved with new natural materials that respond to parkland landscape

- Alton Activity Centre - located at the point where the urban quarter and the parkland quarter intersect- soft landscaping to frame play zones with a half MUGA and grow garden
- 9.12 Detailed design proposals have been submitted for the Detailed Element of the application. The Outline Element comprises 8 plots for which plot size, access routes, siting, maximum height, the usage of ground floor frontages, areas of open space and street hierarchy are controlled by a series of Parameter Plans. The Design Code provides further 'control' of the detailed design of any future buildings proposed on these plots.
- 9.13 The Detailed Element comprises:
- The Village Square
 - Blocks A, O and N which deliver active frontages with community/commercial uses at ground floor and residential uses above
 - Blocks K, M and Q which deliver a mix of housing typologies, sizes and tenures
 - Portswood Place community buildings
 - Downshire Fields enhancements
 - Alton Activity centre enhancements
- 9.14 The Outline Element comprises:
- Blocks B and C which deliver commercial uses at ground floor and residential uses above
 - Blocks G, F, DE, H, I and J which deliver a mix of housing typologies, sizes and tenures

Design Code

- 9.15 A Design Code has been created and will be secured through conditions. It puts in place controls to ensure that high quality architecture and design comes forward, and gives sufficient flexibility to allow architectural interpretation whilst providing the Council with sufficient assurance that the development will be carried out in accordance with the planning permission and to the high standards expected of the Estate Regeneration Project.
- 9.16 The Design Code has been developed in consultation with officers and the DRP. The outline element will be required to accord with the Design Code to ensure that future development comes forward in accordance with the objectives established in the masterplan.

Density

- 9.17 Policy IS1 of the Council's Core Strategy promotes "maximising the use of previously developed land and vacant and underused buildings, taking account of the suitability of sites for high-density mixed-use development and the impact that development will have on the borough's natural resources, environmental and cultural assets and the health of local people." One of the key outcomes identified in the Roehampton SPD is for approximately 500 net new homes and approximately 250 net new student bedrooms or further new

homes to be delivered. Following discussions with Roehampton University, the provision of conventional housing instead of student accommodation has been preferred.

- 9.18 A total of 1108 new and replacement homes are proposed, representing a significant uplift in the quantum of new homes. Whilst this is in excess of the number identified in the Roehampton SPD, the NPPF, London Plan and Policy IS1 make clear that opportunities to optimise housing densities and maximise the use of previously developed land should be supported. The density would increase from 54 units/ ha (200 habitable rooms/ha) to 160 units/ha (477 habitable rooms/ha).
- 9.19 The density matrix at Table 3.2 of the London Plan sets out that a density of 70 to 170 units/hectare (200 to 450 habitable rooms/ hectare) would be appropriate for an urban location with a PTAL of 2 to 3. The proposed density of habitable rooms exceeds the upper threshold of the London Plan density matrix for this location. Density is only one indicator, massing and scale are of importance too as is context. It is noted that Policy D6 of the Draft London Plan has replaced the density matrix with a design led approach and requires development to be designed at optimum density. Officers are satisfied that a design led approach has been adopted to establishing the scale and form of development whilst minimising the impacts on heritage assets and the character of the area.

Height

- 9.20 Taking into account site context and the character of the surrounding area, a medium-rise approach to building height has been adopted. The scale and massing of the Proposed Development varies between 2 and 9 storeys across the masterplan area to create visual interest and articulation within the streetscene. The scale of buildings typically reduces from east to west to provide a sympathetic transition between the built-up areas around the Roehampton Local Centre and the lower scale/more spacious development and open landscape to the east. A consistency of height but variety of building form has been used to address changes in the site level with the stepping of blocks across the existing topography but having regard to the existing properties located on the northern side of Roehampton Lane. Blocks are arranged to allow eye-level views between them of the existing landscape.
- 9.21 Policy IS3 states that applications for tall buildings will need to be justified in terms of the benefits they may bring for regeneration, townscape and public realm and be of high architectural quality, respect local context and the historic environment. Core Principle 5 of the Roehampton SPD acknowledges there are opportunities to explore tall buildings in less sensitive areas of the Alton Estate. A Tall Buildings Assessment has been undertaken in accordance with Policy IS3.
- 9.22 The Tall Buildings Assessment concludes that the proposed development would meet the criteria set out in the London Plan and Policy IS3:

- It would contribute towards providing significant levels of additional housing in the area, including replacement and new affordable housing, new public open spaces, play spaces and commercial and community uses which would add to the economic vitality of the area and contribute towards social inclusion and environmental health.
- A transport assessment and travel plan have been submitted which promote sustainable transport including a car club, cycle provision, new pedestrian routes and improvements to bus services.
- The Microclimate Assessment concludes that wind speeds at ground level will continue to be suitable for pedestrians and in some cases will be improved. The Daylight, Sunlight and Overshadowing analysis also confirms that the Proposed Development will not lead to unduly harmful overshadowing of the Application Site's surroundings
- The application is supported by a Townscape, Heritage and Visual Effects assessment (Chapter 7 of the ES) and CGIs which include wire-line and rendered views of the building from a series of agreed viewpoints. The development has been considered in relation to its surroundings both immediate and distant including direct and indirect heritage assets and views from Richmond Park. It is concluded that the proposals will not have an unacceptable effect on the surrounding areas and existing heritage assets. The Proposed Development does not affect any protected views identified in the London View Management Framework.
- The scale, design and materiality of the proposed buildings and public realm has sought to create a sympathetic transition with heritage assets.
- Chapter 7 of the ES (Heritage, Townscape and Visual Effects) and Design and Access Statement set out a robust justification as to how the tall buildings work well in integrating with the surrounding development without causing an unacceptable harm to views and residential amenity. The massing has been developed in recognition of surrounding townscape, including avoiding overbearing development and detracting upon the various heritage assets that make up and surround the Application Site and the setting of Richmond Park
- The proposed buildings will be sited within an enhanced public realm, would contains active commercial frontages and legible entrances for residential accommodation. The Design and Access Statement sets out the overarching strategy for the streetscape and envisages the introduction of new routes, public open space, commercial uses and residential accommodation which would provide activity and vitality as well as natural surveillance. The streetscape would be enhanced through a coherent landscape strategy which creates a legible, rationalised and high-quality public realm.
- The masterplan layout has sought to utilise the existing street network whilst improving connections to the wider locality. The orientation and configuration of the new buildings similarly matches those found within the existing estate. Whilst reference has been made to the existing building designs both within and around the site, these do not include characteristic setbacks in need of replication. The masterplan adopts a palimpsest approach, whereby the original LCC plan is evolved with contemporary influences whilst addressing the current challenges facing the estate.

- The landscape design forming an integral and central part of the masterplan and utilises high quality materials, soft landscaping, tree planting, children's play space and lighting.
- A Daylight, Sunlight and Overshadowing Assessment (Chapter 13 of the ES) has been carried out and that whilst transient overshadowing would occur over sections of the public amenity spaces (Village Square and Alton Activity Centre) at different times of day throughout the year, the amount of direct sunlight received by these spaces is generally good and accords with the BRE Guide. A wind and microclimate study accompany the Application and demonstrates that these spaces will be suitable for sitting out throughout the year
- The routes and pedestrian access would be an attractive, safe, and accessible and framed by active frontages containing commercial uses. The layout of the buildings and the development both in itself and in relation to adjoining uses incorporates a clear logic and greatly improved permeability that would encourage public access throughout the public realm and to and within the buildings
- The long-term maintenance of public spaces would be undertaken by the Council as owner of the land. These details will be provided as part of subsequent management plan that will be secured pursuant to an appropriately worded planning condition.
The private residential buildings will be managed by a management company who will provide a Management Plan. The remaining buildings will be handed back to the Council to be used and managed once constructed.

Materials Strategy

- 9.23 The materials strategy mediates between existing neighbouring conditions and materials determined by their relationship to existing context. Roehampton Village to the northeast is predominantly an area of traditional stock bricks while Alton West is characterised by a palette of grey concrete. The new development uses its material palette to mediate between these two contrasting areas. The development plots form a material response to this existing context using a general gradation of brick tones from darker red/brown in the east to grey/cream in the west. The increasing use of precast elements across the development plots to the west is a direct reflection of the architectural treatment of both the listed slab and point blocks of Alton West. Landmark buildings, highlighted in yellow, use special materials such as bronze. The treatment indicates their importance as community buildings in the masterplan. The materials strategy is critical to the delivery of a quality scheme and will be secured by planning condition, if permission is granted.

Building Design

Block A

- 9.24 Building A is a 'building in the round', with frontage to the new Village Square and Roehampton Lane, as well as Hersham Close and Holybourne Avenue. The block is composed of a 5 storey U-shaped residential block sitting over a

2 storey podium housing the community facilities. The U-shaped block surrounds a landscaped courtyard providing amenity space for all residents. Access to the apartments would be via an open access deck on each level. A palette of mainly brickwork is proposed with detailed concrete banding and crafted stone elements to address the neighbouring Alton East and historic buildings of Roehampton Village, such as St. Joseph's Church and the High Street. The civic functions would be highlighted by the use of bronze.

- 9.25 Following the work carried out with Officers and the Wandsworth Design Review Panel, the building has been designed to maximise active frontages so far as site constraints permit. There are entrances on each of the elevations; as well as providing activity on all sides of the building. This avoids presenting a 'back' to church to the east and the existing estate to the south.
- 9.26 The community facilities would be co-located in Block A to create an integrated multi-generational community hub with the potential for shared use of facilities. Detailed layouts for the community facilities will be developed in close consultation with the service providers, LBW Children's Services, LBW Library Services and the Wandsworth CCG as set out earlier in this report.

Block O

- 9.27 Block O marks the entrance to the site. It would be 7 storeys in height, lower than the existing Allbrook House. It would provide a mix of uses, incorporating commercial/office zones at the two lower levels. Its distinctive "wedge" shape responds to its respective position facing both the Village Square and Block A to the East and the Block N/O podium to the west, with Roehampton Lane to the north. The commercial uses on the lower floors will be expressed with high quality stonework - giving the building a civic character on the street scene. Chamfered brickwork piers provide variation to the facade on the upper levels and varying façade treatments are applied on all four elevations, which assist in representing the change of use from commercial (bottom), office (middle) and residential (upper) uses. The overall massing of Block O will be "crowned" by a wide concrete effect band which matches the consistent narrower concrete effect bands on the levels below.

Block N

- 9.28 Block N, as proposed, is formed of two pairs of buildings comprising a 7 storey element fronting Danebury Avenue with 6 floors of residential flats on top of a large double height commercial frontage and a 6 storey element on Roehampton Lane comprising 5 floors of residential above a podium car park. Each building would share similar materials, but with detailing and proportion changes, is distinctive. Its central position informs the materials character and strategy, transitioning between formal brick of Roehampton Village to the increase concrete and banding of the Alton Point Blocks. A majority brick palette is proposed with deep reveals that express the larger horizontal openings and reduced massing to soften the edge to Roehampton Lane. The podium/basement of Block N3 houses the energy centre.

Block K

- 9.29 Block K is formed of 3 buildings ranging in height from 4 to 9 storeys. Each building responds to the steep topography of the site through its elevational appearance and entrance strategies. Two public pedestrian routes are provided through Block K, increasing permeability from Roehampton Lane to Harbridge Avenue, Danebury Avenue and the wider masterplan area.
- 9.30 Block K is designed as a family of buildings that respond to the wider masterplan. Each building is picked out in a different shade of brick. The extent of concrete detailing on the facades is in direct response to their position in relation to the Alton Point Blocks and the formal red brick of Roehampton Village. Active frontages are created through the introduction of maisonettes with private entrances along Harbridge Avenue, Ellisfield Drive and in the courtyards to help address the scale of the street. A clear hierarchy is established in the courtyards where shared and public spaces have been defined.
- 9.31 The massing of Block K responds to the nature and scale of its surroundings with lower blocks to the south providing good levels of daylight within the courtyards. Block K3 is also reduced in height along Kingsclere Close in response to the scale and nature of existing properties. The building reads as 5 storeys above ground level on Roehampton Lane frontage due to sharp changes in level between the road and the application site.

Block M

- 9.32 Block M is located on the Roehampton Lane frontage and forms a marker building when arriving from the north. It comprises three elements ranging in height from 7 to 9 storeys, with taller elements located to the east and west and a lower linking block in between. The main residential entrances are located along Kingsclere Close and there is a podium car park which utilises the sloping topography to the north. Brick is proposed as a main material relating to the existing context of the residential properties on Roehampton Lane. Detailed concrete banding is proposed across the building and precast concrete panels are introduced on the west elevation to reference the character of the adjacent Alton Estate point blocks.

Block Q

- 9.33 Building Q is located on the northern edge of the regeneration area, next to Chadwick Hall Student Accommodation and Grade II* listed Downshire House on the north and Downshire Fields to the west. It is formed of three buildings. Block Q2 fronts Roehampton Lane and is 6 storeys above street level whilst Blocks Q1 and Q3 are 8 storeys. The buildings are arranged around an open courtyard arrangement and podium communal garden with views towards Downshire Field. The massing, materiality and fine detailing of Block Q2 responds to the setting of Downshire House and the streetscape of Roehampton Lane. Blocks Q1 and Q3, with the use of concrete panels and horizontality of openings, reflect the character of the Alton Estate slab and

point blocks. The main entrance to the development is from Roehampton Lane with Block Q1 and Q3 accessed through the communal garden.

Portswood Place

- 9.34 The Portswood Place community hub is located on the southern edge of Downshire Field, formed of two buildings of one and two storeys. The design of these buildings has been carefully considered to minimise impact on the conservation area and other designated heritage assets. The buildings reflect the material detail from the neighbouring listed slab blocks and Minstead Garden bungalows, also listed. This context has materialised in the use of robust concrete textures offset with a considered use of timber. The Nursery and Children's centre has been designed in consultation with the future occupiers.

Public Realm and Landscape

- 9.35 The landscape and public realm proposals seek to create a range of external spaces that contribute to the existing landscape setting and use of the proposed buildings and to improving connections to the wider area, by providing legible and accessible public spaces with improved connectivity to the wider townscape. The masterplan has been divided into the following key landscape typologies which are reflected in the Design Codes:
- Public Realm: Featuring the new Village Square, Portswood Place and a series of Pocket Green Squares
 - Streets: A legible hierarchy of streets that are clearly defined and responsive to their user environment. Commercial streets that are robust and residential streets that are green and use a softer palette of materials.
 - Courtyards: Each courtyard is unique to its architectural context but must be guided by a set of principles that ensure a variety of scaled spaces are created. Principles of formal and informal design character will inform the design of each courtyard.
 - Downshire Field: The rolling landscape is home to mature trees, a natural play space as well as important community infrastructure such as Portswood Place and the bus turnaround.
- 9.36 The regeneration of the Alton also offers an opportunity to significantly improve the way people move across the estate and access surrounding neighbourhoods. The landscape strategy prioritises the creation of safe, attractive and healthy streets:
- North/south pedestrian links through the estate will connect the retained and improved streets that predominantly run east/west but including the introduction of switch-back ramps to ensure level access is secured where currently access is stepped.
 - Improved streets will be well proportioned and easy to navigate, drawing people into and through the estate, to access the range of amenities on offer.

- Planting and street trees will be used to screen parking areas and create a more attractive environment but retain surveillance opportunities and safety of local people
- Car parking, cycle stands and street furniture will be incorporated carefully, so that streets are uncluttered, safer and more easily usable particularly for pedestrians and cyclists.
- The creation of a new village square and multi-purpose community building at the gateway to the estate will establish a new focal point for community interaction, recreation, relaxation and engagement events, to draw residents from Alton West, Alton East and Roehampton.
- Alterations to the junction between Danebury Avenue and Roehampton Lane will improve conditions for pedestrians, cyclists and road users, allowing a greater number of vehicles to exit the estate during each traffic signal cycle.

9.37 The character transition from the urban public realm of the Village Square, Community Hub and streetscape gradually 'softens' and transitions to the Parkland landscape of Downshire Field. The section of the report below assesses the four key public spaces proposed: The Village Square; Alton Activity Centre; Portswood Place and Downshire Field.

The Village Square

- 9.38 The original (LCC) Alton Estate Masterplan envisaged a civic space at the eastern end of Danebury Avenue which would be marked by a retail parade as well as a public square. This ambition was never delivered in full. While the existing Danebury Centre provides a retail parade including Roehampton Library, there is no clear focal point in the form of a cohesive or significant public space. While communal green space is not lacking, there is a limited amount of civic public space. It is proposed to create a new Village Square to provide a focal point and to connect Alton West, Alton East and Roehampton Village. The location diverges from that proposed in the 2014 Alton Area Masterplan, which included a square further to the west incorporating the existing village green. This previous location was surrounded predominantly by new development rather than a combination of new and existing buildings. The new location reveals St Joseph's Church along the square's eastern edge and allows Roehampton Village to sit equally alongside the new Alton Green development.
- 9.39 The design of the Village Square has evolved to reflect comments from the DRP and consultation with the community. It provides a flexible public space with a lawn and terraces which relates to the internal spaces of the community hub. It includes generous space for circulation and access, as well as temporary events/exhibitions, and the opportunity for the community to gather, meet and circulate. A green buffer is provided to Roehampton Lane. Feature trees announce the corners and may extend across Roehampton Lane in the future. Trees and planting, seating and terraces encircle the square, creating inward facing activation. A key view to St Joseph's church will be framed by tree planting to the top of the terraces. Key arrival spaces are created at the 4 corners and 1 community entry off Hersham Close. A robust palette of hard

materials is proposed. A multi-use terraced landform runs along perimeter of St Joseph's Church boundary to the east of the Village Square and provides a play space.

- 9.40 The new square extends to 2115 sq.m and is significantly larger than the existing grassed amenity area adjacent to the Library and Allbrook House which has a combined area of 1246 sq.m.

Alton Activity Centre

- 9.41 The Alton Activity Centre is located at the centre of the Alton Estate. The existing play space is gated and of poor quality with restricted opening hours and does not meet the requirements expected of a modern play environment and as set out in the Mayor's Shaping Neighbourhoods: Play and Informal Recreation September SPG, 2012. High fences currently impede the community interaction with the play space and will be replaced in the current proposals. The new Alton Activity space is a complete redesign with the exception of the Activity Centre building which is retained. Engagement with the local youth and families at the Get Active festive, Roehampton Base and community drop-in days have established a strong understanding of community concerns, values and aspirations and the proposed designs are a direct reflection of their input. The landscape responds to the site topography. A series of undulating mounds, terraces and landscape edges create social corners, play features, and a secure perimeter line. Tree planting and soft landscaping is used at the edges to provide a screen and safety buffer from the street and to border play zones. Vegetation will be visually striking with varied texture, height and seasonal colours.

Downshire Field

- 9.42 The SPD states that Downshire Field will become the centre piece of the neighbourhood and an active neighbourhood resource. It will play an important role in the local community and event calendar with several flexible and complementary new features and elements. A sensitively enriched landscape will be created that retains the qualities of nature and actively supports the community. Key principles include the restructuring and upgrading of Downshire Field to incorporate community events, play and recreation facilities. The park will be redesigned to improve accessibility and ease of movement, to link key destinations and activity areas and the layout must respect, restore and enhance the original Georgian landscape.
- 9.43 Following further design development, and in response to consultation with both residents and Historic England, the landscape proposals have been refined so as to adopt a more low-key and sensitive approach that aims to enhance the site's naturalistic parkland beauty and maintain the existing parkland quality of Downshire Field. The existing play area on Downshire Field is of poor quality and no existing play features would be retained. It is proposed that the play area will be improved and extended to provide a naturalistic play zone that responds to its location and encourages children to engage with nature and the wider parkland quarter. The play zone would utilise a palette of natural materials and surfaces, and would be surrounded by

a secure fence line nestled within planting and an outer layer of meadow, ensuring that it reads as a sympathetic intervention, that allows the parkland nature of the site to remain its dominant characteristic. This would be a benefit to the landscape in this location.

- 9.44 Several options have been explored during design development for the relocation of the bus turnaround. Due to the considerable adverse impact on the Downshire Field landscape caused by the need for substantial engineering including large retaining walls, plus difficulties in creating a functional turnaround facility that would allow buses to turn and park off the public highway at Sherfield Gardens, this option was discounted. The relocation of the bus turnaround to the junction of Tunworth Crescent and Danebury Avenue has therefore been identified in the Masterplan as the preferred option. Consultation was undertaken with residents prior to the submission of the planning application and the proposed relocation of the bus turnaround has been supported by the Design Review Panel and Historic England. 15 trees would be removed (1x category B tree, 13 x category C trees and 1 x category U tree) but would be replaced by 23 new medium- large specimen trees in the immediate vicinity of the bus turnaround.

Portswood Place

- 9.45 The landscape design will embed the Portswood Place community buildings within the parkland setting provided by Downshire Field. A high quality treatment of the public realm and Danebury Avenue is proposed which has considered the setting of Minstead Gardens and Mount Clare. New landscaping will link the north and south green spaces, with the road transitioning through the park. Pocket green spaces and small amounts of seating providing for safe informal 'spill-out' and waiting zones in front of the Nursery and Children's Centre. The Eastwood Nursery courtyard will provide physical, quiet, social, sensory and naturalistic play as well as learning opportunities for 0-5 year olds. The courtyard can also accommodate flexible community use for afterhours or functions.

Streetscape

- 9.46 The street network forms a key component of the overall public realm. In order to reflect the parkland setting, there is a focus on introducing 'softer' elements such as rain gardens (SUDs), trees and incidental play areas in appropriate spaces to these movement corridors. The streetscape design will create a healthy public environment with a clear, legible hierarchy applicable to changes in use from commercial to residential. All streets will feature a robust palette of materials, traffic calming measures, full height and minimum height kerbs. Where appropriate pedestrian priority surfacing will be introduced to crossing points to enhance visual communication of user priority.
- 9.47 Key crossings will be provided to encourage safe, legible and inclusive north – south pedestrian routes from Roehampton Lane through to Laverstoke Gardens. Crossing points will be aligned with pedestrian routes and pocket

green squares. Generous pedestrian footways are incorporated into streets. Avenue tree planting, within interspersed car parking bays break up on-street parking bays and provide a rhythm along all streets. Residential frontages will be protected with planted buffer zones to all ground floor windows, ensuring security and privacy. Danebury Avenue is the Primary access route connecting the Parkland and Urban Quarters of the Masterplan. A refurbished street network between development areas improves way finding, accessibility and ensures the estate remains cohesive. Harbridge Avenue and Kingclere Close are defined as residential 'home zones' providing a neighbourhood surface treatment that indicates a slow, safe and shared zone for residents and community to circulate and play safely.

- 9.48 Objections have been received about the narrowing of Danebury Avenue due to bringing development forward to the street frontage creating a more enclosed feel to the street. Whilst the existing spaciousness provided by the grassed amenity areas currently in front of the existing building to be demolished will be reduced, it is considered that the proposed approach is consistent with the objectives of creating a more active street frontage and more attractive streetscape.

Design Review Panel

- 9.49 The design has evolved in consultation with officers and has been subject to extensive design review. The Design Review Panel (DRP) has met on seven occasions during the course of design development and the advice provided by the DRP has been critical to design development. Meetings took place prior to the submission of the planning application in June 2019 as follows:
- 7th August 2017
 - 18th December 2017
 - 19th March 2018
 - 15th June 2018
 - 7th August 2018 (workshop to discuss architecture)
 - 7th September 2018 (workshop to discuss landscape and Design Codes)
 - 17th May 2019
- 9.50 The DRP is supportive of the scheme and has provided comments intended to assist further design development and implementation. The DRP considers it has become a well thought through masterplan that will make a positive difference to the benefit of existing and future residents. In particular, the panel has highlighted the importance of carrying forward the ambitions of the masterplan and providing for effective design guardianship to ensure the quality and integrity of the architecture and landscape is maintained through future phases of development. The Panel's detailed comments may be summarised as follows:

Transport and Highways

- The need for an improved pedestrian crossing at the junction of Roehampton Lane and Danebury Avenue. A home zone environment and

making it a pedestrian friendly and welcoming space is critical to ensure legibility and connectivity to Roehampton High Street and beyond.

- The number of deliveries that a scheme of this scale would attract has not been reflected in the strategy for loading bays and there could be a conflict with the on-street parking. A parking management plan is recommended as well as a servicing and delivery strategy to ensure on-street parking and vehicular movement patterns and needs are planned for (these would be secured by condition).

Accessibility

- Intention of ensuring good accessibility throughout the site is commended but given the site level constraints, it is questioned whether it is essential for every route to be DDA compliant and if the number of ramps could be reduced. In their current form, the ramps appear cumbersome and the DRP are not convinced that they provide a welcoming and pleasant experience for all users. The Panel recommended that an Access Advisor undertakes an accessibility audit to help prioritise and balance out the network of DDA compliant paths and to revisit the ramp and alleyway to the rear of Block A to create a safe and welcoming pedestrian route that is open 24/7.
- Details of ramps, gates, platforms and landing areas should be submitted as part of the detailed landscape strategy that will accompany the application.

Architecture

- Block O should be more visually significant when approached from Roehampton Lane. Block A and Block O should have a distinctive profile and the DRP suggest revisiting the treatment of the tops of these buildings.
- Treatment of the facades of Block Q and the potential to extend the garden spaces of the ground floor flats facing Downshire Field should be further explored. The edge conditions and the boundary treatments with the Mosaic School should also be accurately documented.
- Greater clarity required about the treatment of the edge condition and frontage of Block M.
- Improve the boundaries and edge treatments on Blocks G and F (outline element) to achieve a more gradual transition between the new urban and parkland quarters and with the existing urban fabric. Careful consideration should be given to the treatment of the vehicular entrance into Block G from Harbridge Avenue, particularly given the proximity to the Alton Activity Centre and ensuring the delivery and drop-off, whether on street or in laybys is clearly defined in the application.

Landscape

- The landscape component of the masterplan is crucial in ensuring a well-balanced, friendly and welcoming environment for residents and visitors, and for enabling the community to thrive. The panel is very supportive of the progress the design team has made so far in achieving this and applaud the ambitions and richness of the design and details proposed.

- Progress made on revised landscape proposals for the Village Square and in instilling a sense of place into the heart of the scheme. The design now clearly reflects key desire lines, the landscape positively announces entry points to the space and provides buffer to the streets around, and the overall design maximises the square's flexibility to host a variety of events and happenings as well as providing for different types of spaces to dwell, play and socialise. Whilst integration of St. Joseph's Church is not feasible at the present time, the panel would like to see this retained as a longer-term opportunity. A detailed sunlight analysis is required to better understand and design the dwell spaces between buildings across the scheme.
- The landscaping proposals to address the edge conditions around the masterplan and in particular, at the western end of Danebury Avenue where it meets Downshire Field, should be given an equal amount of care and consideration as the rest of the masterplan area.
- Retention of more of the trees across Downshire Field and landscape proposals for this area is supported. Details such as seating and planting and future management arrangements of this and other public spaces should be provided as part of the application.
- Careful consideration to the ecological value of the landscape including the use of evergreen and indigenous species in the courtyards as well as in the public areas. Given the proximity to Richmond Park, the panel consider the opportunity to attract wildlife is both exciting and ground-breaking.
- The success of such extensive landscaping will be dependent on a strong maintenance and management strategy and the availability of necessary funding. The local planning authority is encouraged to carefully factor this in as part of their consideration of the planning application and in future monitoring of the masterplan to ensure it is well kept long term.

Rooftops

- Green roof strategy is supported. How they will be treated, accessed and maintained should therefore be accurately demonstrated in the landscape strategy. It is recommended that the management and maintenance strategy should be developed in association with an ecologist.

- 9.51 The DRP notes that the area will undergo significant change of spatial identity as a result of the development. Given the increase in density, the DRP thinks it is crucial that the high quality of the scheme needs to be reflected and carried out from strategy into all level of details. The DRP is adamant the design detailing post planning is viable and suggest therefore to employ a Design Champion who is qualified to oversee and safeguard this as the scheme progresses in the next development stages.
- 9.52 The DRP strongly recommends that the local planning authority ensure continuity in the next stages of the development process post-submission and finds ways to sustain the level of integrity in the design and quality of detailing proposed. The Panel therefore recommends the continuity of the design quality of the scheme is secured should the existing consultants not be retained, by sealing this into any planning permission. The opportunity for the

local planning authority in conjunction with the developer to be involved in stipulating a continuity of consultants or be involved in the selection of consultants that will carry on the next stages should be explored.

Revisions to Masterplan (March 2020)

- 9.53 In response to issues raised by the DRP and in representations received following consultation (including the GLA, Historic England, TfL, statutory consultees and the local community), a number of revisions have been made to masterplan and to the architectural design of the new blocks. These are set out in the Design and Access Statement Addendum and are summarised below:

Landscape Design

- 9.54 Amendments have been made to landscape design to address issues raised during consultation. These relate to:
- Retention of trees in Harbridge Avenue
 - Minor revisions to the Village Square
 - Improvements to accessibility within the public realm
 - Proposed re-location of bus driver's welfare facility
- 9.55 The existing road alignment of Harbridge Avenue is to be retained and this has enabled the retention of the existing avenue of trees within a refurbished landscape. These changes are welcomed by officers and address concerns raised by Historic England and in consultation responses.
- 9.56 Minor revisions have been made to the Village Square. These comprise minor adjustments to the road alignments and design of the square in response to service coordination issues and revised landscape design at the junction between Danebury Avenue and Roehampton Lane. The changes do not impact on the public realm principles and character of the area as established in the submitted application.
- 9.57 A comprehensive review has been undertaken of the public realm to illustrate the enhanced accessible routes through the site. The need for an accessibility audit was raised by the DRP and officers prior to the submission of the application and the additional assessment is welcomed. Issues relating to inclusive design are considered further in Section 13. A number of changes have been proposed to the Masterplan to improve accessibility:
- Improvements to the southern accessible route to the Community Hub (Block A) with a stretched out step and ramp geometry. Staggered seating with planting and trees proposed to provide a safe place outside the health centre and community hall.
 - Improvements to Danebury Avenue- Harbridge Avenue and Danebury Avenue- Laverstoke Garden links including widening or sloped connections and provision of planting and seating points.
 - Improved ramp access to Block M

9.58 Following engagement with TfL, the requirement for a toilet facility located immediately adjacent to the turnaround area for use by bus drivers was identified and the options for the turnaround area have been revisited. In addition, in response to TfL's specific concern over noise implications and the risk that resident complaints in future could result in LBW removing TfL's right to use this turning and standing facility, an acoustic and air quality assessment have been carried out and submitted with the application which demonstrate that there are no unacceptable noise or air quality implications. A Stage 1 Road Safety Audit has also been undertaken, which identifies no insurmountable issues and all recommendations of the Auditor have been accepted (including the relocation of the final westbound bus stop to Minstead Gardens, the introduction of tactile paving, and suitable waiting restrictions at junctions). A standalone toilet facility is proposed adjacent to the bus turnaround (previously located within the Portswood Place building). The proposed toilet facility is modest in size and has been positioned to be as unobtrusive in the landscape as possible as well as avoiding impacting on nearby trees. In addition, the existing eastbound bus stop adjacent to the junction of Danebury Avenue and Minstead Gardens has been retained to ensure elderly residents living in the nearby sheltered bungalows continue to board and alight bus services in close proximity to their homes.

Block Designs

9.59 Officers have worked closely with the applicant through a series of workshops to address issues raised by the GLA and in other consultation responses relating to the design and layout of individual blocks. As a result, a number of changes have been made in the revised proposals. These may be summarised as follows:

- Layout Changes - Adjustments to the internal layouts of Blocks A, K, M, O and N to improve accessibility and waste collection arrangements and to address issues raised by the Secure by Design officer. Apartment layouts have been amended in order to improve room areas and usability of spaces. All units would meet Wandsworth's Affordable Housing Design Standards as well as complying with the Draft London Plan. A third core has been added to Block M next to the Roehampton Lane entrance to address concerns about number of units sharing the same core. Review of all layouts to ensure compliance with Building Regulations part M4(3) and DCL Nationally Described Space Standards done.
- Tenure and unit Size Mix Changes - Changes to Blocks A, O, M and Q as a result of changes to affordable housing location and unit size mix changes.
- Elevations - Amendments to Block O (west elevation), Block K and Block M as a result of detailed feedback on facade treatment and layouts.

9.60 The GLA suggested the opportunity was explored of filling in the western frontage of Block Q with additional units. The applicant advises that this would compromise the architectural intent of fitting within the existing context/ building typology of Alton Estate. The adjacent Point Blocks and Slab Blocks are based on single block massing emerging from the landscape and this approach is proposed for Block Q. This intent would be lost once Block Q1

and Q3 are connected on the lower ground floor. Any infill units would be remote and disconnected from the remainder of the development. Furthermore, access to these units would be awkward and undesirable requiring residents to either access their apartment through the podium car park or travel around the entire building to gain access to a front door fronting Downshire Field. It would also result in the loss of parking spaces. Furthermore, the current naturally ventilated car park would be compromised and mechanical ventilation would be required which could result in increased build costs.

Summary on Design

- 9.61 It is considered that the proposed development meets the criteria set out in Policy DMS 1.
- A design-led approach has been adopted to optimise the potential of the site and the layout and arrangement of the buildings achieves a high level of physical integration with their surroundings.
 - The scale, massing and appearance of the development provides a high quality, sustainable design and layout that contributes positively to local character;
 - The development is sympathetic to local landscape character and mitigates impacts on natural features, open spaces and identified views;
 - The layout, design and landscaping of public spaces reflects the character and appearance of surrounding buildings.
- 9.62 The masterplan has been developed in consultation with the community and will deliver the regeneration of the area and a high quality living environment in accordance with the core principles set out in the Roehampton SPD. Officers have worked closely with applicants to address issues relating to landscape and building design and the DRP agrees that it has become a well thought through masterplan that will make a positive difference to the benefit of existing and future residents.
- 9.63 The proposal provides an enhanced and integrated approach to green space, ecology, planting and public realm. The proposals seek to address the difficult topography, with new accessible routes working with the new building positions. There will also be a gain in public and private amenity space with new soft landscaped areas proposed at ground and podium levels. These aim to encourage communal use and provide opportunities for movement, integrated play, recreation, biodiversity and visual amenity.
- 9.64 The masterplan seeks to create a liveable environment that gives pedestrians and cyclists priority, reducing reliance on private car-based travel. The retained road network will be upgraded to generate a legible hierarchy of public and private spaces, using a combination of streets, paths, courtyards and squares. The new pedestrian areas will be free of refuse and deliveries with servicing exclusively from the carriageway. Provision is included for undercroft car-parking spaces for residents, in line with the adopted London Plan. Cycle parking is provided on a block-by-block basis in secure and convenient storage areas within the shared carparks or adjacent to entrance

lobbies. The overall layout and enhancement of existing streets will allow positive natural surveillance across the site. These active frontages also give life to the streets - creating a more neighbourly atmosphere.

- 9.65 It will be important to carry forward the ambitions of the masterplan and provide for effective design guardianship to ensure the quality and integrity of the architecture and landscape is maintained through future phases of development. The Design Code will assist in maintaining design quality and the integrity of the masterplan and conditions are recommended on securing the use of high quality materials and further details on the proposed artwork that is to be integrated into the entrances to the buildings
- 9.66 Further details will be required relating to the landscaping proposals for Downshire Fields and the materiality of the Portswood Place community building to mitigate potential impacts on designated heritage assets (see Section 12). Details of materials and entrance treatment will be secured by condition. In line with the recommendations of the DRP, a maintenance and management strategy and the availability of necessary funding will be required to ensure the quality of the landscape is maintained. This would be secured by condition/Section 106 as appropriate.

10. Housing Standards and Quality

Space Standards

- 10.1 Policy 3.5 (Quality and Design of Housing Developments) of the London Plan and Policy DMH6 (Residential Space Standards) of the DMPD set minimum space standards for new developments based on unit size.
- 10.2 The proposals submitted in June 2019 did not meet adopted space standards and extensive revisions were sought and have now been made to the internal layouts of Blocks A, K, M, O and N in the revised scheme. Apartment layouts have been updated in order to improve room areas and usability of spaces. All units in the revised scheme would meet Wandsworth's Affordable Housing Design Standards for the Alton Estate Regeneration project, as well as complying with the Draft London Plan.
- 10.3 The majority of existing social rented homes on the site fall notably below London Plan space standards. For example, 97 x 3 bedroom existing homes along Danebury Avenue, Harbridge Avenue and Portswood Place are 9 sq.m per unit smaller than the London Plan standard. The proposed development will deliver improved quality housing.

Single Aspect Units

- 10.4 Policy DMH4 (Residential Development including Conversions) of the Development Management Policies and the Mayor of London's Housing SPG states that units should be dual aspect wherever possible, particularly where one of the aspects is north facing.

- 10.5 The Detailed Element of this application comprises 654 dwellings. This comprises a total of 268 single aspect units (41%), 357 dual aspect units (55%) and 29 triple aspect units (4%). All 3 bedroom units are dual aspect, and none are north-facing.
- 10.6 None of the single aspect units are north facing. There are 8 single aspect north-west facing units and 10 single aspect north west facing units in Block M but additional windows have been introduced to mitigate impacts.
- 10.7 The number of single aspect dwellings has been minimised through design development.

Amenity Space

- 10.8 Policy DMH7 (Residential Gardens and Amenity Space) states that the following amenity space should be provided for dwellings depending on their size:
- 10 square metres for one and two bedroom dwellings; and
 - 15 square metres for dwellings with three or more bedrooms.
- 10.9 The blocks contained in the Detailed Element deliver private amenity space in the form of recessed and projecting balconies, clearly demarked private terraces and communal amenity space through raised podium courtyards. Based upon the standards contained in Policy DMH7 and the housing mix in the Detailed Element, a total of 7,090 square metres (sqm) of amenity space is required. The Detailed Element would deliver 10,262 sqm comprising 5,128 sqm of private amenity space and 5,134 sqm communal space (average of 16 sqm/home or 7.84 sqm private amenity space/home). This would exceed the standards set out in Policy DHM7 by 3,172 sqm.

Inclusive Design

- 10.10 London Plan Policy 3.8 'Housing Choice' sets out the requirement for providing 90% of new housing to meet Building Regulations Requirement M4(2) 'accessible and adaptable dwellings' and 10% of new housing meeting Building Regulation requirement M4(3) 'wheelchair user dwellings' and Policy 7.2 'An Inclusive Environment' sets out the requirement to achieve the highest standards of accessible and inclusive design principles.
- 10.11 The London Plan (Intend to Publish Version) includes policies relating to inclusive design and accessible housing. Policy D5 states that development proposals are required to achieve the highest standards of accessible and inclusive design. Policy D7 states that residential development must ensure that: at least 10 per cent of new build dwellings meet Building Regulation requirement M4(3) 'wheelchair user dwellings', and all other new build dwellings meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings'
- 10.12 A number of issues relating to accessibility were raised in relation to the original proposals. These related to unit layouts, external routes and blue badge parking. In addition, further to advice received from Officers and the

DRP, the applicants have undertaken an Accessibility Audit and changes have been proposed to the scheme to ensure compliance with standards.

Public Realm

10.13 Key features for improving access within the public realm include:

- Improved north/south pedestrian links through the estate, with less steep gradients, that will connect the retained and improved streets that predominantly run east/west
- Improved and increased level road crossings on the east / west routes to improve permeability
- Provision of seating throughout the public realm to support people with limited mobility and encourage people to stop and sit and thus providing active surveillance
- Increased blue badge parking for the community and commercial uses
- New step-free routes from Roehampton Lane into the estate
- Improved connectivity to the existing play and green spaces.

10.14 The existing north/south routes in the centre of the estate are poor quality and very steep. The new crossings in the central sections are designed to be shallow slopes (i.e. less steep than 1:21). They align with strategic north south routes similar to the existing site, but with suitable gradients. For example, the slope routes between Blocks I and J is proposed to have a gradient of 1:32. Stepped 'short-cuts' are also provided allowing for choice and shortening routes for ambulant disabled people able to use stairs and as they will reduce travel distances by avoiding the long sloped sections. These routes will be of generous widths and be places where people can stop and sit providing active surveillance. Where the changes in level are too steep to provide ramped or graded routes, new stepped routes will be provided. These will be designed to be easily accessible for people with an ambulant impairment and will be provided with suitable handrails, goings and risers.

10.15 Parking for disabled residents is to be provided within the blocks and as such, direct step-free access to dwellings. Parking provided within the blocks would comprise designated bays that will be provided in accordance with the specification of AD M M4(3) and be distributed adjacent to lift cores. In line with the draft London Plan, for 3% of dwellings at least 1 designated disabled person's parking bay per dwelling will be available from the outset apart from Block A where 10% are catered for. As part of the Parking Design and Management Plan, additional dwellings will be provided with a designated disabled persons parking space in future if required. Designated blue-badge bays are proposed within the Local Centre to serve the commercial uses. Parking is based upon the requirements of the draft London Plan which requires that all non-residential elements should provide access to at least one on or off-street disabled persons parking bay" (Draft London Plan Policy T6.5 para A). The application achieves this with more than one blue badge bay provided at the outset with a mechanism to provide more in future if needed based on demand. The exact details of on-street car parking control will be subject of Traffic Regulation Orders which sit outside the planning process.

- 10.16 Step-free access will be provided into the all non-residential and residential block entrance lobbies. A Detailed audit of all the units against the Optional Requirements M4(2) Accessible and Adaptable and M4(3) Wheelchair user dwellings has been carried out and the design teams have worked closely with the London Borough of Wandsworth's Specialist Housing Occupational Therapist in reviewing the layouts. Amendments have been made to the layouts to ensure compliance with Building Regulation requirements.

Privacy

- 10.17 In relation to privacy, the Design, Landscape and Access Statement offers further details of the separation distances found throughout the scheme. Minimum separation distances of 18 metres have been maintained throughout the Proposed Development, thereby complying with the Mayor's Housing SPG. These separation distances are often exceeded to assist with daylight and sunlight conditions and provide a pleasant environment for residents to live. The units themselves, particularly those on the ground floor, have been designed to maximise privacy. Separation distances between units, both in existing neighbouring buildings, and those falling within the outline element of the Proposed Development will ensure that inter-visibility between habitable windows is minimal, whilst sufficient setbacks of ground floor units behind front gardens will ensure defensible space and provide privacy to habitable windows.

11. Impact on Amenity

Impacts on Daylight/Sunlight

- 11.1 The Mayor published a Supplementary Planning Guidance on Housing in March 2016 (HSPG) which provides updated guidance on sunlight and daylight issues for London Boroughs. The SPG can be interpreted as moving away from the rigid application of the numerical values in the BRE guidelines, which was published in 2011.
- 11.2 The HSPG states at Para 1.3.45 states that "an appropriate degree of flexibility needs to be applied when using BRE guidelines to assess the daylight and sunlight impacts of new development on surrounding properties, as well as within new developments themselves. Guidelines should be applied sensitively to higher density development, especially in opportunity areas, town centres, large sites and accessible locations, where BRE advice suggests considering the use of alternative targets. This should take into account local circumstances; the need to optimise housing capacity; and scope for the character and form of an area to change over time".
- 11.3 London Plan Policy 7.6 (part d) requires new development to avoid causing 'unacceptable harm' to the amenity of surrounding land and buildings, particularly in relation to privacy and overshadowing and where tall buildings are proposed.
- 11.4 Policy DMS1 of the DMPD sets out the general development principles for all new development. New development will only be granted where it does not

"harm" the amenity of occupiers/users and nearby properties through unacceptable noise, vibration, traffic congestion, air pollution, overshadowing, overbearing, unsatisfactory outlook, privacy or sunlight/daylight.

- 11.5 The submitted daylight assessment is contained within Chapter 13 of the Environmental Statement (ES), dated May 2019 which considers the daylight impacts for adjoining occupiers and is based upon the methodology set out in the BRE guidelines. The daylight assessment uses the Vertical Sky Component (VSC) method and the 'no sky-line' (NSL) method. Each one is useful in assessing different aspects of daylight impacts with the VSC being most useful in assessing the degree of change and NSL illustrating the distribution of daylight in a room.
- 11.6 Using these methods of assessment, the BRE guidelines state that if reductions in daylight as a result of the development are greater than 20% then this is likely to be significant and noticeable to residents of neighbouring properties. It should be noted that the BRE guidelines are a guide (not policy) which is intended to inform decision making and assist with development rather than constrain it.
- 11.7 The guidelines are to be interpreted flexibly taking into account the patterns of development within the wider area. The guidelines note that in higher density locations a greater degree of obstruction may be unavoidable if new developments are to match the height and proportions of existing buildings. In addition, the ES identifies a method to quantify daylight and sunlight impacts, varying from negligible (reduction but still complies with BRE guidelines), minor (20-29.9% reduction), moderate (30-39.9% reduction), and major (greater than 40%). In order for the BRE guidelines on impact on daylight to a neighbouring property to be satisfied, both the VSC and NSL criteria should be met.
- 11.8 It should be noted that there are instances where the existing VSC and NSL levels within a property are already low. Therefore, any alteration may result in a disproportionate percentage change compared to the actual or relative change in daylight or sunlight experienced by the occupiers which may not be so noticeable as the results suggest. In these instances, further consideration has been given to the proportion of the rooms / windows affected and or other mitigating factors such as the existence of overhanging balconies or other design features within the building.

Sunlight (Annual Probable Sunlight Hours)

- 11.9 The submitted sunlight assessment also contained within Chapter 13 of the ES considers the sunlight impacts for adjoining occupiers by using the Annual Probable Sunlight Hours (APSH) methodology. This measures the proportion of sunlight that is available at each window. BRE guidance recognises that sunlight is heavily influenced by orientation and so only windows with an orientation within 90 degrees of south need be assessed. The BRE guide also advises that effects on bedrooms and kitchens are of reduced significance compared to sunlight reaching main living rooms and conservatories.

Paragraph [3.2.11] of the BRE Guide states that the sun light of an existing dwelling may be adversely affected where the centre of the window:

- receives less than 25% of annual probable sunlight hours, or less than 5% of annual probable sunlight hours between 21 September and 21 March and
- receives less than 0.8 times its former sunlight hours during either period, and;
- has a reduction in sunlight received over the whole year > 4% of annual probable sunlight hours.”

11.10 Other factors are also relevant in the assessment, such as the presence of overhanging balconies or other structures that limit the available light and make the windows beneath more susceptible to larger relative losses.

Daylight Impacts

11.11 The LPA appointed daylighting consultants Delva Patman Redler (DPR) to review chapter 13 of the ES to assist in understanding the potential effects of the proposed development upon the neighbouring land users when compared to the existing situation. DPR is satisfied that the submitted ES and the methodology adopted by the applicant’s daylight consultants is acceptable.

11.12 The assessment of daylight, sunlight and overshadowing effects presented in the applicant’s ES is based upon the submitted hybrid scheme, comprising detailed proposals for Blocks A, K, O, M, N and Q and maximum parameters for the outline element (all of the remaining blocks). The outline proposal has been assessed as is the ‘worst-case scenario’ should the reserved matters submissions be built out according to the maximum height, form and footprint as defined in the parameter plans.

11.13 The applicant’s daylight assessment took into account the impact of the development upon 23 sensitive receptors where 1,235 windows serving 1,026 rooms were assessed for daylight and 600 rooms for sunlight. The results of the existing situation for these receptors confirms that 941 windows of the 1,235 windows assessed (76%) for VSC and 1012 (99%) of the 1026 rooms assessed for NSL would meet BRE criteria for daylight. For sunlight, 505 (84%) of the 600 rooms assessed meet BRE criteria.

11.14 The likely effect of the development upon the sensitive receptors which would experience a negligible adverse effect (0-19%) alteration or 20-29.9% minor adverse effect (20-29.9%) are not discussed or assessed further in this report.

11.15 As far as daylighting is concerned, 1,018 (82.4%) of the 1,235 windows assessed for VSC and 942 (91.9%) of the 1,024 rooms assessed for NSL would meet the BRE criteria for daylight. As far as sunlight is concerned, 600 rooms were assessed and 95.6% would meet the BRE criteria for both total and winter annual probable sunlight (APSH) hours.

- 11.16 The following properties have been identified to experience reductions in Vertical Sky Component or No Sky Line, considered to have either a *moderate* adverse impact or *major* adverse impact.

Woodcott House Lyndhurst House and Wheatley House

- 11.17 These blocks are 12 storeys in height, provide 44 residential flats within each of the buildings and are located to the north-west and south west of the Alton Activity centre and lie outside of the application site.

Woodcott House

- 11.18 Out of 146 windows, 8 windows would experience moderate reductions and 7 windows would experience major reductions to VSC. These windows do not comply with the standards in the existing situation as the windows are recessed behind inset balconies which make them unusually sensitive with the amount of light reaching these rooms already reduced.
- 11.19 The other 3 windows affected located on the side elevation experience losses between 32.5% and 36% but would still retain VSC values of between 24% and 25.7%. The extent of diminutions is not considered to be substantial and the retained VSC's of over 20% is viewed as acceptable for such an urban location.
- 11.20 For No Sky Line, all 143 rooms fully comply with the BRE guidelines criteria.
- 11.21 As far as sunlight is concerned to Woodcott House, 90% of the rooms assessed would meet the BRE guidelines with 2 rooms experiencing a moderate adverse impact and 6 rooms experiencing a major adverse impact. However, these worst affected rooms are because the windows are recessed behind inset balconies as highlighted in the paragraph above.

Lyndhurst House

- 11.22 Out of 146 windows, 5 windows would experience moderate reductions and 6 windows would experience major reductions to VSC. These windows do not comply with the standards in the existing situation as the windows are recessed behind inset balconies which make them unusually sensitive with the amount of light reaching these rooms already reduced.
- 11.23 The other 5 windows affected are located on the side elevation experience losses between 30.5% and 33.3% but would still retain VSC values of between 23.2% and 24.8%. The extent of these diminutions is not considered to be substantial and the retained VSC's of over 20% is viewed as acceptable for such an urban location.
- 11.24 For NSL, all 143 rooms fully comply with the BRE guidelines criteria.
- 11.25 As far as sunlight is concerned to Lyndhurst House, 93.6% of the rooms assessed would meet the BRE guidelines with 2 rooms experiencing a moderate adverse impact and 4 rooms experiencing a major adverse impact.

However, these worst affected rooms are to windows recessed behind inset balconies as highlighted in the paragraph above.

Wheatley House

- 11.26 Out of 146 windows, 1 window would experience a moderate reduction to VSC. This window is located at first floor level on the side elevation of Wheatley House and recessed behind an inset balcony with the amount of light reaching this first-floor room already reduced. This window would experience a loss of 31.7% but would reduce the already compromised VSC value from 12% to 8.2%. The extent of this reduction is not considered to be significant in the context of the amount of existing light that reaches this first floor accommodation.
- 11.27 For NSL, all 143 rooms fully comply with the BRE guidelines criteria.
- 11.28 As far as sunlight is concerned in respect to Wheatley House, 98% of the rooms assessed would meet the BRE guidelines with 1 room experiencing a moderate adverse effect. However, this room is served by a window that is recessed behind an inset balcony which limits the amount of sunlight reaching the room.

Hurstbourne House

- 11.29 There are no daylight results for Hurstbourne House that fall within the moderate or major category, although there are some minor sunlight deviations. Of the rooms assessed, 97.2% would meet the BRE guidelines with 1 room experiencing a moderate adverse effect. However, this room is served by a window that is recessed behind an inset balcony which limits the amount of sunlight reaching the room.
- 11.30 For NSL, all 143 rooms fully comply with the BRE guidelines criteria.

Nos.245-255 and Nos.257-261 Danebury Avenue

- 11.31 These properties are 2 groups of terraces of single storey bungalows that are designated as grade 2 listed buildings and are located just outside of the red line application boundary on the south side of Danebury Avenue.
- 11.32 Out of a total of 27 windows, 1 window would experience a moderate reduction and 9 windows would experience major reductions to VSC. These windows which don't comply with the guidelines front Danebury Avenue and already receive poor lighting with existing VSC values ranging from as low as 2.3%. As a result, the amount of light reaching these rooms taking into account the proposed development is not as significant as the VSC results would suggest.
- 11.33 As far as NSL is concerned, 16 of the 18 (88%) of the rooms assessed would be fully compliant with the BRE guidelines.

Nos. 73-95 Hersham Close

- 11.34 The properties in Hersham Close are 12 maisonettes that are provided over 4 floors - 6 located and ground / first floor level and 6 further located at second / third floor level. These properties are located to the south of the existing youth club and Multi Use Games Area facility that fronts onto Holybourne Avenue and is set behind the parade of shops and upper floor housing to the north at nos.1 to 29 Danebury Avenue.
- 11.35 Out of a total of 48 windows, 10 windows would experience a moderate reduction and 17 windows would experience major reductions to VSC.
- 11.36 The most significant effects are to the kitchens of these properties which already have limited sky visibility due to the projecting design of the building at first and third floor level. At ground floor level the existing VSC values range between 6.5 and 9, with existing VSC values at second floor level ranging from 7 to 10.1. The proposed VSC values would be reduced to between 2.9 and 3.9 at ground floor level and 4.4 to 7 at second floor level. Bearing in mind that the amount of light reaching these rooms with the existing situation is already compromised, the impact in daylighting terms taking into account the proposed development is not as significant as the VSC results would suggest.
- 11.37 The other 10 windows with a moderate adverse effect are located at ground floor and second floor level opposite an existing single storey garage block. These windows experience losses between 30.5% and 37.9%, the worst affected window would have a VSC value of 4.4 (compared with an existing VSC value of 7) and the least affected window would retain a VSC value of 25. These results taking into account the existence of the projecting element of the building and the retained VSC's of over 20% is viewed as acceptable for this urban location.
- 11.38 As far as NSL is concerned, 33 of the 48 (69%) of the rooms assessed would be fully compliant with the BRE guidelines.

Roehampton Lane Properties

- 11.39 On the northern side of Roehampton Lane, a number of substantial residential properties exist set within in large plots. This starts with no.189 Roehampton Lane which is situated on the corner with Beech Close followed by nos.191 Roehampton Lane (Roehampton Surgery) followed by nos. 193-199 Roehampton Lane, which are 2 storey dwellings (some with rooms in the roof) but most buildings infill the majority of the width of the site, the exception being no.201 Roehampton Lane which is located within a smaller plot of land, with larger garden to the front and side rather than to the rear.

189 Roehampton Lane

- 11.40 Out of a total of 28 windows, 1 window would experience a moderate reduction and 3 windows would experience major reductions to VSC.

11.41 The most significant effects are the windows serving the upper floor of no.189 Roehampton Lane which already have limited sky visibility due to the overhanging roof design of the building. The existing VSC values range between 12.9 and 15.1 and the proposed VSC values would be reduced to between 6.2 and 9.9. Bearing in mind the amount of light reaching these rooms with the existing situation is already compromised, the impact in daylighting terms taking into account the proposed development is not as significant as the VSC results would suggest.

11.42 For NSL, all 6 rooms fully comply with the BRE guidelines criteria.

11.43 As far as sunlight is concerned 5 of the 6 rooms assessed would meet the BRE guidelines with 1 room experiencing a moderate adverse effect. However, the room is affected by the overhanging roof design as highlighted in the paragraph above.

193 Roehampton Lane

11.44 Out of a total of 10 windows, 1 window would experience a moderate reduction and 1 window would experience a major reduction to VSC.

11.45 The most significant effect is upon the windows serving the ground floors of no.193 Roehampton Lane which serve non-habitable space, the entrance hall (see below) and a partially blinkered side return windows in a projecting bay feature. The existing VSC values range between 7 and 14.1 and the proposed VSC values would be reduced to between 2.1 and 7.2, however it should be noted that the principle and much larger window in the bay retains lighting levels in excess of the VSC value of 27%.

11.46 For NSL, 4 out of the 5 rooms fully comply with the BRE guidelines criteria.

11.47 As far as sunlight is concerned 4 of the 5 rooms assessed would meet the BRE guidelines with 1 room experiencing a major adverse effect. However, the space served by the window is non-habitable accommodation room as highlighted in the paragraph above.

195 Roehampton Lane

11.48 Out of a total of 11 windows, 1 window would experience a moderate reduction and 1 window would experience a major reduction to VSC.

11.49 The most significant effect is upon 2 windows at ground floor level and 1 upper floor window of no.195 Roehampton Lane. However, it should be noted that the ground floor windows serve non-habitable space (the entrance hall) and the first-floor window is affected by the existence of the deep overhanging roof design. The existing VSC values range between 8.5 and 12.9 and the proposed VSC values would be reduced to between 4.3 and 8.9, however it

should be noted that the principle and much larger window in the bay retains lighting levels in excess of the VSC value of 27%.

11.50 For NSL, all 6 rooms fully comply with the BRE guidelines criteria.

11.51 As far as sunlight is concerned 5 of the 6 rooms assessed would meet the BRE guidelines with 1 room experiencing a minor adverse effect although the accommodation affected appears to be a bathroom.

197 and 199 Roehampton Lane

11.52 These properties do not have any windows with a VSC value that would experience a moderate or major adverse effect.

11.53 For NSL, all 6 rooms of 197 Roehampton Lane and all 5 rooms of 199 Roehampton Lane fully comply with the BRE guidelines criteria.

201 Roehampton Lane

11.54 Out of a total of 15 windows, 2 windows would experience major reductions to VSC.

11.55 The most significant effect is upon a ground floor window serving a living room at 201 Roehampton Lane and a bedroom at first floor level. The existing VSC values range between 4.2 and 8.8 and the proposed VSC values would be reduced to between 2.2 and 4.9, however it should be noted that the principle and much larger window in the bay retains lighting levels in excess of the VSC value of 27%.

11.56 For NSL, all 6 rooms fully comply with the BRE guidelines criteria.

Whitelands College and Chadwick Hall

11.57 It is recognised there is noticeable adverse daylight impacts to all windows in the north facing elevation which it is assumed would serve student study/bedrooms. The retained VSC values are generally in the mid-teens or higher and most rooms will retain >50% NSL. Sensitivity is lower than permanent residential as these buildings are used by transient occupiers and it is expected that the study desk would be closer to the window in the best lit part of the room.

11.58 As far as sunlight is concerned, the results contained in the daylight / sunlight assessment indicate that all of the rooms assessed in the accommodation in Whitelands College and Chadwick would comply with the BRE criteria.

Summary on Daylight and Sunlight

11.59 In conclusion, it is considered that the proposed development would cause some harm to residential amenity in terms of the impact on daylight and

sunlight that would be enjoyed by the occupiers of neighbouring properties. In the areas where greater deviations from the BRE guidelines are identified as a moderate or major effect, this is due to the existence of the built form of the neighbouring buildings where a number of windows are already set behind recessed balconies or located beneath an overhanging roof or the room is served by additional windows. Taking this into account, it is not considered that the application could be resisted when applying policy DMS1 of the DMPD and as a result, the objections raised on these grounds from the occupiers of the neighbouring residential occupiers are not sustainable.

Internal Daylight and Sunlight

- 11.60 The applicant's internal lighting assessment is contained within Chapter 13 of the Environmental Statement (ES), dated May 2019 and within a revised internal lighting assessment addendum dated March 2020. The assessment has been guided by the NPPF (paragraph 123), London Plan policies 3.8, 7.6 and 7.7 and the Mayors Housing SPG which seek to ensure that new development achieves adequate levels of natural daylight, sunlight and a good standard of overall amenity. Policy DMS1 seeks to protect the amenity of future and existing residents in respect of sunlight and daylight and overshadowing.
- 11.61 The applicant's assessment is measured against the BRE guidelines which provides advice on site layout planning to achieve good sunlight and daylight within buildings. The advice is not mandatory and there is a need for flexibility in applying the BRE guidelines.
- 11.62 The Average Daylight Factor is primarily intended for assessing daylight within new development. The ADF is a measure of the average level of diffuse daylight within a room, and accounts for factors such as the size and number of windows; the total surface area of the room; the reflectance of the internal surfaces; and, the nature of the glazing. A small room with a large window and lighter surface finishes will be better illuminated by daylight than a large room with a small window and darker finishes, and the ADF measure accounts for this.
- 11.63 BRE guidelines confirm that the acceptable minimum ADF target value depends on the use of the room where kitchens, living rooms and bedrooms should receive minimum levels of light measured at 2%, 1.5% and 1% ADF respectively. Notwithstanding this, rooms designed as a living/kitchen/diner (LKD), it is considered reasonable to apply an ADF target of 1.5% to these rooms.
- 11.64 Delva Patman Redler Chartered Surveyors (DPR) were appointed by the LPA to carry out assessments of the detailed residential blocks, the most recent one following the receipt of revised plans in March 2020. The amended plans included alterations to the internal layouts and minor alterations to external elevations to address concerns expressed by Officers about the quality and the arrangement of the internal space for future residents. The revised assessment provides the following levels of adherence to the BRE guidelines:

- 83% adherence to the average daylight factor (ADF) guidelines across all habitable rooms, including 86% in the affordable blocks (A, O and Q) with a breakdown by room type of:
- 80% of living rooms meet the 1.5% ADF target – i.e. 59 fall short of the recommendation, with 18 being below 1% ADF target (for bedrooms).
- 70% of open-plan living/kitchen/dining rooms (LKDs) meet 2% ADF target due to kitchen element or 87% meet the 1.5% ADF target (for living spaces) – i.e. 48 fall short of 1.5% ADF
- 12% of separate kitchens meet 2% ADF target, with 49% achieving 1.5% ADF target (for living rooms)
- 91% of bedrooms meet 1% ADF target
- 77% adherence to the daylight distribution (NSL) guideline across all habitable rooms
- 100% adherence to the room depth criterion (RDC) guideline across all habitable rooms
- For living spaces that have a southerly-aspect window: 70% adherence to annual sunlight (APSH) guidelines,
- 79% adherence for winter sunlight and 66% adherence to both annual and winter sunlight guidelines

11.65 The level of ADF adherence per block is shown in the following table:

Block	Tenure	ADF Adherence		
		Per Block	Per tenure	Overall
A	Affordable	80%	86%	83%
O	Affordable	90%		
Q	Affordable / Private	87%		
K	Private	84%	82%	
M	Private	78%		
N	Private	83%		

11.66 Overall, it can be seen that the affordable blocks provide a better level of adherence to daylight guidelines. It is accepted that the results for Block A are reduced, although this is due to the shape of the footprint of the building and the rear deck access that faces onto the internal courtyard.

11.67 DPR has confirmed that ‘the full adherence to the room depth criterion across all blocks suggests that single-aspect rooms have been appropriately sized to avoid rooms that are overly deep. The resulting transgressions of the daylight guidelines are therefore a factor of height, massing, spacing and plan form of the proposed blocks, plus overhanging balconies, rather than internal room layouts.

11.68 The revised assessment report advises that where possible: -

- Windows have been enlarged.
- The number of combined LKDs has increased the number with separate living rooms and kitchens has decreased.
- Where single aspect LKD's are inevitable, the access to daylight has been prioritised over kitchens.
- Living areas have been located in areas of greater daylight availability.
- Balconies have been located to minimise obstruction to living rooms on the floor beneath by either positioning them in front of bedrooms or by providing such living areas with at least one window without an overhanging obstruction directly above it.
- Different glazing types have been specified to allow for more transparent glazing (allowing greater amount of daylight into rooms); and
- Light floor finishes have been specified for floors to maximise the amount of light that is reflected.

11.69 The low ADF's values for the separate kitchens are located in Block Q in both the affordable and private housing and is largely due to the size of the window opening and due to the window being set behind recessed balconies. Of the 17 windows which fail, 16 would achieve reasonable levels of daylight between 1.1-1.4 ADF, and the first-floor window with a value of 0.9 ADF is set behind a recessed balcony. These deviations are considered acceptable given that the living rooms to these units achieve 2.6-4.3% ADF, which is considered sufficient to address the shortfall arising from the kitchen values. In conclusion, whilst it is accepted that a number of rooms would be below the minimum recommended levels of ADF for new dwellings, the level of adherence is not uncommon for dense housing development. National and regional planning policy and guidance urges flexible application of the guidelines and given the urban setting it is considered that the proposal would provide adequate levels of daylight and sunlight to future residents.

The Outline Element

11.70 In respect of the outline element, DPR acknowledges that the assessment has been carried out according to simple block massing, without any articulation to the residential blocks or the existence of projecting or recessed balconies. It is recognised that the façade results show some challenges on the southern U shaped facades of the 3 northern blocks even before balconies are accounted for. However, DPR state that it is achievable for a similar level of BRE adherence in the outline element which is dependent upon the room layout and building articulation and balcony design. It is expected that sunlight adherence would be lower than the detailed phase, although this is mainly due to a greater number of north facing units that would be provided.

Microclimate Impacts

11.71 London Plan policy 5.3 seeks to deliver and maintain high quality environments and major developments are required to avoid the creation of

adverse local climatic conditions. Policy 7.6 states that "buildings and structures should...not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings, in relation to privacy, overshadowing, wind and microclimate." The need to preserve an acceptable pedestrian environment devoid of wind effects from tall buildings is also echoed in CS Policy IS3 and tall buildings policy DMS4 (parts iii and xi) require applications to address the climatic effects on its surroundings. The Mayors SPG on Sustainable Design and Construction (2014) advises new development to avoid wind tunnelling effects and ensure public realm is not impacted by adverse effects.

- 11.72 Wind conditions around the development have been assessed and tested as part of the Environmental Impact Assessment using Computational Fluid Dynamic (CFD) simulations of the wind microclimate to assess the existing situation to compare with the proposed development. The testing has used the Lawson Comfort Criteria (LCC) which sets out different levels of comfort criteria (sitting / standing / strolling / walking / uncomfortable) ranging from most calm / still through to the most windy and gusty conditions. Although CFD analysis is not as robust as a wind tunnel assessment, it is sufficient for looking at the wind microclimate of the proposed development as the building heights are low to medium rise, ranging from 3 to 8 stories.
- 11.73 The current baseline conditions are considered to be suitable for sitting out as well as for strolling conditions in the winter months and has calmer conditions in the summer months which satisfies the LCC requirements. The wind microclimate at the completed development shows windier conditions than the current baseline conditions and there are locations where the LCC classification is one category higher than required and therefore landscaping and mitigation will be required to satisfy the wind microclimate requirements for the proposed development. These heightened wind conditions would be experienced at the north west of Block M and at the southern facade of Block M and require mitigation to satisfy the LCC requirements.
- 11.74 It is evident a number of large trees exist along the perimeter of the north west corner of Block M which are to be retained throughout the development process and would provide sufficient mitigation to satisfy the LCC requirements. Other additional trees are located at the south west corner of Block M and along the southern façade of Block M which are considered to provide sufficient mitigation from the prevailing winds.
- 11.75 There is potential for strong winds at these locations, so it is important for pedestrian safety that the mitigation is adequate. As the trees at these locations are close together, this is intended to provide adequate mitigation from the prevailing winds as long as the majority of the trees are at least 3m in height and semi mature. The mitigation requiring the retention of trees is considered acceptable for pedestrian comfort at both locations and no additional wind microclimate assessments are considered necessary, subject to a condition being imposed.

Overshadowing to gardens and amenity spaces

- 11.76 Where a proposed development includes tall buildings, these may affect the sunlight availability to gardens or open spaces in close proximity to the Site. Owing to the southerly location of the sun path, only amenity areas located within 90° of due north of a development have the potential to be affected by overshadowing from tall buildings and is taken into account in this assessment.
- 11.77 The 2011 BRE guidelines suggest plotting a series of shadow plans illustrating the location of shadows cast from those buildings at different times of the day and period of the year to assess the potential overshadowing effects. To this end, the overshadowing plots are mapped for the three key dates are listed as: - 21st March (Spring Equinox), 21st June (Summer Solstice); and 21st December (Winter Solstice).
- 11.78 For each of these dates, the overshadowing is calculated at hourly intervals throughout daylight hours from sunrise to sunset. On 21st December, the sun is at its lowest altitude consequently creating long shadows to be cast and represents the worst-case scenario in terms of overshadowing.
- 11.79 The BRE guidelines state that in order to receive adequate levels of sunlight, potentially affected outdoor amenity spaces should receive at least 2 hours of sunlight on March 21st to at least 50% of its area or should retain up to 80% of its existing sunlight in the proposed situation.
- 11.80 The Transient Overshadowing Assessment accompanying the planning application has carried out assessments on 21st, March 21st June and 21st December which confirms that all the amenity areas would experience more than 2 hours of sunlight on more than 50% of the areas assessed. The assessment acknowledges that the effect from overshadowing is negligible in respect of 3 areas, namely the Village Square (to the front of Block A), the existing Alton Activity Centre and residential properties located at nos. 2-10 Rodway Road and nos. 2-24 Rodway Road. The results of the overshadowing assessment have been closely scrutinised and reviewed by the Council's independent daylighting consultants Delva, Patman Redler who agree with the findings and the negligible effect on the 3 areas highlighted above.
- 11.81 The results of the overshadowing assessment indicate that areas where more than an hour of shadow would be cast by the proposed development are as follows: -

The Village Square

- A small section to the east of the square for a period of 4 hours on 21st March and 21st June respectively and 2 hours between 9.00 and 11.00 on 21 December 2020. However, it is recognised the vast majority of the Village Square would be in direct sunlight throughout the day for each of the dates assessed.

The Alton Activity Centre

- The impact for the Alton Activity Centre would be for 2 hours between 8.00 and 10.00 for 21st March, 4 hours between 6.00 and 10.00 for 21st June and 1 hour between 11.00 and 12.00 on 21 December. However, it is recognised that the vast majority of the Alton Activity Centre would be in direct sunlight throughout the day for each of the dates assessed.

Nos. 2-10 Rodway Road and nos. 12-24 Rodway Road

- The impact on the overshadowing of private gardens for the properties in Rodway Road would occur on 21 December between 12.00 and 14.00 for nos. 2-10 Rodway Road and 14.00-16.00 for nos. 12-24. However, it is recognised that the additional shadow is unlikely to be noticeable given the shadow already cast by existing buildings.

11.82 It is considered that the submitted assessment of the impact of the scheme and the potential for the overshadowing of neighbouring residential properties is acceptable taking into account the fact that the assessment has been undertaken in accordance with published guidelines and having regard to the relevant assessment criteria.

11.83 It should be noted that national planning policy and guidance emphasises the need to optimise sites such as the Alton regeneration area for housing delivery and stress the importance of applying BRE guidelines sensitively, specifically paragraph 123 of the NPPF as long as the resulting scheme would provide acceptable living standards.

Overshadowing Assessment of Proposed Units

11.84 As highlighted above, the BRE guidelines suggests that for an external amenity space to appear adequately sunlit throughout the year it should receive two or more hours of sunlight on the 21st March on at least half of their area.

11.85 The proposed areas of courtyard amenity space and public realm have been assessed for sun hours on the ground. Seven courtyard amenity areas within Plots A, M, N, O, K and Q have been tested within the scheme, as well as the new Village Square and the Alton Activity Centre. The results demonstrate that 69% of the total amount of surfaces would experience more than two hours of sunlight, and so the regeneration scheme is considered to offer satisfactory levels of sunlight for future residents throughout the year.

11.86 The results confirm that the courtyard amenity areas within Plots A, M, N and O exceed the BRE recommendation in relation to overshadowing and are considered well sunlit. The new Village Square is fully compliant with the BRE Guidelines with 82.2% of its surface area having 2 or more hours of sunlight on 21 March and over 6 hours of sunlight within almost all of its area on 21 June. The Alton Activity Centre is fully compliant with the BRE Guidelines with 96.7% of its surface area having 2 or more hours of sunlight on 21 March and over 6 hours of sunlight within all its area on 21 June.

- 11.87 The results indicate that the courtyard for Plot Q would fall marginally short of the BRE guidelines with 44% of its area seeing two or more hours of direct sunlight on 21st March, although the assessment advises that the guidelines of 50% is achieved two days later on 23rd March. This amenity space would experience very good sun exposure in the summer and the courtyard will be relatively well sunlit in winter, the marginal deviation highlighted above would be regarded as acceptable.
- 11.88 However, the courtyard amenity areas for the private residential units in Block K would be poorly sunlit in the winter months. These amenity areas will have 8% and 26% of their areas seeing two or more hours of direct sunlight on the 21st March, although it is understood that these spaces will meet the BRE recommendation of 50% on 4th April and 12th April respectively. Whilst not ideal, the greater availability of sunlight to these areas in the summer months is considered to offset the poor sunlit conditions in the winter months.
- 11.89 The outline plots have the potential to experience good daylight and sunlight, with a few areas seeing lower levels than recommended, which is typical of any dense urban development. At the reserved matters stage, it will be necessary to carefully consider the detailed design of the blocks including the quality of the external amenity areas to ensure that sufficient lighting reaches these spaces.
- 11.90 In conclusion, it is considered that the deviations from the BRE guidelines for the sun lighting of the external courtyards to residential blocks K and Q are not significant and that the greater availability of sunlight into these areas in the summer months would offset the poor sunlit conditions that would be experienced in the winter months. Taking this into account, it is not considered that the application could be resisted when applying policy DMS1 of the DMPD.

Noise

- 11.91 A baseline noise survey was undertaken in November 2017 in order to identify appropriate noise criteria and to compare with potential future noise levels as a result of the Development. The highest noise levels were found to be from vehicles along Roehampton Lane, Danebury Avenue and Clarence Lane.
- 11.92 A development of this scale will inevitably have temporary adverse impacts in terms of construction noise, traffic and vibration. This is a matter of concern to the local community given that the development will be phased over a 10 year period.
- 11.93 Traffic flows along Roehampton Lane (North of Rodway Road – two-way), which is assumed would be utilised for HGV/vehicular access in/out of the Development, is in excess of 29,000 vehicles (AAWT). As a result, the required contribution of construction traffic in order to increase existing noise levels by 1 dB would be c.7,500 additional vehicles. Construction traffic levels provided by the transport consultant indicates that an increase in of this magnitude is not expected as part of the Development proposals; the effect due to construction traffic would therefore be negligible. The noise

assessment concludes that the impacts of noise and vibration generated from the construction phase of the Development through vehicles and construction machinery can be suitably controlled through an appropriate Construction Environmental Management Plan (CEMP) and the implementation of best practice measures; this would be secured by condition. Therefore, the assessment concluded that the noise and vibration generated from the construction phase of the Development will be negligible.

- 11.94 The Noise assessment concludes that the noise impacts of the operational phase of the proposed development would be negligible. An assessment of road traffic noise impacts has been undertaken and the impact of operational traffic is considered to be of minor adverse significance when the predicted noise level exceeds 1 dB in the short term. Predicted noise level increases of less than this would be negligible. The predictions show that the effect of the Development (including those cumulative developments in the area) on traffic noise in the short term would increase noise levels by a maximum of 1.4 dB(A) along Harbridge Avenue. Using the DEFRA 2006 update to CRTN procedure, road traffic noise levels (LA10, 18hr) along Harbridge Avenue are calculated to be 49.8 dB (LAeq, 16hr) during the daytime and 42.8 dB (LAeq, 8hr) at night. Such a noise level is below the existing measured baseline noise level in that area and any such increase in noise levels along that section of road would be imperceptible to future receptors. Similarly, the noise increase along Ellsfield Drive would be imperceptible when compared against the existing baseline noise environment.
- 11.95 The assessment of the residential accommodation categorises the apartments as being subject to low, medium and high risk of exposure to excessive noise levels. Combined with the analysis set out in the Energy Strategy and Overheating Assessment, a combination of passive and active mitigation measures, including high specification double glazing and supplementary ventilation systems, would be secured through the use of conditions to resolve noise and overheating on high risk units and ensure a negligible effect.
- 11.96 The Development has been designed to incorporate double glazed windows and supplementary ventilation systems which will reduce noise levels within the residential dwellings, proposed children's centre and library on the site to appropriate levels. Thus, the assessment concluded that the predicted noise levels to be generated from the operational phase of the Development to have a negligible effect on users of the Site.
- 11.97 Daytime noise levels at those areas proposed for outdoor space, specifically the balconies of each residential block have been calculated. The highest values would be experienced at Blocks M and O. Balcony areas within these blocks would be subject to 73 dB(A) during the daytime. Under such circumstances, BS 8233 acknowledges that where the external guidelines are not achievable in all circumstances where development would be desirable, the convenience of having these areas should outweigh the potential high noise levels where such locations are positioned near to existing transport sources. Such an interpretation was sought and agreed with LBW prior to the

assessment; predicted noise levels would therefore be acceptable and outweigh the possible removal of the proposed balcony areas.

11.98 The impact of bus turnaround movements at the proposed Tunworth Crescent is informed by the baseline noise measurements obtained at the existing turnaround location from a number of different vehicles/operations and prediction of daytime (07:00 – 23:00) and night-time (23:00 – 07:00) noise levels utilising the existing bus timetable at the current Danebury Avenue (Minstead Gardens) bus stand. The highest noise levels from the re-location of the bus turnaround area would understandably be at the nearest residential blocks at the entrance of Tunworth Crescent. Predicted noise levels at this location are 48.2 dB(A) LAeq,T during the daytime and 43.9 dB(A) LAeq,T at night; resulting in a total noise increase (existing + predicted) of 0.8 dB during both daytime and night. It is likely that individual movements would be audible at nearest receptor however, the total level of increase for both daytime and night periods (maximum 0.8 dB) would be imperceptible. It should be noted that the assessment has been undertaken assuming a worst-case scenario in terms of the total amount of bus movements per day and night (360 movements). Furthermore, existing glazing within those nearest properties along Tunworth Crescent would be sufficient to ensure the internal criteria within BS 8233 is achieved. The effect of such an increase would be negligible. Should the lower assumed bus movements be taken into consideration from the current bus timetables (240 movements), the highest predicted noise level at Tunworth Crescent is 46.3 dB(A) during the daytime and 42.8 dB(A) at night. The increase of noise above existing ambient levels would be 0.6 dB(A) during daytime and night periods. Maximum noise from the bus turnaround has also been calculated and assessed against the existing noise levels during daytime and night at Tunworth Crescent; existing noise has been obtained from the nearest long-term monitoring position at Sheffield Gardens (LT1). Predicted maximum noise levels at the nearest receptor from the proposed bus turnaround location would be up to 8.2 dB LAmax lower than existing levels at Tunworth Crescent. It is likely that individual bus movements would be audible, however, levels are of a magnitude which do not exceed those already experienced at the nearest receptor locations.

11.99 The suitability of the village square as an outdoor amenity space has been assessed against current conditions within the existing area provided to the east of the existing library. Existing noise levels at the current green space located to the east of the library are dominated by road traffic movements along Roehampton Lane; noise levels from this source have been used to calibrate the model and assess the levels at the proposed village square. Currently, users of the existing green space would be subject to daytime noise levels of 66 dB(A). Users within the centre of the proposed village square would be subject to a daytime noise level of 63 dB(A) based on the increased relative distance from Roehampton Lane to the central position of the square. Based on the Development proposals, users of the village square would experience a 3 dB(A) improvement over the existing levels in the current location, resulting in a negligible impact. Through discussions with the Environmental Services Officer at LBW, it was acknowledged that areas such

as the village square would be subject to such noise levels where the space is positioned next to transport noise sources and as a result, no specific criterion for the use of this space was recommended. In accordance with BS 8233, the inclusion of the proposed village square for amenity space would clearly outweigh its removal and coupled with the improvement in likely noise levels, no specific mitigation (in the form of barriers) is recommended. The Development together with the cumulative scheme has been assessed to have a negligible effect on noise levels as a result of changing road traffic flows.

Summary on Noise

11.100 The assessment indicates that there are no significant effects as a result of the Proposed Development during either the construction and/or operational phases following mitigation measures being applied. The site is affected by existing noise principally due to traffic on Roehampton Lane. Measures will be required to mitigate the impacts of noise, notably the preparation of a Construction and Environmental Management Plan and the incorporation of appropriate noise insulation measures and ventilation in the proposed development. The proposals therefore accord with London Plan Policy 7.15 Core Strategy Policy IS4 and policy DMS1 of the DMPD.

12. Impact on Heritage Assets

- 12.1 Any decisions where listed buildings and their settings and conservation areas are a factor must address the statutory considerations of the Planning (Listed Buildings and Conservation Areas) Act 1990, as well as applying the relevant policies in the development plan and the National Planning Policy Framework.
- 12.2 Para 195 of the NPPF states that where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss. Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.
- 12.3 The effect of an application on the significance of a non-designated heritage asset should also be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset. The NPPF also states that local planning authorities should look for opportunities for new development within Conservation Areas and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably

- 12.4 The Alton conservation area was designated on the 15th March 2001. It covers 58.1 hectares and has more listed buildings (in particular, Grade I and Grade II*) than any other conservation area in the Borough. As detailed in the Alton Conservation Area Appraisal (2010:8):

'What gives the conservation area its special sense of place is the environment created by its atmospheric landscaping, historic layout and the architectural quality of [its] buildings. The area's built form, while contemporary with the surrounding area, derives from the range of building scales and overall consistency and use of materials. The special character of this conservation area is derived from these unique characteristics expressed in its architectural and urban qualities. ... The Alton's setting is of substantial historical and architectural interest as an example of eighteenth century town planning. The Alton Conservation Area contains distinguished individual buildings from the eighteenth, nineteenth and twentieth centuries, all set within an outstanding parkland environment, largely based on the Council's Alton Housing Estate'.

- 12.5 The conservation area comprises two main parts - Alton East and Alton West (Alton East being the first phase of development 1952-55, followed closely by Alton West, 1955-59). Alton West comprised the grounds of the late eighteenth-century estates and many of the principal features of the eighteenth century landscape determined features of the new landscape. Design work began in 1951 with the presumption that a maximum amount of parkland should be left open for amenity and landscape values, and that as many tenants as possible should have views over Richmond Park.
- 12.6 Part of the planning application falls within the conservation area, mainly on the Roehampton Lane frontage, Harbridge Avenue, Downshire Field and Portswood Place (it should be noted that separate applications will be submitted at a later date covering the Grade II listed single storey bungalows in Minstead Gardens). Notable designated heritage assets are located immediately outside the planning application boundary. These include the five slab blocks of Binley, Winchfield & adjoining chimney, Dunbridge, Charcot, and Denmead Houses in Highcliffe Drive, all of which are listed Grade II*. These blocks were designed in 1952-53, by the London County Council architects team led by Bill Howell and constructed in 1955-58. They were inspired by Le Corbusier's Unité d'Habitation in Marseilles, The proposed development will affect the setting of the listed slab blocks, Parkstead House (Grade I), Downshire House (Grade II*), Kings Head (Grade II), 245-261 Danebury Avenue (Grade II) and the Bull Sculpture (Grade II) and locally listed Harfield House. It is considered that the setting of both the Westmead and Roehampton Village Conservation Areas would be affected by these proposals.
- 12.7 For the most part, those parts of the Application Site which lie within the Alton conservation area are integral to the conservation area's special interest. The design of Alton West started from the premise of retaining as much green space as possible, and consciously sought to adapt the picturesque

landscape of the 18th century villas to 'enhance the impact' of the new buildings. The parkland character of Downshire Field provides the setting not only for the estate buildings within the Site boundary but the 18th century houses beyond. The estate's slab blocks are of the highest significance here, as reflected in their Grade II* listing. The point blocks, whilst being of a type developed slightly earlier (and deployed in similar fashion at Alton East), are also integral components of the estate's design value. Other parts of the estate within the application site boundary have more limited inherent heritage value and make a much less fundamental contribution to the special interest of the conservation area. The shopping parade at Portswood Place, the three-storey terraced housing on Kingsclere Close, and the Club Room and No. 2A Minstead Gardens at the northern end of the terrace of Nos. 2-26 Minstead Gardens (beyond the Application Site), are not of the same special interest as the above elements, and their contribution to the special interest of the conservation area is less significant.

- 12.8 Parts of the Application Site lie outside the conservation area. Whilst the conservation area includes the tree lined Harbridge Avenue, it excludes the four-storey maisonettes on either side. Also excluded are the four-storey maisonettes on the southern side of Danebury Avenue, Allbrook House and Roehampton Library, the shopping parade with maisonettes above, the Council Offices and Youth Club at Nos. 36-38 Holybourne Avenue, and the Alton Practice surgery at Nos. 208- 210 Danebury Avenue.
- 12.9 The four-storey maisonettes lining Harbridge Avenue, and those on the southern side of Danebury Avenue, have a markedly different character to the slab blocks on Highcliffe Drive, and to the small domestic nature of the bungalows in Minstead Gardens. Although they are original components of the estate, they are not particularly successful in townscape terms, and are of limited inherent historic and aesthetic value. The same can be said of the shopping parade with maisonettes above at the eastern end of Danebury Avenue. These buildings now have a relatively poor appearance, which detracts from the approach to the conservation area from the east.
- 12.10 Allbrook House and Roehampton Library were completed in 1961. They were considered for statutory listing in 2015 but it was found that the buildings did not meet the criteria and they have not been listed. To the south east of this area, the Council Offices and Youth Club at Nos. 36-38 Holybourne Avenue were not part of the first phase of the Alton West estate; they are not shown on the OS map of 1964-66 but were present by the time of the 1971-77 edition. They are of a different character to the principal buildings of the estate and are not considered to be an aspect of the wider setting of the conservation area that contributes positively to its significance. The poor-quality Alton Practice surgery at Nos. 208-210 Danebury Avenue – also erected between 1964 and 1977 – might also be considered to detract.
- 12.11 The Landscapes to Alton East and Alton West were added to the Register of Parks and Gardens of Special Historic Interest in England by Historic England on 11 June 2020. The historic interest of a park or garden is established as a

material planning consideration if changes or proposals for development are being contemplated.

- 12.12 Historic England's recent listing report in respect of the designation of Alton West and Alton East as a Registered Park & Garden highlights the heritage importance attached to the Alton Estate stating:

'The LCC estates at Roehampton were amongst the most important post-war mass housing schemes built in Britain. The Architects' Department of the LCC was the largest and most influential public architectural office in the world in the 1950s. Of all the housing estates built by the LCC, the Roehampton schemes were the most ambitious, receiving extensive coverage in the contemporary architectural press and gaining an international reputation as being amongst the most important low-cost housing schemes of the period. The architectural significance of the Roehampton estates is now well established'. Whilst Alton East and Alton West estates drew from distinct and differing strands of European modernism, the LCC teams were united in their rationale to integrate and adapt the inherited landscape features. The Historic England listing report states, 'Alton West was particularly notable in this regard, with Architectural Design noting that the 'importance of Roehampton Lane as a housing estate lies in its expression of a unique relationship to a landscape that includes eighteenth-century buildings designed into the whole picture'. One of the intentions of the Alton West team was to form a connection between Downshire House and Mount Clare on the northern and southern slopes of the site. The clear sweep of Downshire Field, a remnant of the C18 landscaping was remodelled by the LCC team to create slight valley rising against the hill towards the north to emphasise views of the point and slab blocks. The placement of the blocks allowed clear vistas to be established both towards and from the two villas. Important legacies of the 1770s estate planting survive at Alton West in the mature trees retained around Mount Clare and Danebury Avenue, which defined earlier boundaries, framed views and formed secluded walks. These trees, as carefully integrated within the estate plan, contribute significantly to the richness of the estate's landscaping.'

- 12.13 Roehampton Village Conservation Area, to the east of the Site, was designated in July 1969 and extended to include properties on the southern side of Roehampton Lane in October 1984. The focus of the conservation area is the core of the old village of Roehampton centred on Roehampton High Street, which has its origins in the 17th century and which includes the Grade II listed King's Head (and Grade II listed Montague Arms).
- 12.14 Westmead Conservation Area, to the north east of the Site, was designated in May 1989, and encompasses three distinct phases of suburban development that occurred on land belonging to the estates of Dover House, Roehampton House and Spencer Lodge.
- 12.15 Core principle 5 of the adopted Roehampton SPD, supported by the Alton Area Conservation Area Appraisal and Management Strategy, outlines the

need to respect and conserve the heritage that defines the Alton Estate and sets out guidance for new development. The SPD states:

- A. All new development must respect and enhance existing heritage assets and their settings
- B. The council will support developments that enhance the conservation area and its setting through the redevelopment of poor-quality housing stock and built form in the Roehampton Local Centre; the area between Roehampton Lane and Danebury Avenue; Portswood Place Important Local Parade and Mount Clare.
- C. The scale of buildings must respond sensitively to the special character and qualities of the site and its context, including the conservation area, listed buildings and Richmond Park. Areas of particular sensitivity (where development of more than three storeys is likely to be inappropriate) include: development in the setting of Mount Clare; development in the setting of listed buildings adjacent to Portswood Place Important Local Parade.
- D. There are opportunities to explore the potential for tall buildings in less sensitive areas where this reflects an established scale and where there is a clear urban design rationale. Any buildings of five or more storeys will however only be acceptable where they satisfy the criteria of DMPD Policy DMS4. Subject to design quality (and impact on the conservation area), this could include: optimising the potential of sites within Roehampton Local Centre and announcing this as an important local service centre; responding to the scale of larger built form in the Danebury Avenue area and providing a strong edge to Roehampton Lane.
- E. Developments should be designed to conserve and better reveal the positive qualities of the heritage assets across the area through the following: improving views to heritage assets; sensitively designing new development including high-quality modern architecture by ensuring that the scale and materials used reflect local character and distinctiveness and respond to the setting of the conservation area and listed buildings; incorporating high-quality new public spaces; upgrading the landscape and public realm; sensitive transport and community infrastructure improvements throughout the area; respecting the original intent of the LCC Masterplan in the definition of the street network; respecting and restoring the original Georgian landscape in Downshire Field, whilst improving the accessibility and usability of the space.
- F. The council will support direct improvements to the following buildings where they maintain and enhance their heritage significance: Mount Clare (Grade I listed); The Highcliffe slab blocks (Grade II* listed); Doric Temple (Grade II*); Bull sculpture (Grade II*); Minstead Gardens bungalows (Grade II listed).

12.16 The key issue to be considered in assessing the heritage impacts of the proposed development may be summarised as follows:

- Whether the proposed development would result in harm to the significance of designated and non-designated heritage assets;
- Whether the development is in accordance with planning policy and the supplementary guidance set out in the Roehampton SPD.
- Whether the impacts on heritage assets can be mitigated

Assessment of Impacts on the Significance of Heritage Assets

12.17 Significance is at the heart of the planning process and is defined in the revised National Planning Policy Framework (NPPF, February 2019) as: *'The value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic or historic'*. Significance derives not only from a heritage asset's physical presence, but also from its setting. The importance of the designated heritage assets potentially affected by the proposed development has already been recognised through their statutory listing or their designation as conservation areas or registered parks and gardens. Similarly, the local interest of the non-designated heritage assets potentially affected has been recognised through their local listing.

Conservation Areas

12.18 The impact of the proposed development on the historic environment has been fully assessed. A Heritage Statement prepared by Built Heritage Consultancy on behalf of the applicant (then Redrow) was submitted with the planning application for the scheme as originally proposed. This sets out the historical development of the Application Site, the wider area, the identified designated and non-designated heritage assets, and provides an assessment of their significance (including the contribution made in each case by their setting). The Heritage Statement notes that aspects of the regeneration, notably: the important views of the listed buildings over the landscape; the relocation of the bus turnaround to a less prominent location; and the reinstatement of an educational use at the heart of the estate, will enhance the significance of the historic environment. The applicant's submission was that whilst limited harm would be caused to the special interest of the Alton conservation area this would be decisively outweighed by the high quality design of new proposals and the wider regeneration benefits of the scheme. Overall, it concludes that the effect is beneficial.

12.19 Chapter 7 (Heritage, Townscape and Visual Effects) of the Environmental Statement provides a comprehensive assessment of the significance of the various heritage and townscape assets that make up and surround the Application Site and the likely effect of the proposed development on the significance of these heritage assets. It concludes that there will be no significant residual effects on built heritage receptors, predominantly because most aspects of the proposed development do not entail direct (i.e. physical) impacts upon designated heritage assets.

12.20 An Addendum to the Heritage Statement was submitted by the applicant in March 2020 which considers the potential effects on the historic environment of revisions to the proposed development, notably the relocation of the bus driver toilet facility from Portswood Place to the bus turnaround towards the western end of the site and the retention of the existing road alignment and trees in Harbridge Avenue. It concludes that the bus turnaround facility, whilst still within the Alton Conservation Area, is much less sensitive in heritage terms than the present location at the foot of Downshire Field. The Heritage

Statement states that this would allow the required number of buses to be accommodated with a much reduced impact on views from Downshire Field and Mount Clare given that Downshire Field and Mount Clare's 'paddock' are the conservation area's most significant open spaces, and represent those aspects of the settings of both the 18th and 20th century buildings that make the greatest contribution to their significance. Given the small scale of the proposed toilet unit, it is considered that its effect on the character, appearance and significance of the Alton Conservation Area as a whole, and on the wider settings, and by extension significance, of the other heritage assets in the vicinity, would be very minor.

- 12.21 The Changes to the treatment of Harbridge Avenue were made by the applicant in response to concerns raised by Historic England and Council Officers in relation to the loss of the historic Lime avenue which is included in the conservation area designation in recognition of this value. The Heritage Statement Addendum maintains that the contribution made to the special interest of the Alton Conservation Area by the existing trees lining Harbridge Avenue would appear mainly to relate to their historical interest as a reminder of the original tree-lined avenue to Roehampton Court that existed before the Alton West estate was built and that the avenue is a relatively modern landscape feature. However, the scheme has been revised and the existing road alignment and all but four of the existing trees are to be retained in line with Historic England's recommendations. When considered as a whole, the proposed works to Harbridge Avenue would create a greatly enhanced public realm, whilst reinforcing the memory of the original treelined avenue. The retention of the original road alignment better reflects the historical interest of the avenue's original purpose.
- 12.22 Other concerns were raised by Historic England over the impact of the original proposals on the statutory designations in and around the Alton Estate noting 'the remarkable juxtaposition of innovative 1950s housing set within 18th and 19th century landscapes'. Historic England have expressed disappointment that very few opportunities have been taken to reveal and enhance the significance of the historic environment, despite the recommendations set out in the adopted Roehampton SPD 2015. Whilst Historic England did not object to the application, it is strongly recommended that the details of the proposed surgery and community building at Portswood Place are revisited, and that opportunities to enhance the historic landscape are explored, such as at Downshire Field (and along Harbridge Avenue) to reduce the harm to designated heritage assets in the area. The revised proposals address Historic England's concerns regarding Harbridge Avenue. which assessed the impact of revisions to the proposed development on the historic environment including the retention of the existing avenue of lime trees on Harbridge Avenue and the relocation of the bus driver toilet facility to the new bus turnaround.
- 12.23 The setting of the Roehampton Village Conservation Area would undergo some change through: the removal of the present shopping parade with maisonettes above (Nos. 1-29 Danebury Avenue) and the Alton Practice surgery (208-210 Danebury Avenue) and the creation of a new public square;

the replacement of the present Allbrook House and Roehampton Library with the new Blocks 'N' and 'O'; and the replacement of the present Council Offices and Youth Club at Nos. 36-38 Holybourne Avenue with the new Block 'A'. At 7 storeys on their Roehampton Lane side, the proposed new Blocks 'N' and 'O' would be lower than the present Allbrook House, but the larger footprint of the blocks and the greater quantum of development would undoubtedly engender a more urban feel to the character of Roehampton Lane. Although the new Block 'O' would come slightly closer to the conservation area boundary than the present Allbrook House, Roehampton Lane is a sufficiently generous thoroughfare that it is considered that the new building would not be an overbearing presence in the conservation area's setting. Block 'A' would be taller than the existing buildings on this part of the Site but would be set back from Roehampton Lane and separated from the conservation area by the landscaped village square. The Heritage Statement concludes that the impact on the setting of the Roehampton Village Conservation Area would be 'less than substantial' in the terms of the NPPF.

- 12.24 The Heritage Statement concludes that the setting of the Westmead Conservation Area would undergo some change through: the replacement of Allbrook House and Roehampton Library with the new Blocks 'N' and 'O'; the replacement of Nos. 1-28 Kingsclere Close and the four-storey maisonettes on the northern side of Harbridge Avenue (Nos. 2-84 even) with the new Block 'K'; and the replacement of No. 190 Roehampton Lane ('Mount Clare Gate House') and adjacent garages with the new Block 'M'. The Proposed Development would introduce a taller built form to the setting of the conservation area, and a more urban feel to the character of Roehampton Lane. However, Roehampton Lane is a sufficiently generous thoroughfare that it is considered that the new buildings would not be an overbearing presence in the conservation area's setting. Indeed, the high design quality and materiality of the new buildings and landscaping would result in a considerable 'upgrade' of the character of the area.

Alton West Registered Park & Garden

- 12.25 Key sections of Alton West & East were designated Grade II on the Register of Parks and Gardens of Special Historic Interest in June 2020. Paragraph 194 of the 2019 NFF says, '*Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification*' and substantial harm to or loss of a grade II registered parks or gardens, should be exceptional.
- 12.26 The Registered Park & Garden assessment undertaken by Historic England notes that 'the landscape's main special interest derives from the post-war LCC Architect's Department's ambition to adapt the 18th and 19th Century – largely 'pastoral' – landscapes, and their retained country houses, to form part of the architectonic Le Corbusier inspired estate design. The aim was to retain as much of the existing green space as possible, and to adapt the picturesque ideal of the original villa landscapes to 'enhance the impact' of the new

buildings. The Registered Park & Garden's significance also owes much to the retained views and trees, as well as the 1950s buildings within it and the carefully chosen public sculptures. Although various elements have been introduced since the 1950s, many of which are of no or even negative heritage value, the LCC's landscape concept remains strongly evident and effective as a complement to the buildings.

- 12.27 An Addendum to the Environmental Statement was submitted in July 2020 to assess the impact of the proposed development on the Registered park & Garden. The applicant's Heritage Consultant reviewed the relevant historical sources as well as the official designation report and list entry to determine whether the conclusions in relation to the significance of effects identified in the Heritage, Townscape and Visual Impacts chapter of the June 2019 ES would change. The Addendum notes that the June 2019 ES Chapter included full consideration of the historic development and heritage value of the landscape prior to the recent designation, in recognition that it was a consciously designed part of the original estate development and thus formed an important part of the significance of the Alton Conservation Area and the settings of various listed buildings. The ES Addendum concludes that the development would have a number of direct and indirect minor effects on the Registered Park & Garden:

Direct permanent effects:

- minor harm from the replacement of the present Club Room/No. 2A Minstead Gardens and the adjacent bus turnaround with a new building accommodating a new Club Room, Shop and healthcare facility, and minor benefits including improved landscaping;
- minor harm from the creation of the new bus turnaround in front of Shalden House and installation of a drivers' WC, and notable benefits to the RPG from removing idling and parked buses from the most important part of the landscape and enhancing key views;
- minor harm from some of the alterations to the Downshire Field landscape including new paths and hard surfacing, and removal of certain trees, and minor benefits from the enhanced character of the play areas in Downshire Field and by the Alton Activity Centre, as well as the enhanced biodiversity and new planting of trees and wildflowers;
- minor harm from the removal of shuttered concrete retaining walls at the corner of Ellisfield Drive and Kingsclere Close built in 1964-1977 as a later addition to the Estate by different designers, and the removal of nearby trees; • minor harm from the increased scale and footprint of the proposed Block M (in part), taking in existing green space and trees, albeit its massing would be broken down to respond to its surroundings in different directions; and • minor harm from the removal of non-original granite sett landscaping and four post-1950s trees along Harbridge Avenue, and minor benefits from the greatly enhanced landscape character of the Development and planting of new trees.

Indirect permanent effects:

- minor harm from the replacement of Allbrook House with the proposed Blocks O and N, and minor benefits from a greatly enhanced public realm at the entrance to the Estate;
- very minor harm from the loss of the poor quality Portswood Place buildings, and minor benefits from the new Community Centre, Nursery and Children's Centre, and associated landscaping, all to a high quality design;
- very minor harm from the proposed Blocks Q and K, due to their increased scale, albeit the built form would be carefully broken down and detailed to respond to nearby buildings in different directions;
- very minor harm from the replacement of the maisonette blocks and shops in the setting of the asset with Blocks B, D, DE, F, G, H, I and J , and very minor benefits from the anticipated much improved character of the new Blocks G and H facing into the RPG in comparison to the existing blank end walls of the Danebury Avenue maisonettes; and
- very minor harm to the asset's setting from that part of Block M that would lie outside the RPG, due to its increased scale, albeit its massing would be broken down to respond to its surroundings in different directions.

12.28 The ES Addendum concludes that the overall harm caused to the special interest of the Registered Park & Garden would be 'less than substantial' and that its core special interest would remain strongly evident and would not be notably impaired and that the considerable public benefits arising from the proposed development outweigh the harm to heritage overall. Therefore, the applicant submits that the conclusions of the June 2019 Heritage, Townscape and Visual ES Chapter remained as previously reported.

12.29 The Council's Conservation Officer commented as follows on the impact of Block M on the Registered Park and Garden: "As the proposal for block M effectively removes a part of the designated Registered Park & Garden, the trees and the shuttered concrete retaining walls there would be substantial harm to this part; whilst less significant to the Park and Garden as a whole". The designation report states that these walls 'are an important element of the shaping of the estate landscape on the steeply pitched northern side of the site where it meets Roehampton Lane'. Notwithstanding the fact this part of the RPG was undertaken as a later phase of the Alton West development it was designed to have an additive quality as part of the 20th century layering. Based on that assessment it is considered that this *substantial harm* would need to be balanced by the public benefits under paragraph 195 of the NPPF.

12.30 The applicant accepts that the proposed works would result in a total loss of those elements but refers to the assessments in the Heritage Statement Addendum and Environmental Assessment Addendum which conclude that there would be localised harm but that overall the harm to the heritage asset would be 'less than substantial'. The assessment set out in the Heritage Statement Addendum notes that the development (including Block M and associated works) would cause 'less than substantial harm' to the Registered Park & Garden's significance. As a result, it is the applicant's position that the

development requires assessment under paragraph 196 of the NPPF (rather than 195), where the harm caused is weighed against the public benefits of the proposal. This is addressed below in the summary and also in the planning balance section of this report.

- 12.31 The Gardens Trust is a statutory consultee on all planning applications affecting a Registered Park & Garden. The London Gardens Trust has objected to the application.
- 12.32 The London Gardens Trust has raised particular concerns regarding the proposed changes to Downshire Field. The objection states: *'Although now partly obscured by trees, the groundworks of the LCC team still remain and the vistas and views so carefully designed and executed 60-70 years ago are still evident and enjoyed. Far from looking to repair and restore the characteristics above, the present proposals actively harm these principles through the imposition of a trim trail and harmful 'grid' approach to the paths serving the Grade II* slab blocks'*. It is noted that the new path does not follow any kind of desire line and instead cuts through the original undulating grassland. The relocated bus turnaround area is considered to represent another cumulative loss of character and therefore significance.

Richmond Park Registered Park & Garden

- 12.33 The Richmond Park Registered Park & Garden to the south west of the site was designated at Grade I in October 1987, meaning that it is regarded as being of exceptional interest. The significance of the Registered Park & Garden derives primarily from its inherent aesthetic and historical value as a park historically planned partly for the preservation of game, and partly for agreeable vistas. Full public access was secured in 1851, and it is thus also of considerable communal value. The Registered Park & Garden also derives significance from the aesthetic and historical value of the listed buildings within it, notably the Grade I listed White Lodge.
- 12.34 Views of and from Richmond Park are a key aspect of its significance. There are glimpsed views, between and over trees, of the slab blocks and point blocks of the Alton West estate, including those within the Application Site, from within the park. Whilst the blocks are important markers, (an aspect of their setting that might be considered to contribute positively to the significance of the Alton Conservation Area), their visibility from Richmond Park is not an aspect of the park's setting that is identified as contributing to its heritage value. However, it is considered that the park is an aspect of the estate's setting that contributes positively to the significance of the heritage assets within it, both because of the views afforded over the park by the higher storeys of some of the buildings, and because it was the park that encouraged the development of the area with aristocratic estates, which in turn formed the basis of the layout of the much later estate.
- 12.35 At ground level, there is very little inter-visibility between the park and the Application Site. Despite this, however, the park's role in the development of the area lends those aspects of the landscape that are redolent of these

estates a considerable degree of significance. The Garden Trust has objected on the grounds that wider views from Richmond Park will be spoilt as a result of the proposed development - changing the present iconic view of elegant listed blocks against a spacious sky.

- 12.36 The impact of the proposed development on views from Richmond Park has been fully assessed in the ES. Those aspects that might potentially affect the RPG's setting comprise: the replacement of the present Council Offices and Youth Club on Holybourne Avenue with the new Block 'A'; the replacement of Nos. 1-28 Kingsclere Close and the four-storey maisonettes on the northern side of Harbridge Avenue (Nos. 2-84 even) with the new Block 'K'; the replacement of the present No. 190 Roehampton Lane ('Mount Clare Gate House') and the adjacent garages with the new Block 'M'; the replacement of the present Allbrook House and Roehampton Library with the new Blocks 'N' and 'O'; and the replacement of the present Nos. 166 & 168 Roehampton Lane with the new Block 'Q'. The removal of the 10-storey Allbrook House should enhance the setting of the Park, and generally the replacement buildings would be lower than this and not so prominent. Although the uppermost storeys of some of the new blocks might be visible, their natural tones and materiality would be more sympathetic to the dense tree cover amongst which they would appear. Where the uppermost storeys of the new blocks might be visible, they would be backed by, or sit amongst, the existing point and slab blocks, and read as part of the wider Alton Estate. The Richmond Park RPG is a large asset of considerable inherent heritage value. The Proposed Development would introduce new buildings into its wider setting. However, given the size of the asset, the extent of its setting, the fact that the new buildings would be concentrated in a direction where there are already relatively tall buildings, and the fact that views of them would be filtered through existing mature trees, the impact on the significance of the RPG as a whole must be considered low. Any harm is assessed as being 'less than substantial' in the terms of the NPPF.
- 12.37 Representations have been made by the Royal Parks on the grounds that the proposal would cause harm to Richmond Park's open sky space as certain buildings within the development would be visible in longer views from within the park. In addition, concerns are raised that the use of artificial lighting at high level would increase the light pollution from the surrounding built environment and impact on biodiversity. The Royal Parks would welcome any reduction in height and massing of the proposed buildings to minimise impacts on the open sky space within and around Richmond Park. With regard to the visual effect of the development, the Royal Parks accepts that as far as can be determined from the visual representations in the ES, it would appear to have a minimal effect on the views as assessed from 3 points in Richmond Park. However, whilst the Roehampton Estate is screened from the Park by the boundary screen planted on Richmond Park golf course, if this deteriorates over time due to storm damage, or the impact of pests and diseases then it may well be the case that the impacts on the views from Richmond Park become greater. For this reason, the Royal Parks strongly request that a contribution is made by the Borough or Developer to pay for additional tree planting to enhance the shelter belt treescape.

Listed Buildings

- 12.38 The Heritage Statement and ES concludes that the impact on listed buildings would be 'less than substantial'.
- 12.39 The key aspect of the setting of the Highcliffe Drive slab blocks comprises their relationships to one another (and to the bungalows and point blocks to the south), and to the landscape of Downshire Field in which they sit. The new Nursery and Children's Centre and the new Club Room, surgery and shop would be at some distance from the slab blocks. Their low-key character would allow the large green space of Downshire Field, and the slab blocks' spatial and visual relationship with the Minstead Gardens bungalows, to remain readily appreciable. The new Block 'Q' to the south east, although taller than the present buildings at Nos. 166 & 168 Roehampton Lane, would be out of the principal views of the slab blocks from Downshire Field, and partially screened by existing trees, and thus would play a very limited role in the setting of the listed slab blocks. Taken together with the landscape proposals, which would leave the vast majority of the trees on Downshire Field in place, it is considered that no harm would be caused to the slab blocks' significance. The redevelopment of these parts of the Site would thus cause no harm to the significance of the slab blocks.
- 12.40 The significance of the bungalows on Minstead Gardens and Danebury Avenue derives in part from their surviving historic fabric elements, but primarily from the aesthetic value of their design concept as simple flat-roofed dwellings offering housing for the elderly within a wider mixed community. The present Club Room and No. 2A have group value with the listed bungalows, as they were built as part of the wider provision for elderly residents. However, they are not of the same special interest, and this is reflected in the fact that they are excluded from the listing. The proposed relocation of the bus turnaround has enabled the massing of the proposed new Club Room building to be kept low, although it would be a little taller than the existing due to modern standards of internal head-room and ceiling-mounted services. The low-key design approach would allow the green spaces, trees, bungalows and Mount Clare to remain the key elements in views. The proposed new Club Room building would thus have a negligible impact on the significance of the listed bungalows.
- 12.41 The Heritage Statement concludes that the minor harm caused by the loss of the less significant original estate structures would be more than outweighed by the improvement in appearance of the new buildings and the wider public benefits of the Proposed Development as a whole. The setting of the Danebury Avenue group would undergo some change through the replacement of the four-storey maisonettes on the southern sides of Harbridge Avenue and Danebury Avenue with the new Blocks 'DE', 'F', 'G', 'H', 'I' and 'J'. The existing maisonettes here must be considered to contribute something to the setting of the bungalows, because they are original elements of the estate. However, this contribution is secondary to that made by the

point blocks opposite across Danebury Avenue. Furthermore, the blank brick end walls of the maisonettes in design terms appear indifferent to the bungalows. Although the replacement buildings would be taller, it is anticipated that they would offer fully-articulated, fenestrated façades towards the bungalows, providing a much more humane context. The more welcoming façades would arguably have a modest beneficial effect on the bungalows' setting.

- 12.42 The proposed new Nursery and Children's Centre, and the new Club Room, would cause some change within the setting of Mount Clare. However, the low-rise nature of these new buildings means they would cause no more harm to the setting of Mount Clare than the existing buildings. Indeed, the Heritage Statement concludes that the new buildings, together with the relocation of the bus turnaround, would greatly improve the appearance of this part of the Site. The proposed relocation of the bus turnaround has enabled the massing of the proposed new Club Room building to be kept low, which would allow the green spaces, trees, bungalows and Mount Clare to remain the key elements in views. The proposed new Club Room building would thus cause no harm to the significance of Mount Clare.
- 12.43 There would be some change to the settings of Downshire House and Hartfield House through the redevelopment of the present Nos. 166 & 168 Roehampton Lane with the taller Block 'Q'. From Downshire House, most of Block 'Q' would be screened by one of the student accommodation blocks of Chadwick Hall. Where the upper parts of the new buildings might be visible, they would appear as part of the wider Alton Estate, grouping with the tall point blocks to the south west, and relating to the other new buildings to the south east. Consequently, the impact of the redevelopment on the overall special interest of Downshire House is considered to be very low.
- 12.44 The proposed new buildings would leave the key aspect of the setting of Parkstead House – the uninterrupted views westwards over Richmond Park – intact.
- 12.45 The wider setting of The Bull sculpture would experience some change through the replacement of the existing Nos. 1-14 Portswood Place and the adjacent garages, car park and Danebury Avenue Surgery with the new Nursery and Children's Centre. It was commissioned specifically for the Alton West estate, and thus its setting on the south-eastern side of Downshire Hill with Brockbridge House as its backdrop is considered to make a strong positive contribution to its significance. The low-rise nature of the building, and the surrounding landscaping including new trees, would mean that it would not be a dominant presence within this part of the Site. Instead, it would allow the large green space of Downshire Field to remain the key feature. The Heritage Statement concludes that any harm caused to the setting of The Bull would be very minor.
- 12.46 The development would introduce taller buildings into the setting of the Watchers sculpture but would not impinge on any important views of the

sculpture or alter its relationship with the buildings or landscape of Alton West which it surveys.

- 12.47 Although the new Block 'O' would come slightly closer to the King's Head public house than the present Allbrook House, Roehampton Lane is a sufficiently generous thoroughfare that it is considered that the new building would not be an overbearing presence in the pub's setting. Block A would be set back from Roehampton Lane and would not have an over-bearing presence. The new square would better connect the estate with the historic core of Roehampton and provide good views back towards the pub. Any harm that the development would have as a result of its increased massing would have a less than substantial impact.
- 12.48 The Montague Arms derives little significance from its immediate setting. Its modern neighbour to the east detracts, and, although it is set back slightly from the building line, the building almost fronts Roehampton Lane. It derives no significance from the buildings of the Alton West estate. The demolition of some of the existing estate buildings here would thus cause no harm to the pub's significance. The proposed new Blocks 'A', 'N' and 'O' would introduce a taller built form to the area, intensifying its urban character. However, they would be at a sufficient distance from the pub that their presence would not have a dominating effect. On balance, it is considered that they would have a negligible impact on those aspects of the pub's setting that contribute to its significance. The new village square could be viewed to provide an enhancement to its wider setting.

Impacts on Non-designated Heritage Assets

- 12.49 There may be many buildings and sites in a local planning authority's area that make a positive contribution to its local character and sense of place because of their heritage value. Although such heritage assets may not be nationally designated or even located within the boundaries of a conservation area, they may be offered some level of protection by the local planning authority identifying them on a formally adopted list of local heritage assets.
- 12.50 The setting of a number of non-designated Heritage Assets would be affected by the proposed development.
- 12.51 The setting of Parkstead House Locally Listed Historic Park & Garden would undergo some change but the development would leave the key aspect of its setting- the uninterrupted views westwards over Richmond park intact. The proposed buildings are taller than the existing and would be more visible through the trees when viewed from the west of the house. However, due to the presence of modern extensions to the listed building and the modern perimeter block of student housing, the buildings are unlikely to be seen from the east of the house. The Heritage Statement concludes that any impact on the significance of this non-designated heritage asset would be less than substantial.
- 12.52 The wider setting of Nos. 24 & 26 Roehampton High Street would undergo some change through the replacement of the present Allbrook House and

Roehampton Library with the new Blocks 'N' and 'O'. Although the new Block 'O' would come slightly closer to the western end of Roehampton High Street than the present Allbrook House, Roehampton Lane is a sufficiently generous thoroughfare that it is considered that the new buildings would not be an overbearing presence in the setting of Nos. 24 & 26. The Heritage Statement concludes that any harm would be less than substantial.

- 12.53 The setting of Hartfield House will be affected by Block Q. The Heritage Statement concludes that the buildings of Block 'Q' would be faced in multi-coloured brick, giving them a much more sympathetic material character than the existing concrete and glass structures on the site. Whilst that is considered to constitute an enhancement of Hartfield's setting, there would clearly be some impact from the new buildings' additional height but this would be moderated by their location to the north of the locally listed building, and by their orientation which means that the main view of Hartfield House (from the east) would not be obstructed. The impact is assessed to be less than substantial.
- 12.54 The wider setting of Nos. 5 & 7 Rodway Road would undergo some change through the replacement of the present Allbrook House and Roehampton Library with the new Blocks 'N' and 'O'. Although the new buildings would come slightly closer to the western end of Rodway Road than the present Allbrook House, Roehampton Lane is a sufficiently generous thoroughfare that it is considered that the new buildings would not be an overbearing presence in the setting of Nos. 5 & 7.
- 12.55 It is considered that all elements of the Proposed Development would be sufficiently well screened from the locally-listed buildings of Ibstock Place School by existing buildings and extensive vegetation such that the locally-listed buildings' setting would experience no appreciable change. The Proposed Development would thus have a neutral effect on the locally listed buildings' significance
- 12.56 At up to 8 storeys, the proposed new buildings on Danebury Road would rise higher than the existing maisonettes and introduce a more urban feel to the streets north east of Maryfield Convent. However, it is considered that the new buildings would not affect any aspects of the convent's setting that contribute to its significance, and no harm would be caused.

Allbrook House and Roehampton Library

- 12.57 Objections have been raised to the demolition of Allbrook House and Roehampton Library, notably by the Twentieth Century Society. Allbrook House and the Library are later additions to Alton West. Both buildings are recognised in the Conservation Area Appraisal as having architectural interest but they have not been statutorily or locally listed.
- 12.58 The Twentieth Century Society is of the view that these buildings are of major importance and are worthy of retention as part of this scheme. It considers Allbrook House and the Library to be non-designated heritage assets, which should be retained owing to both their importance and the harm their

demolition will cause to the setting of the surrounding conservation area and the listed buildings across the Estate.

- 12.59 The status of Allbrook House and Roehampton Library is addressed in the Alton Conservation Area Appraisal & Management Strategy. Para 6.9 of this document states:

‘Generally, those buildings that fall outside the conservation area do not have the same architectural rigour or quality of those that are within. There are, however, buildings in the vicinity of this character area - Allbrook House and Roehampton Library - that are of interest in terms of their architectural presence and relationship to the Alton Estate. The presence and connection of these buildings to the north-eastern edge of the estate makes them difficult to go unnoticed - though outside the conservation area, their impact is complementary due to their applied architectural treatment and form, directly linked to the modernist principles established for Alton West, namely monumentality and originality’.

- 12.60 The revised Planning Practice Guidance on the Historic Environment which was published in July 2019 provides clarity regarding the definition of non-designated heritage assets and how they are identified. Non-designated heritage assets are buildings, monuments, sites, places, areas or landscapes identified by plan-making bodies as having a degree of heritage significance meriting consideration in planning decisions, but which do not meet the criteria for designated heritage assets. There are a number of processes through which non-designated heritage assets may be identified, including the local and neighbourhood plan-making processes and conservation area appraisals and reviews and also in the decision-making process. In this regard, Allbrook House and the Library have not, until now, been identified as non-designated heritage assets.
- 12.61 In terms of considering the significance as per paragraph 197 of the NPPF the fact that these buildings were excluded from the conservation area and an application for statutory listing in 2015 was unsuccessful is relevant. The Secretary of State subsequently received two requests to review the decision not to list but concluded that the evidence was not strong enough to consider overturning the decision. Both would be totally lost and a balanced judgement is required as set out in the conclusions to this report, including the overall planning balance.

Summary

- 12.62 The local planning authority has a duty under paragraph 190 of the June 2019 NPPF to identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset). When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation. Any harm to, or loss of a designated heritage asset (from its alteration or destruction, or from

development within its setting), should require clear and convincing justification.

- 12.63 The Alton Estate has a rich and unique heritage and a development on this scale will inevitably impact on the setting of existing heritage assets. This has been set out in detail above. However, it is recognised that the proposed development of the Alton Estate has been conceived from the outset with the aim of minimising harm to the numerous designated and non-designated heritage assets on the Site and in the immediate vicinity as much as possible, whilst delivering the regeneration of the estate. The proposals have been developed in consultation with Historic England. Officers set out below the conclusion on the heritage impacts, the harm resulting and whether that harm is outweighed by public benefits.

Impacts on Conservation Areas and Listed Buildings

- 12.64 Some harm would be caused to the special interest of the Alton Conservation Area through the loss of several original, but unlisted estate buildings of little inherent heritage value within its boundary, and several more in its setting; as well as through the development of buildings of a larger scale in its setting. Those elements of the proposed development that Officers consider would directly affect the conservation area comprise:

- The replacement of the existing maisonettes, shops and garages at Nos. 1-14 Portswood Place, together with the adjacent car park and Danebury Avenue Surgery, with the new Nursery and Children's Centre;
- The replacement of the present Club Room / No. 2A Minstead Gardens and the adjacent bus turnaround with a new building accommodating a new Club Room, Shop and GP Facility; • The relocation of the bus turnaround;
- The reconfiguration and extension of the existing Downshire Field Play Area;
- Landscape works to Downshire Field;
- The replacement of the present No. 190 Roehampton Lane ('Mount Clare Gate House') and the adjacent garages (outside the conservation area) with the new Block M; and
- The replacement of the present Nos. 166 & 168 Roehampton Lane with the new Block Q.

- 12.65 The replacement of the undesignated buildings to the east side of Alton West will make a change to the setting of the Alton Conservation Area and the listed buildings within it. New Block Q introduces larger structures in the Alton Conservation Area itself in the setting of the grade II* Downshire House, although it is considered that this is relatively well buffered and sits in the context of taller grade II listed point blocks. Longer-range impacts on the grade I Registered Park and Garden of Richmond Park are very limited. There will be some harmful impact on the historic environment as a result of the major development towards Roehampton Lane and Danebury Avenue.

- 12.66 The development of the new buildings in Portswood Place would involve the loss of some original elements of the LCC masterplan and would thus cause some harm to the Alton Conservation Area. Whilst there is no objection to the principle of replacing the existing buildings, further consideration should be given to the elevational treatment and the use of more complimentary materials in the proposed Nursery and Children's Centre and the new community building to ensure they sit well alongside the listed bungalows and do not interrupt the relationship between the bungalows and the listed slab blocks. It is recommended that this should be the subject of a condition in the event of planning approval being granted.
- 12.67 Block M would replace No.190 Roehampton Lane which appears to have been erected between 1913 and the 1930s as an additional gate house to Mount Clare. However, the building is of limited inherent aesthetic or historical value. Its architecture owes nothing to that of Mount Clare, and the historical-functional relationship between the two is no longer appreciable. The building contributes nothing to the aesthetic and historical value of the Alton West estate, and might be considered to play a neutral role in the character and appearance of the conservation area. Its demolition would thus cause no harm to the special interest of the Alton Conservation Area. The garages just to the south east of No. 190 Roehampton Lane (just outside the conservation area) were built as part of the Alton West estate to serve the terraced houses on the southern side of Kingsclere Close. However, they are of no particular interest for their design and are of poor visual quality. Their demolition would cause no harm to the special interest of the Alton Conservation Area. The proposed Block 'M' that would replace No. 190 Roehampton Lane and the garages would be arranged over 7-9 storeys, but, by virtue of the building's massing and the fall in ground level to the south west, would present 5-7 storeys to Roehampton Lane. The building would introduce a larger scale of development to this part of the conservation area than exists at present, but its massing has been broken up into several parts, so that when viewed from any particular direction it would not have a monolithic overbearing appearance.
- 12.68 The building would read as part of the wider Alton Estate, grouping with the taller point blocks to the west, and relating to other new buildings to the south (Block 'K'). The new building's architectural character, materiality and colour palette would fit in with the wider regeneration of the eastern part of the Site. Consequently, it is considered that the proposed Block 'M' would have a very limited impact on the special interest of the Alton Conservation Area; any perceived harm would be 'less than substantial' in the terms of the NPPF, but this would need to be weighed against the public benefits of the regeneration as a whole. The proposed Block 'M' would introduce a taller built form to the boundary between the Alton Estate and Westmead Conservation Areas, and a more urban feel to the character of Roehampton Lane. However, Roehampton Lane is considered a sufficiently generous thoroughfare that the new building would not be an overbearing presence in the setting of the Westmead Conservation Area.

- 12.69 Although broadly contemporaneous with other estate buildings, Nos. 166 and 168 Roehampton Lane are of no inherent heritage value and are considered to detract somewhat from the conservation area's special interest. Their demolition would thus cause no harm to the significance of the Aton Estate Conservation Area. Block Q that would replace these buildings comprises three residential buildings arranged on the northern, southern and eastern sides of an open landscaped courtyard on top of an under-croft car park. The western ends of the northern and southern blocks would extend slightly further to the west than the present No. 166. The eastern building, fronting Roehampton Lane, would rise to 6 storeys, whilst the northern and southern buildings would take advantage of the fall in ground level to the west and rise to 8 storeys. The proposed Block 'Q' would have a potential impact on the setting of the Grade II* listed Downshire House. However, this impact would not be as great as that of the recent 4-storey student accommodation blocks (Chadwick Hall), which have urbanised its former garden setting to the north and south such that it now makes a very minor contribution to the special interest of the listed house. The existing new student block to the south of Downshire House would also act to screen most of Block Q. Where the upper parts of the new buildings might be visible, they would appear as part of the wider Alton Estate, grouping with the tall point blocks to the south west, and relating to the other new buildings to the south east. The proposals for Block Q have responded to feedback from the DRP and Historic England. In particular, care has been taken to articulate the elevations with well-defined framing and generous horizontal openings, drawing upon the character of the nearby point blocks of the Alton Estate. At the same time, the materials have been carefully chosen to respond to the brown brick of Downshire House and the recent student housing blocks, as well as fitting in with the wider regeneration of the eastern part of the Site. The massing, form and materials were broadly welcomed by Historic England in May 2018 as responding well to the setting of Downshire House, and the streetscape of Roehampton Lane, and offering an appropriate companion to the point blocks in views from Downshire Field.
- 12.70 The impact of Block Q on the overall significance of Downshire House, and on the special interest of the Alton Conservation Area, would be very low, and Officers consider this would be offset by the design quality of the new proposals as well as the public benefits of the regeneration.
- 12.71 Officers welcome the changes to the treatment of Harbridge Avenue which will allow for the retention of all but four of the existing trees. Harbridge Avenue was historically a private, tree-lined drive approaching Roehampton Court that became Maryfield Convent in 1927. The original trees were retained by the LCC within their original masterplan for the Alton Estate, and set within a landscaped scheme of stepped beds. However, almost all of the original trees had been removed by 1964, and a new avenue of lime trees was planted within a redesigned landscape of sloping granite setts. Objections were raised during consultation including by Historic England to the removal and replacement of the existing trees and landscape on the grounds that it would harm the conservation area. The Heritage Statement

Addendum suggests that it is not proposed to retain the setts. Officers consider that the existing setts contribute to the character of this part of the conservation area and should be reused in future streetscape works. It is recommended that this should be addressed by a condition in the event of planning approval being granted.

- 12.72 Overall, it is considered that the landscape proposals would enhance the special character of the Alton Conservation Area by responding positively and sensitively to the LCC's version of the Arcadian ideal. Critically, the role of the open space as a key part of the original masterplan, and as the main setting of the slab and point blocks, would be maintained. The benefits of this approach would outweigh any localised harm from the relatively modest expansion of the hard surfacing along Danebury Avenue.
- 12.73 The proposed development would undoubtedly engender a more urban feel to the character of Roehampton Lane, and thus to the settings of the adjacent Roehampton Village and Westmead Conservation Areas, and the various statutorily and locally listed buildings to the east of the Site. It is considered that this would be 'less than substantial' in the terms of the NPPF but would nevertheless need to be balanced against the public benefits of the scheme. The impacts of the development would be offset by the design and materiality of the new buildings and landscaping. In this respect, Officers have worked with the applicant's design team to retain as many as possible of the existing trees, secure replacement tree planting and ensure a materials palette which is reflective of the conservation areas. These would be secured by condition or legal obligation as appropriate.
- 12.74 The Development would introduce buildings of a larger scale into the setting of Parkstead House. The replacement buildings would be lower than Allbrook House and not so prominent, and their natural tones and materiality would be more sympathetic. Where the uppermost storeys of the new blocks might be visible, they would be backed by, or sit amongst, the existing point and slab blocks, and read as part of the wider Alton Estate. From the grounds around Parkstead House, the replacement buildings would appear as well-spaced pavilions behind the tree screen, with high quality brick façades broken up by generous recessed areas and windows. In both cases, any harm is considered to be 'less than substantial' in the terms of the NPPF but would nevertheless need to be balanced against the public benefits of the regeneration as a whole.

Impact on Alton West Registered Park & Garden

- 12.75 The designation of Alton West as a Registered Park & Garden has placed greater focus on the landscape and in particular, the importance of Downshire Field. The key heritage value of this open space derives from the way the LCC architects kept a large expanse of grassland that ran almost uninterrupted from the garden of Downshire House past the point and slab blocks to Danebury Avenue and up the hill to Mount Clare. In this way, the original masterplan for the estate reinterpreted the 18th century Arcadian ideal

that helped attract people to live here in the first place. The character of this landscape may reflect the history of the Site's private owners, but above all a product of the LCC architects' interpretation of the English landscape tradition – albeit with some later alterations such as the introduction of additional trees and car parking. The 2014 masterplan consultation gave rise to proposals for a variety of potential interventions in Downshire Field, reflecting its location at the heart of Alton West and the aspiration to improve the outdoor amenity of the Estate.

- 12.76 Historic England has encouraged the reopening of views across the estate and to re-establish the visual relationship between Mount Clare and Downshire House and has expressed disappointment that this has not been included in the application, with the exception of the relocation of the bus turnaround. It is noted that following further design development, and in response to consultation, the landscape proposals have been refined so as to adopt a more low-key and sensitive approach that aims to enhance the Site's naturalistic parkland beauty.
- 12.77 Amendments have been made to reduce the extent of tree removal on biodiversity and environmental grounds in response to objections received during consultation on the planning application. Very few of the existing trees would be removed from Downshire Field itself and from in front of Mount Clare (and only where absolutely necessary), and additional trees would be planted on the western side of the field and on Danebury Avenue in front of the new buildings. It is considered that an appropriate balance has been struck taking account of the comments received and the views expressed by Historic England.
- 12.78 The reasons for the relocation of the existing bus turnaround and bus standing area to reduce the impact on views across Downshire Field and to accommodate the new community building at Portswood Place are understood. Whilst it is accepted that the proposed location in the vicinity of Shaldon House would have a less direct impact on the setting of Downshire Field, it should also be noted that the new location is within the boundary of the Registered Park & Garden, is significantly larger than the existing turning area and would require the removal of a number of trees. It is considered that the proposals for the design and treatment of the bus turnaround should be reviewed to minimise impacts on the Registered Park & Garden, this is not withstanding the drawings submitted and gives recognition to the phasing of the development. It is recommended that this should be the subject of a condition in the event of planning approval being granted.
- 12.79 The designation of the Registered Park & Garden has been fully assessed in the ES Addendum. The London Gardens Trust has objected on the grounds of impact on the RPG, particularly in relation to the impact on the historic landscape and openness of Downshire Field. Taking into account these comments, it is considered that further review of the landscaping proposals for Downshire Field and paddock area in front of Mount Clare is required to minimise harm to the Registered Park & Garden. This relates in particular to

the introduction and treatment of new footpaths, the design and integration of the children's play area and outdoor gym equipment, new landscape features, location of seating and the treatment of the area around The Bull. The preparation of a Conservation Management Plan for Downshire Field will also be required. Officers believe this would address several of the concerns raised by the London Gardens Trust and it is recommended that this should be the subject of a condition (or conditions) in the event of planning approval being granted.

- 12.80 Whilst it is accepted that the harm caused to a small part of the Registered Park & Garden by the removal of trees, landscaping and the existing shuttered concrete retaining wall to accommodate the development of Block M could be considered to be 'substantial harm' to a designated heritage asset in the context of the NPPF, it is considered that this should be seen as part of the scheme overall. In this context it is concluded that- for the reasons set out above- the proposals result in 'less than substantial harm' to the Registered Park & Garden when taken as a whole and it is necessary to balance this against the wider public benefits of the scheme. The further development of landscape proposals for Downshire Field would provide the opportunity for further consideration to be given to the mitigation of impacts on the Registered Park & Garden, for example through enhancement of the setting of The Bull which is an important designated heritage asset. This would be consistent with Paragraph 192 of the NPPF which states that in determining applications, local planning authorities should take account of the '*desirability of sustaining and enhancing the significance of heritage assets*'.

Impact on Richmond Park Registered Park & Garden

- 12.80 The Development would introduce buildings of a larger scale into the wider setting of the Richmond Park Registered Park and Garden. This has been fully assessed in the ES. Given the size of the heritage asset, the extent of its setting, the fact that the new buildings would be concentrated in a direction where there are already relatively-tall buildings, and the fact that views of them would be filtered through existing mature trees, the impact on the significance of the RPG as a whole would be considered low.
- 12.81 An objection has been received from the Royal Parks who would welcome any reduction in height and massing of the proposed buildings to minimise impacts on the open sky space within and around Richmond Park. The Royal Parks accept that as far as can be determined from the visual representations in the ES, it would appear to have a minimal effect on the views as assessed from 3 points in Richmond Park. However, whilst the Roehampton Estate is screened from the Park by the boundary screen planted on Richmond Park golf course, the Royal Parks strongly request that a contribution is made by the Borough or Developer to pay for additional tree planting to enhance the shelter belt treescape.

Proposed Demolition of Allbrook House and Roehampton Library

- 12.82 Allbrook House and Roehampton Library have been considered as non-designated heritage assets, the Twentieth Century Society has objected to the demolition of these buildings on the grounds that they should be identified as important non-designated heritage assets
- 12.83 These buildings do not form part of the original masterplan and are located outside the boundary of the Alton Conservation Area. Neither building is statutorily listed and a study prepared by Alan Baxter Associates (2015) for Wandsworth Council concluded that the buildings are of insufficient interest to warrant listing and an application to Historic England in 2015 to list the buildings was unsuccessful. Historic England's assessment found that the buildings did not meet the criteria for listing and recommended that they should not be listed. This supports the consideration that their significance as non-designated heritage assets is low.
- 12.84 Demolition of these buildings is necessary to deliver the development proposals. As non-designated heritage assets it is necessary to balance their loss against the wider public benefits of the regeneration proposals. In the event that planning permission is approved, it is recommended that the recording of these buildings prior to demolition should be secured by condition.

Policy Compliance

- 12.85 It is considered that the proposed development is in accordance with Core principle 5 of the adopted Roehampton SPD, which outlines the need to respect and conserve the heritage that defines the Alton Estate and sets out guidance for new development, in particular:
- A. The development has sought to respect and enhance existing heritage assets and their settings
 - B. The setting of the conservation area would be enhanced by the redevelopment of poor-quality housing stock and built form in the Roehampton Local Centre; the area between Roehampton Lane and Danebury Avenue; Portswood Place Important Local Parade and Mount Clare.
 - C. The scale of buildings responds sensitively to the special character and qualities of the site and its context, including the conservation area, listed buildings and Richmond Park.
 - D. Taller buildings are proposed in less sensitive areas where this reflects an established scale and where there is a clear urban design rationale. This has included optimising the potential of sites within Roehampton Local Centre and announcing this an important local service centre; responding to the scale of larger built form in the Danebury Avenue area and providing a strong edge to Roehampton Lane.
 - E. Where possible, the development has been designed to conserve and better reveal and enhance the positive qualities of the heritage assets across the area.

- 12.86 Based on the submitted information and taking account of the representations that have been received, officers are of the view that whilst some harm would be caused to certain aspects of significance of the historic environment as a result of the development, that the overall harm to designated and non-designated heritage assets would be 'less than substantial' in the terms of the NPPF.
- 12.87 The local planning authority must therefore weigh the potential harmful impacts of the scheme against the public benefits to be delivered as a result of the proposed development. This is addressed further in the Planning Balance.

13. Arboriculture and Ecology

- 13.1 The Alton Estate falls into the Arcadian Thames section of the Green Grid, a landscape infrastructure network of interlinked, multi-purpose open spaces, which incorporates the biodiverse wetlands of Barnes and the large open spaces of Richmond Park, Wimbledon Common and Putney Heath. The rolling landscape is habitat to a range of species and age groups of trees, including a number of veteran trees and important specimens, as well as large stands of mature trees.

Arboriculture

- 13.3 An Arboricultural Impact Assessment and Survey of existing trees on site has been undertaken by Tim Moya Associates which assessed all existing trees for quality and longevity, and the impact of the proposed development. This information has been considered within the context of the overall site masterplan, approach to development and site levels.
- 13.4 There are a total of 518 trees within the Application Site and the applicant advises that every effort has been made to retain individual trees and only remove trees that are either dying / poor quality or must be removed to due to direct conflict with the development. The June 2019 proposals involved removing 189 individual specimens, plus selective removals from 9 groups of trees¹⁷. Approximately 79% of the trees to be removed are classified as category C or U quality specimens and none of the trees to be removed are classified as category A.
- 13.5 Objections have been raised to the proposed development on the grounds of the loss of existing mature trees and the impact this would have on biodiversity and the character of the area, in particular the loss of trees in Harbridge Avenue, the existing green space outside the Library, the new bus turnaround area and on the Roehampton Lane frontage.
- 13.6 Amendments have been made in response to consultation responses. These changes have reduced the number of trees to be removed from 189 to 160 trees as a consequence of the retention of 29 additional trees along Harbridge Avenue. This includes the retention of an additional 12 B-Category trees including all the Lime trees along Harbridge Avenue with the exception of one.

The reduced tree removal numbers are coupled with new tree planting which includes 169 trees in communal gardens and private spaces and 564 public trees (a net gain of 573 trees).

- 13.7 There is a risk of harm to the retained trees in Harbridge Avenue during the proposed development works. Therefore, it will be necessary for tree protection measures and methods of working to be appropriately specified that consider these trees in terms of their root protection areas (RPAs) and the stem/crown spreads, this would be secured by planning condition were permission to be granted.
- 13.8 The relocation of the bus turnaround will require the removal of 15 trees. The Arboricultural Assessment Addendum states that removing these trees and replacing them with 23 new trees helps to secure long-term public realm benefits as provided by trees. The existing trees that are proposed for removal have a remaining life expectancy likely not exceeding 20 years, which reflects the prevailing Category C qualities of these trees.
- 13.9 It is considered that the proposed tree strategy will strengthen the masterplan and the trees will become key features and focal points within each character area. A mix of native and non-native tree species will define the key character areas, whilst providing biodiversity and seasonal interest across the scheme. The tree planting strategy aims to provide and connect wildlife corridors across the site linking the 'Parkland' Quarter (Downshire Fields) with the 'Urban' Quarter as well as providing wider green connections between Richmond Park, Putney Heath, Barnes Common, and The River Thames. The tree palette has been developed in consideration of the following:
Appropriateness to place; Aspect and direct sunlight available; Biodiversity value; Longevity; and London Borough of Wandsworth (Enable) input.

Summary on Arboriculture

- 13.10 The proposals seek to retain existing trees where feasible given the broad scale redevelopment and changes to levels within the site boundaries and the complex nature of underground services (existing and proposed) tree loss has occurred. The number of trees to be removed has been reduced in the revised scheme.
- 13.11 The landscape plans show the general location of new street trees and their size. Trees shown vary from small specimen (2- 3m high) to large feature trees (8-10m) Large trees will be planted at a size of 45-70cm girth, medium trees at 25-40cm girth and small trees 14-20cm girth, the exact species is to be secured by condition.

Ecology

- 13.12 Core principle 8 of the Roehampton SPD states that development proposals will be required to demonstrate that they will result in the maintenance and enhancement of biodiversity and habitats. This will be informed by an Ecology Survey and include the following:

- integrating planting and habitats within the new Downshire Field landscape along circulation routes and public spaces
- incorporating Sustainable Urban Drainage Systems (SUDS) in the new Downshire Field in a form that supports drainage and provides biodiverse areas
- prioritising native species (with support planting from some non-native species that have a landscape and ecological value)
- increasing habitat availability through the addition of nesting bat and bird boxes, log piles, insect boxes and other features in appropriate locations
- managing any new lighting between Richmond Park and the SPD area in order to manage dark areas for wildlife
- a robust biodiversity management plan.

13.13 A desk study and an Extended Phase 1 Habitat Survey were undertaken in August 2017 to assess the ecological importance of habitats on the Site and identify the potential of habitats to support protected and notable species. The aim of the appraisal was to identify potential ecological constraints, to provide recommendations for further surveys, and opportunities for mitigation and compensation. The nearest statutory designated site is Richmond Park Special Area of Conservation, which is adjacent to the Site, with Wimbledon Common Special Area of Conservation located 750m east of the Site. The desktop study and Extended Phase 1 Survey identified suitable habitat for the following species; Amphibians; Bats; Badgers; Birds; and Invertebrates.

13.14 Due to the identification of ecological features which have the potential to support species of conservation concern, further ecological surveys were recommended for great crested newts, bats and invertebrates in order to establish their presence or likely absence. These surveys were undertaken in May 2019. The Great Crested Newt Assessment that due to no waterbodies being identified on Site, lack of suitable terrestrial habitat, poor connectivity and significant barriers to dispersal, Great Crested Newts are not anticipated to be directly or indirectly affected by the proposed development. Therefore, they are not considered to be an ecological constraint. The Invertebrate Survey recorded a relatively small number of species due to the fact that most of the site is managed as low cut grassland and the low biodiversity of this habitat type. It is considered unlikely that many of the scarce or unusual Richmond/ Wimbledon species are breeding in the Alton Estate site. On the off-chance that stag beetles (which have hidden subterranean larvae) are ever found on the Alton Estate, suggestions are made regarding creation of stag beetle breeding habitat, and transference of any live larvae. Bat activity surveys were undertaken between June and October 2017. Low levels of bat activity were recorded with the exception of the July dusk transect which recorded higher levels of activity. It is recommended that bat foraging and commuting habitats are maintained within the site in particular lines or groups of mature trees. If habitat clearance is required, it should be compensated for on at least a like for like basis ensuring the functionality of the habitat for bats is maintained. Permanent lighting should be designed to ensure the quality of

the foraging and community habitat is maintained and opportunities for the enhancement of habitats are identified including provision of bat boxes on buildings and retained trees and landscaping to be designed and managed to maximise invertebrate biomass and diversity and foraging opportunities for bats.

- 13.15 Mitigation measures are recommended for works on-site (including vegetation clearance), to avoid contravention of relevant legislation, including undertaking vegetation clearance outside of the nesting bird season. A sensitive approach to lighting and retention of mature trees is recommended. Opportunities for compensation and enhancement of features of nature conservation interest include green walls, climbers and biodiverse roofs; planting wildflower areas; bird and bat boxes; and creation of log piles.
- 13.17 The development proposals seek to create a landscape with a series of closed loop systems and a number of opportunities are identified to enhance the site wide biodiversity and ecology and to mitigate the impact of the proposed development. These include developing designs that: provide a network of trees and green spaces forming potential wildlife habitats and green corridors; promote sustainable planting by developing planting designs that are appropriate for their location, including the availability of sunlight and water; incorporate native plant species into the planting designs across the masterplan including the use of native shrub planting to provide nesting opportunities for birds; establish a series of living roofs on the buildings across the site, to aid biodiversity and establish a range of habitats.
- 13.18 The incorporation of bird and bat boxes and the living roofs is proposed, and provision made for these within the structures and access arrangements of each building. The biodiverse roofs will comprise areas of bare ground, sedum and wildflowers (including species which are notable within London such as Tower Mustard *Arabis glabra* and London Rocket *Sisymbrium irio*). This will mimic the Habitat of Principal Importance 'Open Mosaic Habitat', which together with the provision of log piles and sandbanks will provide opportunities for a range of faunal species, such as invertebrates upon which birds and bats will feed. To complement the vegetation, habitats for invertebrates, birds and bats will be incorporated into the landscape and structures at ground floor, and roof levels. By reusing timber from felled trees throughout the public realm, 2 Stag beetle loggeries and 18 log piles are proposed together with 42 small log piles on the biodiverse roof space.
- 13.19 The ES (Chapter 12 Biodiversity) assesses the likely significant effects of the development on the environment in respect of biodiversity and ecology. The ES concludes that the Proposed Development would not have an effect on the nearby local (including loss of existing trees), regional and national protected sites. Whilst there would be moderate adverse effects on habitats and bat roosting and minor adverse effects on bat commuting and foraging during the construction phase, it concludes that the proposed mitigation measures will mitigate any residual effects. During the operational phase,

effects are less pronounced, albeit moderate or minor adverse effects would be caused on habitats and bat commuting and foraging. However, the ES concludes that the proposed mitigation measures will ensure that these adverse effects are addressed, and minor beneficial effects secured.

- 13.20 The Habitat Regulation Screening Assessment concludes that there will be no Likely Significant Effects whether alone or 'in combination' on the qualifying features of Richmond Park Special Area of Conservation (SAC) or Wimbledon Common SAC. No further assessment, by way of an Appropriate Assessment (Stage 2 of the HRA), is considered necessary.
- 13.21 An updated Bat Survey Report was submitted with the ES Addendum in March 2020 which relates to Phase 1a. The building inspections and emergence and re-entry bat surveys did not record any evidence for roosting bats. Recommendations made in this report in regard to buildings supporting bat roosting potential (namely Allbrook House and 190 Roehampton Lane) and the removal of trees supporting low bat roosting potential (if required) will ensure that the conservation status of local bat populations will be fully safeguarded under the scheme.
- 13.22 Whilst not objecting to the proposed development, LB Richmond has requested that a Biodiversity Policy for the site should be devised (and revised at appropriate periods in time for perpetuity) as well as a Landscape and Environmental Management plan (and revised at appropriate periods in time for perpetuity). This should prioritise priority species and habitats; a full Landscape plan should consist of proposed species, specification and maintenance and a full ecological enhancement plan should be devised as per the recommendations from Ecological Appraisal and Species surveys, along with a maintenance programme. This should be evidenced by a plan showing enhancement type, specification, species, location, aspect, height (where necessary) on which the Wandsworth Ecology Officer would be consulted as information is submitted. This would be secured by condition.
- 13.23 An objection has been received from the Royal Parks. Whilst the Royal Parks accept that with regard to biodiversity that the bulk of the development will have little direct impact on Richmond Park, they remain concerned with certain assertions made in the ES about the impact of future visitors to Richmond Park. In particular, the statement that 'It should be noted that access to Richmond Park SAC and Wimbledon Common SAC is encouraged and resources are available to ensure recreational use is managed appropriately'. Richmond Park SAC/SSSI is operated by the Royal Parks charity on behalf of the Secretary of State for DCMS. The resource to manage this space has been significantly challenged in recent years at a time when visitor usage has doubled in the period 1996 to 2014 to some 5.5million visitors per year (not including through vehicular traffic using the park roads as short cuts). The Royal Parks receives no contribution from surrounding local authorities whose residents benefit from the recreational and ecological services provided and dispute the research that shows people are unlikely to

walk more than 500m to access recreational space. A combination of rising visitor numbers, changing demographics, together with the effects of climate change and pests and diseases, is putting huge pressure on Richmond Park, causing detrimental impact to feature of interest by increased usage. The Royal Parks therefore strongly disagree with the conclusion that the development will have no detrimental impact on Richmond Park and urge the Local Planning Authority to consider some mitigation by supporting the Royal Parks in funding and undertaking some of the suggested works identified in the ES.

Urban Greening

- 13.24 The Draft London Plan (2019) seeks new developments to contribute to the greening of London by including urban greening (Policy G5 Urban greening) as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage. The urban greening calculation has been amended in the DAS Addendum based on the revisions to the design post submission and further guidance which has become available from the GLA. The change in existing low ecological amenity grassland areas to wildflower meadow and species rich grassland, native planting as well as providing extensive habitat creation to roof tops means the proposed redevelopment is a high achiever in the Mayor's target. The existing and trees along with new trees provide substantial stormwater retention, reduce CO² and help the reduce the heat island effect in London and urban greening has been considered from inception of the design process. It is recommended in the Draft London Plan that Boroughs develop an Urban Greening Factor (UGF) to identify the appropriate amount of urban greening required in new developments. In the interim, the Mayor recommends a target score of 0.4 for developments that are predominately residential, and a target score of 0.3 for predominately commercial development. The proposed development has a score of 0.88. This exceeds the benchmark by 0.48, which represents a high level of performance. This score should be reviewed throughout the phased development process as a benchmark for design development.

Summary on Ecology

- 13.25 The ambition of the Masterplan to promote biodiversity objectives is welcomed. However, the DRP has highlighted the need for the applicant to give further careful consideration to the ecological value of the landscape and in order to maximise the biodiversity experience, suggest considering evergreen and indigenous species in the courtyards as well as in the public areas. The seasonality of landscape is very important as a way for new plantings to make a positive contribution to the ecosystem of the area, being more resilient throughout time and the change in form, scale and colour also serves to bring variation in the way people experience and perceive the

spaces. Given the proximity to Richmond Park, the opportunity to attract wildlife is considered by the DRP to be both exciting and ground-breaking.

- 13.26 Whilst having been contacted throughout the process by the project ecologists, the Council's Parks & Biodiversity Manager still has some concerns about gaps in what has been provided with regard to ecology and ecological implications of development. Along with these concerns and given that there may be a time delay before details are finalised on this scheme, there is a strong possibility that the ecological "base line" could change in the interim. It would therefore be more appropriate to finalise and secure mitigation and enhancement for biodiversity via a series of conditions that deal with what is required prior to demolition and site clearance & pre commencement of construction. A whole site biodiversity strategy demonstrating provision of, and management (in perpetuity) for, habitats to be created, maintained and / or enhanced to demonstrate no net loss of biodiversity and measurable biodiversity net gain. These conditions are required to ensure compliance with London Plan Policy 7.19 and Policies PL4, DMO4 and DMO5 and also with the mitigation hierarchy detailed in the NPPF.
- 13.27 The urban greening factor score should be reviewed throughout the phased development process as a benchmark for design development.

14. Open Space, Play and Public Realm

- 14.1 Policy PL4 of the Core Strategy and DMPD Policies DMO1 and DMO3 resists the loss of areas of open space and green infrastructure and seeks to enhance the quality and accessibility of existing open spaces. Core Principle 4 of the Roehampton SPD seeks deliver several open space objectives, including avoiding a net loss of public opens space, maintain the openness and improve Downshire Field, enhance sports and play facilities, create a network of green infrastructure and retain trees where possible.
- 14.2 The Council's Open Space Study (February 2007) and provides a comprehensive assessment of the availability of various forms of open space across the borough and Roehampton & Putney Heath ward. The assessment identifies that there is 309 hectares of open space, of which 166 hectares is public parks, in the Roehampton and Putney Heath ward. This is the highest overall amount of open space provision in all wards in the borough and the second largest amount of public park provision. Roehampton and Putney Heath ward's public park provision equates to 12.77 hectares per 1,000 population, which demonstrates the wider area is relatively well served by open space and is significantly above the borough average of 2.45 hectares per 1,000 population. The Open Space Study also confirms that these open spaces are well used.
- 14.3 Parts of the Application Site, however, are located beyond the 800m catchment area identified in the Open Space Study as being a reasonable distance from areas of open space. The Council's SSAD subsequently confirms that the Application Site is partially located within an Open Space

Deficiency Area. Applying the calculation set out in Table 4 of the Council's Planning Obligations SPD and the Wandsworth Population Yield Calculator, a total of 4,042sqm¹² of additional open space would be required. The SPD does also acknowledge that the quality of the open space that is proposed will be taken into account.

- 14.4 Core Principle 4 of the Roehampton SPD states that development should deliver high-quality outdoor recreational facilities throughout the area. In particular, the SPD states that:
- There must be no net loss of public open space as a result of development proposals and the council will seek opportunities to extend existing provision wherever appropriate.
 - Developments will be required to deliver and make an appropriate contribution towards the enhancements of sports and play facilities. This will be achieved through improvements to the setting of the existing Sport and Fitness Centre; incorporating new public outdoor sports and play facilities within Downshire Field; provision of new children's play facilities (10 sqm of new play space per child) in Roehampton Local Centre, the Danebury Avenue housing area and in Downshire Field and providing new opportunities for contact with nature.
- 14.5 The NPPF requires local authorities to meet identified needs for open space, sport and recreation. It resists building on existing open space, sports and recreational buildings and land unless demonstrably surplus to requirement or replaced by equivalent or better provision in terms of quantity and quality in a suitable location. A London Plan priority is to provide access to good-quality children's play space (Policy 3.16) and to increase participation in, and tackle inequality of access to, sport and physical activity in London, particularly among groups/areas with low participation (Policy 3.19). The council's Local Plan Policies (CS Policy PL4 and DMPD Policy DMO1) provide for the protection and enhancement of open spaces, including smaller areas not shown on the Proposals Map.
- 14.6 The requirements for open spaces in new development are set out in DMPD Policy DMO3, including the preference for on-site provision of open space in larger new developments. According to the Wandsworth Open Space Study (2007) the Roehampton ward has the lowest population density per hectare in the borough and the highest amount of open space per 1,000 population (23.78 ha). The northern part of the Roehampton ward is, however, identified as an area deficient in public parks (taking into account severance issues created by roads and railways). Improving access to public open space and improving the quality of existing provision will therefore be key to meeting the recreational needs of existing and future residents.
- 14.7 Re-provision of open space should be at least at the same level as the existing, taking account of the needs of any increase in the proposed population relating to the new development. The SPD recognises that the

potential of Downshire Field as an amenity is not being fully realised. It states that the landscape could be significantly improved and more directly linked to Richmond Park, as well as providing new outdoor recreation opportunities to improve its usability and quality of life for residents.

14.8 Core Principle 6 of the Roehampton SPD seeks to upgrade and activate the public realm. It states that existing streets, public spaces and pedestrian links will be upgraded so they are more convenient and usable.

14.9 From project inception the approach has been to create a greater variety of open spaces with unique but complementing characters. The proposed development will provide new public spaces and enhance existing open space, including:

1. **The Village Square** – Will replace the undefined village green in the Danebury Centre with a new Village Square with a variety of soft and hard landscaped areas and seating / level changes and an all age play space that can be used for a variety of purposes, including hosting events or for relaxation. This amenity space will be separated from Roehampton Lane by deep planters and a variety of high-quality and ornamental trees;
2. **Downshire Field** – Will retain and improve Downshire Field in its current open field form as well as enhancing and enlarging the existing play space to be suitable for children of all ages. A trim trail suitable for all age groups, with support exercise equipment that use natural materials (including recycled wood), and incidental play facilities, such as boulders for climbing will be installed around the open space;
3. **Alton Activity Centre** – Will replace the poor quality, under-utilised children’s play space facilities with limited access arrangements at the Alton Activity Centre with new playspace facilities and a multi-use games area for children of all age groups that will be made accessible to the wider community on a daily basis;
4. **Courtyard Spaces** - Will create communal courtyard areas within curtilage of the blocks to provide shared amenity spaces and doorstep play for residents to use;
5. **Pocket Green Spaces**- Replace poor-quality and uninviting public realm with high-quality, multi-use public realm and pocket spaces that are safe, more legible and accessible and provide a clear gateway to the Estate; and
6. **Danebury Avenue** – Will upgrade the section of Danebury Avenue between Portswood Place and the main intervention area with streetscape improvements.

14.10 A comparison of existing and proposed open space is presented in the following table. This indicates that there would no net loss of public open space and a net increase overall in the amount of open space. It is also noted that 70% of the application site comprises open space.

Table 9: Comparison of Existing and Proposed Open Space and Public Realm provision

	Existing (sqm)	Proposed (sqm)

Downshire Field (excluding Play Space)	45,415	43,976
Downshire Field Play Space	987	1,680
Alton Activity Space	2,100	2,169
Youth Centre MUGA	430	0
Amenity Space	12,251	8,391
Communal Space	2,382	7,200
Public Spaces	708	2,925
Streetscape	19,177	22,008
Total	83,460	88,349

14.11 The open space at Downshire Field measures about 4.9 hectares in area and offers a high-quality resource for existing residents. The enhancement of Downshire Field forms a key element of the proposals. Previous feasibility proposals included intensive landscape works, but it was decided through consultation with residents this was not appropriate and instead a sensitive and enhancement works is proposed. Key proposals include: -

- a Resin bound loop path network for cyclists and pedestrians including distance markers;
- Timber trim trail;
- Open cut Downshire Field lawn (used for events and general residents and community use);
- Downshire Field Play Space,
- Naturalistic play, 0-11+ years old.
- Perimeter planting and meadow with fencing around play space.
- Wild-flower meadow with picnic seating opportunities and timber trim trail stations; and
- Thermoplastic line markings to denote distance on the footpath.

14.12 The loss of existing amenity space is compensated for by new communal landscaped spaces. New amenity spaces provide high quality seating areas, doorstep play, planting and lawn space. The existing streetscape is low quality. There is an increase in streetscape area which is due to the provision of wider footpaths and the integration of extensive tree and understorey garden bed planting. Public seating is provided every 50m and improved pavement levels and surfacing ensures all abilities can now walk the streets without trip hazards. The current Estate lacks a quality public square or green. The proposed masterplan includes a new vibrant public community space surrounding the Block A community facility. This includes the Village Square and the community hall plaza. The increase in public amenity space offers an area for the estate and wider community to use. The Village Square is designed with all year and daily flexibility ensuring events, markets, screenings and lunchtime uses. The square is connected to the library and facilitates outdoor learning on the square terraces and lawn.

Play Provision

14.13 The analysis of existing play spaces in the local area set out in the Open Space Study reveals a deficiency in children's play space provision for the various age groups, including:

- For under 5s there is no doorstep play provision in the surrounding area.
- For ages 0-11 there is some play provision in the surrounding area that is within an acceptable walking distance. Richmond Park and Putney Heath are located just over 400m away from the boundary of the site which have expanses of lawn. The playground at Downshire Field is on the edge of the 400m maximum distance south from the site. While this is an acceptable distance, it would involve children having to travel along very busy roads to get to these facilities.
- Ages 12+ are well provided within the local area in terms of open space. There are playing fields immediately adjacent to the site in Roehampton Recreation Centre, with further facilities of play areas and sports courts located in Roehampton Playing Fields. A dedicated outdoor youth space is not provided within the application boundary. This provides approximately 1025m² of youth (12+) play requirement. In addition, works to update a MUGA facility together with the introduction of new play equipment has been implemented at Witley Point which is within 800m of the site.

14.14 The proposed scheme includes communal amenity spaces in every residential block with integrated doorstep play, lawn and planting, providing areas for community interaction and socialising. The use and visual aspect of Downshire Field has been improved with the expansion of the Downshire Field Play Space, the inclusion of wild flower meadow to the field, the creation of pocket lawn spaces with seating, improved footpath network with trim trail stations and the addition of rain gardens along Danebury Avenue opposite the Portswood Place Children's Centre. The Downshire Field Play Space area has been increased during design development following consultation with the community including the users of the Roehampton Base, and after reviewing the existing play space requirement, which was deemed not fit for purpose. The new facility is a naturalistic play space which responds to the context. It will be an asset for the residents of the estate and for the wider community. Downshire Field has been enhanced to include more sun/ shade wildflower meadows, an improved path network, and well-defined picnic areas. The loss of the existing MUGA from behind the Holybourne Avenue youth centre has been compensated for by the expansion of the Alton Activity Centre and Downshire Field Play zone area. Downshire Field also includes a shared footpath with running distance markers and timber trim trail equipment. The Alton Activity Centre includes a new half sized MUGA with flexible use for skateboarding. Existing amenity space site-wide includes pocket green spaces to picnic and play as well as existing sloped landscapes. Existing amenity space is not well located in relation to residential blocks and mainly confined to the periphery of the application area.

14.15 The Shaping Neighbourhoods: Play and Informal Recreation, Supplementary Planning Guidance (SPG), of September 2012 provides a benchmark of 10 sqm per child. The requirement for play space provision is set out in the following table using the GLA Population Yield Calculator (v3.2). This

indicates that the level of provision exceeds the required quantum for all age groups. The development proposals also include provision for enhancement of 3087 sqm existing play space within the application boundary.

Table 10: Calculation of Play Space Requirements

	Requirement	Provision
Doorstep Play (0-4years)	532	1170
Local Play (5-11 years)	346	648
All Ages Play (12-17 years)	113	425
	991	2243

Summary on Open Space, Play and the Public Realm

14.16 Consistent with the objectives of the Roehampton SPD, the landscape and public realm the proposed development will deliver:

- opportunities to extend existing provision to accommodate changes in the future population and improving its quality, usability and accessibility to promote a healthy life-style for residents and encourage social interaction;
- a green infrastructure network that permeates through the estate and connect surrounding green spaces;
- enhanced the biodiversity value of the open spaces; and
- an increase the amount of semi-private communal space to encourage social cohesion within the blocks and to provide residents with a perceived sense of ownership of their amenity space which can be used safely and frequently.

14.17 The constraints of the existing buildings, location of the developed areas across the estate and the development parameters set out by the Roehampton SPD mean that opportunities for new areas of open space area limited. However, consistent with Policy DMO1, the Proposed Development avoids a net loss of publicly accessible open space and delivers quantitative and qualitative improvements to the existing open space on the Application Site to address security concerns and encourage these spaces to be used more by residents.

14.18 There would be a net increase in the combined amount of useable open space, public play space provision and public realm (from 83,460 sqm to 88,349 sqm) and a significant increase in the amount of useable semi-private communal amenity space on the Application Site (from 2,382sqm to 7,198sqm). The Proposed Development would not meet the open space calculation set out in the Planning Obligation SPD. However, the proximity other areas of open space, including Richmond Park and the wider availability of open space found in the Roehampton and Putney Heath ward, combined with improvements to the quality and the accessibility of the existing open space on the Application Site would diversify the range of open space and

amenity space within the Application Site. The open space proposals will offer residents with more choices of useable and better quality communal amenity areas that will encourage greater usage by existing and new residents and the wider community in Roehampton. When weighed against the wider regeneration benefits of the scheme, the amount and quality of open space being delivered as part Proposed Development is acceptable.

- 14.19 Play space provision exceeds policy requirements in all age categories. However, provision for under 5s comprises largely doorstep play within communal courtyards. Consideration should be given to the provision of a play space for under 5s in the vicinity of the Nursery and Children's Centre at Portswood Place as part of the further development of proposals for Downshire Field to minimise impacts on the Registered Park and Garden. Further design development of play spaces should be undertaken in consultation with children and young people on the estate.
- 14.20 As highlighted by the DRP, the success of such extensive landscaping will be dependent on a strong maintenance and management strategy and the availability of necessary funding. In the event of planning permission being granted, a condition is recommended requiring the preparation, implementation and monitoring of a Landscape Management and Maintenance Plan which must include how this would be funded in perpetuity.

15.Highways and Transportation

- 15.1 Core principle 7 of the Roehampton SPD relates to improvements to access and connections. The SPD states:
- A. New pedestrian and cycle connections will be provided to ease movement throughout the SPD area and to improve integration with the surrounding neighbourhoods.
 - B. A new traffic-free, green pedestrian and cycling route between Downshire Field and Richmond Park (via Portswood Place) will, through partnership with Royal Parks, improve connections to green space and centres, as well as providing more efficient routes to nearby rail stations.
 - C. Developments will be required to deliver (and contribute towards) improvements to existing routes and facilities
 - D. Developments will be required to make an appropriate contribution towards improvements to public transport to improve connectivity in and through the estate (based on assessed impacts).
 - E. Developments may be required to make an appropriate contribution towards improving the local highways network (based on assessed impacts).
 - F. Parking and cycle parking for new residential units must be provided in accordance with the London Plan standards.
 - G. The council will require adequate parking to support commercial and retail uses within Roehampton Centre and Portswood Place Important Local Parade.
 - H. Parking is to be provided either on street and/or on plot (within the structure of new buildings). On-street parking will be managed in a way to ensure that the needs of residents are met.

- 15.2 The NPPF recognises the role of transport in facilitating sustainable development and requires needs to be balanced in favour of sustainable transport modes, which allows people a choice in how they travel. Section 6 of the London Plan reflects the NPPF objectives of reducing the need to travel (especially by car), improving public transport, and increasing attractiveness of walking and cycling. The Wandsworth Core Strategy requires support for improved linkages and improvements to public transport including enhanced capacity on rail and Underground lines, improved bus and rail services and access to stations. Quality cycling conditions and improved conditions for walking will also be delivered (PL3).
- 15.2 As identified within the masterplan baseline, the area suffers from physical and perceived barriers to pedestrian movement and a lack of direct pedestrian and cycle routes including to Richmond Park. The SPD area also has limited connections into surrounding areas, with a number of insecure and poor-quality pedestrian connections from Roehampton Lane. Primary vehicle access into the SPD area is from Danebury Avenue via Roehampton Lane, in addition to a minor vehicle access point from Kingsclere Close via Roehampton Lane. There are no vehicle access routes from the south and west due to the lack of entrances from Richmond Park. Additionally, vehicle access from the north and west of the site area is restricted by two vehicle gates on Danebury Avenue and Highcliffe Drive. These barriers prevent access from Priory Lane and Clarence Lane respectively. The masterplan discounted the proposal to remove the Danebury Avenue barrier. The full removal of the Highcliffe barrier is also not an option.
- 15.3 Roehampton has good access to the primary and strategic road network through Roehampton Lane, which provides direct connections to the South Circular and the A3. However, the relatively high journey times into central London, coupled with the distances from rail stations and town centres, result in a sense of general disconnection and remoteness for residents of the area. As identified in Core Policy PL15, comprehensive regeneration and new development will be required to deliver enhanced transport linkages to and from the centre of Roehampton. The need for improved pedestrian and cycle access to and from Richmond Park has also been highlighted.
- 15.4 A Transport Assessment was submitted with the application in June 2019. A Transport Assessment Addendum was submitted in March 2020 to address consultation responses and comments received from TfL.

Trip Generation

- 15.5 None of the proposed residential or non-residential land uses will have a significant impact on the operation of the transport network as defined in the Government Guidance for Transport Assessment (Department for Transport, 2007).

Vehicular Access to the Site – Proposed Works at the A306 Roehampton Lane/Danebury Avenue signalised junction

- 15.6 The applicant proposes improved pedestrian crossing facilities, public realm improvements, an additional cycle lane with an advanced stop line, and an additional lane within the carriageway to separate vehicular traffic turning right and left from Danebury Avenue on to the A306 Roehampton Lane. The applicant has carried out LINSIG (UK industry standard software for the assessment and design of traffic signal junctions) modelling at this junction and has a baseline assessment year of 2017 with a final assessment year of 2031, a year after the proposed completion of all phases of the Proposed Development. It is agreed that an increase in background traffic of 6% on 2017 levels by 2031 can be assumed. The modelling showed that with the proposed interventions and changes to the signal timings, none of the arms of the junction would operate at above the recommended maximum degree of saturation of 90% of safe capacity at the AM or PM weekday peak hours.
- 15.7 Since 2017, TfL has introduced improvements at this junction to allow for a cycle contraflow system southbound on Roehampton High Street and an early release for cyclists on the Danebury Avenue approach.
- 15.8 TfL questions whether the proposed installation of an additional lane for vehicular traffic on Danebury Avenue at this junction reflects the strategic objectives of the Mayor of London's Transport Strategy. The request is that the junction is monitored throughout the development construction period so that widening of the carriageway at the junction will only be permitted if the monitoring identifies a significant impact on bus journey times. From the Local Highway's Authority's perspective, the applicant has set out the likely vehicular traffic impacts at the junction and has demonstrated that the proposed mitigation enables all arms of the junction to operate at or below the maximum tolerable degree of saturation of 90%. Therefore, the additional vehicular capacity proposed might be needed.
- 15.9 A recent report was received from the applicant's Transport Consultant containing the adjusted baseline and future year modelling that takes account of the changes TfL made to the Roehampton Lane/Danebury Avenue junction between 2017 and 2018. The report shows that the Roehampton Lane East Nearside Lane currently operates at 93% of the maximum degree of saturation at the AM weekday peak hour and at 90% in the PM weekday peak hour. With background and development traffic considered, all lanes of this junction will operate below the recommended maximum degree of saturation of 90% at the AM and PM weekday peak hours. However, given the need to avoid unnecessary costs and disruption, the Council agrees with TfL's proposal to delay the works until 2029/30 so that the junction can be monitored to ensure that the case is properly made for this improvement, or to use this time and the available evidence to enable alternative interventions to be considered. This will be secured by planning condition should permission be granted.

- 15.10 The proposed works at this junction, plus the re-direction of a sewer and other statutory services which run underneath Block O and Danebury Avenue, will need a comprehensive traffic management plan, so that all forms of through traffic can be accommodated safely on Danebury Avenue while these works are taking place. TfL has asked for additional analysis to show the impact of the works on bus service journey times. Potential measures might include temporary traffic lights on Danebury Avenue. However, a comprehensive construction phasing plan/timetable is needed as part of any construction and logistics plan so that works can be phased to minimise the disruption to residents and business users; this would be secured by condition.

Vehicular Access – Kingclere Close

- 15.11 The applicant proposes improvements to the existing simple priority bell-mouth access junction at the A306 Roehampton Lane/Kingclere Close junction. These include the insertion of a raised table pedestrian crossing, tactile paving, landscaping, and footway improvements. The highway boundary on the southern side of the A306 Roehampton Lane runs to the back or southern edge of the existing footway. Therefore, the applicant will need to enter into an agreement with Transport for London (TfL) to complete any works within the highway boundary on the A306 Roehampton Lane. South of this, Kingclere Close is currently a privately maintained estate road. The proposed landscape masterplan shows that the applicant proposes extensive works on this road, including landscaping, carriageway resurfacing, planting, the creation of inset parallel parking bays, and three other raised table pedestrian crossings. The applicant will offer Kingclere Close for adoption as highway maintainable land at public expense. This will be included in a combined legal agreement with the Local Highway Authority under S38 and S278 of the Highways Act 1980. All works will require the prior technical approval of the Borough Engineer. The applicant will also need to pay a commuted sum for the cost to the Local Highway Authority of maintaining Kingclere Close over 30 years; this will be covered in the agreements under the Highways Act.

Vehicular Access – Holybourne Avenue

- 15.12 Regarding the proposed highway works on Danebury Avenue and Holybourne Avenue described above, the applicant will have to enter into an agreement with the Local Highway Authority to offer some of the proposed works on the eastern side of Danebury Avenue immediately south of its junction with the A306 Roehampton Lane as highway maintainable at public expense, and will also need to complete works within the existing highway boundary. These works will require the full technical approval of the Borough Engineer and the applicant will need to pay a commuted sum to cover the maintenance of new areas of adopted highway and new infrastructure within the existing highway boundary, such as soft landscaping and Sheffield cycle stands over a period of 30 years from the date of adoption.

Vehicular Access – Laverstoke Gardens

- 15.13 The applicant proposes to rebuild an area on the northern side of Laverstoke Gardens which is currently a privately service road for use by commercial properties on Danebury Avenue to provide a footway and inset parallel parking bays. The service areas are to be reallocated to Holybourne Avenue and Danebury Avenue. The parallel parking bays, footway, and landscaping will be offered for adoption as highway maintainable at public expense under S38 of the Highways Act 1980 and a commuted sum will be payable to the Local Highway Authority to fund the cost of maintenance over a period of 30 years.

Vehicular Access and Parking – Portswood Close and Cleeve Way

- 15.14 The applicant wants to offer this area for adoption as highway maintainable land at public expense to connect the highway on Danebury Avenue to that on Swanwick Close. Again, this is currently privately maintained, so the applicant will need to pay a commuted sum to fund the cost of maintenance as highway over a period of 30 years from the date of adoption. The applicant should note that the Local Highway Authority does not usually adopt perpendicular bays as highway due to the difficulties of maintaining these. The applicant also intends to offer the proposed link road between Portswood Place and Cleeve Way for adoption as highway maintainable land at public expense.

Vehicular Access – Minstead Gardens

- 15.15 As with Portswood Close, the applicant proposes a perpendicular parking court. The Local Highway Authority is not inclined to adopt perpendicular bays as highway due to maintenance difficulties and there is a risk these may not be adopted and would need to be otherwise maintained.

Vehicular Parking

- 15.16 Objections have been raised on the grounds of the impact of the development on existing parking provision for residents on the estate and the lack of parking to accommodate the requirements for future residents arising from the Proposed Development.
- 15.17 The applicant proposes 496 off-street vehicular parking spaces for 1108 dwellings, a rate of 0.45 off-street vehicular parking spaces per dwelling. Wandsworth Borough Council's current Development Management Policies Document (2016) states that off-street vehicular parking should be provided in accordance with standards set out in the current London Plan. This states that, in an urban area with a public transport accessibility score (PTAL) 2-4, up to one space should be provided per 1-2 bedroomed dwelling and up to 1.5 spaces should be provided for every dwelling with three bedrooms or more (which would amount to 707 spaces for the detailed scheme and 486 spaces for the outline element). However, the Intend to Publish London Plan would only permit a maximum of 0.25 spaces per dwelling.
- 15.18 The applicant has justified proposing off-street parking spaces below the maximum standards set out in the current London Plan by using electoral

ward level household car ownership data from the Census of 2011 for private and affordable dwellings. This is set out in the Transport Assessment (TA) of June 2019. Unfortunately, the existing Local Characteristics tables in the Census of 2011 only analyses car ownership for households cross-tabulated with the type of dwelling they live in (houses or flats) and household car ownership cross tabulated with the tenure of that dwelling (socially rented, owned, part-owned, privately rented). To validate the proposed number of spaces and forecast overspill, Officers have analysed household car ownership data for all households living in flats, and household car ownership data for households living in socially rented dwellings at the relevant Local Level Super Output Area (LSOA) in the Census of 2011. The results are displayed in the table below.

Block	No of dwellings	Off-Street Spaces	Requirement - LP	Requirement - IPLP	Demand LSOA	Demand TA June 2019	Deficit LSOA	Deficit TA 2019
A	40	4	51	30	25	18	21	14
K1-K3	230	109	237	173	145	124	36	15
M	107	43	107	80	67	57	24	14
N	121	84	121	91	76	64	-8	-20
O	35	3	38	26	21	11	18	8
Q	121	46	153	91	63	47	17	1
Outline	454	207	486	341	284	235	77	28
Total	1108	496	1193	832	681	556	185	60

- 15.19 The table shows that the proposed development, when fully built out, will create overspill parking of up to 60 vehicles arising from the proposed 1,108 new dwellings, if electoral ward level analysis of the Census of 2011 is used, and up to 185 vehicles if LSOA level analysis of the Census of 2011 is used.
- 15.20 Parking in the proposed masterplan area and throughout the wider Alton Estate is a mixture of unrestricted kerbside parking on the highway and private parking on privately maintained estate roads and within privately maintained estate car parks. The applicant completed a vehicular parking stress survey of the whole Alton Estate in November 2017. The results which were presented in the TA dated June 2019, and show that, within the study area agreed at that time, there were a total of 751 vehicular parking spaces and 189 of these were unused between 00.30 and 05.30, with an on-street parking stress level of 75%. The applicant modified this to remove car parking at St. Joseph's Church (19 spaces 1 car), Roehampton Leisure Centre (10 spaces 1 car), and Roehampton Lane Doctors Surgery (3 spaces 0 cars). This left a total of 719 spaces, 561 cars parked, 158 spaces, and a parking stress level of 78%.
- 15.21 The TA of March 2020 show that the proposed development and public realm improvements will result in a net loss of 121 on-street and estate vehicular parking spaces between 00.30 and 05.30. The applicant forecasts that the

demolition of 288 dwellings will result in a net outflow of up to 146 vehicles from the site between 2021 and 2031. This is not supported with evidence. . The applicant conducted a housing needs survey in March 2020 and found that a total of 136 households will move out of the masterplan area in three phases between 2021 and 2027. If a car ownership figure of 0.6 vehicles per dwelling is used, this equates to 82 vehicles that will potentially move out of the masterplan area between 2021 and 2027.

- 15.22 The TA submitted in March 2020 itemises the on-street vehicular parking spaces that will be lost and gained as a result of the development. The applicant estimates that there is current on-street demand of 561 vehicles to use 719 on-street spaces. 121 spaces will be lost because of the development, leaving a total of 598 on-street parking spaces. If 82 vehicles move out of the development as a result of the revised decanting strategy, and overspill of 60 vehicles is created as set out in the TA of June 2019, the on-street parking spaces throughout the study area will operate at 90% parking stress. If the overspill of up to 185 vehicles is created as set out in the analysis of household car ownership at LSOA level, demand rises to 664 vehicles between 00.30 and 05.30, meaning parking stress of 111% and up to 66 vehicles will have to park in the wider Alton Estate outside of the study area, possibly well in excess of 200m from their homes. Therefore, it is recommended that a financial contribution be secured to investigate the feasibility of implementing a CPZ throughout the wider Alton Estate in order to make the development acceptable in highway terms (due to the overspill that will increase on-street parking stress arises directly from the proposed development).
- 15.23 The car-free buildings (except for disabled residents) at Blocks A and O, are also closest to areas that will see extensive highway works including the creation of inset parallel parking bays on Danebury Avenue East and Laverstoke Gardens. Therefore, it is important that the highway works on these roads and on Kingsclere Close described above are completed prior to the first occupation of those blocks to give new residents space to park. All of the highway works need to be carefully phased to take account of the fact that some existing households that currently park on Danebury Avenue and Highbridge Avenue will not be relocated until 2026/2027. Therefore, it is vital that a highway works phasing plan is negotiated through the S278 legal agreement described above; this will require a link to the section 106 agreement to ensure it achieves what is required in planning terms to make the development acceptable.
- 15.24 Whilst TfL acknowledges that the car parking provision both on and off-street has been slightly reduced since the original submission, the development would not accord with the Intend to Publish London Plan (Policy T6.1) which would only permit a maximum of 0.25 spaces per dwelling. Based on the analysis above, Officers consider that the level of parking proposed is appropriate taking into account local conditions on the Alton Estate

Public Transport

- 15.25 Objections have been raised on the grounds of inadequate public transport capacity and services. TfL has requested funding for bus service enhancements, and this should be secured through the s106.
- 15.26 TfL has repeated its concern around noise arising from the relocated bus turnaround and standing facility. This has been addressed through the noise assessment within the Environmental Statement which finds that this is not expected to result in any unacceptable issues.

Cycling

- 15.27 The proposed level of cycle parking is in accordance with the Intend to Publish London Plan and a condition should be secured to this effect. The cycle stores are designed to be consistent with the LCDS recommendation for 95% double stackers and 5% ground level storage as TfL has requested. The cycle routes on the approaches to the stores have been designed to be as commodious as possible, while balancing this against the other requirements of the planning process and the local site conditions, including the topographical challenges.

Summary on transport matters

- 15.28 The level of car parking proposed is appropriate to accommodate demand without unacceptably increasing street parking stress.
- 15.29 The proposed car parking ratio is 0.45 spaces per dwelling in accordance with the adopted London Plan. This reflects the expected car ownership based on 2011 Census data. Existing on-street car parking, which is uncontrolled, serves existing parking demand that is not associated with the regeneration proposals and is retained at a level which maintains the same on-street parking stress. Residents of the application scheme would have no greater or lesser access to on-street spaces within the study area than any other resident or road user. The draft London Plan states (in paragraph 10.6.4) that “consideration should be given to local circumstances and the quality of public transport provision, as well as conditions for walking and cycling”. The application site is within 500m of the south western boundary LB Wandsworth, and therefore within 500m of Outer London. While the draft London Plan Inner London maximum residential car parking standard is up to 0.25 spaces per dwelling, the equivalent maximum for Outer London is up to 0.75 spaces per dwelling. Given the local circumstances of proximity to Outer London, absence of existing parking controls, hilly topography and distance to a rail station (c.2km to Barnes station), there is a compelling case for a level of parking provision which is more akin to an Outer London location than an Inner London location. A provision of 0.45 spaces per dwelling, which is substantially below the Outer London maximum but in excess of the Inner London standard is considered proportionate for this local circumstance.

15.30 This application would only secure parking for the detailed elements (some 286 on-plot car parking spaces are secured in detail). The parking for the elements in outline will be a reserved matter and can be reviewed at an appropriate point. This could also include a review of on-street parking restrictions and regulation (either as part of or in addition to the wider CPZ consultation already proposed to be secured through the application), which could be subject to additional controls. A suitably worded condition should be attached to any permission to require a review of parking for outline blocks and for streets prior to the submission of the first RMA for Phase 2. This approach has been agreed with TfL. Additionally, a parking management strategy as to how and to whom spaces will be allocated within the development, including to different tenures, should be required by condition.

15.31 Obligations will need to be entered into under s278 and s106 to secure the necessary highways and transport improvements and a commuted sum for highway maintenance. In addition, financial contributions will need to be secured under the s106 agreement to mitigate the impacts of the development:

- £100,000 to the London Borough of Wandsworth to study the feasibility of and implement a controlled parking zone within the proposed regeneration area and the wider Alton Estate. This is necessary to make the development acceptable in planning terms to manage overspill parking arising from some of the proposed blocks within the proposed development as measured against the maximum standards set out in Section 6.2 of the current London Plan, household car ownership data in the Census of 2011, and the fact that the applicant's own parking stress survey showed that up to 417 motorists who may not live within the masterplan area currently park on streets within it.
- £650,000 for bus service improvements. This is necessary to make the development acceptable in planning terms because the proposed development will create 255 additional two-way trips on public transport at the AM weekday peak hour and up to 148 additional two-way trips at the PM weekday peak hour. The nearest underground and mainline railway stations are not within 960m walking distance of any part of the regeneration site. Therefore, all public transport users will rely on bus services to access them, as well as other facilities. This contribution could be secured in phased payments but recognising the inadequacy of the existing bus services the first payment should tie in with the first phase of development.

15.32 The S106 agreement should also include an obligation for the applicant to provide 20% active and 20% passive electrical vehicle charging points within the off-street vehicular parking spaces in accordance with standards set out in the current London Plan. Up to eight car club parking bays are to be provided within the proposed development and the applicant would be expected to provide free car club membership for one year for all residents of properties within the application site, secured in the S106 agreement.

16. Waste Management

- 16.1 A Waste Strategy accompanies the Application. Refuse and recycling has been considered in relation to Policies IS1 of the Core Strategy and Policy DMS1 of the DMPD, plus Refuse and Recyclables in Developments SPD (2014).
- 16.2 Dedicated refuse and recycling stores have been set aside as part of the individual block designs to accommodate bulk bin capacity of no less than 150 litres per household for residual waste, plus 70 litres per household for mixed recyclables. Residential waste will be collected separately to commercial waste, by the local authority on a weekly basis. Provision for commercial waste will be determined with subsequent occupiers in order to meet their needs.
- 16.3 The design of each of the residential blocks ensures that the refuse and recycling stores are either within 10 metre dragging distance of a safe stopping point for collection vehicles or that an allocated hardstanding area is set aside to move bins onto on collection days.
- 16.5 A Waste Strategy Addendum was submitted in March 2020 to address feedback received from the Council and to provide additional detail on the operational collection arrangements. This provides clarity regarding the expected responsibilities of both the collection teams and the Council's housing management teams that are required to move residential waste and recycling bins to holding/collection areas. The process will be mirrored for both the residual waste streams and the mixed recycling. Where bin stores do not open directly onto the public realm it is the responsibility of the housing management teams (on the affordable blocks) to move the waste containers to the designated collection point by 06:30 on the scheduled day, and then to return the containers to their storage areas after emptying. Separate arrangements will need to operate for the private residential blocks which must be detailed in the submitted strategy/management plans to be secured by condition. All waste collections would occur between 06:30 and 20:00. In some cases, this may mean that refuse containers should be presented the evening before the collection is due. Where holding stores are being used, management plans will be prepared for each block to clarify the future collection arrangements. These will ensure that both waste and recycling containers are available independently on the collection day(s). This will ensure that when both waste streams are due for collection on the same day, they can be accessed without having to move containers used for the alternate waste stream. This will be important as the collection vehicles can arrive at different times due to the variables that can affect the times of collection. Additionally, there should always be capacity in the stores for residents to dispose of both waste and recycling, even when all other bins are being presented in holding stores. In all instances, the routes identified as being the responsibility of the waste collection teams will have a hard, smooth and continuous finish. The route will be free of features which would obstruct

or impede the movement of the bins, and where required will have a dropped kerb to bring the bins from any raised pavement areas down to the road level.

Bulky Waste

- 16.12 The Wandsworth Local Plan is supplemented with a planning document to cover refuse and recyclables within developments. This guidance was adopted in February 2014 and states that; 'All residential developments of 10 or more flats must provide suitably accessible allocated hard standing space for occupants to present bulky items of waste awaiting collection. This space must be sufficient to enable a sofa plus armchair to be presented and should ideally be an open area at ground level adjacent to the waste store.'
- 16.13 The bulky waste across the Proposed Development will be managed between the residents and facilities teams. The secure and controlled presentation location for the proposed development is immediately adjacent to the vehicular entrance to Block M. It covers an area of approximately 28 sq m which comfortably satisfies the requirement to be able to hold 'a sofa plus armchair'. Residents of Blocks A, M, N, NO and Q will, on agreement from the facilities team, be required to present any bulky waste directly to the collection area within Block M.
- 16.14 Residents of Blocks K will have use of temporary storage areas within the block where bulky waste can be kept before transferring to the collection point within Block M. Residents will be required to pay the local authorities charge for bulky waste collection direct to the facilities management team. The facilities management team will then co-ordinate with the local authority in order to transfer payment and confirm the collection date, in turn ensuring suitable access arrangements to the presentation area within Block M. The finalised details of the bulky waste collections will be agreed within the operational waste management plan, ensuring a coordinated approach, managed from within the Proposed Development. The operational waste management plan will be submitted pursuant to an appropriately worded planning condition.

Commercial waste

- 16.15 The commercial waste produced by units will be dealt with through the award of contracts in an open market, whereby contractors will provide quotes for the collection and disposal on the basis of what is being asked of them. Any commercial contractor must be correctly licensed and legally permitted to transfer and/or dispose of the waste streams they are contracted to be responsible for. The internal commercial bin store for Block A holds up to 9 containers. They will be split across recyclable and non-recyclable waste streams. The containers will be presented externally for a limited period of time in line with the contracted collections, thus with potentially a maximum of 5 bins being collected at any one time. This level of activity would not expect to cause any disruption when managed in line with that proposed. The commercial waste strategy will be secured through planning condition and

must set out the detail in regard to the requirements of individual tenants, and unit uses.

Summary on waste

- 16.16 In line with local guidance all blocks will satisfy the requirements, whilst also maintaining a practical and workable waste collection solution. The arrangements have been agreed with the Council's Sustainable Waste Manager.
- 16.17 Where necessary within Blocks K, N and Q there will be agreed processes in place in order that internal facilities teams ensure that all containers are presented to the agreed point, and in good time for the collection team to empty. They will then in turn return the containers to the point at which residents will have access to readily deposit both their refuse and their recycling. Ultimately the final management strategies will be secured through the use of suitable planning conditions.

17.Sustainability

- 17.1 Core principle 8 of the Roehampton SPD focuses on the creation of a sustainable environment. The SPD states:
- A. Proposals will be required to be consistent with policy requirements relating to climate change mitigation/adaptation, energy, and sustainable design and construction as set out in the NPPF and of the London Plan.
 - B. Proposals will be required to demonstrate that they will result in the maintenance and enhancement of biodiversity and habitats.
 - C. The council will consider proposals that incorporate opportunities for community food production within Downshire Field.
 - D. Development proposals will be required to include a comprehensive tree planting and landscape management strategy
 - E. Proposals will be required to incorporate measures that minimise water consumption and reduce surface water run-off rates.
 - F. Development proposals will be required to be supported by a comprehensive energy strategy in accordance with London Plan policy.
- 17.2 An Energy Strategy was submitted with the application in June 2019. This was updated in March 2020 following comments from the Council's sustainability consultant and the GLA.
- 17.3 The Energy Strategy has been formulated following the London Plan energy hierarchy: Be Lean, Be Clean and Be Green. The overriding objective is the formulation of a strategy which effectively balances a number of key elements, including CO₂ emissions, affordability of heat, climate change adaption, and the provision of high quality buildings. These elements need to work with the regulatory and planning requirements for the development. The development of this Energy Strategy comes during a period of significant change in relation to the regulatory and policy energy landscape, with the New London Plan, The Future Homes Standard, and SAP methodology all challenging the more

conventional energy strategy routes. It is becoming increasingly complex to develop a masterplan energy strategy which enables substantial CO₂ reductions both now and in the longer term, whilst ensuring residents' comfort and a reasonable cost for heat is not compromised.

- 17.4 In response to this, the Energy Strategy prioritises the following:
- Energy demands to be reduced substantially through fabric 'Be Lean' measures to achieve the New London Plan energy efficiency targets for both residential and non-residential uses. This locks in CO₂ savings irrespective of the source of the delivered energy;
 - A holistic approach which balances further considerations such as daylighting, overheating, and noise to ensure resident comfort; >
 - A balanced strategy for the generation and delivery of decentralised heating, which utilises heat pumps as the primary generation source, with gas boilers for peak heat demands;
 - Provision of PV panels across all blocks in the development area, enabling additional on-site electrical generation.
- 17.5 The updated energy report demonstrates that the zero carbon target cannot be met on site. It also demonstrates that the 35% minimum reduction on site as laid out in the GLA guidance and draft London plan on preparing energy assessments has been met including the fabric efficiency targets. Renewables are included after an appropriate feasibility study resulting in cumulative carbon savings of 37.4%(domestic) and 36.9% (nondomestic) at be Green stage.
- 17.6 Both the residential and the non-residential uses will also achieve a standard of Zero Carbon throughout with carbon offsetting contributions that are to be secured via a S106 Agreement. The Detailed Scheme component has been calculated at £1,495,965, with the Outline Scheme component estimated ed at £920,835; this has been agreed by the applicant.
- 17.7 The Sustainability Statement states "a minimum of 'Excellent' will be achieved for all non-residential element of the development." The proposal is expected to achieve BREEAM Outstanding and a commitment to this has been agreed with the applicant.
- 17.8 A Circular Economy Statement has been submitted, compliance with this will be secured by condition. The applicant has made the following commitments:
- Broad objectives for Circular Economy aspirations have been set. Moving forward, workshops will be held to develop and investigate Circular Economy objectives with specific metrics (design team, contractor, suppliers, and facility managers).
 - Site analysis, in the form of detailed pre-demolition / pre-refurbishment audits, will be undertaken.
 - Circular Economy opportunities will be monitored throughout the design and construction process.

- On completion, success against objectives will be reviewed and an analysis will be undertaken on lessons learnt (whole design team, contractor and relevant supply chains).

18.Drainage

- 18.1 The Environment Agency (EA) Flood Zone map shows the site lies wholly within Flood Zone 1 'Low Probability' (as defined in NPPF Planning Practice Guidance (PPG) 'Flood Risk and Coastal Change' Table 1). The proposals for residential and commercial development constitute a (Less and More Vulnerability Classification) land use, which is considered appropriate within Flood Zone 1 (reference NPPF PPG Tables 2 and 3). The sequential test is considered to be passed on the basis that the site is wholly located in Flood Zone 1.
- 18.2 The Mayor's Climate Change Adaptation Strategy (GLA 2011) identified surface water flood risk as the greatest short-term climate risk to London. A large majority of the site is at very low risk of surface water flooding. There are three buildings (Building A, N/O and the Nursery identified as being at risk of surface water flooding. The flood risk mitigation strategy for the development consists of the following elements:
- Flood Resistance and Resilience measures should be considered for buildings identified as being at risk of surface water flooding and appropriate profiling of exterior ground levels away from building entrances;
 - Provision of sustainable drainage systems (SuDS) where practicable including consideration of the projected impacts associated with climate change and exceedance events;
 - Maintenance of surface water overland flow routes through the site. The proposed surface water drainage strategy for the development consists of underground storage tanks with outlet controls into the adjacent existing sewers and these proposals will result in a reduction in peak runoff rates discharging from the site.
- 18.3 The development proposals apply the four pillars of SuDS design as set out in CIRIA C753 The SuDS Manual 2015. These are: Quantity, Quality, Amenity and Biodiversity. By managing quality and quantity to meet requirements on the surface, the benefits of amenity and biodiversity follow. A range of solutions are proposed and retrofitted into the fabric of Alton Green. Paving slabs in planting areas and mulch paths through planting zones all add to the infiltration of stormwater, aeration of the soil and softening of the surface finishes within the public realm. To further compliment this, the vast majority of the roofs on the residential blocks will be biodiverse roofs which will attenuate any rainfall that falls on them and subsequently provide water for the Biodiverse planting on the roofs. Pavements in various areas of the site are designed to drain into adjacent planting areas to assist management of stormwater runoff and reduce reliance on irrigation systems. Specific rain garden design has been included in the streetscape to incorporate plant

types, mulch and drainage to allow periodic inundation and slow drainage into the subsoil, attenuation tanks and stormwater network. The proposed public realm design will incorporate a combination of biodiverse planting with sustainable drainage systems. Key components of this strategy comprise:

- Intensive podium courtyards include drainage board continuous across structural deck, permeable resin bound paths, paving on pedestals, lawn, sand, bark and garden bed planting.
- Biodiverse roofscape to all buildings
- Permeable resin bound paving or paths and courtyards.
- Permeable car parking bays where possible
- Raingardens to all streets

- 18.4 An addendum to the original Flood Risk Assessment and Drainage Strategy Report was submitted in March 2020 which reviews the SuDS features proposed in relation to the drainage hierarchy within London Plan policy 5.13 and Intend to Publish London Plan Policy SI.13.
- 18.5 The drainage proposals provide a range of green infrastructure features such as green (biodiverse) roofs for all the development blocks, blue roofs for blocks K, M and Q, rain gardens in Danebury Avenue near the Nursery, Children's Centre and Surgery and bus turn-around, permeable podium courtyards and external permeable paving.
- 18.6 There are several site constraints such as dense site layout, poor infiltration characteristics, existing services and steep topography within existing landscaped areas. As such, it is not considered viable or practical to incorporate SuDS measures such as basins or standalone infiltration features. The potential benefits of rainwater harvesting were explored, and it was concluded the implementation of such measure is not appropriate for the Alton Estate development.
- 18.7 The overall proposed SuDS system including rain gardens (where suitable and as identified above), permeable car parking and permeable podium courtyards in combination with biodiverse roofs will provide a whole range of benefits including enhanced amenity and biodiversity, improved water quality and reduction and slowing down of surface water runoff leaving the site. These will be secured through appropriate planning conditions or obligations in the Section 106 as necessary. It is therefore concluded that the drainage strategy, as proposed, does give appropriate regard to the drainage hierarchy listed in London Plan policy 5.13 and draft policy SI.13

Summary on Flood Risk and Drainage

- 18.8 The approach to flood risk management for the proposed development complies with London Plan policy 5.12 (and draft New London Plan policy SI.12).
- 18.9 The updated surface water drainage strategy complies with London Plan policy 5.13 (and draft policy SI.13). It gives appropriate regard to the drainage

hierarchy and further details on how SuDS 2 measures at the top of the drainage hierarchy will be included in the development.

- 18.10 The proposed development generally meets the requirements of London Plan policy 5.15 (and draft New London Plan policy SI.5).
- 18.11 The approach to SuDs has been agreed with the GLA following advice received at Stage 1 and through subsequent discussions. The GLA has advised that the applicant should also consider water harvesting and reuse to reduce consumption of wholesome water across the entire development site.

19. Air Quality

- 19.1 Chapter 10 (Air Quality) of the ES presents an assessment of the likely effects of the development on air quality.
- 19.2 The assessment includes analysis on human health and ecological receptors, sets out impact predications and includes an air quality neutral calculation. This assessment notes that the air quality effects of road traffic generated by the Proposed Development and other committed developments would not be significant, as there are no predicted exceedances of Air Quality Strategy Objectives for NO₂, PM₁₀ and PM_{2.5} with or without the development in place in 2021. The chapter concludes that, overall, the construction and operational air quality effects of the Proposed Development would be 'not significant' with dust and fine particulate matter mitigation measures in place.
- 19.3 The Proposed Development therefore accords with Policy 7.14 'Improving Air Quality' of the London Plan, supported by the Mayor's control of dust and emissions during construction and demolition SPG (July 2014), Core Strategy Policy IS 4 and DMPD Policy DMS1.
- 19.4 An Air Quality technical Note was submitted in March 2020 which updates the air quality neutral calculation. As predicted vehicle trips and traffic emissions generated by the Development are below the relevant benchmarks of the GLA's SPG on 'Sustainable Design and Construction', the Development is expected to be compliant with the air quality neutral requirement of the SPG with regards to transport emissions.

Summary on air quality

- 19.5 The Development is expected to be compliant with the air quality neutral requirement of the SPG with regards to transport emissions. The applicant has proposed an air quality contribution of £100 per new non-electric parking space towards measures to improve air quality as set out in the Air Quality Strategy. This equates to a contribution of £43,520 which will be secured through the s106 agreement.

20. Cultural Strategy

- 20.1 Policy DMTS12 promotes well-designed places that reflect the social and cultural diversity and well-being of a community and delivery of new art, cultural and entertainment related facilities. The Roehampton SPD

emphasises the need to improve the community arts and cultural offer for residents on the Alton Estate. The Council's Planning Obligations SPD outlines how major development proposals are expected to contribute to neighbourhoods in the borough being welcoming, appealing and accessible places to live, work and visit.

- 20.2 The Cultural Strategy that accompanies the planning application has been developed alongside the evolution of the masterplan and in consultation with the local community. The strategy will continue to develop in partnership with the local community to embed a responsive and ambitious cultural programme at the heart of the 10-year development programme. The Cultural Strategy to be secured as part of the Section 106 Agreement, identifies 8 principles that will provide a framework for the community to engage with prospective cultural activities, promote wellbeing, build confidence and skills within the community and ensure the masterplan incorporates the arts, culture and creativity. The proposals are aimed at animating the Alton Estate at an early stage of the development and encouraging public awareness of the work being delivered. A programme of temporary and long-term events and site activities which may be run by local community organisations will be commissioned to engage diverse audiences across a wide range of art forms. Proposals relate to the following themes: a Hoardings Programme; Events and Festivals; Sound; signage and wayfinding; Lighting; Sport; Performance and Play.
- 20.3 In line with the adopted Planning Obligations SPD it is proposed to consider the Public Arts contribution and the Cultural Infrastructure and Arts contribution separately within the section 106 agreement. Public arts projects should respond to local need. All proposed works should be discussed with the Council's Arts & Culture Services at an early stage and submitted for the approval before any works commence. This would be covered by the submission of a Public Art Strategy to secure the delivery of on-site public art by the Owner to the value of the financial contribution, the strategy to detail timing and consultation and even competition. The alternative would be to make a payment to the Council to deliver public art to the value of the contribution. The Public Arts contribution as agreed with the applicant is £500,000.
- 20.4 The second part relates to cultural infrastructure which it is proposed to achieve through the delivery of the Cultural Strategy and Action Plan which is critical to the regeneration of the estate. The DRP has expressed its support the innovative approach taken and how this will continue to evolve with the engagement of the local community and recommend that in order to guarantee its success over time, beside ensuring ongoing funding through the s106 agreement, the careful curation of a varied and interesting calendar of events with the integration and involvement of existing initiatives and local groups and organisations. Arrangements for the programming and management of spaces will be crucial in ensuring all activities are timely programmed and well-coordinated making sure all interests and age groups are considered. How arts, colours and interpretation are integrated into the

architecture still remains a decisive factor moving forward, and the DRP strongly advises setting that out with more clarity and rigour.

- 20.5 Through the submitted Cultural Strategy the applicant is committing to fund the delivery of a Cultural Strategy for the area that “celebrate(s) what is special about the Alton Estate by providing a programme of inspiring and engaging creative activities that will give everyone the opportunity to participate. The vision aligns to the Council’s four key objectives:
- To develop local skills and talents;
 - Widen horizons and increase well-being;
 - Promote community engagement and cohesion through an appreciation of the area’s diversity; &
 - Foster a sense of place and belonging within the neighbourhoods and communities of the Alton.”
- 20.6 It will be necessary to turn these principles within the Cultural Strategy into deliverables by developing an over-arching Cultural Action Plan. The cultural contribution of £648,000 (agreed by the applicant) and the phasing of when this funding will be made available will be secured through the s106 agreement. This will require the appointment of the Cultural Projects Co-ordinator and the establishment of the advisory panel (made up of local residents, local arts professionals, arts and cultural groups/organisations from Roehampton and Wandsworth, representatives from the Council and Redrow and key design and delivery teams). This advisory panel is considered to be critical in determining the immediate and longer-term priorities and phased delivery of the cultural strategy. The Head of Arts and Culture has emphasised the importance of securing and guiding the Cultural Projects Co-ordinator role and would welcome an opportunity to secure a cultural anchor within the Alton Estate. The Section 106 will be expected to cover the options for the applicant/developer to deliver the Cultural Action Plan or for the Council to step in and to deliver it to the value of the contribution which has been identified and agreed. The applicant has already agreed to explore the opportunities for using the construction hoarding to deliver cultural benefits and to provide an opportunity for engagement with the local community; this sits outside of the above.

21. Equalities

- 21.1 Section 149 of the Equality Act 2010 requires local authorities to fulfil a public sector equality duty by considering the impact of policies and proposals on people with “protected characteristics” e.g. age, ethnicity, disability etc. The responsibility for discharging the public sector equality duty rests with the Local Planning Authority. An Equalities Impact and Needs Assessment (EINA) has been submitted with the planning application to enable the Local Planning Authority to consider the likely impacts on protected groups of the hybrid planning application for the Alton Estate regeneration programme.
- 21.2 The EINA has identified a total of 13 temporary impacts during the construction phase. Of these temporary impacts, 1 is positive, 6 are negative

and 6 are neutral. The revised EINA submitted in May 2020 includes an additional temporary negative impact which has been identified following the originally submitted EINA in relation to disabled residents due to changes to housing provision. The main positive temporary impact is as follows:

- The temporary employment opportunities generated during the construction phase of the proposed development are likely to have a positive impact on existing residents from BAME groups.

21.3 The main negative temporary impacts are as follows:

- The disruption accompanying the construction phase is expected to have a negative impact on existing elderly residents. In order to mitigate the negative impacts of the proposals, a Construction and Environmental Management Plan (CEMP) will be submitted subject to condition. The final CEMP for each phase will be agreed prior to works commencing and will set out a detailed strategy to minimise construction impacts. Such measures could include using low-noise machinery and equipment, enclosing and screening machinery, dust suppression and using low vibratory foundation methods.
- The short-term changes to play space and youth provision are expected to have a negative impact on existing residents who are young. In order to mitigate the negative impacts of the proposals, these facilities will be re-provided over the course of the construction period. Re-provision will be achieved by reconfiguring the facilities provided at the Base to accommodate the activities of users of Roehampton Youth Centre. Modifications to the Base include updates to the ICT facilities, extending the kitchenette to create a larger kitchen and combining rooms within the facility to create a multimedia/ music room. In order to minimise disruption in play space and facilities, the delivery of the Alton Activity Centre and Downshire Fields play areas should be prioritised within the first phases of the development.
- The disruption accompanying the construction phase is expected to have a negative impact on existing residents who are disabled.
- The changes to housing provision are expected to have a negative impact on disabled residents.
- The disruption accompanying the construction phase is expected to have a negative impact on existing residents who are pregnant or young mothers; and
- The disruption accompanying the construction phase is expected to have a negative impact on existing residents who are from BAME groups. Given that BAME groups are disproportionately represented in the impact area, as set out in the baseline assessment, the construction impacts can be considered to have a disproportionate effect on such groups.

21.4 The main neutral temporary impacts are as follows:

- In the short term, the changes to social infrastructure provision are expected to have a neutral impact on existing residents who are young or old;

- In the short term, the changes to housing provision are expected to have a neutral impact on disabled residents;
- In the short term, the changes to social infrastructure provision are expected to have a neutral impact on disabled residents;
- In the short term, the changes to social infrastructure provision are expected to have a neutral impact on existing residents who are pregnant or young mothers;
- In the short term, the changes to social infrastructure provision are expected to have a neutral impact on existing residents from BAME groups; and
- In the short term, the changes to social infrastructure provision are expected to have a neutral impact on existing residents from religious groups

Permanent Impacts

21.5 The EINA has identified a total of 20 permanent impacts on protected groups from the Alton Estate regeneration programme. Of these permanent impacts, 17 are positive and 3 are negative. There are no neutral permanent impacts. The revised EINA submitted in March 2020 includes two additional permanent negative impacts which have been identified following the originally submitted EINA. This includes the impact on residents in temporary accommodation who are from BAME groups due to the change in housing provision, as well as the impact on those residents with severe disabilities and very elderly residents in particular resulting from the disruption to their existing living arrangements.

21.5 The main positive permanent impacts are as follows:

- The new replacement affordable housing is expected to have a positive impact on existing residents who are young or old;
- The upgraded and improved social infrastructure provided as part of the completed development is expected to have a positive impact on existing residents who are young or old;
- The improved opportunities for social interaction provided as part of the completed development are expected to have a positive impact on existing residents who are young or old;
- The improved and expanded play space provided as part of the completed development is expected to have a positive impact on existing residents who are young or old;
- The enhanced open space provided as part of the completed development is expected to have a positive impact on existing residents who are young or old;
- The community facilities provided as part of the completed development are expected to have a positive impact on existing residents who are young or old;
- The improved access to the site is expected to have a positive impact on existing residents who are old;

- The new replacement affordable housing is expected to have a positive impact on disabled residents;
- The upgraded and improved social infrastructure provided as part of the completed development is expected to have a positive impact on disabled residents;
- The improved access to the site is expected to have a positive impact on disabled residents;
- The improved opportunities for social interaction provided as part of the completed development are expected to have a positive impact on female residents;
- The new replacement affordable housing is expected to have a positive impact on existing residents who are pregnant or young mothers;
- The upgraded and improved social infrastructure provided as part of the completed development is expected to have a positive impact on existing and future residents who are pregnant or young mothers;
- The improved access to the site is expected to have a positive impact on existing and future residents who are pregnant or young mothers;
- The new replacement affordable housing is expected to have a positive impact on existing residents from BAME groups;
- The employment opportunities which the proposed development is likely to generate are expected to have a positive impact on existing residents who are from BAME groups; and
- The upgraded and improved social infrastructure provided as part of the completed development is expected to have a positive impact on existing residents who are from BAME groups.

21.6 The main negative permanent impacts are as follows:

- The change in housing provision is expected to have a negative impact on residents in temporary accommodation who are from BAME groups;
- Members of some protected groups will experience negative impacts as a result of the disruption to their existing living arrangements, particularly those with severe disabilities and very elderly residents; and
- A minority of existing non-secure council tenants will experience negative impacts as a result of being unlikely to be eligible for replacement new units in the proposed development.

21.7 The use of homes in the regeneration area for temporary accommodation purposes has been ongoing for the last several years as part of a strategy to minimise the use of bed and breakfast and other less suitable types of accommodation; maximise the provision of accommodation within the borough, in compliance with statutory obligations, in the face of successive years of rising homelessness and within that, a significant increase in a large family homelessness. Using temporary accommodation in homes earmarked for demolition therefore delivers more positive outcomes for most if not all of the households concerned and, as the regeneration progresses, rehousing into settled housing elsewhere would be ensured in the usual way i.e. by

keeping in touch, clarifying current housing needs, discussing potential offers and by making offers of suitable, affordable and reasonable accommodation, within the statutory safeguards of rights to review and/or appeal.

- 21.8 Private tenants of leasehold and freehold properties are likely to experience disruption to living arrangements without the mitigation provided to Council tenants and resident leaseholders and will be required to make alternative private arrangements for rehousing at the point of their tenancies coming to an end. As set out in the Alton Masterplan, a significant share of private tenants of leasehold and freehold properties in the area are likely to be students associated with Roehampton University. Students are more likely to be renting in the area on a short-term basis than other groups, and the Council has made the University aware of development plans from the outset of the regeneration process. However, it is anticipated that there will be some private tenants of leasehold and freehold properties who will experience a long-term negative impact on their housing status as a result of the proposals. The duties of the Council towards private tenants of leasehold properties is the same as it would be for any other private tenant in the borough whose tenancy has come to an end and they are presented with homelessness. The Council in its statutory role would provide advice as a minimum on re-housing. Depending on circumstances, which is more likely to benefit some of those protected groups- families with children/disabled members, for example – the Council's Housing Options team may also provide assistance with finding other suitable private accommodation. This could also include assistance with deposits, or alternatively, assistance with Council housing. Factoring in the mitigation measures in places, some private tenants of non-resident leaseholders may experience other marginally negative changes to their housing situation, as a result of their landlord selling the property back to the Council. For example, long-term residents who may have benefitted from preferential rents due to their length of tenure and their rents not increasing in line with market rates. This group of residents may or may not include persons belonging to the statutory protected groups.

Summary on the Public Sector Equalities Duty

- 21.9 The impacts of the proposed development on people with 'protected characteristics' will generally be positive. A number of actions will be required in monitoring the anticipated effects on protected groups of the Alton estate Regeneration programme. This action plan will be developed further in consultation with the Council including the identification of delivery milestones that is to be secured by condition. Actions will include:
- Consultation with local residents about opportunities for construction training and employment (Wandsworth Workmatch)
 - Monitor take up by local residents of construction training and employment opportunities (Wandsworth Workmatch)

- Manage the decant of Wandsworth tenants from the Alton Estate (LBW Housing and Regeneration)
- Manage the move into new homes of returning Council tenants (LBW Housing and Regeneration)
- Maintain dialogue with existing leaseholders about any issues encountered in securing funding to buy new homes (LBW Housing and Regeneration)
- Monitor the use of new services and social infrastructure facilities to understand the extent to which they are being accessed by local residents (Wandsworth Council)

22.Fire Strategy

- 22.1 Draft London Plan D5 Inclusive design requires developments to incorporate safe and dignified emergency evacuation for all building users, by as independent means as possible. Policy D5, criterion B 5 states that all development should be designed to incorporate safe and dignified emergency evacuation for all building users. In all developments where lifts are installed, as a minimum at least one lift per core (or more subject to capacity assessments) should be a suitably sized fire evacuation lift suitable to be used to evacuate people who require level access from the building.
- 22.2 A Fire Safety Strategy was submitted in June 2019 and a Fire Safety Strategy Addendum was submitted in March 2020.
- 22.3 Each residential core will be provided with an evacuation lift. The evacuation lifts will be, or have the following:
- Back-up power supply
 - Communication at each level to the access level
 - Located within a protected lobby at each storey served by the lift.
 - A protected final exit route (similar to the escape stairs)
 - Emergency voice communication, to enable rapid identification of locations where people require assistance. This requires fire rated cabling.
- 22.4 The Fire Strategy states that as part of the inclusive design it must be ensured the following is achieved:
- 1) The proposed escape strategy is safe
 - 2) The proposed escape strategy is dignified for the end user
 - 3) The proposed escape strategy allows an escape that is by as independent means as possible.
- 22.5 The proposed strategy is to provide fire evacuation lifts in each new block. These evacuation lifts can be used in the event of emergency, and will be designed to meet the following criteria:

- Be enclosed in fire rated construction that is at least the fire rating of the structure
- Be accessed via a protected lobby, or common corridor protected by smoke venting
- Be treated as life safety systems and will be provided with dual power supply
- Be useable in a fire event and will not automatically descend to ground on detection of smoke.
- Be usable by occupants and facilitate an escape strategy dignified for the end user. If a firefighting lift is already present in the block, the lift that can be used in an emergency will be separate.

22.6 Taking the above considerations into account, along with relevant fire safety regulations, a detailed management strategy for the evacuation lifts in each block will be secured by way of planning conditions

22.9 As part of the inclusive design approach to the development, it is proposed that apartments that are accessible for wheelchair users and those using mobility scooters, are provided with charging points in the protected entrance hallways. The protected entrance hallway is a means of escape route for occupants in flats to safely pass a room on fire. It is intended to allow charging points in the protected entrance hallway, and a design/strategy will be developed to ensure that occupants within the apartment are at no greater risk due to the charging points.

23. Phasing

23.1 The redevelopment proposals and the accompanying phasing plan have been developed to ensure the Council's long-established commitment to enable secure tenants and resident homeowners that wish to remain on the estate to only move once (known as the one move policy). The phasing plan also ensures continuity of provision for community services, such as the Roehampton Library, The Base, Eastwood Children's Nursery and Children's Centre and two medical practices. These services will also move once and continuity of service delivery is maintained throughout.

23.2 The Phasing Plan shows the intended phasing of development which is required to accommodate the proposed decant and rehousing strategy. Early delivery of affordable housing is crucial to ensure the decant of residents which together with the re-provision of community facilities will allow the demolition and construction programmes to follow on. Precise dates have not been defined in the Phasing Plan in view of the need for the Council to procure a new development partner.

- 23.3 The phased construction programme provided by the applicant indicates that the development will take around 10 years to complete. The development has been divided into four distinct phases:

Phase 1- Blocks A, O, M, Village Square, bus turnaround, Portswood Place Club Room, retail unit & healthcare/ community space & Alton Activity Centre. (Years 1-3)

Phase 2- Blocks K, N, Q, Portswood Place Nursery and Children's Centre and Downshire Field landscape improvements (Years 3-7)

Phase 3- Danebury Avenue public highway improvements (Years 7-9)

Phase 4- Outline Element (Years 7-10)

- 23.5 75 units of affordable housing (Blocks A and O) and a variety of public benefits including the new library, youth centre and healthcare facility, the Portswood Place Club Room, retail unit and healthcare/community space and Bus Turnaround will be delivered ahead of completion of the first private housing block (M) in Phase 1.

- 23.6 The second phase of construction will see the delivery of several community benefits, including improvements to Downshire Field as well as the new nursery school and children's centre incorporating a flexible space for community use ahead of any private housing. In addition, it is proposed that a further 121 affordable homes would be delivered more than a year before the completion of the private housing within that phase. The bulk of the affordable housing, including all the affordable homes required to rehouse returning secured tenants and resident homeowners, will be delivered in these two construction phases

- 23.7 In terms of the outline element of the scheme it is expected that the remaining affordable housing and flexible non-residential floorspace, will be delivered at an early stage of the construction programme.

- 23.8 In terms of the outline element of the scheme it is expected that the remaining affordable housing and flexible non-residential floorspace, will be delivered at an early stage of the construction programme. The applicant has also committed to a review of the financial viability of the scheme at a mid-stage of the development. In the event, the viability review reveals that economic circumstances have improved, and that a financial surplus beyond that anticipated at the time the planning application was determined, additional affordable homes would be delivered on site through the latter phases of the development.

24. S.106 Planning Obligations

- 24.1 Policy 8.2 of the London Plan and Policy IS7 of the Core Strategy consider the requirement to seek planning obligations on a site by site basis to secure

provision of affordable housing and ensure proposals fund local improvements to mitigate the impact of the development. These policies have been taken into consideration together with the Council’s SPG on Planning Obligations together with the Mayoral CIL payment which the proposed development would be liable for.

24.2 The following Heads of Terms have been discussed and agreed between officers and the applicant to form the basis (subject to approval of the Committee) for obligations under S106 of the Town and Country Planning Act 1990. Negotiations on the detail of these obligations are to be progressed in the event that the Committee resolve to grant planning permission. The applicants have made the following offer associated with the development in relation to affordable housing and site-specific mitigation. It is considered that these obligations/contributions meet the tests as set out in the Regulation 122(2) of the Community Infrastructure Levy Regulations 2010.

Table 11: S.106 Heads of Terms

Topic	Key terms
Affordable housing	<p>Owner to deliver not less than 261 residential units (equating to 909 habitable rooms) across the site as affordable housing (excluding any uplift as a result of the review mechanisms) of which 201 will be social rent (equating to 710 habitable rooms), 29 will be shared equity (equating to 109 habitable rooms) and 31 will be London shared ownership (equating to 90 habitable rooms). Not less than 201 social rented units (equating to 710 habitable rooms) and 31 London shared ownership units (equating to 90 habitable rooms) to be provided across the development.</p> <p>Unless otherwise agreed by the LPA:</p> <p>(i) The detailed phase to provide 196 affordable homes (690 habitable rooms) as follows:</p> <ul style="list-style-type: none"> • Block A - 40 affordable homes (166 habitable rooms) of which 35 will be social rent (147 habitable rooms) and 5 will be shared equity (19 habitable rooms); • Block O - 35 affordable homes (96 habitable rooms) of which 29 (78 habitable rooms) will be social rent and 6 will be shared equity (18 habitable rooms); • Block Q – 121 affordable homes (428 habitable rooms) of which 72 (266 habitable rooms) will be social rent, 18 will be shared equity (72 habitable rooms) and 31 will be

	<p>London shared ownership (90 habitable rooms)</p> <p>provided that if any shared equity units in Blocks A and O and Q are not taken up by existing resident owners such units will be converted to social rent, and an equivalent number of social rent units in the outline phase shall be converted to an alternative tenure of affordable housing to be approved by the LPA as part of the Affordable Housing Outline Scheme</p> <p>(ii) The outline phase of development to provide 65 affordable homes (219 habitable rooms) which shall:</p> <ul style="list-style-type: none"> • include as a minimum an equivalent number of affordable housing units as the number of shared equity units converted to social rent in the detailed phase in an affordable tenure to be approved by the LPA as part of the Affordable Housing Outline Scheme • be delivered in accordance with an Affordable Housing Outline Scheme in general conformity with the Revised Development Specification and the Design and Quality Standards unless otherwise agreed in writing by the LPA. <p>(iii) The tenures will be secured as follows:</p> <ul style="list-style-type: none"> • Social Rent – will be let at the Council’s rent setting and decant policy. • Shared Equity - will be sold up to an 80% equity share to existing resident owners. Unsold equity will be held by the Council with no rent charged and if no take up then units will remain as affordable housing (tenure to be approved by the LPA) and upon subsequent disposal on the open market the equity share of the Council shall be used by the Council for the provisions of affordable housing in the Borough • London Shared Ownership - will be delivered in accordance with the Council’s intermediate housing policy including the Shared Ownership Affordability Criteria. Housing costs (rent, service and mortgage costs) should be no greater than 40% of net household income and net income to be
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	<p>assumed as 70% of gross household income.</p> <ul style="list-style-type: none"> • Shared ownership will have a marketing statement submitted by the applicant and approved by the Council at least 9 months before practical completion of any shared ownership unit. <p>Detailed triggers will be negotiated between the LPA, the GLA and the applicant, but they will ensure the early delivery of affordable housing in the detailed phase, links between delivery in the detailed and outline phases that will also ensure the outline affordable housing and any additional affordable housing will be delivered in the early phases of the outline scheme, as well as site wide triggers to secure delivery of affordable housing alongside private housing.</p> <p>All of the Affordable Housing Units will be retained by the Council (rather than transferred to a Registered Provider).</p> <p>Submission of an Estate Management Strategy to set out how the estate will be managed including services charges for affordable housing within the redline of the Development. Social rent housing total housing costs, including service charges, will be no more than the capped affordable rent as identified in the Council's Annual Affordable Housing update report applicable at the time of completion of individual blocks.</p> <p>No restriction on occupiers of the affordable housing units within the redline of the Development accessing and using any leisure type facilities (for example gymnasium facilities but not roof terraces) or shared work or IT space which are available to all the occupiers of the private residential units provided as part of the development. In the event that an occupier of an affordable housing unit within the redline of the Development wishes to utilise such facilities then such facilities will be made available provided that the relevant occupier requests to utilise these facilities and pays separately to use them.</p> <p>10% of affordable homes to comply with Building Regulations Part M4(3) accessible homes standards with compliance confirmed in writing by</p>
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	<p>the Council's specialist housing occupational therapist prior to commencement of any block:</p> <p>(a) The applicable standard for social rented units is Part M4(3)(2)(b) of the Building Regulations 2015; and</p> <p>(b) The applicable standard for intermediate housing/shared ownership is Part M4(3)(2)(a) of the Building Regulations 2015.</p>
Affordable housing review mechanism	<p>(i) Early Stage Review</p> <p>(ii) Mid Stage Review to be undertaken and agreed prior to the submission of the first RMA for the outline phase (to ensure that any surplus identified through the review can be translated into additional on-site affordable housing integrated within the design of the outline phase). Delivery of any such additional onsite affordable housing will be linked to the delivery triggers for the baseline affordable housing in the outline phase.</p> <p>(iii) Late Stage Review</p>
Air quality contribution	Owner to pay an air quality contribution of £43,520 to the LPA towards improving air quality.
Carbon offsetting contribution	<p>Owner to pay a carbon offsetting contribution to the LPA towards achieving zero carbon homes as follows:</p> <p>(i) in respect of the detailed phase £1,231,200 for the residential elements and £253,365 for the non-residential elements; and</p> <p>(ii) in respect of the outline phase an amount to be calculated following submission and approval of reserved matters (as detailed design will determine the amount of carbon to be offset).</p>
TfL buses contribution	Owner to pay £650,000 to the LPA towards the enhancement of existing TfL bus routes operating within the vicinity of the development. Payment in five equal annual instalments with trigger for first instalment on commencement of the first block containing private housing.
CPZ study contribution	Owner to pay £100,000 to the LPA to study the feasibility of and implement a controlled parking zone within the proposed regeneration area and the wider Alton Estate.
Car club	Owner to secure provision of 8 car club spaces in locations to be agreed with the LPA. Residents of the new development to be given notice of availability of spaces and entitlement for one

	member of each household to 1 year's free membership to the car club. Membership should be open to all residents in wider area on payment of membership fee.
Exclusion from CPZ	Not to complete a sale of residential units or commercial units until occupiers have been notified of restrictions of obtaining permits from within existing or future CPZs.
Community and Health Facilities	Obligations to ensure the existing library, youth centres and health facilities are not demolished until the replacement facilities have been constructed, fitted out to an agreed level of specification and made available for occupation.
Public Art	Prior to commencement of development the Owner to either (1) submit to the LPA for written approval a Public Art Strategy (of a value equivalent to £500,000) and thereafter implement the approved Public Art Strategy or (2) pay a commuted sum to the LPA of £500,000.
Cultural Strategy	<p>Prior to commencement of development, the Owner to submit to the LPA for written approval a Cultural Strategy Action Plan (of a value equivalent to £648,000) derived from the submitted Cultural Strategy.</p> <p>The Cultural Strategy Action Plan shall (inter alia) make provision for the appointment of a Cultural Co-ordinator in consultation with the LPA and confirm whether the Owner can deliver the measures set out in the Cultural Strategy Action Plan and:</p> <ul style="list-style-type: none"> • where it confirms that the Owner is able to deliver all of the measures to the satisfaction of the LPA, the Owner shall deliver the Cultural Strategy Action Plan in its entirety and no contribution shall be payable to the LPA; • where it confirms that the Owner is able to deliver some of the measures but unable to deliver other measures, the Cultural Strategy Action Plan shall identify the value of the measures the Owner cannot deliver and the Owner shall (i) pay such sum to the LPA in agreed instalments in lieu of delivering those measures (ii) deliver the remaining measures in accordance with agreed plan; • where it confirms that the Owner is unable to deliver any of the measures, the Owner shall pay the sum of £643,000 to the LPA in

	<p>lieu of delivering the Cultural Strategy Action Plan (in phased instalments that ensure part payment on commencement).</p>
District Heating Network (DHN)	<p>Owner to deliver on site low carbon heat network (LCHN) and energy centre as part of the development in accordance with submitted Energy Statement.</p>
Local Employment	<p>Owner to:</p> <ul style="list-style-type: none"> • enter into a Local Employment Agreement to maximise business, employment and training opportunities for local people and businesses with particular regard to supporting local regeneration objectives, in accordance with the Council's Planning Obligations SPD • pay local employment contributions to be calculated in accordance with the Council's Planning Obligations SPD
Highway works	<p>Owner to enter into agreement(s) under S38 and S278 of the Highways Act 1980 with the Council to construct the following highway works (together with payment of a commuted sum towards cost of maintaining additional carriageways etc to be approved by the LPA but currently estimated at £700,000):</p> <ul style="list-style-type: none"> • public realm and landscaping improvements on the eastern and western sides of Danebury Avenue immediately south of its junction with the A306 Roehampton Lane • new kerb and junction realignment and public realm and landscaping improvements at the Holyborne Avenue/Danebury Avenue simple priority bell-mouth junction; • improvement works on Holyborne Avenue south of its junction with Danebury Avenue including footway improvements, planting, cycle stands, the provision of inset servicing bays, carriageway resurfacing, and the provision of a vehicular crossover access junction to Block A; • improvement works on Danebury Avenue west of its junction with Holyborne Avenue including footway and public realm improvements, the provision of inset vehicular parking, servicing, and disabled bays, one vehicular crossover access to Block F, the relocation of bus stops and shelters B and C (Roehampton Library) and their provision as on-carriageway bus stop cages, raised table pedestrian crossings,

	<p>the relocation of a bus turn-around area and stops, and carriageway resurfacing (with the new bus stop turnaround area to be subsequently adopted as highway maintainable at public expense at the end of the relevant maintenance period);</p> <ul style="list-style-type: none"> • carriageway surfacing, public realm improvements, three raised table pedestrian crossings, inset vehicular parking bays, one vehicular crossover access to Block M, and footway improvements on Kingclere Close (to be subsequently adopted as highway maintainable at public expense at the end of the relevant maintenance period); • carriageway surfacing, landscaping, footway and pedestrian crossing improvements, the provision of inset vehicular parking bays on Laverstoke Gardens; • the provision on inset parallel vehicular parking bays, footways, and public realm improvements on Ellisfield Drive to be subsequently adopted as highway maintainable at public expense at the end of the relevant maintenance period); • the provision of footway, public realm, three inset servicing bays, four raised table pedestrian crossings, and vehicular crossover accesses to the proposed Blocks K2, J, and N (Some areas of the proposed footway will be subsequently adopted as highway maintainable at public expense) at the end of the relevant maintenance period); • the provision of a raised table crossing, footway, and public realm improvements on Minstead Gardens; • the provision of a raised table pedestrian crossing, footway, and carriageway improvements on Portswood Place to be subsequently adopted as highway maintainable at public expense at the end of the relevant maintenance period); and • footway, public realm, inset parallel vehicular parking bays, and carriageway resurfacing on Cleeve Way to be subsequently adopted as highway maintainable at public expense at the end of the relevant maintenance period).
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	<p>Owner to enter into agreement(s) under S38 and/or S278 of the Highways Act 1980 with TfL to construct the following highway works (together with payment of a commuted sum towards cost of maintaining additional carriageways etc):</p> <ul style="list-style-type: none"> • works at the existing A306 Roehampton Lane/Danebury Avenue signalised junction; • works at the existing A306 Roehampton Lane/Kingsclere Close simple priority bell-mouth access junction; • the widening of the existing one-way access and egress points from the southern side of the A306 Roehampton Lane into 166-168 Roehampton Lane to make a two-way simple priority bell-mouth access junction; • a Traffic Management Order (TMO) to relocate red-route short-stay vehicular loading and disabled parking bays on the southern side of Danebury Avenue that are currently west of the junction with Holybourne Avenue <p>A permanent Traffic Management Order (TMO) will also be required under the Road Traffic Regulation Act 1984 to:</p> <ul style="list-style-type: none"> • Install inset servicing bays on the southern and northern sides of Danebury Avenue; • Install one inset disabled vehicular parking bay on the northern side of Laverstoke Gardens south of the proposed Block B; • Install inset servicing and disabled vehicular parking bays on the western and eastern side of Holybourne Avenue • Install inset servicing bays on Harbridge Avenue; and • Relocation of bus stop cage bays and signage on Danebury Avenue. <p>The applicant will need to pay a fee of £3,200 to the Local Highway Authority to fund its administrative costs.</p>
<p>General</p>	<p>Include but not limited to:</p> <p>(i) index linking of payments to appropriate index (as agreed by the LPA); interest charging for late payments;</p> <p>(ii) parties to act reasonably; administration and repayment of unspent contributions;</p>

	<p>(iii) bar to fettering LPA's discretion; registration at Land Registry; dispute resolution;</p> <p>(iv) monitoring fee in line with the requirements of the Council's Planning Obligations SPD (50% upon commencement of the detailed blocks and 50% on the commencement of the outline blocks).</p> <p>(v) enforcement protocol</p>
<p>Legal costs</p>	<p>Owner to meet LPA's reasonable legal costs associated with the Section 106 Deed. All fees to be agreed in advance and payment made prior to completion of the Section 106 Deed</p>

Community Infrastructure Levy

24.3 The application site is located within the ‘Roehampton Charging Area’ on the ‘Community Infrastructure Levy Charge Zones’ map (within the adopted Borough CIL Charging Schedule) where there is zero charge for all new floor space. The Mayoral CIL contribution is estimated on the basis of the information supplied with the planning application to be £7,921,708 although this figure could change subject to any relief sought.

Mechanism for Securing Planning Mitigation

24.3 The Council as landowner has taken over as applicant for the planning application and intends to procure a new development partner, and there is currently no third party landowner capable of entering into a s106 agreement for this planning application. As a matter of contract law, the Council as landowner cannot enter into a bilateral agreement/contract with itself as local planning authority. Consideration must therefore be given to the appropriate mechanism for securing planning mitigation and legal advice has been taken from Winckworth Sherwood, the planning authority’s legal adviser, on this matter. This is set out in full for the benefit of the Committee below

1. There is nothing in law to prevent an LPA granting planning permission for land or development that the Council owns. Indeed, the Town & Country Planning Act 1990 (as amended) provides for it and the regulations set out the process and procedure. The Council as landowner has taken over as applicant for the planning application and intends to procure a new development partner, and there is currently no third party landowner capable of entering into a s106 agreement for this planning application.
2. As a matter of contract law the Council as landowner cannot enter into a bilateral agreement/contract with itself as LPA.
3. An Arsenal-style Grampian condition (which requires completion of a bilateral s106 agreement prior to the commencement of development) is not applicable in the current circumstances, given that it is not known what property interest a future development

partner might have in the site at the point of commencement of development. It is not unusual in developments of this nature for the development partner to be granted short building leases and/or licences, which means that potentially there would be no third party with a legal interest in the site capable of being bound by a bilateral s106 agreement during the construction of the development. Obviously, the LPA has to ensure that it secures mitigation for the effects of the development.

4. Government Guidance states that mitigation should be secured by planning condition rather than planning obligation wherever possible, and in the present case conditions are preferable because:
 - (a) conditions are not subject to the common law principles of contract law nor the limitations in section 106, so are not constrained in the same way as planning obligations; and
 - (b) conditions can be enforced against any person who is carrying out the development, whether or not they have an interest in the land.
5. This means that planning conditions could be enforced against the Council's future development partner (and its sub-developers and contractors) whether or not they have an interest in the site capable of being bound by a s106 agreement.
6. However, not all planning mitigation will be capable of being secured via condition, so this option does not provide a single solution to the issue. In particular, financial contributions and affordable housing obligations will still need to be secured through planning obligation.
7. To address the position in contract law that a person cannot enter into an agreement with itself, the Council/Landowner has committed to provide a unilateral deed of undertaking ("UU") to the LPA. The LPA would not be a party to the UU. It would be offered unilaterally by the Council/Landowner. There is precedent for the Council as landowner giving UUs to the LPA in relation to other developments undertaken by the Council. There is also precedent generally as to this approach from other LPAs and Development Corporations whereby they are granting planning permission for development where they are also the owner of the land and need to secure mitigation.
8. The UU will append an agreed draft form of bilateral s106 agreement between an unspecified owner and the LPA ("Agreed Form S106"). This draft form of bilateral s106 will reflect the heads of terms set out in the table above in Section 24. In the UU the Council as landowner will unilaterally undertake to the LPA as follows:
 - (a) to abide by the terms of the Agreed Form S106 (to be appended to the UU) with the intention that the planning obligations contained therein bind its freehold interest in the site and will become

automatically enforceable against the Council's successors in title and persons deriving title under it (so should the Council secure a development partner in the future and that developer acquires an interest in the site (whether that be a freehold interest, long leasehold interest or building lease), the planning obligations would then be enforceable against the developer as well as the conditions); and

- (b) subject (c) below, not to dispose of its freehold interest or grant any leasehold interest in the site without first imposing a legally enforceable obligation on the transferee to enter into the Agreed Form S106 (so should the Council secure a development partner in the future that developer would not be able to acquire an interest in the site until it had entered into the Agreed Form S106).
- (c) The restriction on disposals in (b) above would need to carve out disposals of agreed parts of the site (e.g. individual residential units, non-residential units, land owned by statutory undertakers) so that future purchasers/lessees of those parts would be exempt from the requirement to enter into the Agreed Form S106. Without such a carve out such individual units would be unmarketable. This carve out would reflect the standard s106 boilerplate which confirms that planning obligations are not enforceable against owners and occupiers of individual units.

- 9. In recognition of the fact that the LPA could not enforce the terms of the UU against the Council as landowner, the UU will contain an enforcement protocol setting out how any issues of non-performance by the Council/Landowner would be resolved internally within the Council. Again, this approach has been utilised by other public bodies to show commitment to the UU and transparency as to how it would operate but importantly it enables the LPA to secure any mitigation required. This approach has been agreed by the applicant.

25. Planning Balance and Conclusions

- 25.1 The assessment of the proposed development has taken into account the policies referred to in the policy section and throughout this report. Extensive consultation has been undertaken and whilst it is acknowledged that the Covid-19 pandemic has limited face to face meetings to discuss the revisions submitted in May 2020, information about the planning application has been widely distributed to properties in the surrounding area and the consultation period has been extended to allow additional time for representations to be made. The representations received have been carefully considered in the assessment of the application.
- 25.2 The regeneration of the Alton Estate has been identified as a strategic priority by the Council and a number of options have been considered. The area identified for regeneration in the current application has been the subject of

wide-ranging consultation and an assessment of options has been undertaken. The application site is characterised by poor quality housing and buildings in physical decline and areas of underutilised space and a poor-quality public realm and level access that fall significantly short of current building regulation requirements and housing standards. There is a concentration of social deprivation in the area and lack of opportunities for the community living there. The proposals seek to improve and accelerate local estate regeneration to deliver more and better-quality housing to enhance opportunities for existing and future residents on the Alton Estate.

- 25.3 The proposed development would result in a number of public benefits, which must be weighed against the harm identified in the main body of this report. It will also be necessary to ensure that the impacts of the development can be mitigated through the use of appropriate conditions or through the s106.
- 25.4 The principle of development is acceptable taking account of national, strategic and local planning policies, a principle which is generally welcomed by those who have made representation. The Alton Estate has been identified for regeneration to deliver improvements to housing, business floor space, shops, community facilities, and environmental improvements to the landscape, as well as improved employment opportunities for residents and new transport linkages. The proposed development is generally in accordance with the vision and objectives set out in the Local Plan and the Roehampton SPD.

Principle of demolition

- 25.5 Based on the available information, the demolition of the existing buildings is necessary to deliver improved housing and to achieve the wider regeneration objectives and public benefits set out in the Roehampton SPD. The refurbishment of existing buildings would not guarantee that these objectives could be achieved.

Housing provision

- 25.6 The scheme makes provision for an increased number of dwellings at a higher density and for the replacement of existing social rent units on an equivalent basis in terms of unit numbers, habitable rooms and floorspace in accordance with policy requirements. The provision of additional residential units accords with policy objectives and would contribute to meeting the annual housing target across the phased implementation period. This is a significant benefit of the scheme which is considered further in the planning balance. The scheme therefore complies with London Plan Policies 3.3 (Increasing Housing Supply) and 3.4 (Optimising Housing Potential) and Local Plan Policies.
- 25.7 The private housing mix proposed in the Detailed Element does not comply with policy DMH3, with a higher proportion of 1 bedroom units and a lower proportion of 3+ bedroom units and this weighs against the scheme. Whilst it is recognised that the dwelling mix can be applied flexibly it is considered

important to ensure that the need for family sized units is met. As mitigation a condition is proposed to ensure that a *minimum* of 10% of the units to be provided in the Outline Element would be family sized units in order to ensure the proposed development delivers an appropriate level of provision in accordance with policy requirements.

Affordable Housing

- 25.8 The policy requirement in respect of estate regeneration is to ensure the replacement of existing affordable housing and to *maximise* the level of additional affordable housing that can be secured.
- 25.9 The level of social rent and overall affordable housing to be provided has been increased in the revised proposals and the revisions have also accelerated delivery of the affordable housing. 75% of the affordable housing will now be delivered as part of the detailed application. The conversion of Block O from market to affordable tenure provides better integration of the affordable housing and has addressed concerns about segregation of the affordable housing.
- 25.10 The local planning authority's viability advisers Carter Jonas has advised that the proposed level of affordable housing is the maximum reasonable amount that can be secured from the proposed scheme. Early, mid and late reviews are required to ensure the level of affordable housing is maximised over the course of the development. The GLA Viability team has advised that aspects of the FVA need further clarification and is unable to say at this stage if additional affordable housing could be justified or whether there is a deficit and what this might be; this is reflected in the Officer recommendation. The FVA will be further appraised by the GLA Viability Team as part of the GLA Stage 2 review should the Committee resolve to grant permission.
- 25.11 It must be a requirement of any planning permission subsequently granted that whatever is the outturn of the number of homes in the final scheme, that the percentage of affordable housing by unit, habitable room and floorspace provided in this hybrid application, split in similar tenure proportions to those in the outline scheme having ensured first that all social housing and leaseholder replacement units have been delivered.
- 25.12 In respect of the replacement social rent units, the Applicant would need to identify the social housing rent that would be charged on these homes. The current assumption is that the homes would be let at formula social rents and if this is revised there should be provisions made within the Section 106 / Unilateral Undertaking to secure any additional benefit arising to support increased provision of affordable homes.
- 25.13 There will be a requirement for the submission and agreement of an estate management strategy prior to the occupation of the development. This should be secured by condition.

Non-Residential Uses

- 25.14 The proposals offer the potential for a step-change in the quality of retail, workspace, educational and community facilities to serve the Alton estate and wider community. As landlord, the Council will continue to exert high levels of control and management of these facilities to ensure they meet the needs of the local community, ensuring the continuity of services and ongoing community engagement.
- 25.15 The Roehampton SPD identifies the potential for up to 5000 sqm gross of replacement and new retail floorspace. The proposed development will deliver 3,305 sqm. Whilst the amount of retail floorspace is less than the potential identified in the SPD, the main objective of policies DMTS1 and DTMS3 is to protect existing town centres. It is also proposed that the re-provision of existing retail floorspace should be secured by an appropriate condition. There will be a reduction in retail floorspace in the Portswood Place Local Parade, but this is considered acceptable given the enhancement of the Local Centre and the re-provision of a convenience store in a new pavilion building to be located at Portswood Place to meet local needs.
- 25.16 The Proposed Development will deliver up to 5,368 sqm of new and replacement community facilities within the Detailed Element, within the target of 'up to' 5,500sqm identified in the Roehampton SPD. This could be seen as a reduction in the amount of community floorspace currently on the Application Site, however approximately 2,394 sqm of this floorspace is vacant or comprises inefficient circulation space that offers no community value. The Proposed Development therefore delivers an increase of 1,631 sqm of community floorspace compared to the amount of in use floorspace currently on the Application Site, and the new floor space will also be considerably better quality and of greater value to residents. The new buildings will offer an enhanced service to building users due to their enhanced quality and the provision of two new community spaces. The new buildings have been designed to accommodate flexible use and this will meet a wider range of community needs. The Youth and Library Services will undertake further engagement with users and the wider community to ensure the new space and services meets community need.
- 25.17 To ensure that the public benefits of the enhanced provision are secured and can be given appropriate weight in the planning balance there will be a requirement for a Community Facilities Strategy and Management Plan to be prepared in consultation with the local community and this should be secured by condition. There will also be a requirement that the new facilities are open for use by the public before the existing facilities can be closed or that an alternative provision is made in the intervening period which is at least of the equivalent level of service, this will be secured by condition.
- 25.18 It will be necessary to secure the timely re-provision of the built health facilities as the demolition of two existing surgeries which serve the existing community is required early in the development programme. A Health Delivery Plan will be required by condition and the replacement built facilities must be capable of being open for use by the public prior to the demolition of

existing facilities and this is also to be secured by condition, this would cover any temporary arrangements to ensure continuity of provision although it is recognised that the applicant cannot control the actions of the Clinical Commissioning Group or practices currently operating from the estate but the total loss of these facilities would not be acceptable. The applicant will continue to work with the Clinical Commissioning Group to understand what general practice services and other health services would be re-provided.

- 25.19 Once complete and operational, it is estimated that the development would provide between 243 and 296 jobs from the proposed office, community and commercial uses, estimated to represent a net increase of between 50 and 59 jobs which is also a benefit of the scheme which weighs in its favour. The Council will remain freehold owners of the commercial premises, enabling the future provision of retail, office and community floorspace, beyond the re-provision of the existing retail floorspace, to be carefully curated to meet the needs of the community in the future. Details of the future marketing and lettings strategy would be secured through the use of conditions. The provision of flexible, affordable workspace is a further benefit of the scheme and a management strategy for the affordable workspace would be secured by condition.

Design

- 25.20 It is considered that the proposed development meets the design criteria set out in Policy DMS 1. The masterplan has been developed in consultation with the community and will deliver the regeneration of the area and a high-quality living environment in accordance with the core principles set out in the Roehampton SPD. It has become a well thought through masterplan that will make a positive difference to the benefit of existing and future residents.
- 25.21 The proposal provides an enhanced and integrated approach to green space, ecology, planting and public realm. The proposals seek to address the difficult topography, with new accessible routes working with the new building positions. There will also be a gain in public and private amenity space with new soft landscaped areas proposed at ground and podium levels. These aim to encourage communal use and provide opportunities for movement, integrated play, recreation, biodiversity and visual amenity.
- 25.25 The masterplan seeks to create a liveable environment that gives pedestrians and cyclists priority, reducing reliance on private car-based travel. The retained road network will be upgraded to generate a legible hierarchy of public and private spaces, using a combination of streets, paths, courtyards and squares. The new pedestrian areas will be free of refuse and deliveries with servicing exclusively from the carriageway. Cycle parking is provided in secure and convenient storage areas within the shared carparks or adjacent to entrance lobbies. The overall layout and enhancement of existing streets will allow positive natural surveillance across the site. These active frontages also give life to the streets - creating a more neighbourly atmosphere.

25.26 It will be important to ensure the quality and integrity of the architecture and landscape is maintained through future phases of development. The Design Code will assist in maintaining design quality and the integrity of the masterplan. Some further design development is required, and conditions are recommended on securing the use of high-quality materials and further details on the proposed artwork that is to be integrated into the entrances to the buildings. Further details will also be required relating to the landscaping proposals for Downshire Fields and the materiality of the Portswood Place community building to mitigate potential impacts on designated heritage assets. In line with the recommendations of the DRP, a maintenance and management strategy and necessary funding will be required to ensure the quality of the landscape is maintained. This would be secured by condition / Section 106 as appropriate.

Housing Quality

25.27 The majority of existing social rented homes on the site fall notably below London Plan space standards. All units in the revised scheme would meet Wandsworth's Affordable Housing Design Standards for the Alton Estate Regeneration project, as well as complying with the Draft London Plan.

25.28 Policy DMH4 and the Mayor of London's Housing SPG states that units should be dual aspect wherever possible, particularly where one of the aspects is north facing. Whilst 41% of the units in the Detailed Element are single aspect there are no north facing single aspect units. 55% are dual aspect and 4% triple aspect.

25.29 Based on the standards in Policy DMH7, a total of 7,090 square metres (sqm) of amenity space is required in the Detailed Element. The proposals would deliver 10,262 sqm in the Detailed Element comprising 5,128 sqm of private amenity space and 5,134 sqm communal space (average of 16 sqm/home or 7.84 sqm private amenity space/home). This would exceed the standards set out in Policy DHM7.

25.30 A number of issues relating to accessibility were raised in relation to the original proposals. These related to unit layouts, external routes and blue badge parking. In addition, further to advice received from Officers and the DRP, the applicants have undertaken an Accessibility Audit and changes have been proposed to the scheme to ensure compliance with standards.

25.31 Minimum separation distances of 18 metres have been maintained or exceeded throughout the Proposed Development, thereby complying with the Mayor's Housing SPG.

Impact on Amenity

25.32 Objections have been raised by residents of properties adjoining the application site on the grounds of impact on daylight and sunlight. The proposed development would cause some harm to residential amenity in terms of the impact on daylight and sunlight that would be enjoyed by the

occupiers of neighbouring properties. In the areas where greater deviations from the BRE guidelines are identified as a moderate or major effect, this is due to the existence of the built form of the neighbouring buildings where a number of windows are already set behind recessed balconies or located beneath an overhanging roof or the room is served by additional windows. Taking this into account, it is not considered that the application could be resisted when applying policy DMS1 of the DMPD.

25.33 The transgressions of the daylight guidelines set out within the main report are a factor of height, massing, spacing and plan form of the proposed blocks, plus overhanging balconies, rather than internal room layouts. Overall, the affordable blocks provide a better level of adherence to daylight guidelines.

25.34 The wind microclimate at the completed development shows windier conditions than the current baseline conditions and landscaping and mitigation requiring the retention of trees in these locations will be required to satisfy the wind microclimate. This mitigation will be secured by condition.

25.35 It is considered that the potential for the overshadowing of neighbouring residential properties is acceptable taking into account the fact that the assessment has been undertaken in accordance with published guidelines and having regard to the relevant assessment criteria. In terms of overshadowing impacts on proposed development, it is considered that the deviations from the BRE guidelines for the sun lighting of the external courtyards to residential blocks K and Q are not significant and that the greater availability of sunlight into these areas in the summer months would offset the poor sunlit conditions that would be experienced in the winter months. Taking this into account, it is not considered that the application could be resisted when applying policy DMS1.

Noise

25.36 A development of this scale will inevitably have temporary adverse impacts in terms of construction noise, traffic and vibration. This is a matter of concern to the local community given that the development will be phased over a 10-year period. The noise assessment concludes that the impacts of noise and vibration generated from the construction phase of the Development through vehicles and construction machinery can be suitably controlled through an appropriate Construction Environmental Management Plan (CEMP) and the implementation of best practice measures; this would be secured by condition.

25.37 The noise impacts of the proposed bus turnaround have been assessed and this has been informed by the baseline noise measurements obtained at the existing bus turnaround location. The assessment indicates that the total level of increase for both daytime and night periods (maximum 0.8 dB) would be imperceptible.

25.38 It is noted that users of the existing green space to the east of the library would be subject to a higher daytime noise level than users of the Village

Square which weighs against the scheme. The benefits of the Village Square as an amenity space and its central location between the Alton Estate and Roehampton Village are positive and to be taken into account in the overall balance.

Heritage

- 25.39 The local planning authority has a duty under paragraph 190 of the June 2019 NPPF to identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset). The Alton Estate has a rich and unique heritage and a development on this scale will inevitably impact on the setting of existing heritage assets.
- 25.41 Some harm would be caused to the special interest of the Alton Conservation Area through the loss of several original, but unlisted estate buildings of little inherent heritage value within its boundary, and several more in its setting; as well as through the development of buildings of a larger scale in its setting.
- 25.42 The replacement of the undesignated buildings to the east side of Alton West will make a change to the setting of the Alton Conservation Area and the listed buildings within it. New Block Q introduces larger structures in the Alton Conservation Area itself in the setting of the grade II* Downshire House, though this is relatively well buffered and sits in the context of taller grade II listed point blocks. Longer-range impacts on the grade I Registered Park and Garden of Richmond Park are very limited. There will be some harmful impact on the historic environment as a result of the major development towards Roehampton Lane and Danebury Avenue. The development of the new buildings in Portswood Place would involve the loss of some original elements of the LCC masterplan and would cause some harm to the Alton Conservation Area. Further consideration must be given to the elevational treatment and the use of more complimentary materials in the proposed Nursery and Children's Centre and the new community building to ensure they sit well alongside the listed bungalows and do not interrupt the relationship between the bungalows and the listed slab blocks. It is recommended that this should be the subject of a condition in the event of planning approval being granted.
- 25.43 Block M would replace No.190 Roehampton Lane which is of limited inherent aesthetic or historical value and its demolition would thus cause no harm to the special interest of the Alton Conservation Area. The building would introduce a larger scale of development to this part of the conservation area than exists at present, but its massing has been broken up into several parts and the building would read as part of the wider Alton Estate grouping.
- 25.44 Nos. 166 and 168 Roehampton Lane are of no inherent heritage value and are considered to detract somewhat from the conservation area's special interest. Their demolition would thus cause no harm to the significance of the Aton Estate Conservation Area. The impact of Block Q on the overall

significance of Downshire House, and on the special interest of the Alton Conservation Area, would be very low.

- 25.45 The changes to the treatment of Harbridge Avenue which will allow for the retention of all but four of the existing trees are welcomed. Officers consider that the existing setts contribute to the character of this part of the conservation area and should be reused in future streetscape works. It is recommended that this should be addressed by a condition in the event of planning approval being granted.
- 25.46 Overall, it is considered that the landscape proposals would enhance the special character of the Alton Conservation Area by responding positively and sensitively to the original vision of the LCC architects. Critically, the role of the open space as a key part of the original masterplan, and as the main setting of the slab and point blocks, would be maintained. The benefits of this approach would outweigh any localised harm from the relatively modest expansion of the hard surfacing along Danebury Avenue.
- 25.49 The designation of Alton West as a Registered Park & Garden has placed greater focus on the landscape and in particular, the importance of Downshire Field. It is considered that further review of the landscaping proposals for Downshire Field and paddock area in front of Mount Clare is required to minimise harm to the Registered Park & Garden. The preparation of a Conservation Management Plan for Downshire Field will also be required. Officers recommend that this should be the subject of a condition in the event of planning approval being granted.
- 25.50 The reasons for the relocation of the existing bus turnaround and bus standing area are understood. Whilst it is accepted that the proposed location would have a less direct impact on the setting of Downshire Field, it should also be noted that the new location is within the boundary of the Registered Park & Garden, is significantly larger than the existing turning area and would require the removal of a number of trees. It is considered that the proposals for the design and treatment of the bus turnaround should be reviewed to minimise impacts on the Registered Park & Garden. It is recommended that this should be the subject of a condition in the event of planning approval being granted.
- 25.51 It is considered that the harm caused to a small part of the Registered Park & Garden by the removal of trees, landscaping and the existing shuttered concrete retaining wall to accommodate the development of Block M would constitute 'substantial harm' to a designated heritage asset in the terms of the NPPF. Para 195 states that where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss. The harm caused by the development to the Registered Park & Garden as a whole is

considered to be 'less substantial. Nevertheless, it will be necessary to balance this against wider public benefits. There is opportunity for further consideration to be given to the mitigation of impacts on the Registered Park & Garden, for example through enhancement of the setting of The Bull which is an important designated heritage asset. This would be consistent with Paragraph 192 of the NPPF which states that in determining applications, local planning authorities should take account of the 'desirability of sustaining and enhancing the significance of heritage assets.

25.53 Whilst Allbrook House and Roehampton Library have not been previously identified by the Council as non-designated heritage assets, the Twentieth Century Society has objected to the demolition of these buildings on the grounds that they should be identified as important non-designated heritage assets. Demolition of these buildings is necessary to deliver the development proposals and would have a less than substantial impact on the setting of the Alton Conservation Area. Assessing these buildings as non-designated heritage assets it would be necessary to balance their loss against the wider public benefits of the regeneration proposals. In the event that planning permission is approved, a condition would be required to secure the recording of these buildings prior to demolition.

25.54 It is considered that the proposed development is in accordance with Core Principle 5 of the adopted Roehampton SPD, which outlines the need to respect and conserve the heritage that defines the Alton Estate. It is necessary to balance the identified 'less than substantial' harm to designated and non-designated heritage assets set out above against the wider public benefits of the development proposals.

Arboriculture

25.59 It is considered that the loss of trees will be compensated for by the scale of tree planting proposed which will include a significant number of medium and large trees. The proposed tree strategy will strengthen the masterplan and the trees will become key features and focal points within each character area. A mix of native and non-native tree species will define the key character areas, whilst providing biodiversity and seasonal interest across the scheme.

Biodiversity

25.60 The ES concludes that the Proposed Development would not have an effect on the nearby local (including loss of existing trees), regional and national protected sites. Whilst there would be moderate adverse effects on habitats and bat roosting and minor adverse effects on bat commuting and foraging during the construction phase, it concludes that the proposed mitigation measures will mitigate any residual effects. During the operational phase, effects are less pronounced, albeit moderate or minor adverse effects would be caused on habitats and bat commuting and foraging. However, the ES concludes that the proposed mitigation measures will ensure that these adverse effects are addressed, and minor beneficial effects secured.

25.61 The ambition to promote biodiversity objectives is welcomed. However, the DRP has highlighted the need for the applicant to give further careful consideration to the ecological value of the landscape and in order to maximise the biodiversity experience, suggest considering evergreen and indigenous species in the courtyards as well as in the public areas. The seasonality of landscape is very important as a way for new plantings to make a positive contribution to the ecosystem of the area, being more resilient throughout time and the change in form, scale and colour also serves to bring variation in the way people experience and perceive the spaces. Given the proximity to Richmond Park, the opportunity to attract wildlife was considered by the DRP to be both exciting and ground-breaking. A Biodiversity Policy for the site should be devised as well as a Landscape and Environmental Management Plan which should prioritise priority species and habitats together with a full Landscape plan should be prepared consisting of proposed species, specification and maintenance and an ecological enhancement plan as per the recommendations from Ecological Appraisal and Species surveys, along with a maintenance programme. This would be secured by condition.

25.64 There are gaps in what has been provided with regard to ecology and ecological implications of development. Given that there may be a time delay before details are finalised on this scheme, there is a strong possibility that the ecological “base line” could change in the interim. It would therefore be appropriate to finalise and secure mitigation and enhancement for biodiversity via a series of conditions that deal with what is required prior to demolition and site clearance & pre commencement of construction. A whole site biodiversity strategy demonstrating provision of, and management (in perpetuity) for, habitats to be created, maintained and / or enhanced to demonstrate no net loss of biodiversity and measurable biodiversity net gain. These conditions are required to ensure compliance with London Plan Policy 7.19 and Policies PL4, DMO4 and DMO5.

Open Space, Play and Public Realm

25.65 The constraints of the existing buildings, location of the developed areas across the estate and the development parameters set out by the Roehampton SPD mean that opportunities for new areas of open space area limited. However, consistent with Policy DMO1, the Proposed Development avoids a net loss of publicly accessible open space and delivers quantitative and qualitative improvements to the existing open space on the Application Site to address security concerns and encourage these spaces to be used more by residents.

Highways and Transport

- 25.69 The level of car parking proposed is considered to be appropriate to accommodate demand without unacceptably increasing street parking stress. The proposed car parking ratio is 0.45 spaces per dwelling in accordance with the adopted London Plan and is considered proportionate for this local circumstance as detailed within the main report.
- 25.71 This application would only secure parking for the detailed elements (some 286 on-plot car parking spaces are secured in detail). The parking for the elements in outline will be a reserved matter and can be reviewed at an appropriate point. A suitably worded condition should be attached to any permission to require a review of parking for the outline blocks and for streets prior to the submission of the first RMA for Phase 2. This approach has been agreed with TfL. Additionally, a parking management strategy as to how and to whom spaces will be allocated within the development, including to different tenures, should be required by condition.
- 25.72 Obligations will need to be entered into under s278 and s106 to secure the necessary highways and transport improvements and a commuted sum for highway maintenance. In addition, financial contributions will need to be secured under the s106 agreement to mitigate the impacts of the development including phased contributions for improvements to bus services with the first payment aligned with the commencement of development.
- 25.73 The S106 agreement should also include an obligation for the applicant to provide electrical vehicle charging points in accordance with standards set out in the current London Plan. Up to eight car club parking bays are to be provided within the proposed development and the applicant would be expected to provide free car club membership for one year for all residents of properties within the application site, also secured in the S106 agreement.
- 25.74 Officers agree with TfL's proposal to delay the works to the Danebury Avenue/Roehampton Lane junction until 2029/30 so that the junction can be monitored to ensure that the case is properly made for this improvement, or to use this time and the available evidence to enable alternative interventions to be considered. This will be secured by planning condition should permission be granted.

Sustainability

- 25.75 The proposals are consistent with policy requirements relating to climate change mitigation/adaptation, energy and sustainable design and construction.
- 25.76 The Energy Strategy seeks to maximise the level of reduction in on-site carbon emissions in accordance with planning policy requirements. The updated energy report demonstrates that the zero carbon target cannot be met on site. It also demonstrates that the level of on-site carbon reduction has been maximised and the 35% minimum reduction on site as laid out in the

GLA guidance and the Intend to Publish London Plan on preparing energy assessments has been met including the fabric efficiency targets. Both residential and non-residential aspects will also achieve a standard of Zero Carbon throughout offsetting contributions. The detailed application component has been calculated at £1,495,965, with the total outline application component calculated at £920,835. This will be secured through the s106 agreement.

25.77 The Sustainability Statement states, “a minimum of ‘BREEAM Excellent’ will be achieved for all non-residential element of the development.” A commitment to achieving ‘BREEAM Outstanding’ has been agreed with the applicant.

25.78 A Circular Economy Statement has been submitted, compliance with this will be secured by condition.

Drainage

25.79 In terms of flood risk, the site is wholly located in Flood Zone 1 which given the requirement to locate development in areas least likely to flood means that the sequential test is passed notwithstanding the site allocation.

25.80 The proposals incorporate a surface water flood risk mitigation strategy and the use of sustainable drainage systems. The SuDS system including rain gardens, permeable car parking and permeable podium courtyards in combination with biodiverse roofs will provide a whole range of benefits including enhanced amenity and biodiversity, improved water quality and reduction and slowing down of surface water runoff leaving the site. These will be secured through appropriate planning conditions. The approach to SuDs has been agreed with the GLA following advice received at Stage 1 and through subsequent discussions.

Air Quality

25.81 The Development is expected to be compliant with the air quality neutral requirement of the SPG with regards to transport emissions. The applicant has proposed an air quality contribution towards measures to improve air quality as set out in the Air Quality Strategy. This will be secured through the s106 agreement.

Cultural Strategy

25.82 The Cultural Strategy has been developed alongside the evolution of the masterplan and in consultation with the local community: there are two elements to the strategy with the first being around public art and the second around arts and cultural infrastructure. A public arts contribution has been agreed and will be secured in the Section 106.

25.83 It is considered that securing the delivery of an approved Cultural Strategy and Action Plan is critical to the regeneration of the estate. Arrangements for

the programming and management of spaces will be crucial in ensuring all activities are timely programmed and well-coordinated making sure all interests and age groups are considered; this is different to work around community engagement but complementary. The Head of Arts and Culture has emphasised the importance of securing and guiding the Cultural Projects Co-Ordinator role and would welcome an opportunity to secure a cultural anchor within the Alton Estate.

- 25.84 The local planning authority is seeking either a contribution of £648,000 to be secured through the s106 agreement to cover the costs of appointment of a Cultural Projects Co-ordinator and the phased delivery of a programme of cultural events and projects or for an alternative mechanism to ensure that an approved Cultural Strategy and Action Plan to the same value is delivered by the appointed development partner and/or the applicant with a provision for step in rights for the Council should it prove to be the case that the applicant/development partner is not able to deliver the approved Plan; the details of this would be secured in the Section 106.

Equalities

- 25.85 Officers have addressed the public sector equality duty and the EINA has provided robust information about the equality-related impacts arising from the development which has assisted Officers in carrying out this duty. Having regard to the equality objectives it is considered that, on balance, the impacts of the proposed development on people with 'protected characteristics' will generally be positive. Harm arising from the interim and construction phases of the development is temporary and can be mitigated through conditions as set out above. A number of actions will be required in monitoring the anticipated effects on protected groups of the Alton Estate Regeneration programme. This action plan and monitoring will be developed further, including the identification of delivery milestones, and secured through an appropriate condition.

Phasing

- 25.86 The Phasing Plan shows the intended phasing of development which is required to accommodate the proposed decant and rehousing strategy. Early delivery of affordable housing will ensure the decant of residents. Together with the re-provision of community facilities, this will allow the demolition and construction programmes to follow on. Precise dates have not been defined in the Phasing Plan in view of the need for the Council to procure a new development partner. However, the Phasing Plan which will be agreed as part of the application indicates that the bulk of the affordable housing and the community facilities will be provided in the first two stages of development. Any variation from the Phasing Plan will require a new application and a deed of variation.

Planning Obligations

- 25.87 The s106 Heads of Terms have been negotiated having full regard to the nature of the development and to the normal expectations in accordance with the statutory tests for s106 obligations set out in the Community Infrastructure Levy Regulations 2010 (as amended) and the adopted Planning Obligations SPD.
- 25.88 Triggers will be required based on market sales completions to secure the delivery of the affordable housing in both the detailed and outline elements of the application both by units and by habitable rooms. It will be necessary to secure these triggers as part of the s106 agreement. Early phase/mid and late review mechanisms would need to be secured within the legal agreement and additional on-site affordable housing provided should the scheme enter into surplus at any of the review stages.

Conclusions

- 25.89 In accordance with section 38 (6) of the Planning and Compulsory Purchase Act 2004, in making the recommendation to PAC officers have considered the planning application with regard to the requirements of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017, National Planning Policy Framework 2019 (paragraphs 11, 47-50), and the development plan (The London Plan, the Wandsworth Core Strategy, the Site Specific Allocations Document and the Development Management Policies Document), so far as material to the application, and to other material considerations including the Intend to Publish London Plan, adopted and draft SPDs, representations received from statutory and non-statutory consultees and third party representations.).
- 25.90 It is considered that the proposal would result in a number of public benefits, identified in this report. The principal public benefit is that it would deliver the transformational change sought by adopted planning policy in relation to the Alton Estate.
- 25.92 The provision of new housing should be given substantial weight as a benefit of the scheme. The provision of replacement and new affordable housing can also be taken as a positive benefit. To this must be added the very significant benefit of the re-provision of existing social rented housing stock to an improved standard and the enhancements to community facilities, including health provision, and enhanced open space. Furthermore, the bulk of the affordable housing and the new and enhanced community facilities and other public benefits would be delivered in the early phases of development and would benefit existing residents.
- 25.93 It is concluded that the 'less than substantial harm' to designated and non-designated heritage assets is clearly outweighed by wider public benefits set out above. Overall, the harm caused by the development and identified above within the main report would be outweighed by the wider public benefits.

- 25.94 In order to make the development acceptable in planning terms and secure the necessary mitigation identified throughout the assessment in the report the application of conditions will be necessary: these are set out below the officer recommendation. Furthermore, the applicant will be required to enter into a s106 agreement to manage and mitigate the impacts of the proposed development as set out in this report. As the applicant is (another part of) the Council it is not possible to enter into a bilateral agreement under Section 106 of the Planning Act, a unilateral undertaking will be offered which will obligate a future development partner to enter in to a bilateral agreement to secure the obligations to deliver the agreed heads of terms set out above.
- 25.94 It is noted that this is a GLA referable application: to date the GLA has not confirmed it is satisfied that the scheme provides the maximum reasonable amount of affordable housing. The FVA will be further appraised by the GLA Viability Team as part of the GLA Stage 2 review should the Committee resolve to grant permission. Continued engagement with the GLA will be required in the lead up to the Stage 2 process and during that process to understand whether the GLA can be satisfied that the maximum level of affordable housing is being delivered over the course of the scheme. The Committee should be aware that this could result in negotiated amendments to the scheme to increase the level of affordable housing above what is proposed in the scheme before the planning authority. The recommendation has been tailored to enable this to be accommodated without reference back to PAC.
- 25.95 To conclude, it is considered that the development would be in general compliance with the development plan for the Borough.
- 25.96 Furthermore, it is concluded that none of the material considerations which have been identified and taken into account in reaching a recommendation indicate that the presumption in favour of approving sustainable development which is in accordance with an up-to-date development plan should not apply here (paragraph 11 of the NPPF). If there were these would need to be incapable of being mitigated and of sufficient weight to justify refusal of the application. Officers are therefore recommending approval of the scheme, subject to conditions and to securing Section 106 obligations further to Stage 2 referral to the GLA and any directions from the Secretary of State. Further engagement with the GLA will take place.

RECOMMENDATION:

It is recommended that the application be approved subject to:

- i) the negotiation, revision and completion of a draft Section 106 agreement securing the heads of terms set out in the report and including triggers as necessary including as indicated in relation to the delivery of affordable housing and community facilities to the satisfaction of the Assistant Director (Planning and Transport Strategy);

- ii) the submission of a signed Unilateral Undertaking by the applicant which would include an obligation not to dispose of its freehold interest or grant any leasehold interest without securing that any future development partner would be required to enter into, without amendment, the final draft Section 106 agreement referred to at (i), to the satisfaction of the Assistant Director (Planning and Transport Strategy); and
- iii) subject to further discussions with the GLA leading up to a formal Stage 2 referral, with authority given to the Assistant Director (Planning and Transport Strategy) to agree any increase in the affordable housing provision above the level secured in the agreed heads of terms sought by the GLA (and agreed by the applicant) including consequent amendments to the Section 106 agreement in terms of tenure and unit size mix; and
- iv) the decision of the Mayor following Stage 2 referral to the Mayor of London not to call in the application for his determination or to direct a decision; and
- v) the conditions listed below, for which delegated authority will be given to the Assistant Director (Planning and Transport Strategy) to amend, revise, delete and make additions as might be required by the Stage 2 discussions with the GLA.

In respect of the delegated authority sought above in sections (i), (ii) and (v) these to be exercised in consultation with the Chair of the Planning Applications Committee.

CONDITIONS

1. Condition NC28 – In accordance with approved drawings

The development shall be carried out in accordance with the following approved drawings, documents and specifications.

DOCUMENTS:

Revised Development Specification, Revised Parameter Plans, Design and Access Statement & Addendum, Access Statement, Environmental Statement and Addendums dated March and June 2020, FRA and Drainage Addendum, Revised Energy Strategy, Sustainability Statement Addendum, Transport Assessment Addendum, Verified Views, Heritage Statement Addendum, Arboricultural Addendum, Revised Financial Viability Assessment, Affordable Housing Addendum, Revised Decant Strategy, Non-residential Management and Governance Statement, Framework Wider Estate Management Structure, Revised Equalities Impact Needs Assessment, Statement of Community Involvement and Addendum, Operational Waste Strategy & Addendum, Revised Internal Daylight, Sunlight and Overshadowing Assessment, Fire Safety Strategy & Addendum.

DRAWINGS:

Site Information:

9028-A-Z-M-100-04-0011-0015 Rev P01, 9028-A-Z-M-100-80-103 Rev P03, 9028-A-

Z-M-100-08-0001 Rev P01, 9028-A-Z-M-100-04-200 Rev P01, 9028-A-1-M-100-04-201 Rev P01, 9028-A-2-M-100-04-202 Rev P01, 9028-A-3-M-100-04-203 Rev P01, 9028-A-4-M-100-04-204 Rev P01, 9028-A-5-M-100-04-205 Rev P01, 9028-A-6-M-100-04-206 Rev P01, 9028-A-7-M-100-04-207 Rev P01, 9028-A-8-M-100-04-208 Rev P01, 9028-A-9-M-100-04-209 Rev P01, 9028-A-10-M-100-04-210 Rev P01, 9028-A-11-M-100-04-211 Rev P01, 9028-A-12-M-100-04-212 Rev P01, 9028-A-13-M-100-04-213 Rev P01, 9028-A-14-M-100-04-214 Rev P01, 9028-A-15-M-100-04-215 Rev P01, 9028-A-16-M-100-04-216 Rev P01, 9028-A-17-M-100-04-217 Rev P01, 9028-A-18-M-100-04-218 Rev P01, 9028-A-19-M-100-04-219 Rev P01, 9028-A-20-M-100-04-220 Rev P01, 9028-A-Z-M-200-05-0210-0221 Rev P01, 9028-A-Z-M-100-04-0001-0013 Rev P02, 9028-A-Z-M-300-06-0300-0302 Rev P01.

Parameter Plans

9028-A-Z-M-100-04-0030-0034 Rev P02

Plans

9028-A-A-GF-100-04-0010 Rev P05, 9028-A-A-01-100-04-0011 Rev P04, 9028-A-A-02-100-04-0012 Rev P04, 9028-A-A-03-100-04-0013 Rev P04, 9028-A-A-04-100-04-0014 Rev P04, 9028-A-A-05-100-04-0015 Rev P04, 9028-A-A-06-100-04-0016 Rev P04, 9028-A-A-RF-100-04-0017 Rev P02.

9028-A-K-GF-100-04-THD Rev P06, 9028-A-K-01-101-04-THD Rev P05, 9028-A-K-02-102-04-THD Rev P04, 9028-A-K-03-103-04-THD Rev P04, 9028-A-K-04-104-04-THD Rev P04, 9028-A-K-05-105-04-THD Rev P04, 9028-A-K-06-106-04-THD Rev P04, 9028-A-K-07-107-04-THD Rev P04, 9028-A-K-08-108-04-THD Rev P04, 9028-A-K-RF-109-04-THD Rev P04

9028-A-M-GF-100_04_100 Rev P04, 9028-A-M-01-100_04_101 Rev P04, 9028-A-M-02-100_04_102 Rev P03, 9028-A-M-03-100_04_103 Rev P03, 9028-A-M-04-100_04_104 Rev P03, 9028-A-M-05-100_04_105 Rev P03, 9028-A-M-06-100_04_106 Rev P03, 9028-A-M-07-100_04_107 Rev P03, 9028-A-M-08-100_04_108 Rev P03, 9028-A-M-RF-100_04_109 Rev P03, 9028-A-M-RF-100_04_0110 Rev P03

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9028-A-O-GF-100-04-0100 Rev P02, 9028-A-O-GF-100-04-0101 Rev P02, 9028-A-O-01-100-04-0101 Rev P02, 9028-A-O-02-100-04-0102 Rev P02, 9028-A-O-03-100-04-0103 Rev P02, 9028-A-O-04-100-04-0104 Rev P02, 9028-A-O-05-100-04-0105 Rev P02, 9028-A-O-06-100-04-0106 Rev P02, 9028-A-O-07-100-04-0107 Rev P02, 9028-A-O-RF-100-04-0108 Rev P02, 9028-A-Q-GF-100_04_100BW Rev P03

9028-A-Q-01-100_04_101BW Rev P04, 9028-A-Q-02-100_04_102BW Rev P04, 9028-A-Q-03-100_04_103BW Rev P03, 9028-A-Q-04-100_04_104BW Rev P03, 9028-A-Q-05-100_04_105BW Rev P03, 9028-A-Q-06-100_04_106BW Rev P03,

9028-A-Q-07-100_04_107BW Rev P03, 9028-A-Q-RF-100_04_108BW Rev P04

9028-A-PP-GF-100-04-0100 Rev P02, 9028-A-PP-01-100-04-0101 Rev P01, 9028-A-PP-RF-100-04-0102 Rev P01, 9028-A-DF-GF-100-04-0100 Rev P01

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9028-A-A-M-300-06-0300-302 Rev P01, 9028-A-O-M-300-06-0300 Rev P02, 9028-A-NO-M-300-06-0301 Rev P02, 9028-A-NO-M-300-06-0302 Rev P01, 9028-A-NO-M-300-06-0303 Rev P02, 9028-A-PP-M-300-06-0300-0302 Rev P01, 9028-A-M-M-300_06_300 Rev P02, 9028-A-Q-M-300_06_300BW Rev P03

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9028-A-A-M-200-05-02000203 Rev P03, 9028-A-K-M-200-05-THD Rev P03, 9028-A-K-M-201-05-THD Rev P04, 9028-A-K-M-202-05-THD Rev P03, 9028-A-K-M-203-05-THD Rev P03, 9028-A-K-M-204-05-THD Rev P03, 9028-A-K-M-205-05-THD Rev P03, 9028-A-K-M-206-05-THD Rev P03, 9028-A-K-M-207-05-THD Rev P03, 9028-A-K-M-208-05-THD Rev P03, 9028-A-K-M-209-05-THD Rev P03

9028-A-M-M-200_05_200-206 Rev P02

9028-A-NO-M-200-05-0200 Rev P03, 9028-A-NO-M-200-05-0201-203 Rev P02

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9028-A-N-M-500-05-0251 Rev P01, 9028-A-N-M-500-05-0252 Rev P02, 9028-A-N-M-500-05-0253-0254 Rev P01

9028-A-O-M-500-05-0255 Rev P01

9028-A-Q-M-200_05_250BW Rev P03

9028-A-PP-M-500-05-025 Rev P01

9028-A-K-M-220-224-05-THD Rev P03, 9028-A-K-M-225-05-THD Rev P04, 9028-A-K-M-226-227-05-THD Rev P03

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Reason: To ensure a satisfactory standard of development, and to allow the local planning authority to review any potential changes to the scheme

2. Condition CN01 - 5 years

This development shall be begun within five years from the date of this permission.

Reason: To comply with Section 92 of the Town and Country Planning Act 1990.

3. Condition - Reserved Matters (Approval)

Applications for approvals of Reserved Matters shall not be made to the local planning authority later than 7 years following the date of this planning permission.

Reason: To comply with Section 92 of the Town and Country Planning Act 1990

4. Condition - Details of Reserved Matters

Excluding the parts of the development shown on the Schedule of Drawings dated 19.8.2020 (Extent of Detailed Element Within Hybrid Application), approval of details of the following Reserved Matters shall be obtained from the local planning authority prior to commencement of that related phase or part thereof and the development shall be carried out only as approved. Reserved matters to be in accordance with the approved parameter Plans and Design Code unless otherwise approved in writing by the local planning authority: -

- access to and within the site for vehicles, cycles and pedestrians (with exception of those access submitted in detail);
- appearance;
- landscaping;
- layout;
- scale:

Reason: To comply with Section 92 of the Town & Country Planning Act 1990. Planning policy will evolve throughout the development and the reserved matters applications should take account of this.

5. Condition - Reserved Matter (Time Limit for Submission)

No application or applications shall be submitted to the local planning authority for the approval of Reserved Matters in respect of any of the development hereby permitted later than 7 years following the date of this permission unless otherwise agreed in writing with the local planning authority.

Reason: To comply with Section 92 of the Town and Country Planning Act 1990.

6. Condition - EIA Scope

The development shall be carried out within the scope tested in the approved Environmental Impact Assessment, which was carried out for the approved drawings as listed under Condition 1 of this permission and incorporate the mitigation measures set out in the Environmental Statement dated May 2019 and an Environmental Statement Addendum dated March 2020.

Reason: To ensure the development is carried out in accordance with the principles of mitigation that have been assessed in the EIA.

7. Condition - Design Code

The applications for the approval of Reserved Matters submitted under condition 4 shall be in accordance with the Design Codes Parts 1-3, dated May 2019 or as subsequently amended and agreed in writing by the local planning authority.

Reason: To control the appearance and architectural form of the development and to ensure a high quality and co-ordinated design for the built form and landscaping, in accordance with policy IS3 of the Core Strategy and policy DMS1 of the

Development Management Policies Document and London Plan Policies 7.5, 7.6 and 7.7.

8. Condition - Parameter Plans

The applications for the approval of Reserved Matters submitted under condition 4 shall be in accordance with the scale, massing, access and circulation limitations and distributions of uses set by the Parameter Plans.

Reason: To ensure the development proceeds on the basis of the scheme on which an Environmental Impact Assessment has been undertaken and to allow the Local Planning Authority to review any potential changes to the scheme in accordance with policy DMS1 of the Development Management Policies Document.

9. Condition - Phasing Plan

Prior to the commencement of development on any phase in the Detailed or Outline Elements of the site as shown on the Site Wide Master Plan Drawing 9028-L-Z-M-100-94-0100, a phasing plan for the Detailed Element must be submitted and approved in writing by the Local Planning Authority. Prior to the commencement of above ground works on any Development Block, a phasing plan for the Detailed and Outline Elements must be submitted and approved in writing by the Local Planning Authority. The development must be carried out in accordance with the approved phasing plans unless otherwise approved in writing by the Local Planning Authority.

Reason: To ensure that the development is consistent with the principles of good master planning in accordance with DMPD Policy DMS1, Core Strategy Policies PL 13, IS1, IS3 and London Plan Policies 2.14, 3.5 3.7, 7.1.

10. Condition - Gross Internal Floorspace Areas

The total gross internal floorspace of the non-residential uses hereby approved shall be limited to the maximum quantum of internal floorspace of 9,377 sqm as set out in the approved Development Specification, dated May 2019 and updated in March 2020.

Reason: To restrict the floorspace of the various uses to the levels proposed and assessed, and to ensure a suitable mix of uses within the development.

11. Condition - Affordable Housing

The Affordable Housing Units authorised under this planning permission shall not be occupied for any purpose other than as Affordable Housing, save where the circumstances set out in paragraphs [INSERT] and [INSERT] of the Section 106 agreement dated [] apply.

Reason: To ensure the delivery and retention of affordable housing in accordance with Core Strategy IS4.

Commercial Uses

12. Condition - Size of Commercial Units

With the exception of the food store to be provided in Block O, no other individual commercial unit within the development shall exceed 300 sqm (GIA) unless otherwise agreed in writing with the Local Planning Authority.

Thereafter, the commercial uses shall be operated in accordance with the drawings hereby approved unless otherwise agreed in writing by the local planning authority

Reason: To prevent large out-of-centre commercial units in accordance with Council policy and to limit internal alterations and ensure that larger units are not implemented without prior consideration by the Local Planning Authority in line with policies DMTS1 and DMTS2.

13. Condition - Quantum of A1, A2, A3 and A5 Retail Floorspace

A minimum of 2,830 sqm (GIA) of the commercial floorspace hereby permitted shall be used for only Class A1-A5 retail uses and for no other use falling within the newly created Class E of the Use Classes Order 1987 (as amended) unless otherwise agreed in writing by the Local Planning Authority.

Reason: To ensure replacement of existing retail floorspace, whose loss would be unacceptable, and to ensure the Local Centre meets needs of local area in accordance with DMTS1 and DMTS2 and the NPPF.

14. Condition - Commercial Uses

The ground floor units as shown on the approved plans for Development Blocks O, N1 and N2 in the Detailed Element and the ground floors of the Development Blocks in the Outline Phase shall be used only for purposes within Use Classes A1, A2, A3, A5, B1 and D1 use.

Reason: To ensure the commercial space activates on this site are implemented as assessed in the application and to ensure a suitable mix of uses within the development and to safeguard the amenities of the neighbourhood by ensuring that other uses which could cause a loss of amenity and/or parking pressures do not commence without prior approval in accordance with Council DMPD Policies IS1, DMTS2, DMS4, DMS1 and DMT2.

15. Condition - Details of Uses

Details of the amount and spatial distribution between Class A1, A2, A3 and B1 uses on the ground floor / first floors of Blocks O, N1 and N2 in the Detailed Element and the areas shown to accommodate such uses within the subsequent Outline blocks, as well as full details of the size, façade treatment, disabled access, refuse facilities and toilets (where appropriate) for each unit shall be submitted to and in approved in writing by the Local Planning Authority prior to occupation of each unit. The uses shall only be operated in accordance with the details approved by the local planning authority.

Reason: To ensure a suitable mix of uses within the development in the interests of the appearance of the development and to ensure satisfactory access for people with disabilities in accordance with Council policies DMTS2, DMTS8 and DMS1.

16. Condition - Commercial Use Management Plan

Prior to the first occupation of any of the retail and commercial floorspace hereby approved, a Management Plan shall be submitted to and approved in writing by the Local Planning Authority including hours of operation and management, pricing and allocation of affordable workspace in Block O to local businesses and community organisations. The Management Plan shall thereafter be implemented as approved and updated in agreement with the Local Planning Authority when any new tenant occupies the affordable workspace.

Reason: To ensure a satisfactory management of the development and to protect the residential amenity of nearby or adjoining occupiers in accordance with Council Policy DMS1.

17. Condition - Details of Forecourt / Outdoor Space for Commercial Units

Prior to the first occupation of the relevant units, details of any outside forecourt/outdoor space for those units associated with any of the A1, A2, A3, A5, B1 or D1 uses hereby approved are to be submitted to the Local Planning Authority for approval in writing, including details of location, hours of use and any boundary treatment and furniture (temporary or permanent) prior to any use of such areas. The forecourt/outdoor spaces shall not be implemented other than in line with those details approved by the Local Planning Authority in writing.

18. Condition - Commercial Unit Strategy (Signage)

Prior to the first occupation of any non-residential uses, a Site Wide Signage Strategy for the non-residential uses within that Development Block or Phase shall be submitted to and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details, or such other details agreed in writing by the Local Planning Authority.

Reason: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with DMPD Policies DMS1 and DMTS 9.

Fire

19. Condition - Fire Hydrants (London Fire Brigade)

Prior to the commencement of development (excluding demolition and Site Enabling Works) in any Development Block or Phase, details for the provision of fire hydrants within that Development Block or Phase shall be submitted and approved in writing by the local planning authority. The fire hydrants should be sited within the footpath, one metre clear of obstructions, with the outlets no more than 300mm below ground level. The hydrants should conform to BS:750 and be indicated with a hydrant indicator plate conforming to BS:3251.

Reason: In the interest of ensuring resilience to emergencies and to minimise the potential physical risk as a result of fire and related hazards, in accordance with London Plan Policy 7.13.

20. Condition - Fire Safety

Each Reserved Matters application must be accompanied with a Fire Safety Statement produced by an independent third party suitably qualified assessor which shall detail the buildings construction, methods, products and materials used; the means of escape for all building users including those who are disabled or require level access together with the associated management plan; access for fire service personnel and equipment; ongoing maintenance and monitoring; how provision will be made within the site to enable fire appliances to gain access to the building and details of fire rated lifts including loading lifts to the basement level and measures to ensure that one lift per core will operate at all times and no wheelchair occupiers are trapped if a lift breaks down. The Development Blocks within the Detailed Element shall be carried out in accordance with the approved details and the Fire Safety Strategy dated May 2019 and the Fire Safety Strategy Addendum dated March 2020. Any fire rated lifts will be managed and maintained in full working order for the lifetime of the development.

Reason: In order to provide a safe and secure development in accordance with Policy DMS1.

21. Condition- Fire Safety

Before the occupation of a Development Block, full details of the Fire Evacuation Plan and Evacuation Lift for the relevant Development Block shall be submitted to and approved by the Local Planning Authority. These details should respond to the points identified in the Fire Safety Strategy Addendum dated March 2020 as set out below: -

- Provision for Back-up power supply
- Communication at each level to the access level
- Located within a protected lobby at each storey served by the lift.
- A protected final exit route (similar to the escape stairs)
- Emergency voice communication, to enable rapid identification of locations where people require assistance, which requires fire rated cabling.
- As part of the inclusive design it must be ensured the following is achieved: the proposed escape strategy is safe, is dignified for the end user and allows an escape that is by as independent means as possible.
- Be enclosed in fire rated construction that is at least the fire rating of the structure
- Be accessed via a protected lobby, or common corridor protected by smoke venting
- Be treated as life safety systems and will be provided with dual power supply
- Be useable in a fire event and will not automatically descend to ground on detection; and
- Includes a detailed management and maintenance strategy for the evacuation lifts provided in each block.
- The development shall be carried out in accordance with these approved details.

Reason: In order to provide a safe and secure development in accordance with Policy DMS1.

Contamination

22. Condition - Contaminated Land Desktop Investigation

No development shall take place until a desktop study shall be submitted to and approved in writing by the local planning authority. The desktop study shall identify all previous site uses, potential contaminants associated with those uses, a conceptual model of the site indicating sources, pathways and receptors and any potentially unacceptable risks arising from contamination at the site and any measures to be taken to prevent and or remedy contamination at the site, site investigation scheme (providing information for an assessment of the risk to all receptors that may be affected, including those off site), intrusive investigation and risk assessment (assessing the degree and nature of any contamination on site and the risks posed by any contamination to human health, controlled waters and the wider environment). Any measures to be taken to prevent and/or remedy contamination at the site set out in the approved document shall be undertaken in accordance with the approved details.

Reason: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other off-site receptors, having regard to Council policies IS4 and DMH4 of the Development Management Policies Document (adopted March 2016) coupled with the requirements of the National Planning Policy Framework 2018. The details are required prior to the start of the works so that the necessary precautions and mitigation measures can be incorporated into the construction.

23. Condition - Contaminated Land Method Statement

No development shall take place until a detailed method statement for the remediation works (to include all works to be undertaken, proposed remediation objectives and remediation criteria, timetable of works and site management procedures) to make the site suitable for its intended use shall be submitted to and approved in writing by the local planning authority. There shall be no development unless and until any remediation works have been completed and a validation report to verify these works has been submitted to and approved in writing by the local planning authority. If, during development, further contamination not previously identified is found to be present at the site the local planning authority is to be informed immediately and no further development shall be carried out until a report indicating the nature of the contamination and how it is to be remediated is submitted to and agreed in writing by the local planning authority, and any required remediation shall be detailed and verified as an amendment to the remediation statement and carried out accordingly.

Reason: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other off-site receptors, having regard to Council policies IS4 and DMH4 of the Development Management Policies Document (adopted March 2016) coupled with the requirements of the National Planning Policy Framework 2018. The details are

required prior to the start of the works so that the necessary precautions and mitigation measures can be incorporated into the excavation and construction.

24. Condition - Land Remediation Scheme

No development shall take place until a detailed remediation scheme to bring the site to a condition suitable for the intended use by removing unacceptable risks to human health, buildings and other property, and the natural and historical environment shall be prepared and submitted to and approved in writing by the local planning authority. The scheme must include all works to be undertaken, proposed remediation objectives and remediation criteria, timetable of works and site management procedures. The works included in the approved scheme shall be undertaken in strict accordance with the approval and completed prior to first occupation of the development.

Reason: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other off-site receptors, having regard to Council policies IS4 and DMH4 of the Development Management Policies Document (adopted March 2016) coupled with the requirements of the National Planning Policy Framework 2018. The details are required prior to the start of the works so that the necessary precautions and mitigation measures can be incorporated into the excavation and construction.

25. Condition - Contaminated Land Verification

Prior to first occupation of the development, a verification report demonstrating completion of the remediation works set out in the approved remediation statement and the effectiveness of the remediation shall be submitted to and approved by the local planning authority. The report shall include results of sampling and monitoring carried out to demonstrate that the site remediation criteria for residential use have been met.

Reason: To ensure that remedial measures have been undertaken and the environmental risks have been satisfactorily managed so that the site is deemed suitable for residential use to accord with Council policies IS4 and DMH4 of the Development Management Policies Document (adopted March 2016) coupled with the requirements of the National Planning Policy Framework 2018.

26. Condition – Piling (Environment Agency)

Piling or any other foundation designs using penetrative methods shall not be permitted other than with the express written consent of the Local Planning Authority, which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to groundwater. The development shall be carried out in accordance with the approved details. The developer should be aware of the potential risks associated with the use of piling where contamination is an issue. Piling or other penetrative methods of foundation design on contaminated sites can potentially result in unacceptable risks to underlying groundwaters. We recommend that where soil contamination is present, a risk assessment is carried out in accordance with our guidance 'Piling into Contaminated Sites'. We will not

permit piling activities on parts of a site where an unacceptable risk is posed to Controlled Waters.

Reason: To protect the underlying groundwater from the risk of pollution. Infiltrating water has the potential to cause remobilisation of contaminants present in shallow soil/made ground which could ultimately cause pollution of groundwater in accordance with paragraph 170 of the National Planning Policy Framework and DMPD Policy DMS5 and Policy DMS6.

27. Condition - Japanese Knotweed

Prior to commencement of development or any demolition on site, a survey to map the extent and location of Japanese Knotweed and a management plan to ensure it is not spread either on or off the site shall be submitted to and approved in writing by the Local Planning Authority and the development shall be carried out in accordance with the details as approved.

Reason: Policy DMO 4 Nature conservation.

Drainage / Flooding

28. Condition - Sustainable Drainage Schemes

No new infiltration of surface water drainage into the ground is permitted other than shown on the approved drawings or other approved documents without the express written consent of the Local Planning Authority, which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to Controlled Waters. The development shall be carried out in accordance with the approval details.

Reason: For the protection of Controlled Waters in accordance with Council policy DMS5 and DMS6.

29. Condition - Surface Water Drainage Scheme

No development shall commence within any Development Block or Phase until a detailed surface water drainage strategy, derived from the submitted Flood Risk assessment and Drainage Strategy (May 2019) as amended by the Addendum to the Flood Risk Assessment and Drainage Strategy (February 2020) detailing any on and/or off-site drainage works for that Phase, has been submitted to and approved in writing by the Local Planning Authority. The drainage strategy should demonstrate that the surface water run-off generated up to and including the critical duration 1 in 100-year storm event will be managed by sustainable drainage systems to achieve at least 50 per cent attenuation of the existing site's surface water run-off. The scheme shall subsequently be implemented in accordance with the approved details before the development is completed.

Reason: To ensure a sustainable drainage system is implemented to manage the increased risk of flooding, to improve and protect water quality and improve habitat and amenity in accordance with Council policies DMS5, DMS6 and the Mayor's London Plan policy 5.13 and to ensure compliance with the Flood and Water Management Act 2010.

30. Condition – Rain Gardens

The development permitted by this planning permission shall be carried out in accordance with the Drainage Strategy dated May 2019 and the Addendum to the FRA and Drainage Strategy Addendum dated February 2020 for the Alton Estate Chapter 12 of the Environmental Statement, Volume 2 – Appendix 2 which requires the installation of Rain Gardens. Full details of the Rain Gardens including the maintenance arrangements shall be submitted to and approved by the local planning authority prior to their installation. The development shall be carried out in accordance with these approved details.

Reason: To ensure a sustainable drainage system is implemented and that sufficient capacity is made available to cope with the new development to avoid adverse environmental impacts upon the community in accordance with DMS5, DMS6 and the Mayor's London Plan policy 5.13 and to ensure compliance with the Flood and Water Management Act 2010.

31. Condition - Sustainability Statement

The development hereby approved shall be carried out in accordance with the Sustainability Strategy dated May 2019 and the Sustainability Strategy Addendum dated March 2020.

Reason: To ensure high standards of sustainable design and construction in accordance with DMS3 and London Plan policy 5.3.

32. Condition - Existing Water Supply Infrastructure

Development shall not commence in any Development Block or Phase until Impact Studies of the existing water supply infrastructure for that Development Block or Phase have been submitted to and approved in writing by the local planning authority in consultation with Thames Water. The studies should determine the magnitude of any new additional capacity required in the system and a suitable connection point.

Reason: To ensure that the water supply infrastructure has sufficient capacity to cope with the additional demand.

33. Condition - Infrastructure Phasing Plan (Thames Water)

No properties shall be occupied until confirmation has been provided that either: - all water network upgrades required to accommodate the additional flows from the development have been completed; or - a housing and infrastructure phasing plan has been agreed with Thames Water to allow additional properties to be occupied. Where a housing and infrastructure phasing plan is agreed no occupation shall take place other than in accordance with the agreed housing and infrastructure phasing plan.

Reason: The development may lead to no / low water pressure and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate additional demand anticipated from the new development in accordance with DMS6 and the Mayor's London Plan policy 5.13 and to ensure compliance with the Flood and Water Management Act 2010.

34. Condition - Flood Risk Assessment and Mitigation

Prior to the commencement of construction on each of the Development Blocks A, N1, N2 and O and the Children's Nursery at Portswood Place, full details of the mitigation measures and the flood resistant and resilient measures for those parts of the development shall be submitted to and approved by the Local Planning Authority in accordance with the Flood Risk assessment (FRA) and the Drainage Strategy dated May 2019 in the Environmental Assessment Volume 2, Appendix 2.5 and the Addendum to the FRA and the Drainage Addendum dated February 2020. The development shall then be carried out in accordance with these approved details.

Reason: To reduce the risk and effects of flooding to the proposed development and future occupants. To minimise the risk of internal flooding and to ensure that the areas impacted by flooding will be able to be reinstated within as short a time as possible, and to prevent the services to the building being cut off during a flood and to reduce the risk of flooding to the proposed development and future occupants, in accordance with DMPD policy DMS5 and to ensure accordance with the Flood and Water Management Act 2010.

Air Quality

35. Condition - Demolition Method Statement

- i. Prior to commencement of demolition works in each Development Block or Phase, a Demolition Method Statement shall be submitted to and approved in writing by the Local Planning Authority. Details shall include control measures for dust, noise, vibration (piling), lighting, delivery locations, restriction of hours of work and all associated activities audible beyond the site boundary, advance notification to neighbours and other interested parties of proposed works and public display of contact details including accessible phone contact to persons responsible for the site works for the duration of the works for that Development Block or Phase.
- ii. No demolition shall commence until a risk assessment based on the Mayor's Best Practice Guidance (The control of dust and emissions from construction and demolition) has been undertaken and a method statement for emissions control (including an inventory and timetable of dust generating activities, emission control methods and where appropriate air quality monitoring) has been submitted to and approved in writing by the council. The appropriate mitigation measures to minimise dust and emissions must be incorporated into the site-specific Demolition Method Statement and Construction Management Plan. Developers must ensure that on-site contractors follow best practicable means to minimise dust and emissions at all times. Demolition works shall be undertaken in accordance with the approved details.

Reason: To ensure that occupiers of surrounding premises are not adversely affected by noise, vibration, dust, lighting or other emissions from the building site in accordance with DMPD Policy DMS1 and The Mayors SPG "The control of dust and emissions during construction and demolition (July 2014).

36. Condition - Air Quality Monitoring

During and after demolition and construction works (and a month prior to commencement of any works on site), PM10 monitoring shall be carried out on site. Parameters to be monitored, duration, locations and monitoring techniques must be approved in writing by Wandsworth Council prior to commencement of monitoring.

Reason: To manage and prevent further deterioration of existing low-quality air across London in accordance with London Plan policy 5.3 and 7.14, and NPPF 181.

37. Condition - Non-Road Mobile Machinery

All Non-Road Mobile Machinery (NRMM) used during the course of the development that is within the scope of the Greater London Authority 'Control of Dust and Emissions during Construction and Demolition' Supplementary Planning Guidance (SPG) dated July 2014, or any subsequent amendment or guidance, shall comply with the emission requirements therein.

Reason: To manage and prevent further deterioration of existing low-quality air across London in accordance with London Plan policy 5.3 and 7.14, and NPPF 181.

38. Condition - Gas Boilers

Prior to occupation of the Development Block, details of the Ultra-Low NO_x Gas fired boilers to mitigate air pollution shall be submitted to and agreed in writing by the council. The Ultra Low NO_x Gas fired boilers to be provided for space heating and hot water shall have dry NO_x emissions not exceeding 30 mg/kWh (at 0% O₂). Where any installations do not meet this emissions standard, it should not be operated without the fitting of suitable NO_x abatement equipment or technology as determined by a specialist to ensure comparable emissions. Following installation, emissions certificates will need to be provided to the council to verify boiler emissions. The approved details shall be fully implemented prior to the occupation/use of the development and thereafter permanently retained and maintained.

Reason: To manage and prevent further deterioration of existing low-quality air across London in accordance with London Plan policy 5.3 and 7.14, and NPPF 181.

39. Condition - Construction and Environmental Management Plan (CEMP)

Prior to commencement of development in each Development Block or Phase a Construction and Environmental Management Plan (CEMP) shall be submitted to and approved in writing by the Local Planning Authority. The construction management plan shall then be reviewed and updated prior to commencement of development in each Phase and an updated version submitted to the Local Planning Authority for approval prior to commencement of development in each Phase unless it is agreed in writing by the Local Planning Authority that no amended version is warranted. The CEMP shall include specific details for:

- a) the control of construction noise and vibration during hours of noisy activities;
- b) a Construction Logistics Plan (CLP) to include - a construction waste and material management, transportation and disposal strategy; including construction delivery booking and construction vehicle holding arrangements; site access and car parking arrangements; construction phasing and agreed routes; timings; travel plan for staff/personnel involved in construction.

- c) air quality measures for the control and monitoring of emissions (including from construction vehicles), dust, fine particles and odours; a Dust Management Plan (DMP), based on an AQDRA (Air Quality and Dust Risk Assessment). The DMP shall be in accordance with The Control of Dust and Emissions during Construction and Demolition SPG 2014. The DMP will need to detail the measures to reduce the impacts during the construction phase.
- d) construction traffic routing through the area and the site and the development site, including details of signage and an enforcement system for breach of its provisions;
- e) a low emission strategy for construction traffic and machinery;
- f) piling or other penetrative methods of foundation design in relation to risks to underlying groundwater;
- g) measures to protect controlled waters from construction processes and contamination;
- h) measures to minimise cross contamination on site;
- i) measures to deal with unexpected contamination on site;
- j) details of security of the construction site in relation to the boundary of the development site;
- k) details of coordination with sites abutting the application boundary;
- l) hours of construction and details to minimise disturbance to residents;
- m) access through the site during works and upon completion of works in relation to any phasing, including the connections with any completed phases, and connections to the surrounding area and its network of cycle paths, roads and footpaths; and
- n) any temporary works, including any boundary treatment around later phases. Provisions for pedestrians shall be fully accessible to all including people with disabilities.
- o) details of cranes and other tall construction equipment (including the details of obstacle lighting) – Such schemes shall comply with Advice Note 4 ‘Cranes and Other Construction Issues’ (available at www.aoa.org.uk/policy-campaigns/operations-safety).

The development shall not be undertaken otherwise than in accordance with the CEMP approved in writing by the Local Planning Authority, unless otherwise agreed in writing with the Local Planning Authority.

Reason: To ensure construction works and traffic impacts are minimised, to protect amenities of neighbouring occupiers and occupiers of the new residential units within the development itself in accordance with Core Strategy policy IS4, and DMPD policies DMS1 and DMS3, To protect harm to protected species in accordance with Policy DMO4a in relation to Criterion ‘o’ to ensure that construction work and construction equipment on the site and adjoining land does not contravene the regulation set out in the London Tall Buildings Policy and endanger aircraft movements and the safe operation of Heathrow Airport.

Reason: To prevent harm to protected species in accordance with Policy PL4 and DMO4.

Ecology / Biodiversity

40. Condition - Construction Ecological Management Plan

Prior to the commencement of any and all preparatory works, demolition, sort stripping and any site vegetation clearance (including trees), within a Phase submit for approval a Construction Ecological Management Plan detailing (but not limited to):

- a) details (including qualifications, experience and professional membership) of the independent ecological clerk of works (ECoW) to be appointed to oversee any and all relevant aspects of the development to ensure it is delivered in accordance with Clause 10 of BS 420202;
- b) details of an updated bat report featuring results of external and internal building inspections, together with emergence and re-entry bat surveys;
- c) timing of works to remove vegetation (nesting birds) and / or measures to inspect all buildings and vegetation for nesting birds immediately (48 hours) prior to works commencing;
- d) measures to eradicate Invasive Non-native species from the site including details of any necessary biosecurity;
- e) measures to ensure that all construction lighting is in accordance with Guidance Note 08/18 Bats and artificial lighting in the UK Bats and the Built Environment series by the Institute of lighting Professional and the Bat Conservation Trust;
- f) measures to minimise noise and vibration disturbance to foraging and commuting bats and breeding and foraging birds;
- g) locations of and measures to protect/ provide receptor habitats (including but not limited to trees lines and woodland that provides foraging / commuting routes for bats as identified in Environmental Statement Volume 2 Appendix 12.4) and minimum no 18 bat boxes and 20 bird boxes across the site during development;
- h) details of an annual programme of inspection and maintenance for bat and bird boxes to ensure they remain effective during development;
- i) measures to prevent entrapment of mammals within the wider site and within any excavations.
- j) details of construction lighting and any necessary mitigation measures to prevent light spill affecting features of biodiversity value.

The development shall not be undertaken otherwise than in accordance with the Construction Ecological Management Plan as approved in writing by the Local Planning Authority, unless otherwise agreed in writing with the Local Planning Authority.

Reason: to prevent harm and disturbance to protected species DMO4a

41. Condition - Ecological Method Statement

Prior to the commencement of any works to trees, submit for approval a method statement for the removal of trees identified as having potential roost features (PRFs)for bats. The method statement shall include:

- a) details of the named ecologist who will supervise all works;
- b) the locations, confirmation of number (c18 in clusters of 3) and specification of bat boxes to be placed in advanced of tree felling to host any bats disturbed;
- c) the dates, times and weather thresholds for felling operations / works to trees;

- d) the method for removing sections of the trees with PRFs, how the orientation of tree sections will be maintained and the location of any sections to be retained if advised by the ecologist.
- e) details of an annual programme of inspection and maintenance for bat boxes to ensure they remain effective.

The development shall not be undertaken otherwise than in accordance with this Ecological Method Statement as approved in writing by the Local Planning Authority, unless otherwise agreed in writing with the Local Planning Authority.

Reason: to avoid harm to priority protected species DMO4a (NB this can be discharged on a phased basis if development is to be delivered according to an agreed phasing plan)

42. Condition – Biodiversity Strategy

Prior to commencement of development submit for approval a detailed whole site biodiversity strategy demonstrating the provision of and management (in perpetuity) for habitats to be created, maintained and / or enhanced to demonstrate no net loss of biodiversity and measurable biodiversity net gain including (but not limited to):

- a) a minimum of 1.9 ha brown biodiversity roofs to be delivered in accordance with “The GRO Green Roof Code 2014 section 2.2.2”. (Any biodiversity roof proposed shall have extensive substrate base (undulating depths of 80-150mm);
- b) habitat features such as (but not limited to) gravels, sand, boulders or rocks and planted / seeded with an agreed mix of species but this should be focused on wildflower planting and shall contain no more than a maximum of 25% sedum.
- c) an agreement to the biodiversity roofs not being used as an amenity or sitting out space of any kind whatsoever and shall only be used in the case of essential maintenance or repair, or escape in case of emergency);
- d) measures to implement recommendations for ecological enhancements included in the conclusions of the species specific to the Environmental Statement Vol 2 Appendix 12.2 – 12.7;
- e) the creation of a dedicated minimum 4.48ha biodiversity meadows, rough grassland and wildflower habitats as detailed in Environmental Statement Vol 1 Chapter 12 Biodiversity para 12.137 – 12.140, numbers and locations of integrated nest boxes for birds (min no 20) and bat boxes (min no 18);
- f) structured planting (including but not limited to trees and shrubs) to provide ecological functionality and connectivity within and across the wider site; proposals to retain or provide deadwood habitats for saproxylic invertebrates including locations;
- g) ecological benefits, if any, to be provided by the further 6.7ha of other soft landscaped public realm; and
- h) Additionally, submit details of numbers, and locations of and topics to be covered by on site interpretation panels.

The development shall not be undertaken otherwise than in accordance with this Biodiversity Strategy as approved in writing by the Local Planning Authority and maintained in accordance with the approved scheme, unless otherwise agreed in writing with the Local Planning Authority.

Reason: to ensure no net loss of habitats, no harm to species populations and to ensure the provision of biodiversity gain in accordance with Policy PL4 and Policy DMO4b

43. Condition - Provision and Maintenance of Biodiverse Roofs

A scheme detailing the provision and maintenance of biodiverse roofs for each Development Block shall be submitted to and approved in writing by the local planning authority prior to the occupation of the Development Block. This shall include details of how these roofs will provide habitats and features for biodiversity (in accordance with definition of an extensive biodiverse roof and advice provided in The GRO Green Roof Code 2014).

The agreed scheme shall be implemented as approved prior to first occupation of the development and thereafter maintained in accordance with the approved scheme.

Reason: To ensure the proposed green roofs are provided and maintained in a satisfactory manner, in accordance with Council policy DMS1, and to ensure no net loss of biodiversity and enhanced biodiversity (net gain) in accordance with Policy PL4 and DMO4.

44. Condition - Biodiversity Lighting Design Strategy

Prior to the first occupation of development in any Phase or Development Block or Phase, a Biodiversity Diversity Lighting Strategy shall be submitted to and approved in writing by the Local Planning Authority to:

Include identification of those areas/features that are particularly designed to retain ecological functionality and / or enhance biodiversity across the whole site (both built environment and landscaping); and

show how and where external lighting will be installed in accordance with "Guidance note 08/18 Bats and Artificial Lighting in the UK" produced by the Institute of Lighting Professionals.

All external lighting shall be installed in accordance with the specifications and locations set out in the strategy, and these shall be maintained thereafter in accordance with the strategy.

Reason: To ensure no net loss of biodiversity and ensure net gain for biodiversity in accordance with Policy DMO4.

Landscaping and Trees

45. Condition - Details of Landscaping in Detailed & Outline Phases

Details of hard and soft landscaping, habitat features for protected species and treatment of parts of the site not covered by buildings, to include species of new planting and any existing plants/trees to be retained for each Development Block or Phase, shall be submitted to and approved by the Local Planning Authority before the relevant works are commenced. To include tree planting pit cross-sections with full details of soil volume provision (quantities and locations for each species) of trees planted in hard landscaping. All planting, seeding or turfing included in the approved details shall be carried out prior to the occupation of any part of the

development, or in accordance with a programme agreed in writing with the Local Planning Authority. Any trees or plants planted as part of the approved landscape scheme for each Development Block or Phase which within a period of five years from when the trees or plants are planted are found to be dead, removed, or becomes seriously damaged or diseased, shall be replaced in the next planting season with others of similar size and species, unless otherwise agreed in writing by the local planning authority.

The development shall not be undertaken otherwise than in accordance with this Landscaping Scheme as approved in writing by the Local Planning Authority and shall be managed and maintained in accordance with the approved scheme for the lifetime of the development, unless otherwise agreed in writing with the Local Planning Authority.

Reason: In the interest of design quality, residential amenity, public safety and biodiversity, in accordance with DMPD Policy DMS1, Policy DMO4 and Policy DMO5.

46. Condition - Retained Trees

In this condition 'retained tree' means an existing tree or hedge, which is to be retained in accordance with the approved drawings and specifications. The paragraphs set out below shall have effect until the expiration of 5 years from the first occupation of the development.

No retained tree shall be cut down, uprooted or destroyed, nor shall any retained tree be pruned other than in accordance with the approved drawings and specifications, without the written approval of the Local Planning Authority. Any pruning shall be carried out in accordance with British Standard 3998:2010 Tree work and in accordance with any supplied Arboricultural Development Statement. If any retained tree is removed, uprooted or destroyed or dies, another tree shall be planted at the same place and that tree shall be of such size and species, and shall be planted at such time, as may be specified in writing by the Local Planning Authority.

Reason: To safeguard the trees in the interest of the amenity of the area, in accordance with Council Policy DMO5 (b).

47. Condition - Tree Protection and Pre-Commencement Site Visit

- a) Details of the means of protecting the trees (in line BS5837:2012) within each Development Block or Phase which are to be retained from damage during building works shall be submitted to and approved by the local planning authority before the start of any demolition, building or other works. Such protection shall be installed and retained as approved throughout the period of works required to implement the development approved.
- b) No development shall take place within each Development Block or Phase until tree protection measures are installed and any further information is provided in accordance with the submitted arboricultural information. The applicant shall arrange a pre-commencement meeting with the Local Planning Authority and the applicant's project arboriculturist to allow inspection of the protection measures once in situ.

- c) The tree protection measures shall be maintained in-situ and not moved or removed until all construction has finished, and equipment, materials, or machinery are removed from the relevant Development Block or Phase. All arboricultural protection information and plans submitted as part of the application, and listed in the approved drawings condition, shall be implemented and adhered to at all times during the construction process unless otherwise agreed in writing with the Local Planning Authority.

Reason: To safeguard the trees in the interest of the amenity of the area, in accordance with Council Policy DMO5 (b).

48. Condition – Additional Tree Planting – Block M

Prior to the commencement of development on Block M (excluding demolition, site investigation and enabling works), details of a revised landscape plan shall be submitted to and approved by the Local Planning Authority which shall propose additional tree planting in the gap between T181 and T183 of a semi-mature size (20/25 cm stem circumference) such as an appropriately sized Maple or Hornbeam. The development shall be undertaken in accordance with the revised landscape plan as approved in writing by the local planning authority and the tree shall be managed and maintained in accordance with the approved layout for the lifetime of the development, unless otherwise agreed in writing with the Local Planning Authority.

Reason: In the interest of design quality and visual amenity and to minimise the impact on heritage assets in accordance with DMPD Policy DMS1, Policy DMO4 and Policy DMO5.

Car / Cycle Parking and Highways

49. Condition - Residential Car Parking (Detailed Scheme)

Prior to the commencement of development on the Development Blocks containing residential uses within the Detailed Scheme (other than demolition, site investigation and enabling works) in any Development Block or Phase, details of the number, layout, location, access and allocation to residential car parking spaces to be provided for that Development Block or Phase shall be submitted to the local planning authority for approval. Thereafter the spaces shall be provided in accordance with the scheme as submitted and approved in writing by the Local Planning Authority and the spaces shall be managed and maintained in accordance with the approved scheme for the lifetime of the development, unless otherwise agreed in writing with the Local Planning Authority.

Reason: To avoid creating unacceptable traffic congestion on the surrounding road network and ensure there would be adequate parking and servicing for the development and no adverse transport impacts from the development in accordance with Core Strategy Policy IS1 and DMPD Policies DMT1 and DMT2.

50. Condition - Residential Car Parking Strategy (Outline Element)

Prior to the submission of the first Reserved Matters Application for the Outline Element of the Proposed Development, a review /study of the on-street car parking supply and demand and a strategy for residential car parking for the Outline Element shall be submitted to and approved by the local planning authority. The approved

residential car parking strategy shall be incorporated into the subsequent Reserved Matters Applications unless otherwise agreed in writing with the Local Planning Authority.

Reason: To avoid creating unacceptable traffic congestion on the surrounding road network and ensure there would be adequate parking and servicing for the development and no adverse transport impacts from the development in accordance with Core Strategy Policy IS1 and DMPD Policies DMT1 and DMT2.

51. Condition - Parking Management Strategy and Car Park Management Plan

A Parking Management Strategy and Car Park Management Plan for each relevant Phase or Development Block shall be submitted to the Local Planning Authority for approval in writing prior to commencement of use of any car parking in that Phase. This shall provide a strategy for car park management including:

- a) pricing structure,
- b) means of separating operational and residential parking and enforcing that separation;
- c) allocation of residential spaces between market and affordable units,
- d) service charges;
- e) number and location of blue badge parking bays;
- f) car club allocation; charging points for electric vehicles;
- g) cycle parking/storage differentiated by residential and other users;
- h) access controls to the underground parking and emergency vehicle route;
- i) handling the relationship between private and service vehicles;

The development shall not be operated at any time otherwise than in accordance with the Parking Management Strategy and Car Park Management Plan as may be approved.

Reason: To ensure appropriate levels of parking are provided and adequate servicing arrangements and vehicle access, in line with council policy DMT2.

52. Condition- Temporary Parking Strategy

Prior to first occupation within each Development Block a Temporary Parking Strategy shall be submitted and approved by the local planning authority which shall respond to the approved Phasing Plan. The details of the temporary car parking during the development build-out shall include details of:

- a) Management of existing car parking spaces;
- b) Displacement and replacement of parking spaces within the development site
- c) boundary for residents;
- d) Associated controls on these spaces.

Reason: To ensure the development meets the needs of its existing and future occupiers and to comply with the requirements of Policies 3.8 and 7.2 of the London Plan (2016) and also, to ensure that the development does not over-provide car parking spaces and to encourage sustainable travel in accordance with Policy DMT2.

53. Condition - Travel Plans

Residential and commercial travel plans shall be submitted to the Local Planning Authority for approval in writing prior to the occupation of each Phase of development or Development Block. The Travel Plans should include targets for a reduction in car mode share and an increase in sustainable transport modes within the first 5 years and measures to achieve this and should be implemented in accordance with the approved documents which will include arrangements for monitoring and review.

Reason: To encourage the use of alternative means of travel to the private car and encourage greater use of public transport, cycling and walking as an alternative in accordance with policy IS1 of the Core Strategy.

54. Condition - Cycle Parking

Details of the exact number, layout, design, location and access to cycle parking spaces for each of the uses within an identified Phase or Development Block, including, the method of implementation, shall be submitted to the Local Planning Authority for approval in writing in association with details submitted pursuant to Condition 4. The cycle parking shall be in accordance with the London Cycling Design Standards and shall be retained in perpetuity for use by residents and visitors to the development.

Reason: In the interests of the appearance of the development and to ensure an appropriate level of cycle parking is provided in accordance with Core Strategy policy IS1 and DMPD policy DMS1 and to accord with London Cycle Design Standards (2014).

55. Condition – Demolition and Construction Management and Logistics Plan

Prior to the commencement of a development Phase, a demolition and construction management and logistics plan will need to be submitted to and approved in writing by the Local Planning Authority.

This must include:

- a) Vehicle tracking which shows that the largest vehicle needing access to the site can enter, turn in, and exist the site in forward gear
- b) A description of all types of vehicle to be used
- c) Details of traffic management proposals to keep all road users safe throughout the construction period
- d) An estimate of how many vehicle trips construction and demolition will generate per working day
- e) Details of wheel washing facilities to be provided
- f) Confirmation that employees will travel to the site by sustainable modes.

Thereafter, the development shall only be carried out in accordance in accordance with such details as approved and be retained, managed and maintained thereafter, unless otherwise approved in writing by the local planning authority.

Reason: In the interests of providing safe and suitable access to the development and to the surrounding road network in accordance with Para. 108b of the National Planning Policy Framework (NPPF)

56. Condition- Highway works to Danebury Avenue/Roehampton Lane Junction

Notwithstanding the drawings hereby approved, the widening of the Danebury Avenue/Roehampton Lane junction with the addition of a second exit lane will not be undertaken until the final phase of development on the approved phasing plan. These works will only be required to be implemented in the event that monitoring of traffic movements indicates adverse impacts to bus journey times and performance, the full details of which would need to be submitted to and reviewed by the local planning authority in consultation with Transport for London before work commences on the final phase of development. Prior to the commencement of development, details showing the treatment of this junction in the interim period will be submitted to and approved by the local planning authority and implemented and maintained in accordance with the approved details and phasing plan unless otherwise advised by the Local Planning Authority.

Reason: In the interests of highway safety and to promote sustainable travel in accordance with Core Strategy Policy IS1 and DMPD Policies DMT1 and DMT2.

57. Condition - Internal Road Management Plan

Details of an internal road management plan for the highway layout shall be submitted to the Local Planning Authority for approval prior to the occupation of the first Development Block. The management plan should include the following details:

- a) details of how the internal roads would link to and adjacent sites;
- b) how vehicular traffic would be managed along the identified routes; and
- c) design details of the internal roads, footpaths and cycleways (including design, materials, dimensions, alignment, maintenance, accessibility).

The management plan shall be implemented in accordance with such details as may be approved and retained, managed and maintained thereafter, unless otherwise approved in writing by the local planning authority.

Reason: To ensure adequate access and servicing is maintained to the site and neighbouring sites in accordance with DMPD Policy DMT2.

58. Condition - Delivery and Servicing and Management Plan

No use within a Development Block or Phase of the development hereby permitted shall not be occupied until a Servicing and Delivery Management Plan (SDMP) for that use in that Development Block or Phase has been submitted to and approved in writing by the local planning authority. The uses hereby permitted shall thereafter be operated in accordance with the approved details. The submitted details must include (but not limited to) the following:

- a) frequency of deliveries to the site;
- b) frequency of other servicing vehicles such as refuse collections;
- c) dimensions of delivery and servicing vehicles;
- d) proposed loading and delivery locations;
- e) a strategy to manage vehicles servicing the site;
- f) The hours/days of deliveries for vehicles and the precautions and measure to be taken to mitigate noise impacts

The management plan shall be implemented in accordance with such details as may be approved and retained and maintained thereafter for the lifetime of the development, unless otherwise approved in writing by the local planning authority.

Reason: In the interests of providing safe and suitable access to the development and to the surrounding road network in accordance with Para. 108b of the National Planning Policy Framework (NPPF) and to protect the amenity of existing and future occupiers in accordance with DMPD Policy DMS1.

59. Condition - Electric Vehicle Charging Points

Prior to the commencement of each Phase containing a Development Block with residential uses, a plan showing that the applicant can provide 20% of the proposed vehicular parking spaces will be provided as active electric vehicle charging points and 80% as passive electric vehicle charging points must be submitted to and approved in writing by the Local Planning Authority. Thereafter, the development shall only be implemented in accordance with the approved details and shall be retained thereafter for the lifetime of the development, unless otherwise approved in writing by the local planning authority.

Reason: In the interests of achieving the objectives in accordance with Policy T6.1 in the draft London Plan Table 6.2 of the current London Plan.

Accessible / Adaptable Units

60. Condition - Details of Accessible and Adaptable Units

Prior to any above ground construction works related to Development Block, a 1:50 drawings showing the detailed layout of the 10% residential units being provided as wheelchair accessible/adaptable homes (for market and affordable housing tenures respectively) shall be submitted to and approved by the Local Planning Authority.

Thereafter, the development shall only be carried out in accordance in accordance with these details as approved and these units shall be retained and maintained thereafter, unless otherwise approved in writing by the local planning authority.

Reason: To meet the needs to households with mobility issues and accord with London Plan 7.4.

61. Condition - Accessibility and Adaptability

Prior to the occupation of each Development Block, 10% of the residential units provided shall be capable of easy adaptation to Building Regulations Approved Document M4(3) Category 3: (Wheelchair user dwellings), all London Affordable Rent Units shall be provided in accordance with M4(3)(2)(b) (Wheelchair user dwellings) and the remainder of dwellings shall comply with Building Regulations Requirement Approved Document M4(2) Category 2: Accessible and adaptable dwellings

Reason: To ensure that accessible housing is provided in accordance DMPD Policies DMS1 DMH4, DMH6 and DMH7 and Policies 3.8 and 7.2 of the London Plan (2016).

62. Condition - Accessibility and Management Plan Residential & Non-Residential

No permanent above ground works shall take place in a Development Block until a detailed accessibility statement and management plan (including a programme for implementation) is submitted outlining those measures proposed to ensure an accessible and inclusive environment, both internally and externally, including but not limited to, pedestrian routes and crossing points, the treatment of step free, graded and ramped routes throughout the public realm (including the Village Square) and into all building entrances, lift specifications, accessible toilet provision, access points along with blue badge spaces. This statement shall be approved in writing by the local planning authority and shall be implemented in accordance with the approved details and shall be retained thereafter for the lifetime of the development, unless otherwise approved in writing by the local planning authority.

Reason: Access arrangements must be identified prior to the commencement of development to ensure an inclusive environment in accordance DMPD Policy DMS1, DMH4, DMH6 and DMH7 and Policies 3.8 and 7.2 of the London Plan (2016).

63. Condition - Access Statement

The development permitted by this planning permission shall be carried out in accordance with the Access Statement dated March 2020. Full details of the maintenance arrangements shall be submitted to and approved by the local planning authority prior to the occupation of the relevant development block. The development shall be carried out in accordance with these approved details and retained as approved for the lifetime of the development.

Reason: Access arrangements must be identified prior to the commencement of development to ensure an inclusive environment in accordance DMPD Policy DMS1 and London Plan Policy 7.2.

64. Condition - Signage and Way-Finding Strategy

Notwithstanding the details shown on the drawings hereby approved, prior to the first use/occupation of the development within any Phase, a detailed Signage and Wayfinding Strategy for that Phase shall be submitted to and approved by the Local Planning Authority.

Thereafter, the development shall only be carried out in accordance in accordance with such details as approved and the signage shall be retained, managed and maintained thereafter, unless otherwise approved in writing by the local planning authority.

Reason: To promote walking through improvements to pedestrian routes, streets and public spaces, to give greater priority to pedestrians, particularly through improvements to signage and wayfinding in accordance with DMPD Policy DMS1, DMT2 and London Plan Policies 6.9, 6.10, 7.2 and 7.5.

Wind

65. Condition - Wind Mitigation

Prior to the commencement of development (other than demolition, site investigation and site enabling works) in respect of Block M, full details of the tree retention proposed in the mitigation as set out in Wind Microclimate Assessment dated May 2019 to be submitted for approval in writing by the Local Planning Authority for that Phase. The scheme approved by the Local Planning Authority shall be fully implemented in accordance with a scheme/timetable of implementation to be detail in the submission and maintained as approved for the lifetime of the development. Any trees which form part of the necessary mitigation which die shall be replaced in accordance with a scheme to be approved by the Local Planning Authority; that scheme to include species, planting size and timing of planting.

Reason: To comply with the mitigation measures identified in the Environmental Impact Assessment and to achieve an acceptable wind climate within the public realm in accordance with Policy DMS1.

Noise / Ventilation

66. Condition - Residential Noise Mitigation

Prior to the occupation of Phase containing a Development Plot including residential dwellings, details of the noise measures for that Phase or Development Block shall be submitted to and approved in writing by the local planning authority. The noise assessment shall provide details of the necessary mitigation works for that Phase or part of the development to protect the residential accommodation hereby approved from external noise sources, in order to meet the appropriate internal noise levels, set out in BS8233. This may include details of fenestration, and balustrade and screen design to balconies, including fixing windows or other demonstrable mitigation, and details of ventilation. That Phase or Development Block shall be designed in accordance with the mitigation measures in the report, and fully implemented prior to first occupation of the residential accommodation to which it relates and retained as such, unless otherwise approved in writing by the local planning authority.

Reason: To protect the occupiers of the residential buildings, in accordance with Core Strategy policy IS4 and DMPD policy DMH4 (ii).

67. Condition - Non- Residential Noise Insulation

Prior to the occupation of a Phase containing a Development Block non-residential development in any Development Plot or Phase containing A1, A3, A5, B1 and D1 uses, details of noise insulation measures of A1, A3, A5, B1 and D1 uses to provide effective resistance to the transmission of airborne sound (including amplified music) and impact sound horizontally and/or vertically between those units in that Phase and any residential unit (C3) shall be submitted to and approved in writing by the Local Planning Authority. The internal noise levels will be designed to meet the appropriate levels set out in BS 8233. The approved measures shall be implemented prior to the commencement of the relevant A1, A3, A5, B1 and D1 uses and retained and maintained in perpetuity.

Reason: To safeguard the amenities of adjoining occupiers, in accordance with Council policies DMS1 and DMH4.

68. Condition - External Ventilation Equipment

Prior to the installation of external ventilation equipment (including ducting), details shall be submitted to the Local Planning Authority for approval, in association with those reserved matters submitted pursuant to Condition 4, where appropriate, and shall be installed and maintained in accordance with those details approved by the Local Planning Authority.

Reason: In the interests of local amenity and visual appearance, and in accordance with Core Strategy Policy IS3.

69. Condition - Mechanical Ventilation Heat Recovery (MVHR)

Details of air quality mitigation measures, including mechanical ventilation heat recovery (MVHR) system, to provide an effective clean air source to be installed in all apartments proposed, as well as any possible mitigation measures that may be implemented to maintain and where possible improve the air quality in the vicinity of the development, shall be submitted to and approved in writing by the local planning authority before occupation of a Development Block contained within a Phase. Plans for the proposed maintenance and servicing for the MVHR and NOx filters shall be submitted for approval in writing from the local planning authority within six (6) months after first occupation of the Development Block contained within a Phase; thereafter the approved maintenance and servicing shall be implemented only as approved to ensure satisfactory operation of the mitigation measures for the lifetime of the development.

Reason: To protect the occupiers of the residential buildings in accordance with Core Strategy policy IS4 and DMPD policy DMH4.

Refuse

70. Condition - Sustainable Waste Strategy

Prior to the commencement of development (other than demolition, site investigation and site enabling works) on a Development Block within a Phase, details of a Sustainable Waste Strategy including an Operational and Waste Management Plan shall be submitted to the Local Planning Authority for approval in writing in association with the details required under Condition 4. Each Phase shall be implemented in accordance with the sustainable waste strategy as approved by the Council and shall be maintained as such, unless otherwise approved in writing by the local planning authority.

Reason: To mitigate the quantity of waste arising from the operation of the development, ensure appropriate provision is made for storage and disposal, and to minimise the environmental impacts from that waste in accordance with DMPD policy DMS1.

71. Condition - Refuse Storage and Recycling

There shall be no occupation of any commercial or residential unit within a Development Block until provision is made for the storage of refuse/ recycling awaiting collection to serve that Development Block (including a strategy to deal with bulky waste) in accordance with details which shall previously have been agreed in writing by the Local Planning Authority. Unless otherwise agreed in writing these

details shall include provision for suitable containment and segregation of recyclable waste. The measures shall be fully implemented in accordance with the agreed details for the development or the relevant phases thereof as the case may be and maintained and retained as agreed.

Reason: To protect the amenity of future occupiers and adjoining occupiers in accordance with Policy DMS1.

The Village Square, Public Open Space, Public and Private Realm

72. Condition - Scheme for the Provision of the Village Square

Notwithstanding the plans hereby approved, prior to the first occupation of the development of any Phase or Development Block, a scheme detailing the exact arrangements for the provision of the Village Square shall be submitted to and agreed by the Local Planning Authority. The scheme shall include:

- a) the detailed layout of the Village Square;
- b) details of the exact play equipment, furniture and seating to be provided within the Village Square;
- c) details of hard and soft landscaping, tree planting & boundary treatments;
- d) a timetable for its construction, provision and availability for use;
- e) details of the arrangements for the future maintenance and management of the Village Square and the play equipment, furniture, seating, hard and soft landscaping, tree planting and boundary treatments;
- f) details of arrangements for the hiring / use of the space, including any fees / charges and use of electricity / services by local residents, local groups and businesses
- g) details of access for wheelchair users and people with disabilities.

The first phase of the Village Square shall then be provided and be available for use prior to the occupation of Block A and shall be managed and maintained in accordance with the approved scheme for the lifetime of the development, unless otherwise agreed in writing with the Local Planning Authority.

Reason: To ensure adequate open space and play space provision to meet the demands of the development in accordance with Council policy DMH7 and to meet strategic aspirations for the provision of open space in accordance with SSAD and DMPD Policies DMO1, DMO3, DMO4, DMO5.

73. Condition - Landscape Management and Maintenance Plan

Prior to the first occupation of any Phase of the development, a Landscape Management and Maintenance Plan for the public realm and private courtyards of that Phase of Development shall be submitted to and approved in writing to the Local Planning Authority. The development will be carried out in accordance with the approved Landscape Management and Maintenance Plan, unless otherwise agreed in writing by the Local Planning Authority.

Reason: In the interest of the appearance of the public realm and open space and to ensure appropriate management and maintenance in accordance with DMPD Policy DMO3 and London Plan Policy 7.5.

74. Condition- Downshire Field Enhancement Scheme

Notwithstanding the plans hereby approved and prior to the first occupation of the development, a scheme for the enhancement of Downshire Field shall be submitted to and agreed by the Local Planning Authority. The scheme shall include details of: overall layout;

- a) play equipment and seating;
- b) hard and soft landscaping, tree planting & boundary treatments;
- c) footpaths and surface treatment;
- d) landscaping including tree planting;
- e) landscape enhancements to setting of the Bull sculpture; and
- f) a timetable for implement the enhancement works.

Thereafter, the enhancement scheme for Downshire Fields shall only be carried out in accordance with the approved drawings, unless otherwise approved in writing by the local planning authority and shall be managed maintained as approved for the lifetime of the development.

Reason: To ensure adequate open space and play space provision to meet the demands of the development in accordance with Council policy DMH7 and to minimise impacts on designated heritage assets in accordance with Policy DMS2, DMO3 and London Plan Policy 7.5.

75. Condition – Downshire Field - Conservation Management Plan

Prior to the first occupation of the development a Conservation Management Plan for the long-term management and maintenance of Downshire Field shall be submitted to and approved in writing to the Local Planning Authority. The Proposed Development shall be carried out in accordance with this approved Conservation Management Plan, unless otherwise agreed in writing by the Local Planning Authority.

Reason: In the interest of the appearance of preserving the special quality of the Alton West RPG in accordance with DMPD Policy DMS2, DMO3 and London Plan Policy 7.5.

76. Condition- Estate Management Plan

No building shall be occupied until an Estate Management Plan has been submitted to and approved in writing by the Local Planning Authority. The development shall be managed in accordance with the approved Estate Management Plan unless otherwise agreed in writing with the Local Planning Authority.

Reason: To ensure the coordinated management and maintenance of the site including its buildings, roads, SUDs, open spaces, landscaping, street trees, public squares, energy centre and site network in the interests of sustainable development and in accordance with the NPPF, London Plan (2016) and Policy DMS1.

77. NSTD Condition – Play Spaces

Prior to the occupation of the development in each Phase, details of each of the publicly accessible play spaces, equipment and street furniture and the play space and play equipment located in the private courtyards in that Phase shall be

submitted to and approved by the local planning authority. Each Phase will include the appropriate play provision to meet GLA play requirements and details will be in accordance with the design approach as set out in the Design and Access Statement (including the landscape statement). These details will be developed in consultation with children and young people and provide for inclusive / accessible play and include an indication of the skills which will be encouraged by the equipment provided. Details of management and maintenance will also be provided including measures to ensure surface and equipment meet BS 1176 and BS 1177, full details of the regular inspection and maintenance programme to be implemented to maintain public access and safety and the anticipated life span before replacement.

Thereafter, the play spaces shall be provided and carried out in accordance with the approved details, unless otherwise approved in writing by the local planning authority and the play spaces shall be retained, managed maintained as approved for the lifetime of the development.

Reason: To provide public access to play and recreation facilities in accordance with Policies DMH7e, DMO1 and DMO2 and to meet the requirements for the provision of play and informal recreation for children and young people in accordance with London Plan Policy 3.16.

Community Facilities

78. Condition - Details of Community Hub- Block A

Notwithstanding the plans hereby approved, prior to the commencement of the construction of Block A, (excluding demolition, site investigation and enabling works), a detailed specification for the community hub to be provided in Block A will be submitted to and approved in writing by the local planning authority. This will include the following: -

- a) A fit-out specification for the building;
- b) Details of future occupiers and how the building will meet their needs including Youth Service, Library Service and operators of the new health centre;
- c) Floor plans of the ground floor and first floor at a scale of 1:50 detailing how the layout for this accommodation is to be arranged
- d) A Community Use Strategy detailing how the spaces will be used by different local user groups;
- e) A Community Use Management Plan including inter alia, details of pricing policy, hours of opening, access (including access for community groups to the community hall), operation of the café and management responsibilities and a mechanism for review. The approved management plan shall be implemented upon commencement of use of Block A or otherwise as agreed in writing with the local planning authority.
- f) A timetable for its provision and availability for use by the local community.

The development shall be implemented and maintained in accordance with the approved details and the ground floor and first floor shall be fully fitted out internally and be available for use prior to the occupation of the residential use of the upper floors of Block A, unless otherwise approved in writing by the local planning authority.

Reason: To secure a well-managed community facility which will meet the needs of existing and new residents in line with Policies DMC2 and IS6.

79. Condition - Details of Community Hub– Portswood Place

Notwithstanding the plans hereby approved, prior to the commencement of the construction of the Portswood Place community hub, a detailed specification shall be submitted to and approved in writing by the local planning authority. This will include the following: -

- a) A fit-out specification for the building;
- b) Confirmation of the use of the community space in the pavilion building
- c) Floor plans of the ground and first floor at a scale of 1:50 detailing how the layout for this accommodation is to be arranged to meet the needs of future occupiers;
- d) Further information to explain how the pavilion building would operate, such as the days and hours of use for the healthcare facility (or alternative community use) and the arrangements for access to the clubroom by the local community;
- e) A Community Use Management Plan which includes inter alia, details of pricing policy, hours of use, access (including access to and use of the community space in the Nursery and Children's Centre), management responsibilities and a mechanism for review. The approved management plan shall be implemented upon commencement of use of the development or otherwise agreed in writing with the Local Planning Authority; and
- f) A timetable for its provision and availability for use by the local community.

The development shall be implemented and maintained in accordance with the approved details and the buildings shall be fully fitted out internally and be available for use on commencement of use of the community hub building at Portswood Place, unless otherwise approved in writing by the local planning authority.

Reason: To secure a well-managed community facility which will meet the needs of existing and new residents in line with Policies DMC2 and IS6.

80. Condition - Health Facilities Delivery Plan

Prior to the demolition of the existing healthcare facilities on the site, a Health Facilities Delivery Plan will be submitted to and approved by the local planning authority setting out how the needs of new and existing residents will be met by the provision of new health facilities. The applicant will use reasonable endeavours to agree with the Clinical Commissioning Group those aspects of the Delivery Plan which are outside of the control of the applicant. As a minimum it is expected that the required Delivery Plan will include details of the location of new facilities and timescale for provision first to shell and core and then to fit out for occupation, the date at which the built facility will be capable of occupation and operation including the continued management and maintenance arrangements of those facilities to ensure availability to meet the needs of residents. The Delivery Plan should also include any temporary measures proposed to facilitate ongoing delivery within the locality of GP / health services by third party providers during the construction phases.

Thereafter, the health facilities shall be provided and carried out in accordance with the approved details, unless otherwise approved in writing by the local planning authority and the health facilities shall be retained, managed maintained as approved for the lifetime of the development.

Reason: To ensure the needs of existing and new residents for health facilities will be met in accordance with DMC2, DMC3 and IS6.

81. Portswood Place

Prior to the demolition of the existing parade of shop units at Portswood Place, the proposed retail unit provided in the pavilion building shall be constructed, fully fitted out internally and be available for use in accordance with a management plan to be submitted to and approved by the local planning authority.

Thereafter, the retail use shall be retained and maintained in accordance with the approved management plan, unless otherwise agreed in writing by the local planning authority.

Reason: To ensure replacement of existing retail floorspace, whose loss would be unacceptable, and to ensure the Local Centre meets needs of local area in accordance with DMTS1 and DMTS2 and the NPPF.

Materials, Detailed Design and Amending Conditions

82. Condition - Materials

Notwithstanding any materials specified in the application, details and samples of materials proposed to be used on all external surfaces, including the public realm and the road surfacing to be used in the Development Block or Phase shall be submitted to and approved by the local planning authority before any installation of such materials in that Development Block or Phase. Such details and samples should be in accordance with the design approach as set out in the Design and Access Statement and the Design Code.

Thereafter, the development shall be carried out in accordance with the approved materials, unless otherwise approved in writing by the local planning authority and the materials shall be retained, managed maintained as approved for the lifetime of the development.

Reason: In order to assess the suitability of the proposed materials, in the interests of the appearance of the locality, in accordance with DMPD policy DMS1.

83. Condition - Entrances and Artwork

Detailed drawings of the proposed entrances including the artwork that is to be integrated within each block shall be submitted to and approved by the local planning authority before the occupation of the relevant Development Block.

Thereafter, the development shall be carried out in accordance with the approved details, unless otherwise approved in writing by the local planning authority and the

details shall be retained, managed maintained as approved for the lifetime of the development.

Reason: In order to ensure that the detailing and proposed artwork to the entrances for each building is considered acceptable in the interests of the appearance of the locality, in accordance with DMPD policy DMS1.

84. Condition – Materials, Portswood Place

Notwithstanding the plans hereby approved, prior to the commencement of development of the Portswood Place community buildings, revised details of external materials shall be submitted to and approved by the Local Planning Authority.

Thereafter, the development shall be carried out in accordance with the approved materials, unless otherwise approved in writing by the local planning authority and the materials shall be retained, managed maintained as approved for the lifetime of the development.

Reason: In order to ensure that the materials used in the Portswood Place buildings are in keeping with the character and appearance of the conservation area and preserve and enhance the setting of nearby listed buildings in accordance with DMPD policy DMS1 and policy DMS2.

85. Condition – Revised Layout, Bus Turnaround

Notwithstanding the plans hereby approved, prior to the commencement of development on the bus turnaround, a revised details shall be submitted to and approved by the Local Planning Authority which seek to maximise the number of trees to be retained to mitigate the impact of the bus turnaround on the setting of the Alton West Registered Park and Garden.

Thereafter, the development shall be carried out in accordance with the approved revised layout plan unless otherwise approved in writing by the local planning authority and shall be retained, managed maintained as approved for the lifetime of the development.

Reason: In order to reduce the impact of the bus turnaround and to preserve the setting of the Alton conservation area and the Alton West registered Park and Garden in accordance with DMPD policy DMS2.

86. Condition – Re-use of Granite Setts

The existing granite setts located within the pavement surfacing in Harbridge Avenue shall be re-used within the public realm and landscaping unless otherwise agreed in writing by the Local Planning Authority.

Reason: In order to preserve the setting of the Alton conservation area in accordance with Policy DMS2.

87. Condition - Recording of Allbrook House

Prior to its demolition, the whole of Allbrook House and Roehampton Library shall be recorded to enable details of the buildings to be published prior to demolition in

accordance with a written scheme of investigation to be agreed in writing by the local planning authority.

Reason: In order to retain a record of Allbrook House and Roehampton Library in accordance with DMPD policy DMS2.

88. Condition - External Lighting

Prior to its installation details of any external lighting associated with the development as set out in the approved Design and Access Statement (June 2019), including levels of illumination, position, design, structure, direction of illumination, shall be submitted to and approved in writing by the Local Planning Authority.

Thereafter, the development shall be carried out in accordance with the approved details, unless otherwise approved in writing by the local planning authority and the external lighting shall be retained, managed maintained as approved for the lifetime of the development.

Reason: In the interests of the appearance of the development and the amenity of neighbouring properties in accordance with policy DMS1.

89. Condition - External Fittings

Unless specified on the approved drawings, no lights (excluding aviation lights), meter boxes, flues, vents or pipes, and no telecommunications equipment masts or equipment or associated structures, alarm boxes, television aerials or satellite dishes shall be fixed or installed on the external face or roofs of the buildings, without the prior approval in writing of the Council.

Reason: In order to safeguard the architectural quality buildings and to safeguard the character and appearance of the wider area in accordance with the requirements of DMPD Policy DMS1 and London Plan Policies 7.4 and 7.6.

90. Condition - Boundary Treatments

Prior to the first occupation of each Development Block or Phase, details of all proposed walls, fences and boundary treatments shall be submitted to and approved in writing by the Local Planning Authority. The boundary treatment(s) shall then be carried out in accordance with the approved details and retained permanently thereafter to the satisfaction of the Local Planning Authority.

Reason: To ensure a satisfactory standard of external appearance, in accordance with DMPD Policy DMS1 and London Plan Policies 7.4 and 7.6.

91. Condition - No Water Tanks or Plant

No plant, water tanks, water tank enclosures or other structures, that are not shown on the approved plans for the detailed phase and any subsequent plans approved under Reserved Matters Applications, shall be erected upon the roofs of the buildings hereby permitted unless approved in writing by the Local Planning Authority.

Reason: To ensure a satisfactory external appearance, in accordance with Policies DMS1 and Policy 7.6 of the London Plan.

Crime

92. Condition - Secure by Design

The development hereby permitted shall achieve a minimum silver award of the Secure by Design for Homes (March 2019) and Commercial (2015 Guide Version 2) or any equivalent document superseding the guidance. A certificated Post Construction Review, or other verification process agreed with the Local Planning Authority, shall be provided upon completion, confirming that the agreed standards have been met.

Reason: In order to provide a safe and secure development, in accordance with DMPD Policy DMS1.

93. Condition - CCTV and Security Lighting

Prior to the occupation of each Development Block or Phase a scheme showing full details of the following for that phase shall be submitted to and approved in writing by the Local Planning Authority.

- a) CCTV;
- b) Security lighting;

Reason: To ensure that the development provides a safe and inclusive environment which maximises personal safety and minimises opportunities for crime and antisocial behaviour in accordance with DMPD Policy DMS1.

Archaeology

94. Condition - Archaeological Investigation (WSI)

No demolition or development shall take place within a Phase or part thereof until a written scheme of investigation (WSI) has been submitted to and approved by the local planning authority in writing. For land that is included within the WSI, no demolition or development shall take place other than in accordance with the agreed WSI, which shall include the statement of significance and research objectives, and

- a) The programme and methodology of site investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works
- b) The programme for post-investigation assessment and subsequent analysis, publication & dissemination and deposition of resulting material. This part of the condition shall not be discharged until these elements have been fulfilled in accordance with the programme set out in the WSI.

Reason: To safeguard the archaeological interest on this site.

Energy / Sustainability

95. Condition - Energy Statement

The development granted by this planning permission in the Detailed Element shall be carried out in accordance with the Alton Estate Energy Strategy dated March 2020 unless otherwise agreed in writing by the local planning authority.

Reason: to ensure the implementation of sustainable design, low carbon development and renewable energy in accordance with Core Strategy policy IS2 and DMPD policy DMS3.

96. Condition - BREEAM

No later than 6 months after occupation of the non-residential development a Post Construction Certificate verifying 'Outstanding' BREEAM level unless otherwise agreed in writing beforehand, shall be submitted to the Local Planning Authority.

Reason: To ensure the implementation of sustainable design, low carbon development and renewable energy in line with Core Strategy policy IS2 and DMPD policy DMS3.

97. Condition - Photovoltaic Panels

Details of the location, layout and specification of Photovoltaic Panels to be installed on the roof of the buildings within the Detailed Element as detailed in the Energy Strategy dated March 2020, or as subsequently detailed within the Reserved Matters applications, shall be agreed in writing by the Local Planning Authority and installed prior to occupation.

Reason: To ensure the implementation of sustainable design, low carbon development and renewable energy in accordance with Core Strategy policy IS2 and DMPD policy DMS3.

98. Condition - Carbon Reduction- Residential

The residential component of the development hereby permitted shall achieve as a minimum 35% reduction in carbon dioxide emissions over Part L of the Building Regulations (2013) secured on site as declared in the submitted Energy Strategy March 2020.

Reason: To ensure compliance with the proposed energy strategy in accordance with Policy 5.2 of the London Plan (March 2016) and Draft London Plan (Dec 2019) and Policy IS1, IS2 of Core Strategy and Policy DMS1, DMS3 of the DMPD.

99. Carbon Reduction- Non-Residential

The non-residential component of the development hereby permitted shall achieve as a minimum a 35% reduction in carbon dioxide emissions over Part L of the Building Regulations (2013) site as declared in the submitted Energy Strategy and Sustainability Assessment December 2018.

Reason: To ensure compliance with the proposed energy strategy in accordance with Policy 5.2 of the London Plan (March 2016) and Draft London Plan (Dec 2019) and Policy IS1, IS2 of Core Strategy and Policy DMS1, DMS3 of the DMPD.

100. Condition –Updated Energy Strategy

Prior to the commencement of development for each of the Outline Blocks, details of sustainability and energy strategies shall be submitted to the Local Planning Authority for approval. These details shall include: BREEAM, passive design measures, energy efficiency, and renewable technologies. The development shall

not be implemented other than in accordance with the sustainability and energy strategies approved by the Local Planning Authority.

Reason: to ensure the implementation of sustainable design, low carbon development and renewable energy in accordance with Core Strategy policy IS2 and DMPD policy DMS3.

Other Conditions

101. Condition - Temporary land uses/buildings

Prior to implementing any works for any temporary uses of buildings or temporary structures including sales/marketing suites within the site, with the exception of any buildings or temporary structures necessary for the works of construction hereby approved, details shall be submitted to and approved in writing by the Local Planning Authority. Any (interim/semi-permanent) structures, uses and buildings shall be implemented in accordance with the approved details, for a specified time period set out in the details and shall be discontinued/removed once the temporary period has expired.

Reason: To ensure that the site remains in a tidy condition during the construction phase and to ensure that any temporary uses/structures do not create unneighbourly impacts and to prevent harm to the street scene. In accordance with Policy DMS1 of the DMPD.

102. Condition - Hoardings

No development within a Development Block or Phase, shall commence until a scheme for temporary fencing and/or enclosure of the site has been submitted to and approved in writing by the Local Planning Authority, and the temporary fencing and/or enclosure has been erected in accordance with the approved details. The temporary fencing and/or enclosure shall thereafter be retained for the duration of the demolition and building works in accordance with the approved details.

Reason: To ensure a satisfactory external appearance and to prevent harm to the street scene and public realm, in accordance with Policies 7.1 and 7.6 of the London Plan and DMPD Policy DMS1.

103. Condition - EINA Statement

The development hereby approved shall be carried out in accordance with the Equality Impact and Needs Analysis (EINA) dated March 2020 which shall include the submission of an action plan to monitor the anticipated effects on the protected groups as identified in the EINA for review by the Local Planning Authority. The timescale for the submission and agreement of the action plan shall be submitted to the local planning authority prior to the commencement of development.

Reason: To have regard to the impact of policies and proposals on people with “protected characteristics” as set out in Section 149 of the Equality Act 2010.

104. Condition – Family Sized Units

The residential units to be provided in the Outline Blocks shall deliver a minimum of 10% of the total number of units to be family sized units (of 3 bedrooms or more).

Reason: In order to ensure the proposed development would deliver an appropriate level of family sized accommodation in accordance with policy DMPD Policy DMH3.

105. Condition – Open Market Unit Provision

The Proposed Development shall provide a maximum of open market unit provision across the Application Site within the following phases:

- (a) Detailed phase - 458 units (equating to 1,271 habitable rooms)
- (b) Outline phase - 389 units (equating to 1,104 habitable rooms)

Reason: To ensure the delivery of housing in accordance with Core Strategy IS5 and DMPD Policy DMS5

INFORMATIVES

1. NPPF

In dealing with this application the Council has implemented the requirement in the National Planning Policy Framework to work with the applicant in a positive and proactive manner and the Council has, as far as practicable, sought solutions to problems arising in relation to dealing with the planning application. We have made available detailed advice in the form of our statutory policies in the Local Plan consisting of the Core Strategy, Development Management Policies Document, Supplementary Planning Documents and where appropriate the Site Specific Allocations Document as well as offering a full pre-application advice service, in order to ensure that the applicant has been given every opportunity to submit an application which is likely to be considered favourably. In addition, where appropriate, further guidance was offered to the applicant during the processing of the application.

2. CIL - Community Infrastructure Levy 1

Community Infrastructure Levy (CIL): From the information available, it appears that the development permitted is subject to a Community Infrastructure Levy charge in accordance with the Community Infrastructure Levy Regulations 2010 (as amended).

You or the relevant interested parties are required to provide the Council with the information set out in the Regulations. The process for the collection of CIL includes:

- the requirement to complete an "Assumption of Liability" form as soon as possible;
- to claim charitable exemption, social housing relief, self-build exemption or residential annex/extension

exemption you or the relevant interested party must complete the correct claim form. The Council will issue a Liability Notice(s) which details the charges due.

As soon as the developer, landowner or other interested party(ies) is aware of the date when development is going to start, they must also submit a "Commencement Notice".

Failure to comply with the Regulations, including failure to complete the forms when required or providing inaccurate information can lead to surcharges, invalidate claims for relief or exemption from the charge, or other penalties as set out in the Regulations.

General information on the Community Infrastructure Levy, including the forms mentioned above can be found on the Planning Portal (www.planningportal.gov.uk). Details of the Mayoral CIL can be found on the GLA and TfL websites (www.london.gov.uk and www.tfl.gov.uk).

The Assumption of Liability Form, Claiming of Exemption or Relief Forms and Commencement Notice must be sent to:

Community Infrastructure Levy
Environment and Community Services
Wandsworth Council
Town Hall
London
SW18 2PU
cil@wandsworth.gov.uk
Fax: 020 8871 6003 (marked FAO CIL)
90. CIL - Community Infrastructure Levy 2

3. CIL - Community Infrastructure Levy 2

Any assessment of CIL liability by the Council has been based on the information provided. Where the calculation of CIL liability includes taking account of the existing use of a building, CIL liability may change if the information provided in relation to the existing use(s) of buildings is not still current at the time of the decision which first permits development. This date will be the latest date of either: the date of this permission; the approval of the last pre-commencement condition associated with a phase of a phased planning permission; or for a phase of an outline permission granted in phases the date of permission of the last reserved matter or pre commencement condition associated with that phase

4. Informative – Archaeology

The written scheme of investigation will need to be prepared and implemented by a suitably qualified professionally accredited archaeological practice in accordance with Historic England's Guidelines for Archaeological Projects in Greater London. This condition is exempt from deemed discharge under schedule 6 of The Town and Country Planning (Development Management Procedure) (England) Order 2015.

5. Informative - Dust Management Plan (DMP)

A DMP:

- May be integrated within a wider Construction Environmental Management Plan (CEMP);
- Must mitigate negative impact on air quality and receptors in the vicinity;
- Must detail the measures to reduce the impacts on air quality during all construction phases (demolition, construction, Earthworks, Trackout)
- Include maintenance schedule of the dust mitigation measures;
- Undertake to carry out air quality monitoring before, during and after demolition and construction works
(at least a month prior to commencement of any works on site). Parameters to be monitored, duration, locations and monitoring techniques must be approved in writing by Wandsworth Council prior to commencement of monitoring.
- Shall be in accordance with "The Control of Dust and Emissions during Construction and Demolition", Mayor of London SPG 2014.

6. Cadent Informative

As your proposed activity is in close proximity to National Grid's Transmission assets, we have referred your enquiry/consultation to our Asset Protection team for further detailed assessment. We request that you do not commence work or take further action with regards to your proposal until you hear from us. We will endeavour to contact you within 21 days from the date of this response. Please contact us at assetprotection@nationalgrid.com if you have not had a response within this time frame.

Due to the presence of Cadent and/or National Grid apparatus in proximity to the specified area, the contractor should contact Plant Protection before any works are carried out to ensure the apparatus is not affected by any of the proposed works.

7. Thames Water Informative

There are water mains crossing or close to your development. Thames Water do NOT permit the building over or construction within 3m of water mains. If you're planning significant works near our mains (within 3m) we'll need to check that your development doesn't reduce capacity, limit repair or maintenance activities during and after construction, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes.

[hps://developers.thameswater.co.uk/Developing-a-large-site/Planning-yourdevelopment/Working-near-or-diverng-our-pipes](https://developers.thameswater.co.uk/Developing-a-large-site/Planning-yourdevelopment/Working-near-or-diverng-our-pipes)

The proposed development is located within 15m of our underground water assets and as such we would like the following informative attached to any approval granted. 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 our 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.

[hps://developers.thameswater.co.uk/Developing-a-large-site/Planning-yourdevelopment/Working-near-ordiverng-our-pipes](https://developers.thameswater.co.uk/Developing-a-large-site/Planning-yourdevelopment/Working-near-ordiverng-our-pipes). Should you require further information please contact Thames Water. Email:

developer.services@thameswater.co.uk

8. Supplementary Comments

Wastewater: The information supplied is too complex and complicated. Thames Water needs clear and concise information to carry out an effective sewer assessment. For this please provide; 1. All foul Water connection locations, rate and type of discharges & manhole references. 2. All Surface Water connection locations, rate and type of discharges and manhole references. All this information needs to be simplified by the developer either in a table or list version to avoid any issues in the future pre-construction and post-construction.

9. CAA Informative

Please note the following guidance for crane operations and lighting of obstacles: If a crane is located on top of another structure, it is the overall height (structure + crane) that is relevant. Temporary structures such as cranes can be notified through the means of a Notice to Airmen (NOTAM). If above a height of 300ft (91.4m) above ground level, the developer must ensure that the crane operator contacts the CAA's Airspace Regulation (AR) section on ARops@caa.co.uk or 01293 768202. If the

crane is to be in place for in excess of 90 days it should be considered a permanent structure and will need to be notified as such: to that end the developer should also contact the DGC on dvo@mod.uk - Additionally, any crane of a height of 60m or more will need to be equipped with aviation warning lighting in line with CAA guidance concerning crane operations which is available at

<http://publicapps.caa.co.uk/docs/33/CAP%201096%20In%20Focus%20%20Crane%20Ops.pdf>

See Air Navigation Order (CAP393) regarding Lighting for obstacles (Articles 221 to 225).

<https://publicapps.caa.co.uk/modalapplication.aspx?catid=1&appid=11&mode=detail&id=7523>

See also CAP168 Licensing of Aerodromes regarding lighting and marking of obstacles, Chapter 4, page 177 to page 187.

http://publicapps.caa.co.uk/docs/33/CAP%20168%20Issue11_Licensing%20of%20Aerodromes%2013032019.pdf

Due to the unique nature of operations in respect of altitudes and potentially unusual landing sites, it would be sensible for you to establish the related viewpoints of local emergency services Air Support Units through the: National Police Air Service (NPAS) organisation via email npas.obstructions@npas.pnn.police.uk; and through the London Air Ambulance info@londonsairambulance.org.uk

10. Fire Brigade Informative

An undertaking should be given that, access for fire appliances required by Part B5 of the current Building Regulations Approved Document b and adequate water supplier for firefighting purposes, will be provided. The London Fire Brigade are also required to be consulted when the process reaches the building consultation phase. The London Fire brigade promotes the installation of sprinkler suppression systems, as there is clear evidence that they are effective in suppressing and extinguishing fires; they can help reduce the numbers of deaths and injuries from fire, and the risk to firefighters.

11. Design Champion Informative

The existing architects shall be retained in a capacity as a design reviewer / champion on the regeneration site to ensure that the integrity of the master plan and all of the new buildings is delivered and that the design codes and parameter plans are fully met.

12. Alton Estate Community Access Forum Informative

It is recommended that a consultative Alton Estate Community Access Forum be set up as detailed in the Access Statement submitted to the Local Planning Authority in March 2020. This forum should attract membership from existing disabled residents located on the Alton estate members with members chosen from across a wide spectrum of people with lived experience of disability and who have an interest and a stake in the future of the estate. The forum is designed to form the basis of a community asset for the area where disabled residents have a specific role in the future management of the estate and will ensure that members feel they are part of the planning process and are able to input into some of the detailed designs going forward (such as the design of the Village Square