



THE LESNES ESTATE

Planning Statement

JUNE 2021

LESNES ESTATE, SOUTH THAMESMEAD

Peabody

**Planning Statement in support of an
application of Outline Planning Permission**

June 2021

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1 Introduction

- 1.1 This Planning Statement has been prepared by CBRE on behalf of the applicant, Peabody, to accompany the submission of an application for outline planning permission with all matters reserved for the proposed development at Lesnes Estate, South Thamesmead, within the London Borough of Bexley ('LB Bexley').
- 1.2 The description of development is as follows:
"Outline application with all matters reserved for the demolition of existing structures and phased construction of buildings providing up to 1,950 residential units and up to 3,225 sqm (GIA) of commercial floorspace (Use Class E (all purposes) and public house) alongside access works with works to the internal road network, car and cycle parking, public realm, and enhancements to the Abbey Way public open space."
- 1.3 This document sets out the characteristics of the Site and surrounding area; describes consultation with stakeholders; and assesses the proposals in terms of relevant planning policy as set out in the National Planning Policy Framework (NPPF) (2019) and the Development Plan.
- 1.4 To provide background to the application, in 2014 Gallions Housing Association, Trust Thamesmead and Tilfen Land became part of the Peabody Group. Following the merger, Peabody Group made a number of commitments to Thamesmead, including significant investment into the area. Peabody's commitment to Thamesmead has been, and continues to be, shaped and informed following discussions with existing residents about their views and experience of living in Thamesmead and their hopes for the future.
- 1.5 Peabody has been working with the GLA and LB Bexley to deliver the Housing Zone applications (see Section 3 for more detail) and the redevelopment of Lesnes is part of a strategic programme of investment by Peabody into the wider South Thamesmead Estate.

SCOPE OF SUBMISSION

- 1.6 The following documents form part of or inform the planning application:
 - Planning Application Form (including ownership certificates)
 - Development Specification
 - Site Location Plan
 - Parameter Plans
 - Design Code
 - Design and Access Statement
 - Illustrative drawings
 - Environmental Statement
 - Volume I: Non-technical Summary
 - Volume II: Main Volume
 - Volume III: Townscape and Visual Impact Assessment
 - Volume VI: Technical Appendices
 - Fire Statement
 - Energy Strategy
 - Sustainability Statement

1 Introduction

- Statement of Community Involvement
- Viability Assessment

FORMAT OF SUBMISSION

- 1.7 Given that the application is made in outline, the parameter plans, Design Code and Development Specification are put forward for approval. These are supported by the Design and Access Statement, the Illustrative Masterplan Documents and the Environmental Impact Assessment (EIA). All the documents assess the maximum development parameters set out in the description of development but have referred to the Illustrative Masterplan where it is relevant for the purpose of their assessment.
- 1.8 The Illustrative Masterplan has been prepared by Macreanor Lavington to demonstrate how a scheme could come forward on the Site, but this does not constitute the proposed scheme for the site; this is intended to come forward through a series of Reserved Matters Applications ('RMAs'). Further information on the format of the submission is provided in Section 5 of this Planning Statement.

STRUCTURE OF PLANNING STATEMENT

- 1.9 Following this introduction, Section 2 of this Planning Statement provides the site context and a description of the Application Site, before considering Peabody's involvement in the area and the Housing Zone consents in Section 3. Section 4 describes approach that has been taken to the development and the other approaches that were considered but subsequently withdrawn. Section 5 sets out the format of the application and a summary of the proposals, and Section 6 provides a summary of the pre-application consultation that has informed the development of the scheme. Section 7 provides the planning policy context; Section 8 comprises an assessment of the proposals against relevant planning policies and other material considerations. Section 9 sets out anticipated Section 106 Heads of Terms and CIL Contributions and Section 10 sets out our conclusions.

2 Site Context

- 2.1 This Section of the Planning Statement sets out the context of the Application Site and its location within Bexley. It also provides a description of the Site in its current form, refers to relevant planning history and begins to set out the strategic planning context for bringing forward the proposals.

SOUTH THAMESMEAD

- 2.2 The Application Site forms a portion of the wider South Thamesmead Estate which was constructed in the 1960s by the Greater London Council ('GLC') as a master planning project to deliver post-war housing for 60,000 people. At the time, the aim of the GLC was to create a compact area in which residents could combine all types of activities, with the lake at the heart of the estate. The area was planned to be divided into North, South, Central, East and West areas, which each area providing a different function for residents. As part of this, five residential areas – Tavy Bridge, Southmere, Lesnes, Parkview and Rushdene – were created.

- 2.3 To deliver the ambitious housing target, the GLC also committed to delivering improved infrastructure to Thamesmead to ensure it was connected to the inner city. This was due to be provided through a Jubilee extension and a bridge crossing over the river. However, due to a lack of funding, these infrastructure provisions did not materialise, which reduced the potential connectivity of the estate. Other forms of social infrastructure such as shops, amenities and services were also not provided as originally conceived. Despite having been built with much promise, in the intervening years the limitations associated with the design of the estate became apparent. As summarised within the Thamesmead and Abbey Wood Supplementary Planning Document (August 2009: 3) produced jointly by LB Bexley and RBG:

"The plans [referring to the original masterplan] contained high aspirations for architectural innovation to overcome floodplain issues and develop high density communities. However, a combination of the form of development and a lack of connections to the wider area has resulted in a community which is somewhat isolated and which suffers disproportionately from issues of multiple deprivation."

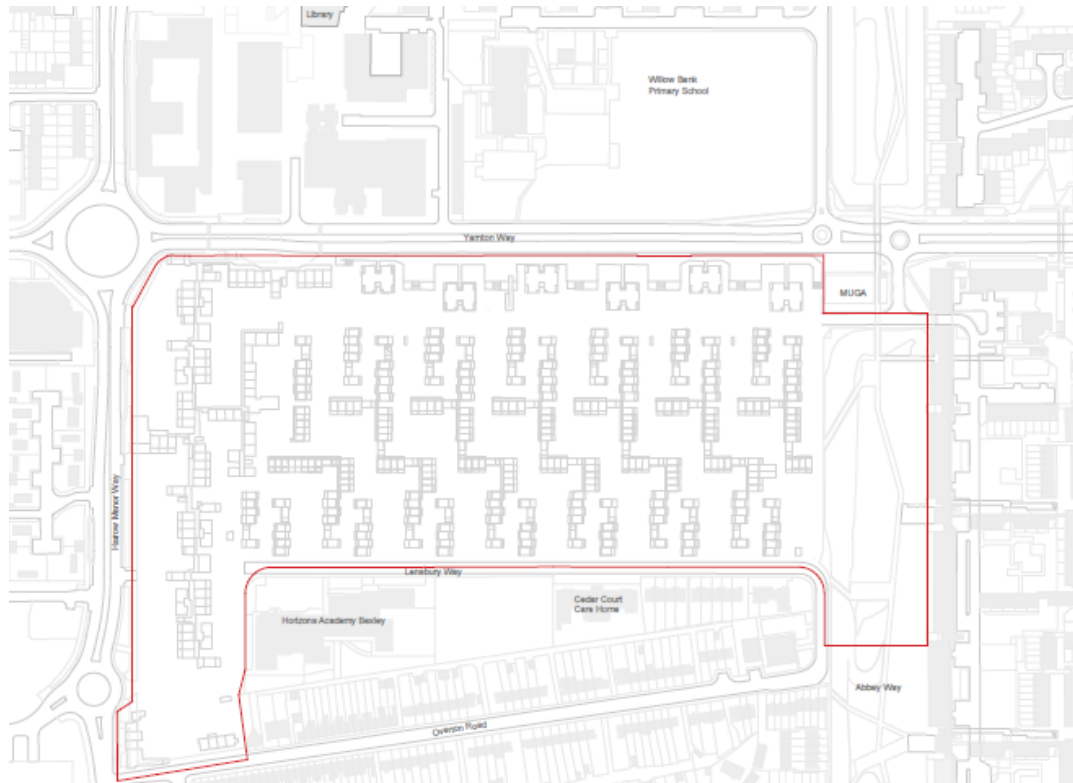
- 2.4 With great natural assets in the area such as Southmere Lake and Southmere Park, combined with major planned transport improvements at Abbey Wood, Peabody sees Thamesmead as a place of opportunity, where people will aspire to live, work and visit.
- 2.5 There has been a long-held aspiration to improve the estate and provide a better-quality environment for all living there. Peabody's mission is to help create vibrant, cohesive and thriving neighbourhoods in one of the world's greatest cities – places where people and whole communities can improve their quality of life and fulfil their aspirations. Peabody has undertaken a series of improvements to the South Thamesmead area, as detailed further in this Section, alongside proposed comprehensive development of four areas of the Estate, known as the Housing Zone applications. These applications are considered in detail at Section 3.

THE APPLICATION SITE – LESNES ESTATE AND CORALLINE WALK

- 2.6 The Site is located within South Thamesmead and is often referred to as the Lesnes Estate. The Site forms two distinct parts; Coralline Walk and the Lesnes Estate, which collectively comprise the Application Site. The Application Site boundary is shown in Figure 1 below. For the avoidance of doubt, any reference to the Site throughout this statement refers to Application Site boundary. The hatched area shown in Figure 1a is the indicative area that formed the Coralline Walk application.

2 Site Context

Figure 1 – Site Location



Source - Site Location Plan by Maccreanor Lavington

Figure 1a – Indication of Coralline Walk area



Source – Design and Access Statement by Maccreanor Lavington

2 Site Context

- 2.7 The Site is bound to the west by the A2041 Harrow Manorway ('Harrow Manorway'); to the north by Yarnton Way; to the east by housing along Maran Way and to the south by Overton Road. The Site is roughly L-shaped and covers an area of 11.07 hectares, of which c.1.37ha is formed of Abbey Way Park. The main body of the site is flat and level at an approximate elevation of 1m above ordnance datum (AOD).
- 2.8 Coralline Walk benefits from an outline consent (16/01288/OUTM) and forms one of the four Housing Zone consents. It is currently undergoing demolition as part of prior approval (19/01623/PRIORD), which is due to complete in July 2021. It is expected that demolition of the buildings in this part of the Site will have been completed and the area will have become open ground prior to commencement of the construction phase for the current proposals.
- 2.9 Prior to demolition, Coralline Walk provided 150 units, 136 of which were socially rented. Under the current proposal, these units are not considered to require re-provision as residents have already been relocated to alternative accommodation and have been considered as part of the Southmere Village application. This is considered in more detail in Section 8 of this Statement.
- 2.10 The Lesnes Estate portion of the Site currently hosts 596 dwellings, predominantly comprising three to four storey linear blocks that are predominantly terrace houses constructed around small landscaped areas that include amenity grassland and scattered trees. Six 13-storey residential towers are also present lining the northern site boundary, adjacent to Yarnton Way. The existing 596 residential properties on site comprise a mix of homeownership and rented homes as shown in Table 1.

Table 1 – Existing Mix of Units at Lesnes Estate

Tenure	Quantum				Total
	1 bed	2 bed	3 bed	4 bed +	
Social and Affordable Rent	136	135	72	68	411
Privately owned	2	8	64	99	173
Peabody Market Rent	6	1	1	4	12
TOTAL	144	144	137	171	596

- 2.11 In total, the Lesnes Estate provides 29,890sqm¹ of Social and Affordable rented units, which equates to 411 units or 1,858 habitable rooms.

Relevant Planning History for the Application Site

- 2.12 According to the Bexley Public Access Search, the Lesnes Estate area of the Site has a very limited planning history.
- 2.13 Coralline Walk benefits from an outline planning consent (16/01288/OUTM), granted as part of the wider Housing Zone consents. This is explored in detail at Section 3.

¹ This figure applies only to the cumulative total GIA of affordable residential units. It does not include common areas and circulation spaces.

2 Site Context

Access

- 2.14 The primary access to the Site for both pedestrians and vehicles is via Wolvercote Road, which traverses the centre of the site and is accessed from Yarnton Way. Vehicular and pedestrian access to the site can also be made via Harrow Manorway, Lensbury Road and Coralline Walk. Pedestrian access can also be made from Maran Way and Abbey Way in the east of the site. On-site car parking is provided, largely via on-street parking. Cars have also been observed to park informally on the hard standing in the public realm, in front of ground floor garages.
- 2.15 The eastern portion of the application site comprises a corridor of open space known as Abbey Way. This area comprises amenity grassland, mature scattered trees, pedestrian access routes and a Multi-Use Games Area (MUGA). Abbey Way was originally designed to provide an evacuation location for the area in the event of a flood. The area forms part of the Southmere Park and Yarnton Way/Viridion Way Site of Importance for Nature Conservation (SINC) (Site of Borough Importance Grade 2). This is a non-statutory designated site and is described as follows on the designation:
- A large lake mainly used for recreation, its large size being of value to water birds. The lake has surrounding parkland, a woodland with black poplar *Populus nigra ssp betulifolia*, a priority species in the London and Bexley BAPs and an accessible corridor of greenspace."*
- 2.16 The majority of the areas of ecological interest listed in the designation description are located off site, including Southmere Lake and the woodland areas.

Site Surroundings

- 2.17 Thistlebrook Travellers Site is present on the opposite side of Harrow Manorway. Thistlebrook has 40 pitches (20 large and 20 medium) and can accommodate 60 homes such as trailers, caravans and mobile homes. It is currently full. Adjacent to this site is the Cross Quarter scheme (12/3058), the first phase of which delivered the Sainsbury's supermarket after completion in 2015. The second phase for 245 dwellings was approved in October 2018 and has not yet commenced.
- 2.18 A variety of uses are present to the north of Yarnton Way, including Lakeside Medical Practice and its adjacent car park, Blewbury House residential block, Willow Bank Primary School and its school playing fields, and the redevelopment of Land at Southmere Village (16/01251/FUL), the first of the four Housing Zone applications to be developed. The development will bring forward a variety of uses, including residential, office, non-residential institutions and commercial.
- 2.19 On the opposite side of Overton Road, residential and commercial properties are present. To the south of Lensbury Way, Horizons Academy Bexley (an alternative provision school that provides education for pupils who have been permanently excluded from other schools) and its playing fields, Cedar Court Care Home and residential properties are present. A residential area is also present further to the south.
- 2.20 The wider context of the application site is largely residential in character. Other locations of note in the surrounding area include Abbey Wood train station and Southmere Lake, which are located approximately 200m to the south and 170m to the north of the application site respectively. The majority of surrounding buildings are low rise, with the exception of a number of 13 storey towers that line Yarnton Way and Southmere Lake, as well other tall buildings currently under construction in Southmere.

Strategic Planning Context

Abbey Wood and South Thamesmead Opportunity Area Planning Framework

- 2.1 South Thamesmead has long been identified as an area in need of regeneration with the potential to deliver improved housing for current residents and to deliver on the initial GLC aims for the Estate. The area's potential has been embedded in planning policy since its designation as an Opportunity Area in 2011. The position has now been strengthened further with the adoption of the Opportunity Area

2 Site Context

Planning Framework ('OAPF') for Abbey Wood and South Thamesmead in December 2020. Within this, the Site is identified as a "potential site of change".

- 2.2 The OAPF states that *'that the lack of transport infrastructure and subsequent car dominant design is considered to be at least partially responsible for the original masterplan failing to achieve its utopian vision. 50 years on, the OAPF seeks to revitalise the area's original ambition to address the current day housing crises by delivering the final piece of the puzzle; transport links'*. This new commitment to providing strategic links in Thamesmead provides a very positive context for regenerating the estate and beginning to deliver the ambitious growth for the Thamesmead and Abbey Wood Opportunity Area ('TAWOA').
- 2.3 The London Plan promotes the following change in the Opportunity Area: enhancement of Thamesmead through estate renewal; redevelopment and intensification of employment sites; provision of better quality, publicly accessible open spaces; creation of a new local centre around Abbey Wood station; revitalisation of Thamesmead town centre and Plumstead High Street; and improved local transit connections.
- 2.4 As a result of the interventions, the London Plan sets out an indicative capacity of 8,000 new homes and 4,000 new jobs for the Opportunity Area as a baseline position.

Transport Accessibility

- 2.5 As set out above, the lack of public transport to the area has resulted in some of the shortcomings of the current estate. The current Public Transport Accessibility Level (PTAL) is between 1a and 6a, although only a very small part of the Coralline site has a 6a rating.
- 2.6 However, the announcement of Crossrail at Abbey Wood Station and the significant investment that has been put into the station surrounds means that the site is now very well connected to the city. It is estimated that 12 trains per hour will run between Whitechapel and Abbey Wood in both directions. This will provide significantly improved access to Canary Wharf and Central London. With this current baseline of public transport improvements, the OAPF estimates that 5,000 new homes and 4,000 new jobs could be created.
- 2.7 The OAPF also models scenarios where additional transport infrastructure is provided. The Intermediate Growth Option introduces a Bus Rapid Transit (BRT) link which would connect Woolwich to Thamesmead as well as providing the opportunity for a high-quality walking and cycling route. This would increase the capacity of the OA to 8,000 new homes and 5,500 new jobs.
- 2.8 The OAPF also sets out a high growth option which provides the BRT alongside a new cross-river DLR connection, which is a priority for the Mayor. This would increase the development capacity of the OA to 15,500 new homes and 8,000 new jobs, making it one of the larger OAs in London.

3 Peabody in South Thamesmead

- 3.1 This Section provides a summary of the history of Peabody as an organisation and its vision for South Thamesmead. It sets out a summary of improvement works and planning applications that Peabody has undertaken since taking ownership of the South Thamesmead Estate in 2014. It also provides a detailed summary of the Housing Zone applications and explains how these have been taken account of in the current proposals.

INTRODUCTION

- 3.2 Peabody was founded in 1862 by philanthropist George Peabody. Since its foundation, Peabody has grown to become one of the largest housing associations in London, managing more than 27,000 homes across the capital and housing around 80,000 residents.
- 3.3 In January 2014 the Peabody Group acquired Gallions Housing Association, the former owners of the Thamesmead Estate, Bexley and the Application Site. Following the merger, Peabody Group made a number of commitments to Thamesmead, including significant investment into the area. Peabody's commitment to Thamesmead has been, and continues to be, shaped and informed following discussions with existing residents about their views and experience of living in Thamesmead and their hopes for the future.
- 3.4 The area of Thamesmead and Abbey Wood was made an Opportunity Area in the London Plan in 2011 in acknowledgement of the need for regeneration in the area and planned infrastructure improvements, such as Crossrail, that will increase the area's connectivity and capacity for growth. The principle of regenerating the area has since been established within the Bexley Core Strategy (February 2012), London Plan incorporating Minor Alterations to the London Plan (MALP) 2016, Abbey Wood and Thamesmead Supplementary Planning Guidance Document (June 2009) and the South Thamesmead Regeneration Framework (2012). In January 2014 Peabody, in partnership with LB Bexley, submitted a joint bid for part of the Thamesmead Estate to be designated as a Housing Zone to assist in the regeneration of this area.
- 3.5 Peabody has sought to work closely with the existing community to understand what does and does not work well in Thamesmead to ensure that future plans for the area are conceived so as to reflect the needs of the existing community.

PEABODY'S VISION

- 3.6 In 2018 Peabody launched its Plan for Thamesmead which sets out its 30-year vision; its mission; and describes the 'whole place' approach to delivery.

Whole Place Approach

- 3.7 Peabody's work is holistic, joining up the regeneration, investment and management of the whole town. The approach is distilled into four strategic themes: Pride and Aspiration, Designing for People, Stewardship, Made in Partnership. These provide structure and focus for making Thamesmead a great place. Peabody's investments in South Thamesmead, and more specifically at Lesnes Estate, will fit into its wider Plan for Thamesmead.

Mission

- 3.8 Peabody's mission is to improve, grow and look after Thamesmead for the long-term. That means using its expertise as a place maker, patient investor and stewards to make a lasting contribution to the physical, social and environment wellbeing of the area, for the community today and for future generations.

3 Peabody in South Thamesmead

Thamesmead 2050 – Peabody’s Vision

- More than 100,000 people are now proud to call Thamesmead home. It’s seen as a place you want to grow up and old in, a place to put down roots.
- There’s space for everyone in Thamesmead. The area offers homes of all shapes, sizes and tenures, bringing together people from different walks of life. The homes are comfortable, the neighbourhoods feel safe and secure, and the town feels well managed and cared for.
- In Thamesmead, you live in the landscape. Parks, waterways and nature are woven into everyday life. The town offers an escape from the hustle and bustle of London, with space to play and breathe.
- Thamesmead is a place to meet. Getting into and around Thamesmead is easy. There’s plenty of reasons to visit, from cafes, bars and shops to a flourishing arts and culture scene.
- Activity in Thamesmead is home-grown. “Made in Thamesmead” is a badge worn with pride. It’s a place of opportunities where you can find purpose and make the most of your life.
- Living in Thamesmead, you feel like you belong. The town’s identity has evolved from its unique heritage, and its future is built by the collective

PEABODY’S INVESTMENT INTO SOUTH THAMESMEAD

The Housing Zone applications

- 3.9 Following the designation of the Abbey Wood and South Thamesmead Housing Zone in 2015, Peabody undertook extensive work to evolve an indicative masterplan for the area of land comprised within the Housing Zone which extends into the Abbey Wood and South Thamesmead estate. These applications are very relevant to the Site, so are considered in greater detail within this Section.
- 3.10 Peabody has also embarked upon a programme of other interventions into the wider South Thamesmead Estate to bring about improvements for local residents. These applications are summarised below and demonstrate Peabody’s commitment to the estate.

South Thamesmead Landscaping Improvements

- 3.11 As part of the improvements to South Thamesmead Estate, Peabody has secured planning permission for the first phase of a wider landscape strategy. The first phase related to Portmeadow Walk and Mangold Way to deliver landscape improvements and environmental enhancements to help to improve the living conditions of the existing tenants. The works include enhanced way finding, new hard and soft landscaping and improved play facilities.
- 3.12 Two separate applications (18/00630/FUL and 18/00634/FUL) were approved in March 2018. The works are still pending commencement.

Lakeside Centre

- 3.13 An application (17/00623/FULMIN) was approved in July 2017 for alterations and refurbishment of the existing building to provide mixed use including business (Class B1), day nursery (Class D1), cafe (Class

3 Peabody in South Thamesmead

A3), residential (Class C3a) and leisure (Class D2). Peabody has now secured a tenant for the building (Bow Arts Trust) who are delivering the works.

Multi Use Games Area

- 3.14 In 2017 Peabody was granted planning permission (17/01019/FUL) for the refurbishment of the existing MUGA to provide improved facilities for the residents. This development is pending commencement.

Yarnton Way Wall Demolition

- 3.15 In January 2020, planning permission (19/07128/FUL) was granted to enable the demolition of the Yarnton Way Wall which currently runs along the south of Yarnton Way and results in an inactive frontage and poor relationship with the road. The application is currently under determination and proposes replacement of the wall with a high-quality landscaping scheme to improve the public realm surrounding the existing towers.

- 3.16 This scheme is located directly to the northern boundary of the application site.

Boat Club

- 3.17 As part of the S106 agreement attached to the Housing Zone applications, there was a requirement for a new facility to be provided following demolition. The new facility was granted planning permission in October 2020 and were developed alongside the YMCA Boating Club who will operate the new facility.

Marketing Suite

- 3.18 In October 2020, temporary planning permission (20/01860/FUL) was granted for a marketing suite and sales centre to market the residential units coming forward at Southmere Village.

Southmere Library

- 3.19 Part of the requirements of the Southmere Village application is the delivery of a new, purpose-built library that faces onto Southmere Lake to replace the temporary library on Binsey Walk. Planning permission (18/02252/FUL) for this new facility was granted on September 2018.

Lensbury Way Realignment

- 3.20 An application is currently pending validation in order to realign Lensbury Way that runs to the south of the proposed development site. The realignment is required to provide access through the demolished Coralline site and to connect to the works on Harrow Manorway that are currently being undertaken by LB Bexley.

THE HOUSING ZONE CONSENTS

- 3.21 Following designation as a Housing Zone, four planning consents were granted in 2016 to deliver up to 1,622 residential units and 11,191 sqm of non-residential space across four areas of the South Thamesmead Estate. The Housing Zone was considered on a holistic basis in order to optimise the benefits arising through the development but split into the following applications to facilitate delivery:

- 16/01251/FULM: Southmere Village Detailed Planning Application ('Southmere DPA')
- 16/01287/OUTM: Binsey Walk Outline Planning Application ('Binsey OPA')
- 16/01288/OUTM: Coralline Walk Outline Planning Application ('Coralline OPA')
- 16/01275/OUTM: Sedgemere Road Outline Planning Application ('Sedgemere OPA')

- 3.22 These areas are depicted on Figure 2. Throughout this Statement, these permissions are referred to collectively as 'the Housing Zone consents'.

3 Peabody in South Thamesmead

3.23 The applications on the four parcels of land were submitted as four separate applications in 2016; Southmere in detail and the other three as outline applications. However, they were all bound by one Design and Access Statement and a set of Design Principles. Due to them acting as different phases for the Housing Zone and for funding arrangements, they were subject to one S106 agreement.

Figure 2 – Housing Zone Planning Application Sites



Source – Design and Access Statement by Proctor and Matthews Architects and Mecanoo.

3 Peabody in South Thamesmead

Quantum of Development proposed

3.24 Table 2 below provides a summary of each of the four applications.

Table 2 – Housing Zone Permissions

	Southmere	Coralline	Sedgemere	Binsey
Number of units	525	549	219	329
Quantum/type of commercial space	3,691 sqm of A1-A3, B1a, D1 and D2 uses	3,225 sqm of A1-A4, B1a and D1 uses	3,225 sqm of A1-A4, B1a and D1 uses	1,050 sqm of A1-A4 uses, B1a, D1 and D2 uses
Car parking ratio	0.6	0.5	0.4	0.6
Proposed affordable housing	<p>Across the four sites, the GLA required 591 of the units to be provided as affordable dwellings – or 35% - to secure the Housing Zone funding.</p> <p>The S106 required that a minimum of 16,249 sqm (Gross Internal Area) of affordable housing be provide (considered in more detail below).</p> <p>Southmere has delivered 32,700 sqm GIA of affordable housing,</p>			
Maximum heights proposed	14 storeys (46.2m)	17 storeys (57.7m)	17 storeys (58m)	17 storeys (57.7m)
Delivery phase	1	2	3	4

Design Approach

3.25 The applications were worked up on a holistic basis to present a coherent masterplan. Supporting the four consents was a Design Principles Document (DPD) which provides an overarching framework so that each parcel of development could be brought forward separately but would always appear as a coherent masterplan. The DPD highlights a number of common design themes across the three sites, but also highlights specific principles within each application site to underpin a sense of individuality within the overarching development. For the outline consents as a whole, the DPD requires that the following must be observed for the outline consents:

- Non-residential active uses (retail, workspaces, community facilities) are positioned in the plinth of each cluster or in a special landmark building.
- Where non-residential active use is absent, the plinth is activated by maisonettes or townhouses with entrances at ground level. The ground floor dwellings have sufficient and attractive defensible space.
- Entrance halls and entrance courtyards must have a prominent position and should be spread across the ensemble.
- Tall buildings and street profiles should be precisely defined to create coherence and a clearly articulated public space.
- The housing units are designed in individual volumes that have a scale that mediates between the new and existing surroundings.
- The non-residential functions are spread across the development as a whole.
- Brickwork must feature strongly as a material within the urban public facades.
- The courtyards are to be differentiated in architectural language, detail, material or colour.
- Seek to maximise dual aspects where possible.
- Achieve GLA best practice guidance from the Housing SPG.

3 Peabody in South Thamesmead

- Marker buildings are positioned in a defined number of locations for townscape legibility and consist of one volume.

S106 agreement

- 3.26 The outline consents and detailed consent at Southmere were bound under one S106 agreement. The consents were intended to be bought forward as phases and expected (but not required) to be delivered in the order set out at Table 2 above and each phase relates to one of the outline consents; Coralline being Phase 2. Relevant obligations from the S106 are summarised below.

Affordable housing

- 3.27 Paragraph 2.2 of the S106 agreement states that *“the percentage of dwellings provided as Affordable Housing Units in each of Phase 2, 3 and 4 will be the figure specified in any Approved Affordable Housing Scheme for that Phase provided always that the Owner shall (subject to paragraph 2.5) endeavour to provide 35% Affordable Housing across the development.”*
- 3.28 Paragraph 2.5 states that *“the owner shall not carry out any works that comprise the development of the relevant outline phase beyond the completion of the foundation pile until an Affordable Housing Scheme in respect of the relevant Outline Phase has been approved in writing by the Council and the owners shall thereafter provide affordable housing units in accordance with the approved Affordable Housing Scheme”*. Paragraph 2.5.2 notes that if the Baseline Affordable Housing Level has already been secured as part of a previous phase, then this can be disregarded.
- 3.29 The Baseline Affordable Housing Level is 16,249 sqm. Paragraph 2.5 indicates that if this has been provided, then there is no requirement for an Affordable Housing Scheme to be submitted in future phases.
- 3.30 A key implication of the existing provisions of the Housing Zone permissions is that the affordable housing that had existed at Coralline Walk has already been re-provided through the Southmere consent. Further, Southmere Village is currently being delivered and is programmed to achieve practical completion in 2022/23. This development will deliver 26,160 sqm NIA (approximately 32,700 sqm GIA) of affordable floorspace which far exceeds the baseline re-provision requirement in the Housing Zone S106.
- 3.31 Other relevant obligations to the Coralline phase include:
- Requirement for a Local Employment Scheme
 - Restrictions on use of public parking
 - Contribution of £500,000 towards the total £1.5m payment towards the improvement of the bus service provision in the vicinity of Abbey Wood Station
 - Provision of car club spaces
 - Submission of a Public Areas scheme to demonstrate the proposed arrangements for future management, maintenance and monitoring of the public areas
 - Submission of a Travel Plan

3 Peabody in South Thamesmead

CORALLINE WALK OUTLINE PLANNING CONSENT

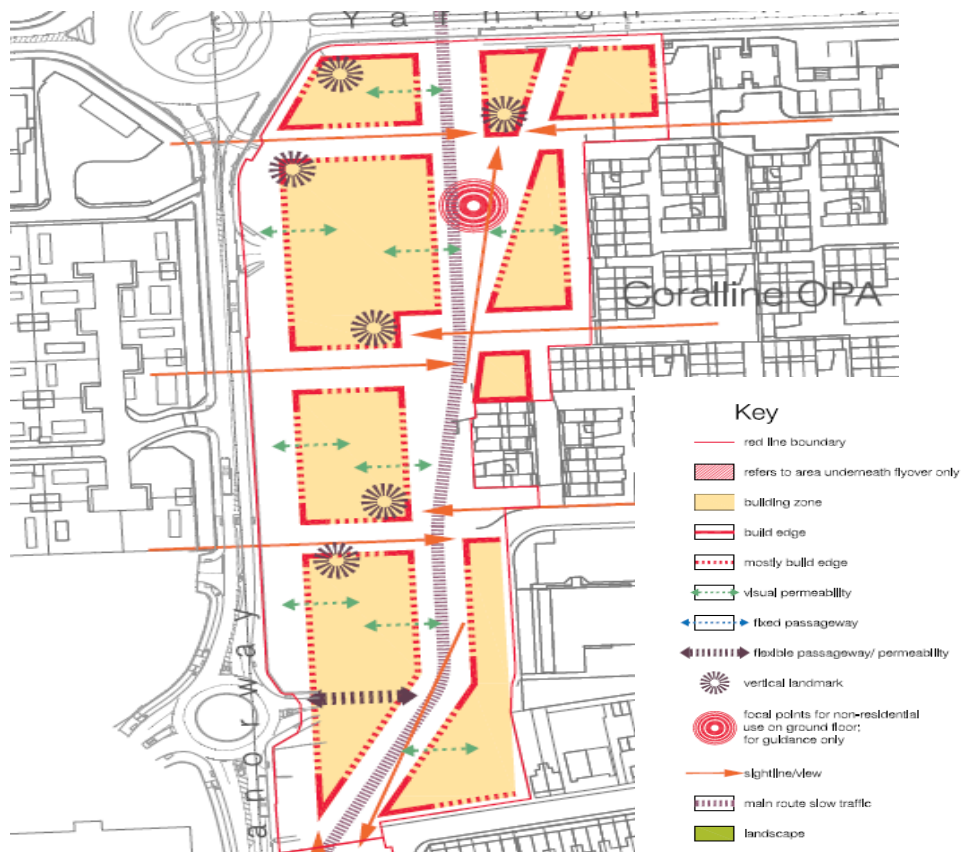
3.32 Given that part of the Site forms the Coralline Walk outline consent, this is considered in further detail. As detailed in Table 2 above, the Coralline consent secured up to 549 homes and 3,225 sqm of commercial space. The consent includes nine plots for development as shown in Figure 3 below.

3.33 At the early design development stage, the red line area of the Coralline consent did not form part of the plans for the redevelopment of the Lesnes Estate. However, for reasons set out in the Design and Access Statement, and summarised later in this Section, it was considered beneficial for Coralline to be revisited as part of this application. The design development of the site has considered the above design principles as well as the following, Coralline specific principles as set out in the DPD:

- The new buildings should have frontages along Harrow Manorway, Southmere Lane (the new north-south route created through Coralline, also known as the Quietway), and all other sides facing the public realm;
- Creating strong east-west connections with the aim of linking the new quarter to the existing neighbourhoods;
- Visual and spatial permeability between Southmere Lane and Harrow Manorway;
- Marker buildings in strategic locations to terminate views, aid orientation and identify the main pedestrian route through the development; and
- A significant planted edge along Harrow Manorway to create protected pedestrian space.

3.34 These principles are summarised visually on Figure 3 below.

Figure 3 – Approved Urban Design Principles for Coralline Walk

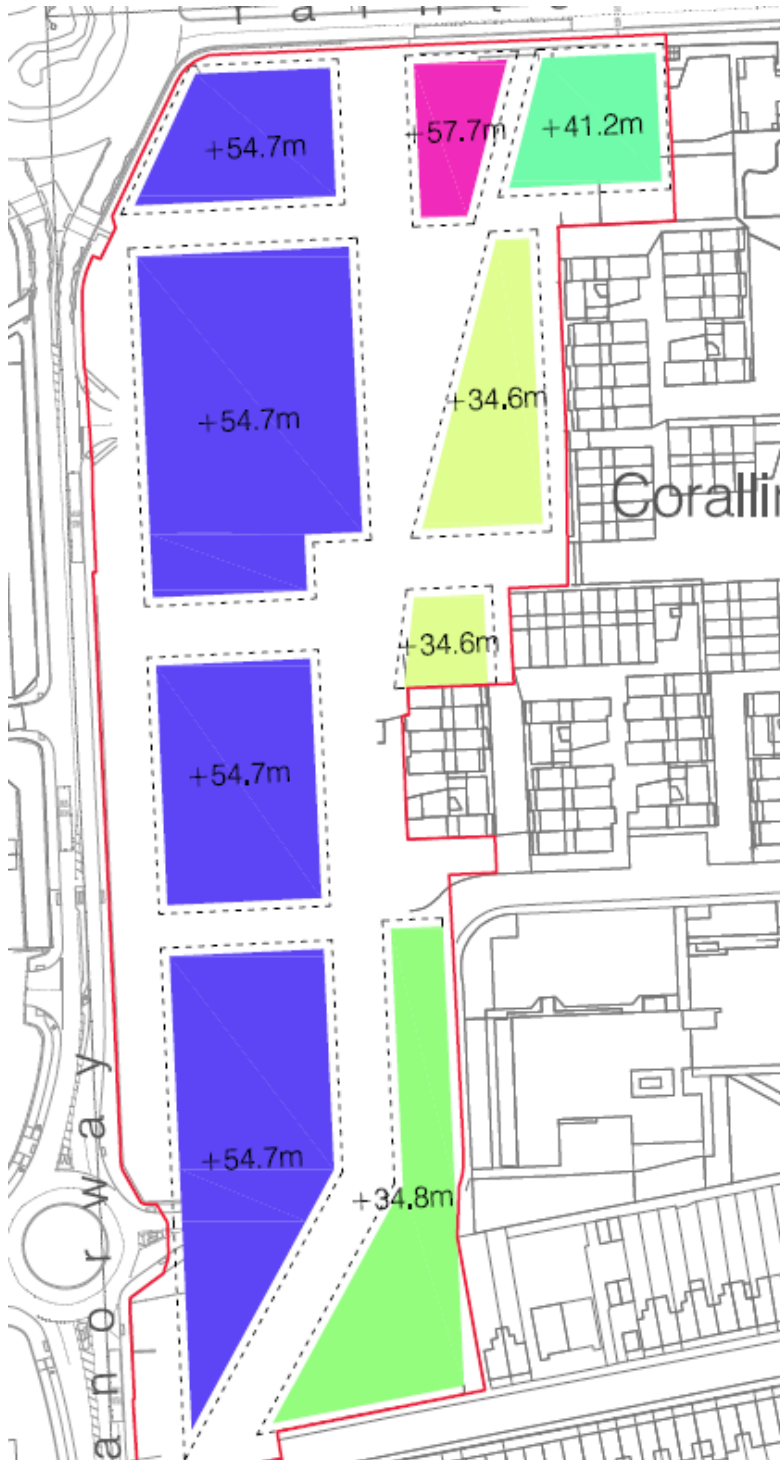


Source – Abbey Wood and South Thamesmead Design Principles by Proctor and Matthews Architects and Mecanoo

3 Peabody in South Thamesmead

3.35 In terms of building heights, the outline consent for Coralline was accompanied by a parameter plan indicating that the maximum scale of development is 57.7m AOD at Yarnton Way as shown in Figure 4.

Figure 4 – Approved Heights Parameter Plan for Coralline Walk



Source – Max. Building Height and Massing Parameter Plan by Proctor and Matthews Architects and Mecanoo

3 Peabody in South Thamesmead

Re-examining the Coralline Walk Consent as part of a Comprehensive Masterplan

3.36 Whilst the Coralline Walk Consent works well in isolation, at the time the plans for it were produced, Lesnes was not part of the masterplan and so the future redevelopment could not be taken into account. Therefore, there were challenges in designing the residential blocks on the boundary between the two sites. Including the Lesnes Estate provided the opportunity to consider a more holistic development that could better respond Peabody's aspirations for the area. This has given rise to the following opportunities for reconsideration:

Height

- The locations of the tall, landmark buildings indicated access points to the scheme, but with the larger site area, there was an opportunity to enhance daylight/sunlight and privacy across the plots.

Layout

- Relooking at the widths of the streets proposed to enhance the public realm and permeability across the combined site area

Improving the pedestrian and vehicular circulation around the public square

- Creating more meaningful arrival space
- Re-examining the sight lines of the buildings to ensure visual connectivity through the wider site
- Reconsidering the placement of commercial uses throughout the development to ensure that the correct character is introduced for the Quietway, compared to the more commercial nature of Harrow Manorway.

Access

- Opportunity to create multiple access points into the scheme

Design

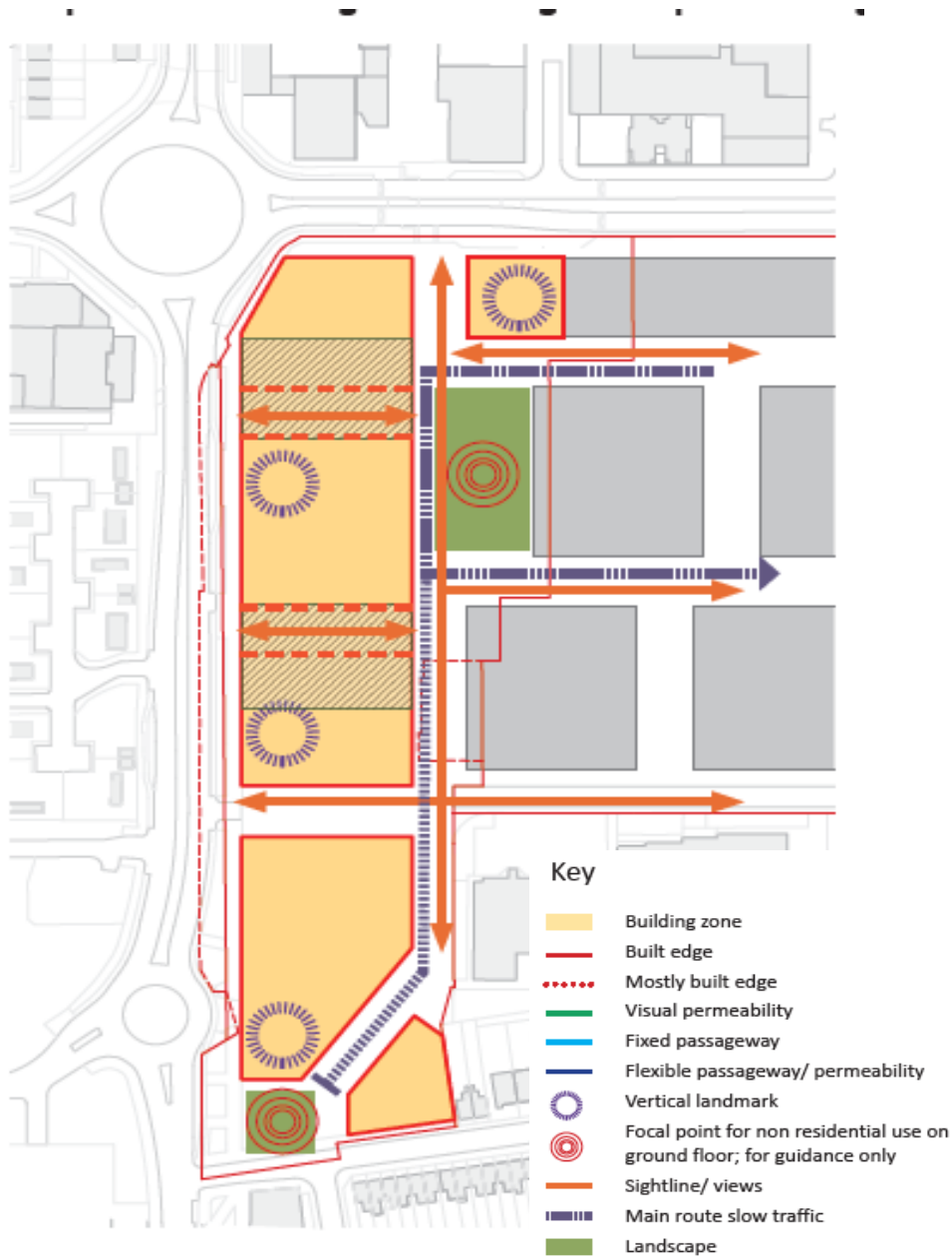
3.37 The aim of reviewing the Coralline consent was to ensure a holistic and integrated urban design for the two adjacent parcels of land, whilst maintaining key aspirations of the Quietway route to link Abbey Wood Station and Southmere and retaining access into Lensbury Way from Harrow Manorway.

3.38 Using a number of qualitative and quantitative criteria, which are explored in more detail in the Design and Access Statement, Macreanor Lavington looked at two options for combining the two sites; one which complied with the existing design approach for the Housing Zone consents and a second which looked at a more holistic rethinking of the parameters.

3.39 This has resulted in the original design principles set by the approved DPD and shown in Figure 3, being amended as demonstrated in Figure 5. Whilst improving the relationship between Coralline and the Lesnes Estate, the proposal is still considered to relate successfully to the remaining Housing Zone consents. Therefore, the decision has been made to include Coralline Walk within this application.

3 Peabody in South Thamesmead

Figure 5 – Current Design Principles Proposal for Coralline Walk



Source – Design and Access Statement by Maccreanor Lavington

4 Development Approach

- 4.1 The preceding Sections of this Statement have set out the context of the Application Site. This Section is intended to build upon that context to demonstrate how the comprehensive approach to the regeneration of the Site offers the most benefit to the existing residents, to build upon Peabody's other improvements within the surrounding area.

CHALLENGES OF THE EXISTING ESTATE

- 4.2 The Site was constructed in 1960 and has a very particular 20th century style that was popular in the era. Although there are positives to the estate which these proposals seek to retain and enhance, the Site in general is now in a poor state of repair, and there is a real need to modernise, refurbish and improve the quality of the buildings on the Site to ensure that the estate can continue to be a home to its existing residents.
- 4.3 Wayfinding through the Site is currently challenging, particularly amongst the low-rise element and the public thoroughfares, and the spaces lack differentiation or a spatial hierarchy. A number of the homes have adjusted their entrance to the back gardens, which makes it difficult to navigate. The Yarnton Way wall runs along the northern perimeter of the site and creates unused and poorly overlooked public spaces around the towers, with numerous undercrofts and hostile anti-trespassing measures.
- 4.4 The separation of vehicular routes and pedestrian spaces as part of the initial construction has created segregated and impermeable public spaces. The towers have historically been poorly maintained and are visually distinguishable from one another only by signage. Due to the prefabricated construction system and their complex geometry, they generally suffer from poor energy efficiency. This is due to large surface-area-to-volume ratios and severe thermal bridging of the external envelope, which has led to some homes developing significant damp and mould issues.
- 4.5 Parking in the estate is also informal and causes a lack of distinction between parking areas and areas meant as public realm.
- 4.6 Due to the current poor quality and dated appearance of the buildings, lack of public realm and poor legibility, its redevelopment is considered a significant opportunity to improve the quality of life for the residents of the estate and surrounding South Thamesmead area. Therefore, a comprehensive redevelopment approach is proposed for the Site.

TESTING ALTERNATIVES TO THE PROPOSED APPROACH

- 4.7 Peabody acknowledges that, even with a suite of commitments to manage the impacts of redevelopment, the comprehensive redevelopment of estates such as Lesnes will inevitably cause some disruption to the lives of existing residents. For this reason, the decision to demolish existing housing and build new homes at the Site was informed by technical analysis and substantial engagement with residents, and followed testing of a range of options for the site which involved refurbishing all and part of the existing housing stock.
- 4.8 This analysis and consultation relates to the eastern (undemolished) part of the Site, as a decision had already been made to redevelop the part of the Site known as Coralline Walk – see the background on the Housing Zone Consents in the preceding sections of this Planning Statement .

Feasibility Analysis

- 4.9 To address the current shortfalls of the housing stock and to consider alternative options to redevelopment, before Peabody acquired the Site, the previous landlord (Gallions Housing Association) explored options for refurbishing the housing stock in South Thamesmead. This involved delivering comprehensive refurbishment of 55 Wolvercote Road as a pilot study for wider scale refurbishment at South Thamesmead. The project was only viable due to the funding from the Technology Strategy Board,

4 Development Approach

a Government funded competition called 'Retrofit for the Future' launched in March 2009 seeking scalable ways to reduce CO2 emissions. The cost of refurbishment was almost as much as the market value of the original property and demonstrated that wholesale refurbishment of the low-rise properties would not be viable.

- 4.10 Gallions Housing Association also explored options for the high-rise stock. One option that was tested involved landscaping the land at the base of the towers to improve the street level experience. Another option looked at designing low-rise infill blocks between the towers to create a more consistent frontage along Yarnton Way. None of the options explored were pursued by Gallions Housing Association before the Site was acquired by Peabody in 2014.
- 4.11 Following the Housing Zone designation of land adjacent to Harrow Manor Way in 2015 (see Section 2 and 3), Peabody began exploring options for the remaining housing stock at South Thamesmead, including the eastern part of the Site then referred to as Wolvercote Road. A number of options were explored, including:
- retaining and repairing existing homes;
 - undertaking refurbishment works and environmental improvements; and
 - replacing existing homes with new ones.
- 4.12 Peabody's appraisal of the potential options included consideration of: the condition of the stock and the public realm; works needed to address housing and public realm issues; the potential for densification, based on connectivity and townscape character; existing residents' rehousing needs and how they might be accommodated; the feasibility and viability of refurbishment/redevelopment plans; and the presence and spatial distribution of third party owners.
- 4.13 These investigations concluded that refurbishment of the Wolvercote Road properties was not a feasible option for a number of reasons including:
1. The design and precast concrete construction of the existing housing makes the stock more susceptible to damp, condensation and mould growth than traditionally constructed dwellings;
 2. The homes have poor energy performance and many of which are in the bottom 10%, when compared to all other Housing Association dwellings in England;
 3. The existing housing is not financially sustainable to maintain due to the above issues, and the net present value of these homes is within the lowest 10% of all Peabody managed general needs stock; and
 4. The proximity to the Housing Zone development makes Wolvercote Road an intuitive extension of the new development and provides well timed rehousing opportunities for existing Wolvercote Road residents who want to stay living in the area.
- 4.14 By comparison, investigations indicated that redevelopment had the potential to deliver new, high density housing in a manner that improved the local environment and complemented the new neighbourhood to be delivered under the Housing Zone Consents. These investigations suggested that redevelopment could be phased to ensure that existing residents would only move once, and that an offer for residents would be prepared that allowed residents to remain living in South Thamesmead should they wish to. This offer could be developed in consultation with the community to help to minimise the disruption and uncertainty that redevelopment can cause.
- 4.15 The feasibility testing of the redevelopment option did identify that there were (and still are) a number of leaseholders living on this part of the estate. The spatial distribution of leaseholders is highly dispersed, with only one high rise block and two low rise blocks being entirely controlled by Peabody. The

4 Development Approach

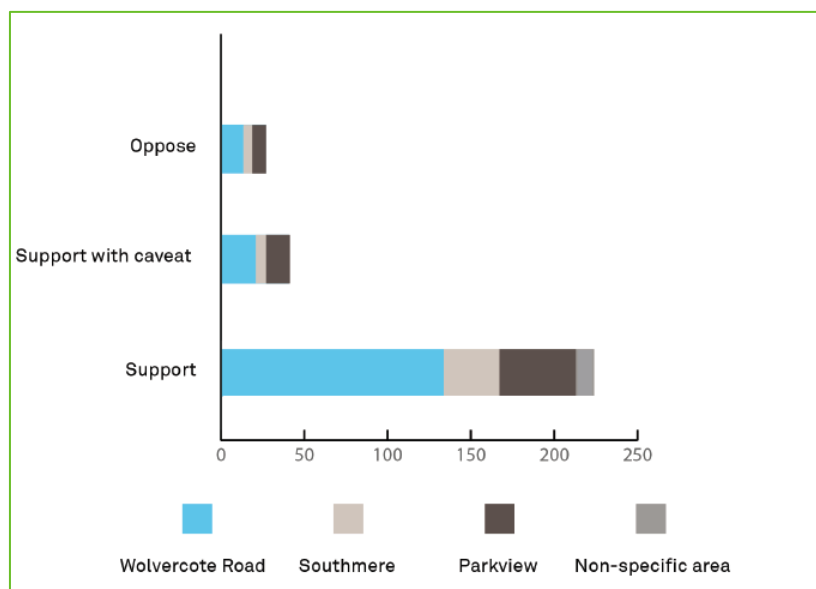
geography of ownership arrangements means that it would not be feasible or desirable in masterplanning terms to bring forward redevelopment without acquiring leaseholders' homes. This position has been monitored and reviewed throughout the masterplanning process.

- 4.16 Whilst the deliverability of redevelopment would need to be advanced and detailed throughout the life of the project, Peabody considered comprehensive redevelopment of the Site to be the only potentially feasible option that could deliver a high-quality neighbourhood and housing for residents, and deliver Peabody's ambitions for Thamesmead (set out in Section 2 of this Statement). Before taking the decision to prepare plans for redevelopment, Peabody engaged with residents to seek their views on Peabody's preferred option for the Lesnes Estate.

RESIDENT ENGAGEMENT

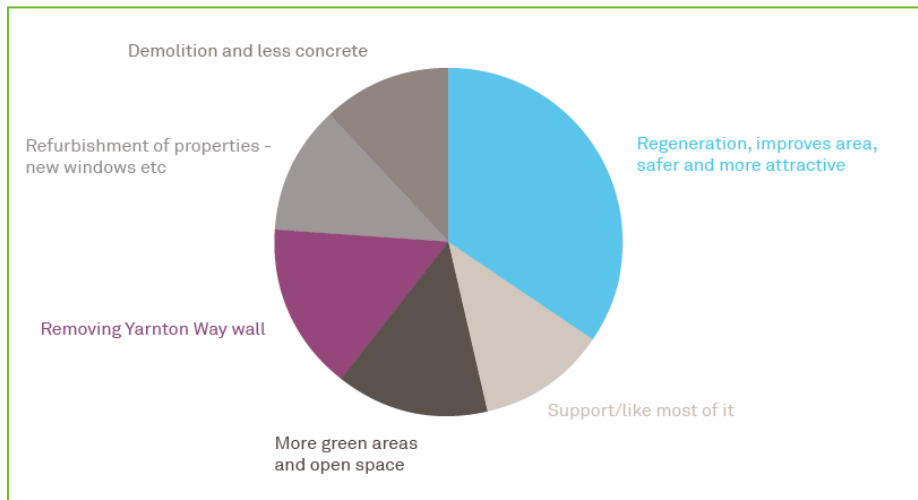
- 4.17 Peabody undertook a 15-week consultation exercise in 2016 regarding its preferred options for South Thamesmead. The consultation comprised a combination of drop-in sessions, door knocking, phone calls, email correspondence, home visits and a dedicated website to engage with residents of the estate. Surveys were undertaken and collated by an independent party. The survey indicated that strong support for Peabody's preferred option to redevelop Wolvercote Road (83%) – see Figure 6 below. Of those that supported the proposals, 79% were tenants, 20% were resident homeowners and 1% non-resident homeowners. Respondents generally felt that redevelopment would improve their lives by making the area more attractive and safer, and by improving the quality of their living accommodation – see Figure 7.
- 4.18 The feedback from residents in 2016 provided Peabody with a mandate to prepare plans for redevelopment at Wolvercote Road. It also highlighted residents' hopes and expectations regarding Peabody's rehousing commitments, including offering all residents the opportunity to move into the new Housing Zone homes and buying back homes from homeowners.

Figure 6 – Survey response to Q1: What do you think about our proposals for South Thamesmead?



4 Development Approach

Figure 7 – Survey response to Q2: Are there any things you particularly like about our proposals?



Sources - South Thamesmead Consultation: Feedback Analysis Report 2016 by Westbourne Engagement

SUMMARY

- 4.19 Since taking ownership of the Site and wider South Thamesmead area in 2014, Peabody has considered a number of options, as summarised above, for improving the estate for its residents. Through this testing, which has taken place over a period of 10 years; it is clear that the comprehensive redevelopment option is the optimum option for delivering change and improvement to the Estate, which has been supported by residents.

5 The Proposals

- 5.1 This Section of the Planning Statement sets out how the Outline Planning Application ('OPA') has been structured to accord with all relevant legislation and provides a summary of the outline proposals.

PLANNING APPLICATION APPROACH

- 5.2 The applicant is seeking OPA, with all matters reserved. This approach has two key benefits in this instance.
- 5.3 First, it provides some certainty to the community regarding the overall nature and design of development and secures the features necessary to manage the impacts of the development and/or ensure its quality.
- 5.4 Second, it provides some flexibility on the detailed design of the proposed redevelopment which will not be built for a number of years, and in this time the housing needs and detailed design requirements may have evolved.
- 5.5 It is intended that the 'detail' for the Site will be dealt with through the submission of Reserved Matters Applications ('RMAs') pursuant to outline planning permission for each phase or sub-phase of the development, and there may be a series of submissions for each phase or sub-phase of development.

FORM AND STRUCTURE OF THE APPLICATION

General Management Procedure Order (2015) – Requirements for Outline Applications

- 5.6 The context of the OPA is in accordance with the Town and Country Planning (Development Management Procedure (England) Order 2015 and has been discussed in advance with LB Bexley.
- 5.7 The General Management Procedure Order (GMPO) (2015) sets out the legislative requirements for Outline Planning Applications. It states that Outline Planning Applications need to include information on use and the amount of development. Where access is a reserved matter, it also states that outline planning applications must state where the points of access to the development proposed will be situated.
- 5.8 The General Management Procedure Order (2015) also sets out the requirements for a Design and Access Statement ('DAS'). The legislation states that a DAS should, amongst other requirements 'explain the design principles and concepts that have been applied to the development.'
- 5.9 The DAS is a necessary document for the validation of a planning application and is intended to be a key tool in clearly demonstrating how the proposed development has evolved. In order to do this, it contains lots of information, including information in relation to an illustrative scheme. The purpose of the illustrative scheme is to inform LB Bexley's determination of the application but falls away at the point of grant.
- 5.10 To ensure that the design principles and concepts are embedded in any future RMAs, Peabody has produced a Design Code to establish the "musts, shoulds and coulds" for a future development. This extracts and locks in key principles from the DAS that will be brought forward as part of a future RMA. As set out in Table 3 below, the Design Code is expected to be secured by condition.

Town and Country Planning (Environmental Impact Assessment) Regulations 2017

- 5.11 The proposed development is EIA development by virtue of being a Town and Country Planning (Environmental Impact Assessment) Regulations 2017 Schedule 2 development. The EIA Regulations require the Environmental Statement ('ES') to provide a description of the proposal in terms of location, size and design that would allow for the robust assessment of the 'likely significant environmental effects'

5 The Proposals

of the project (adverse and beneficial). In using the term 'likely' the EIA Regulations are seeking to ensure that the 'main' effects have been identified that 'could well happen', and not necessarily all theoretical effects, unlimited by the application of reasonable assumptions.

- 5.12 The EIA has tested the quantum and uses set out in paragraph 5.8 above and has assessed the proposed development on the basis of parameters, with a realistic worst case deployed. This is explained in detailed within the ES.

Contents of the Outline Planning Application

- 5.13 In light of the above requirements, the content, formal and supporting documents of the OPA is summarised in the table below.

Table 3 – Outline Planning Application Contents

FORMAL DOCUMENTS FOR APPROVAL	SUPPORTING DOCUMENTS
Planning Application Form	Indicative drawings
CIL form	Design and Access Statement
Site Location Plan	Planning Statement
Parameter Plans	Environmental Statement Volume I: Non-technical Summary Volume II: Main Volume Volume III: Townscape and Visual Impact Assessment Volume VI: Technical Appendices
Design Code	Fire Statement
Development Specification	Energy Strategy Sustainability Statement Flood Risk Assessment Transport Assessment Statement of Community Involvement Viability Assessment

Formal Documents

- 5.14 The Parameter Plans and Design Code provide a framework for subsequent details to be prepared, and it is anticipated that these would be controlled by way of planning condition(s) to fix the parameters and the key principles of the development.
- 5.15 The OPA does not seek approval, at this stage, for the detailed design or external appearance of any new buildings. However, the Design Code is submitted as a formal component of the OPA and will enable the LB Bexley to understand the key principles which Peabody expect the future RMAs to adhere to.

Supporting Documents

- 5.16 The OPA is accompanied by a number of supporting documents. Whilst these do not form part of the formal application for which planning permission is sought, the supporting documents are submitted with the aim of assisting both the understanding and evaluation of the proposals. The suite of supporting documents takes account of, and responds fully to, the relevant national and local requirements for making planning applications.

5 The Proposals

Illustrative Masterplan

- 5.17 As part of the Supporting Documents, an Illustrative Scheme is provided to assist with understanding of how the Parameter Plans and Design Code can be interpreted and to assist with understanding and evaluating the proposals. The Illustrative Scheme complies with the Parameter Plans and Design Code but the final design for the scheme could differ from the Illustrative Scheme whilst still remaining within the framework of the approved documents. The Illustrative Scheme is described in detail within the DAS but proposes 1,849 dwellings across buildings of 2-13 storeys within the proposed layout shown in Figure 8.

Figure 8 – Illustrative Masterplan



Source – Design and Access Statement by Macreannor Lavington

APPLICATION PROPOSALS

- 5.18 The submission made on behalf of Peabody is for an outline planning application with all matters reserved, for the following development:

“Outline application with all matters reserved for the demolition of existing structures and phased construction of buildings providing up to 1,950 residential units and up to 3,225 sqm (GIA) of commercial floorspace (Use Class E (all purposes) and public house) alongside access works with works to the internal road network, car and cycle parking, public realm, and enhancements to the Abbey Way public open space.”

- 5.19 In accordance with the Town and Country Planning (Development Management Procedure) (England) Order 2015, the OPA also seeks approval, at this stage, for:

- Use – the uses proposed for the development and any distinct development zones within the Site identified
- Amount of development – the amount of development proposed for each use

5 The Proposals

- Layout framework – the approximate location of buildings, routes and open spaces included in the development proposed
- Scale parameters – an indication of the upper limit for all building heights.

5.20 For clarification, matters which are reserved for future consideration, and thus do not form part of the OPA are:

- Access – the accessibility to and within the site, for vehicles, cycles and pedestrians in terms of precise positioning and treatment.
- Layout – the way in which buildings, routes and open spaces are provided within the development and their relationship to buildings and spaces outside the development
- Scale – the exact height, width and length of each building proposed in relation to its surroundings
- Appearance – the aspects of a building or place which determine the visual impression it makes, excluding the external built form of the development
- Landscaping – the treatment of private and public spaces to enhance or protect the site’s amenity through hard and soft measures, for example, through planting of trees or hedges or screening by fences or walls.

Summary of the proposals

5.21 The proposed development comprises the following:

- Site clearance and preparation works, including removal of hardstanding areas, trees and vegetation, where necessary;
- Demolition of all remaining existing buildings on-site;
- Construction of a series of buildings at a range of heights up to a maximum of 51m AOD. Outline consent is then sought for the provision of:
 - Up to 1,950 residential units, including a minimum of 35% affordable housing; and
 - Up to 3,225 sqm(GIA) of flexible, non-residential uses comprising Class E and including up to 400 sqm of Public House use
- Access improvement works and provision of car and cycle parking spaces;
- Public realm improvements and provision of new outdoor amenity space; and,
- Proposed enhancements to the Abbey Way public open space in the east of the Site, including planting and pedestrian access improvements.

Delivery and Phasing

5.22 Due to the scale of the development, it is intended to be delivered from January 2024 until 2034, although these time period may change. The phasing for the development has been calculated based upon an indicative strategy to enable maximum flexibility as the development is constructed.

5.23 The quantum of demolition and the anticipated completion date is shown in Table 4 below.

Table 4 – Anticipated demolition timescales

PHASE	ANTICIPATED DATE	QUANTUM OF EXISTING DEVELOPMENT TO BE DEMOLISHED
1A	Not included within the Lesnes proposals	150 homes
1B	Not included within the Lesnes proposals	

5 The Proposals

2	January 2024 – April 2025	236 homes
3	October 2025 - January 2027	216 homes
4	March 2027 - June 2028	144 homes

5.24 The quantum of development for each phase will be confirmed as part of each reserved matters submission; however, an indication of phasing and the quantum of development is included in Table 5. This is based upon the Illustrative Masterplan, so is only intended as an indication at this stage.

Table 5 – Anticipated Phasing

PHASE	INDICATIVE COMPLETION	INDICATIVE RESIDENTIAL DELIVERY
1	2026	323 units
2	2028	370 units
3	2030	214 units
4	2032	555 units
5	2034	381 units

5.25 The indicative phasing plan of these phases is shown in Figure 9.

Figure 9 – Indicative Phasing Plan



Source – Design and Access Statement by Macreannor Lavington

Proposed Residential Decant Strategy

5.26 Phasing in relation to the decant strategy for the existing tenants residing in affordable housing on the Site is set out in Section 7 of this Statement.

5 The Proposals

Indicative Unit Mix

- 5.27 Table 6 below demonstrates the indicative split between unit sizes and tenures. Given that the development is proposed to come forward over a minimum of 12 years, these targets are not expected to be fixed as part of the outline application, to ensure that there is flexibility during each phase to respond to housing need at the time of commencement.

Table 6 – Indicative Proposed Mix (Illustrative Scheme)

UNIT SIZE	MARKET HOUSING	INTERMEDIATE HOUSING	SOCIAL HOUSING
1	30%	30%	25%
2	55%	55%	30%
3	15%	15%	30%
4	0%	0%	15%

Design, character and appearance of the proposals

- 5.28 It is proposed that the development will comprise two distinct quarters: the Eastern Quarter and the Western Quarter, with the character of the Eastern Quarter building on the qualities of the adjacent Southmere Village, i.e. busy and activated by non-residential uses; and the character of the Eastern Quarter building on the qualities of Abbey Way/Lesnes Abbey, i.e. a peaceful network of green spaces. The two quarters will remain closely connected in their appearance, materiality and approach to public space, while creating a nuanced experience of the space by introducing subtle variations in the approach to heights, chromatic choices, uses and treatment of the ground floor.
- 5.29 The detailed design of each of the character areas will be confirmed at the reserved matters stage, but the outline application ensures that principles are established to create the two distinct areas.
- 5.30 The development is intended to come forward in Development Zones. Each of these development zones has a maximum height that can be delivered, to ensure that there is variety in heights across the site. The heights proposed range from 15m in Development Zond D to 51m in Development Zone E.

Public Realm

- 5.31 Across the site, a minimum of 4,750 sqm of open space will be provided. Three main public outdoor amenity spaces are fixed as part of this outline application:
- Arrival Square;
 - Coralline Square; and
 - Abbey Way Public Open Space.
- 5.32 The remaining spaces will come forward as part of future RMAs but are secured within the Parameter Plans.

Highways, parking and servicing

- 5.33 Up to 780 car parking spaces are proposed at the application site, comprising a mix of ground level undercroft parking and on-street parking. Further details on proposed parking arrangements will be secured through subsequent reserved matters applications made following the granting of any outline planning approval.
- 5.34 The proposed cycle parking for the development will be in accordance with the standards outlined in the London Cycle Design Standards (LCDS). It is anticipated that providing policy compliant and good quality cycle parking will help to encourage cycling to and from the development. Based on the

5 The Proposals

maximum residential unit and floorspace parameters, up to 3,445 long stay and 71 short stay cycle parking spaces would be required at the site.

- 5.35 The majority of delivery and servicing trips to the residential units will be from day to day activity such as groceries and Amazon type deliveries as well as refuse vehicles. Refuse stores will be located at ground floor level within each building and refuse vehicles will be able to access all bin stores across the Site.
- 5.36 Three loading bays are proposed within the site for servicing vehicles to service the residential development. These will serve delivery of bulky items, removals vans and others. For smaller vehicles with a lower dwell time, empty on street parking spaces around the development can also be used along with the loading bays.

Sustainability

- 5.37 In developing the proposals, Peabody has sought to achieve the highest level of sustainable design standards, as far as can be secured via an outline planning application. This approach reflects national, London Plan and Bexley's policies which seek to mitigate and adapt to climate change.
- 5.38 Peabody has a number of key ambitions for the development to ensure that it delivers as sustainable a development as possible. These are set out within the Sustainability Statement but include:
- To ensure sustainability issues influence the development of the masterplan, and of the preferred design options for the Site;
 - To safeguard that sustainable design, construction and operational needs are considered and embedded from an early stage;
 - To deliver innovative solutions to address the challenges of for example: fuel poverty, climate resilience; and,
 - To ensure the embodied carbon footprint of the project is considered in order to minimise emissions.
- 5.39 Where relevant, sustainability is also embedded within the Design Code to ensure that it is given substantial weight in future RMAs.

6 Pre-submission Engagement and Scheme Evolution

- 6.1 There has been extensive engagement with LB Bexley officers over a number of years. Consultation has also been undertaken with officers at Greater London Authority (GLA), Transport for London (TfL) and RB Greenwich. This Section seeks to summarise the consultation that has taken place. Further information is provided within the Design and Access Statement and Statement of Community Involvement.
- 6.2 The applicant has actively sought the opinions of local stakeholders and the community through a programme of public exhibitions, events and online platforms. The proposals have been fundamentally influenced by the engagement process that has taken place prior to the submission of the application, and consultation will continue to take place during the course of determination and beyond.

LB BEXLEY ENGAGEMENT

Planning Performance Agreement

- 6.3 At the beginning of the planning process, Peabody entered into a Planning Performance Agreement (PPA) with LB Bexley pursuant to Section 111 of the Local Government Act 1972, Section 2 of the Local Government Act 2000 and Section 93 of the Local Government Act 2003.
- 6.4 The NPPF (2019) endorses the use of PPAs where this would help with managing the process and agreeing any dedicated resources for progressing the application. It acknowledges that this is are likely to be needed for applications that are particularly large or complex to determine.

Design Charettes

- 6.5 A 'design charette' approach to the planning application was undertaken to provide a collaborative forum for the applicant team and LB Bexley officers to:
- Identify the issues and opportunities for the Site;
 - Agree a shared set of objectives that the proposal would need to achieve, and that various options would be assessed against;
 - Agree a series of design questions that the optioneering exercise would need to explore and test; and
 - Appraise the relative success of the options in addressing the design questions and the shared masterplan objectives.
- The Design and Access Statement sets out the Site analysis; agreed objectives; and some of the options tested during the design charettes.

Masterplan Framework

- 6.6 The first output of the design charettes was a framework masterplan. This version of the masterplan determined that there would be a primary east-west connection in the current location of Wolvercote Road and a primary north-south connection between the two local schools: Horizons Academy and Willow Bank Primary School. These two core routes would provide the basic structure for further design development and have been retained throughout the development of the outline application.

Coralline Walk

- 6.7 The framework masterplan focussed principally on the land to the east of Coralline Walk and to the west of Abbey Way. An analysis of this land's interface with the Coralline Walk design in the 2016 masterplan identified a number of opportunities as discussed in Section 3.

6 Pre-submission Engagement and Scheme Evolution

Illustrative Masterplan

- 6.8 The masterplan for the whole Lesnes Estate was developed through further design charette sessions with officers at LB Bexley. These included more options testing and appraisal, to arrive at an illustrative masterplan which addresses the agreed objectives for the Lesnes Estate. Masterplan themes explored included:
- Identifying and establishing character areas
 - Developing the design of the masterplan 'edges' that interface with existing development
 - Housing typologies across the site
 - Ground floor activity and building access treatments
 - Hierarchy and role of streets and public realm
 - Access to amenity space and open space
 - Quality of housing and residential amenity
 - Scale and height of buildings, including locations for tall buildings
 - Amount and type of car parking
- 6.9 Specific issues explored in detail as part of this exercise are referenced in the Design and Access Statement.

Design Codes and Parameter Plans

- 6.10 The process for developing the design code and parameter plans worked back from the illustrative masterplan. In collaboration with officers at LB Bexley, the design team translated the design framework into parameter plans which will control key elements of the detailed masterplan to come forward at reserved matters change. Engagement with officers also helped the design team to identify the design rules that 'must', 'should' or 'could' be taken forward into the detailed plans for the Site, as set out in the Design Code.

GLA ENGAGEMENT

- 6.11 The planning application is referable to the Mayor of London, and so consultation has been undertaken with planning officers at the Greater London Authority (GLA) and Transport for London (TfL).
- 6.12 This consultation focussed on the principles of estate regeneration, the high-level design of the masterplan, the amount and type of affordable housing proposed and transport matters, including car parking.
- 6.13 Officers at the GLA and TfL supported the delivery of high-quality housing in the opportunity area for a range of housing needs. Officers queried whether any additional affordable rent housing could be provided in the scheme – as explained in paragraph 8.53 of this Planning Statement, the proposed development delivers the maximum viable amount of affordable rented housing and will support the evolution of a mixed and balanced community in South Thamesmead. Officers at TfL encouraged lower levels of car parking to be explored – as explained in the Transport Assessment that accompanies this application, the proposed maximum parking ratio of 0.4 spaces per home is considered to respond appropriately to the Site's current and future public transport accessibility and anticipated car ownership levels in the area. The proposed levels are also policy compliant for opportunity areas in Outer London.

6 Pre-submission Engagement and Scheme Evolution

COMMUNITY ENGAGEMENT

- 6.14 The consultation undertaken by Peabody in 2016 which informed the decision to prepare plans for the regeneration of the Site is described in Section 4.
- 6.15 Further community engagement took place throughout 2019 and 2020. The engagement throughout 2019 and 2020 helped to inform the analysis of the site, the masterplan principles and the form of the illustrative masterplan that underpins the outline planning application. The format of this consultation was varied – involving one to one conversations, interactive activities, online information and questionnaires – and the setting for communication was also varied, including exhibitions at the Thamesmead Hub, stalls at the local supermarket, home visits and the Thamesmead festival.
- 6.16 The engagement with the local community during 2019 and 2020 provided the design team with good quality insights about what it is like to live or work in the area, what works well and should be enhanced and also what doesn't work so well currently and would benefit from improvement. Engagement also provided constructive feedback which has helped to inform the masterplan as it has developed.
- 6.17 Further engagement has taken place in January 2021, largely for the purposes of informing the local community of the proposals included within the outline planning application submitted to LB Bexley. As a result of the current pandemic, this engagement uses online platforms, including a virtual meeting. Newsletters have also been circulated and telephone conversations offered to supplement and provide an alternative to the virtual engagement options offered.
- 6.18 Overall engagement with the community consultation regarding these proposals has been extremely positive and productive. The engagement process is described in more detail in the Statement of Community Involvement which summarises: the consultation process; the local groups who have engaged; the feedback received; and how this feedback has informed the masterplan.
- 6.19 During the consultation process, to support its application for grant funding from the Mayor of London Peabody held a resident's ballot in March 2020 whereby eligible residents of the estate were asked the following question: "Are you in favour of Peabody's proposal to include Lesnes Estate in their regeneration plans for South Thamesmead?". In response, 65.4% of residents took part in the ballot and 70.2% voted 'yes'.

7 Planning Policy Context

- 7.1 This chapter sets out the relevant planning policy context against which the proposals for the Site need to be assessed.
- 7.2 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications are determined in accordance with the provisions of the Development Plan, unless material considerations indicate otherwise.

STATUTORY DEVELOPMENT PLAN

- 7.3 The Development Plan for LB Bexley comprises:
- The London Plan 2021;
 - Bexley Core Strategy (2012); and
 - Saved Policies from the Unitary Development Plan (2004; amended 2007 and 2012)

The London Plan

- 7.4 The London Plan was adopted on 2 March 2021. It sets out the Mayor's vision for London as:
- A 24-hour city;
 - A city for all Londoners, where no one is left behind;
 - A city with 'Good Growth', that reduces inequalities and makes the city a better place to live, work and visit;
 - A city with integration across policy areas to achieve sustainable growth;
 - A city with a thriving economy, for all Londoners;
 - A zero-carbon city by 2050.
- 7.5 The London Plan recognises the Thamesmead and Abbey Wood area as an Opportunity Area to deliver significant housing and regeneration benefits in line with the vision set out above.

Bexley Core Strategy

- 7.6 The Bexley Core Strategy ('the Core Strategy') sets out a spatial planning framework for the London Borough until 2026. It seeks to ensure that investment and development decisions are not made in isolation, but are properly coordinated, with a focus on promoting the principles of sustainable development. The Core Strategy replaced a number of policies in Bexley's Unitary Development Plan that were 'saved'.
- 7.7 At paragraph 3.4.2 of the Core Strategy it is stated that:
- "Thamesmead and Abbey Wood were the focus of large-scale planned development in the late 1960s and early 1970s, many parts of which are now in need of renewal. There are issues with overcrowding in existing housing and there is a need for further sheltered and adapted housing. This area suffers from the highest levels of multiple deprivation in the borough with an unemployment rate of 21%."*
- 7.8 It continues to state at paragraph 3.6.9 that:

"There continues to be a strong partnership between Bexley and Greenwich boroughs and other key partners in Thamesmead and Abbey Wood, such as Tilfen Land, Gallions Housing Association and Trust Thamesmead. Greenwich and Bexley Councils have jointly produced an LDF Supplementary Planning Document covering Thamesmead and Abbey Wood, as this area lies in both boroughs. In particular there will be a focus on joined up improvements to the urban form

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and physical fabric of the area arising from redevelopment opportunities and the preparation, where appropriate, of estate renewal master plans, including flood management proposals and open space enhancements.”

Saved Policies from the UDP

- 7.9 The Bexley Unitary Development Plan (UDP) was initially adopted in April 2004 and contains proposals to guide development in the Borough up to 2016. It includes general policies for the use and development of land, and site-specific policies aimed at meeting the needs of the community, whilst maintaining a high quality environment.
- 7.10 In accordance with the Planning and Compulsory Purchase Act 2004, the Secretary of State issued a Direction in September 2007 indicating the policies of the UDP that were ‘saved’, which therefore remain part of the Development Plan for the purposes of Section 38(6) of the Planning and Compulsory Purchase Act. Following the adoption of the London Borough’s Core Strategy, some of the ‘saved’ policies of the UDP have been superseded and therefore cease to form part of the Development Plan. The ‘saved’ policies noted in this section, unless otherwise stated, remain part of the Development Plan.

MATERIAL CONSIDERATIONS

National Planning Policy Framework and Planning Practice Guidance

- 7.11 The National Planning Policy Framework (NPPF) was published and adopted on 19 February 2019, replacing the NPPF 2018. The NPPF sets out the Government’s planning policies for England and how these are expected to be applied; it is a material consideration in planning decisions.
- 7.12 At the heart of the NPPF is a presumption in favour of sustainable development. For plan-making, this means local planning authorities should positively seek opportunities to meet the development needs of their area, for decision-taking this means approving development proposals that accord with the development plan without delay. The NPPF encourages the re-use and redevelopment of previously developed land and the more efficient use of land.
- 7.13 For the purposes of decision-taking, the policies in the development should not be considered out-of-date simply because they were adopted before the publication of the NPPF. However, the policies in the NPPF are material considerations which the determining authorities should take into account. Due weight should be given to relevant policies according to their degree of consistency with the NPPF (the closer the policies in the plan to the policies in the NPPF, the greater the weight that may be given).
- 7.14 Whilst the Bexley Core Strategy (February 2012) pre-dates the NPPF, in the context of the presumption of sustainable development for decision taking the Bexley Core Strategy is not absent or silent on the principle of the proposed development at Thamesmead. Policy CS03 (‘Belvedere Geographic Region’) further confirms this by ‘seeking opportunities for renewal and enhancement associated with the region’s location within the Thames Gateway and two London Plan Opportunity Areas.’ It is further stated within the supporting text that ‘Thamesmead and Abbey Wood were the focus of large-scale planned development in the late 1960s and early 1970s, many parts of which are now in need of renewal.’
- 7.15 Furthermore, Policy CS03 is considered as being up-to-date in the context of applying the principle of sustainable development in decision making. A core planning principle of the NPPF is to encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value.
- 7.16 Also of relevance at the national level is the Government’s Planning Practice Guidance (PPG). The PPG consolidates previous national planning guidance and comprises an online resource which is regularly updated.

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Estate Regeneration National Strategy

- 7.17 In 2016, the Department for Communities and Local Government published the Estate Regeneration National Strategy, Good Practice Guide - Part 1. This Guide sets out 20 steps that should be taken when considering estate regeneration. Steps include, but are not limited to, gaining a full appreciation of the estate's physical, social and economic issues; setting out the main aims and objectives for regeneration; ensuring meaningful engagement with residents; and evaluating the different options available to determine the optimum long term solution. Part 2 of the guidance comprises a map/flow chart which provides a visual representation of some of the steps described in Part 1. Part 3 comprises a design checklist – this is referenced further in the Design section of this Planning Statement.
- 7.18 In 2018, the Mayor of London published Better Homes for Local People – The Mayor's Good Practice Guide to Estate Regeneration. This guidance reiterates the requirements of Policy H8 of the emerging London Plan, and also sets out some more detailed guidance on the approach that should be taken in relation to estate regeneration.
- 7.19 This includes taking the following engagement measures:
- Early consultation and involvement for residents;
 - Transparent, extensive, responsive and meaningful engagement which takes various forms ranging from direct conversations and surveys to focus groups and public meetings;
 - Residents as primary consultees;
 - Supporting residents to be involved, including through Independent tenant and leaseholder advisors (ITLAs);
 - Engaging with other stakeholders – e.g. community amenity providers and businesses;
 - Resident Charters;
 - Open and transparent options appraisals.
- 7.20 In addition to an increase in affordable housing, the guidance also states that estate redevelopment must ensure full rights to return or remain for social tenants, and a fair deal for leaseholders and freeholders.
- 7.21 The Mayor's guidance also requires proposals involving the demolition of housing to use ballots as a means of demonstrating resident's support for redevelopment. Demonstrating this will be a condition of the Mayor's grant funding.

Bexley Supplementary Planning Guidance/Documents

Bexley Growth Strategy (2017)

- 7.22 In 2017, LB Bexley adopted a Growth Strategy to set out how it proposes to positively manage housing and economic growth and its associated supporting infrastructure in the borough into the future. It addresses a wide range of issues, spanning a 30-year period to 2050. It is intended to influence and shape physical growth within the Borough and to inform its new local planning policies.
- 7.23 The Strategy identifies Thamesmead as a Growth Area with an aspiration to provide up to 4,000 new homes and 5,000 new jobs. The vision for Thamesmead includes:
- Building high quality new homes at a range of medium and high densities
 - Using the full potential of Thamesmead's blue and green assets
 - Improving transport connectivity

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- Improving digital connectivity
- Creating a new local centre
- Facilitating economic development

Abbey Wood and South Thamesmead Supplementary Planning Document (2009)

- 7.24 The purpose of the SPD is to define an area-wide vision for Thamesmead and Abbey Wood, outlining a series of key themes and objectives which inform the decision-making process. It is a cross-boundary SPD, covering parts of the LB Bexley and the Royal Borough of Greenwich, to set out a vision for Thamesmead and Abbey Wood which will help to shape the area in the future. It also sets out guidance for the development and implementation of spatial and non-spatial regeneration projects which are being developed in a separate Delivery Plan Summary.
- 7.25 The SPD sets out seven key objectives for the area which include, inter alia, design and development, environment, open spaces and sustainability, community, neighbourhoods and local centres and employment and economy. Of particular importance throughout the document is the transformation of the area, delivering change through regeneration, providing opportunities for local entrepreneurs and new businesses and supporting both existing community facilities and the provision of new amenities. The SPD sets out a strategic spatial strategy for the Abbey Wood and South Thamesmead area, identifying key neighbourhoods, employment areas, key transport proposals and opportunity areas.

South Thamesmead Regeneration Framework (2012)

- 7.26 The framework was prepared by LB Bexley, Gallions Housing Association, Trust Thamesmead, Tilfen Land and the GLA as main (then) stakeholders in the area. It includes a series of coherent neighbourhood strategies to enhance the quality of life for residents and create thriving and resilient communities and identifies projects that can be delivered collaboratively.
- 7.27 The document is a material consideration in the consideration of planning applications in the area.

Other Relevant Documents

- Affordable Housing SPD (2006 – amended 2009 and 2012)
- Design for Living – Residential Design Guide (2006)
- Planning Obligations Guidance (2008)
- Sustainable Design and Construction Guide (2007)

GLA Supplementary Planning Guidance/Documents

- 7.28 The GLA has also prepared a series of guidance documents which sits with the London Plan policy. The most relevant documents are outlined below:
- Affordable Housing & Viability (August 2017)
 - Housing Supplementary Planning Guidance (2017)
 - Accessible London: Achieving an Inclusive Environment (October 2014)
 - Character and Context (June 2014)
 - Sustainable Design and Construction Supplementary Planning Guidance (April 2014)
 - GLA Guidance on Preparing Energy Assessments (October 2018)
 - Circular Economy Statement – Consultation Draft (October 2020)

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- Whole Life Carbon Assessment – Consultation Draft (October 2020)

Better homes for local people – The Mayor’s Good Practice Guide to Regeneration

- 7.29 Published in 2018, this document sets out how the Mayor considers plans for estate regeneration should be approached to ensure that it brings genuine benefits to Londoners, with better homes for local people living on the estate, more homes of all tenures, improvements to neighbourhoods, new opportunities for training and employment, and new community facilities
- 7.30 To deliver this vision for Estate Regeneration, the Mayor considers any proposals should include the right to return or remain for social tenants, and a fair deal for leaseholders and freeholders. The Mayor also wishes to see the level of affordable housing – particularly homes where rents are based on social rent levels – maintained and, wherever possible, increased through estate regeneration schemes, in full consultation with existing residents.

Thamesmead and Abbey Wood Opportunity Area Planning Framework

- 7.31 In December 2020, the GLA adopted the Thamesmead and Abbey Wood Area Planning Framework to support and guide emerging developments in the Thamesmead and Abbey Wood Opportunity Area. The vision for the document is to seek to revitalise the area’s original ambition from the 1960s to address the current day housing crisis through strategic transport interventions.
- 7.32 The OAPF sets out three growth options for the area; the first based upon committed transport infrastructure; the second looking at creating a new Bus Rapid Transit Route (BRT) alongside the committed transport infrastructure, that would run to the west of the site and the third considering the creation of a new DLR connection, the BRT and the existing commitments. These offer alternative growth scenarios of up to 15,500 new homes and 8,000 new jobs.
- 7.33 This level of growth is considered to offer lots of opportunities for improved transport connections, infrastructure initiatives to tackle inequalities as well as the environment, social and economic barriers that affect the lives of people in the area.

Emerging Development Plan Documents

The Draft Local Plan

- 7.34 LB Bexley is currently in the process of reviewing its Local Plan. In April 2019, a Regulation 18 consultation was held to set out the preferred approaches for strategic and development management policies and the arrangement and designation of land uses in the borough. In June 2021, the Proposed Submission Local Plan was published for consultation. Relevant policies of the Proposed Submission Plan are considered where relevant.
- 7.35 Under the Draft Local Plan, the site has an emerging allocation for residential development through estate regeneration to deliver 1,849 new homes replacing the existing dwellings on the site.

DEVELOPMENT PLAN SITE-SPECIFIC DESIGNATIONS

- 7.36 On the Proposals Map which accompanies the ‘saved’ policies of the UDP, the site has the following planning designations:
- Primarily residential use – yellow fill
 - The following designations are also relevant to the immediate surrounds:
 - Borough Distributor Road – yellow dash line (north)
 - Metropolitan Open Land – green fill (north and east)

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- Boundary of South East London Green Chain Boundary – green edge with triangles (north and east)
- Educational Buildings and Playing Fields – vertical green stripes (south and north)
- Primarily Residential Area – yellow fill (all surrounding built form)
- Borough boundary with Greenwich – black line (west)

Figure 10 – Bexley Proposals Map extract



Source – LB Bexley Proposals Map

8 Planning Policy Assessment

INTRODUCTION

8.1 This chapter of the Planning Statement provides a description and assessment of each relevant element of the application proposals including justification in terms of relevant planning policies, as set out below.

- Principle of development
- Estate redevelopment
- Housing Provision
 - Affordable Housing
 - Tenure Mix
 - Amenity Provision
- Principle of Commercial Uses
- Design and Built Form
 - Design Approach
 - Public Realm
 - Density
- Height and massing
 - Proposed scale
 - Townscape, heritage and key views
- Transport and Highways
 - Impact
 - Parking
 - Healthy Streets Approach
 - Delivery and Servicing
 - Waste Management
- Environment and Sustainability
 - Minimising carbon emissions
 - Sustainable design and construction
- Other Environmental Considerations
 - Biodiversity
 - Ecology
 - Urban Greening Factor
 - Drainage and Flood Risk
 - Wind and microclimate
 - Air Quality
 - Contamination

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- Amenity
 - Privacy and outlook
 - Daylight and Sunlight
 - Noise
 - Construction

8.2 Whilst the NPPF does not form part of the statutory Development Plan, it nevertheless sets out the Government’s policy on planning. It has therefore been treated as policy for the purposes of assessing the proposed development.

ESTATE REDEVELOPMENT

Policy Context

NPPF

8.3 Paragraph 93 of the NPPF states that planning policies and decisions should consider the social, economic and environmental benefits of estate regeneration. It adds that local planning authorities should use their planning powers to help deliver estate regeneration to a high standard.

London Plan

8.4 The London Plan acknowledges that the residential environment and capacity of Thamesmead should be enhanced through estate renewal. It states:

“Housing Zone status and investment by Peabody in estate renewal in the area will improve the quality of the environment and bring new housing opportunities”.

8.5 The planning policy tests for estate redevelopment proposals are set out at Policy H8 ‘Loss of existing housing and estate redevelopment’. Parts A, D and E of this policy relate to affordable housing, which is set out in the following section of this Planning Statement.

8.6 Part C requires that before considering the demolition and replacement of affordable homes, housing associations should always consider alternative options first. They should balance the potential benefits of demolition and rebuilding of homes against the wider social and environmental impacts and consider the availability of Mayoral funding and any conditions attached to that funding.

Bexley Local Plan

8.7 Policy CS03 (‘Belvedere Geographic Region’) further supports the principle of regeneration at Thamesmead. The supporting text specifically recognises that Thamesmead and Abbey Wood were the focus of large-scale planned development in the late 1960s and early 1970s, many parts of which are now in need of renewal.

8.8 The draft Local Plan (2021) also allocates this site for comprehensive change through estate redevelopment.

Assessment

8.9 It is clear that the principle of regeneration in the TAWOA is supported by the Development Plan policies referenced above.

8.10 The specific type and form of regeneration proposed at the Site has been developed over a number of years, through engagement with residents and local stakeholders. Whilst a good proportion of this

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engagement took place prior to the guidance referenced above, the principles of information gathering; site analysis; options testing and resident engagement have all been demonstrated throughout the process.

- 8.11 The decision-making process that defined the ultimate brief to redevelop the Site is described in Sections 4 and 5 of this Planning Statement. In summary, the studies undertaken and the engagement with the community in 2016 made it clear that change was needed, and that redevelopment provided an opportunity to deliver the quality of homes and place that residents of the estate wanted to see delivered.
- 8.12 On the back of this clear mandate, plans for the comprehensive redevelopment of the Site began to be explored in detail in 2018. Throughout 2019 and in the early part of 2020 Peabody and the design team engaged with residents of the estate and local stakeholders (such as local schools and religious leaders) to better understand what the community would like to see addressed/enhanced by the new plans. Some of the feedback and learnings obtained through this process, such as the need for energy efficient homes with access to high quality play space and safe feeling streets, are summarised in Section 5 and detailed in the Statement of Community Involvement. This engagement aimed to ensure that plans not only address planning priorities at the strategic/borough level but also, and most critically, respond to the needs of those living/spending time on the estate.
- 8.13 As well as focussing on what opportunities could be secured through plans for new development, the engagement also crucially sought to understand the level of disruption and distress that might be caused for residents, and to explore measures that could be taken to reduce this and provide certainty over the moving process. This engagement built on the 2016 consultation which highlighted residents' hopes and expectations for the rehousing offer and process. The resident offer for Lesnes Estate is the result of this engagement and sets out the commitments that Peabody has made that seek to ensure that residents benefit from new development, with as minimal stress and uncertainty as possible.
- 8.14 For assured, social and secure tenants, Peabody will offer a new home within South Thamesmead that meets residents' housing needs and maintains their existing tenancy rights, together with financial compensation and moving costs/support. Accommodation in other Peabody stock is also offered for those looking to relocate away from the area.
- 8.15 For resident homeowners Peabody will offer to buy homes at market value, plus 10% as compensation. The money obtained can be used to buy a new property in South Thamesmead, and if this is more than current house value, Peabody will provide interest and rent-free equity (up to 50% of the new home value). This equity offer is also available to homeowners looking to move off of the estate (albeit up to 35% of the new home value).
- 8.16 In February and March 2020, following extensive engagement on the resident offer and redevelopment proposals, Peabody held a resident's ballot which was managed by Civica Election Services (CES), an independent body appointed by Peabody, and met the requirements of the Mayor of London's guidance. It should be noted that the ballot related specifically to the occupied part of the Lesnes Estate, and not the part of the Site known as Coralline Walk which is vacant and in the process of being demolished further to earlier plans for redevelopment.
- 8.17 Through the ballot, eligible residents were asked the following question: "Are you in favour of Peabody's proposal to include Lesnes Estate in their regeneration plans for South Thamesmead?". In response, 65.4% of residents took part in the ballot and 70.2% voted 'yes'.
- 8.18 This ballot result provides Peabody with a further directive from the community to deliver the redevelopment plans for the Site, and Peabody will continue to work with residents and the local community to develop the detailed plans for the Site.

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- 8.19 The decision to develop plans for the comprehensive redevelopment of the Site have been the result of extensive analysis and engagement. In accordance with Policy H8(C) of the emerging London Plan, this process has:
- considered alternatives to redevelopment first, through detailed studies of refurbishment options and engagement with residents;
 - balanced the potential benefits of rebuilding of homes – e.g. energy efficient buildings, inviting public spaces and improved connections – against the wider social and environmental impacts, through collaborative design and community engagement; and
 - considered the availability of Mayoral funding and any conditions attached to that funding, through engagement with GLA and holding a ballot where eligible residents voted in favour of regeneration.
- 8.20 Overall, the ballot undertaken was consistent with requisite policy and the conclusions it provided support the redevelopment the estate. This provides the foundations that have enabled Peabody to evolve a scheme for the site, permission for which is now sought through this planning application.

HOUSING PROVISION

Principle of New Housing

Policy Context

London Plan

- 8.21 The London Plan encourages high levels of housing delivery within the wider Abbey Wood and Thamesmead Opportunity Area, and identifies an indicative capacity for 8,000 new homes over the plan period.

Local Plan

- 8.22 The Proposals Map that accompanies the Bexley Unitary Development Plan (2004) identifies the Site as being located in an area of 'predominantly residential development'.
- 8.23 Policy CS01 of the Bexley Core Strategy (February 2012) states that in meeting the Borough's housing target, opportunities to maximise the potential of the Thames Gateway and London Plan Opportunity Areas (within which the Site is located) will be sought

Material Considerations

- 8.24 The Coralline Walk element of the Site forms part of the Abbey Wood and South Thamesmead Housing Zone. Its Housing Zone status indicates that it is an area expected to deliver a significant amount of housing in an accelerated programme

Assessment

- 8.25 Housing needs for LB Bexley, London and the country are significant and growing. There will therefore be a need for sustainable locations that are well served by public transport to optimise housing delivery.
- 8.26 LB Bexley currently has a housing land supply of 5.5 years, and on that basis policies for the supply of housing are considered to be up-to-date in the context of the NPPF.
- 8.27 The proposed development will deliver up to 1,950 new homes between circa 2026-2034 on a site which, at its nearest point, is c. 275m from Abbey Wood station and has PTAL rating of 5. This represents a net increase of 1,194 homes (when the 596 existing homes at Wolvercote Road and the

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160 recently demolished homes at Coralline Walk) are accounted for. This represents nearly 2 years' worth of housing land supply for Bexley based on the London Plan targets and will contribute significantly towards meeting the borough's housing needs beyond 2025. It is worth noting that the 389 net additional units were approved at Coralline Walk further to the Housing Zone Consents will be superseded by the 1,194 net additional homes proposed by this application.

- 8.28 This is particularly significant as Crossrail forms the only committed significant transport infrastructure improvement in the borough, which is currently constrained in growth terms by a lack of transport infrastructure, large amounts of Metropolitan Open Land/Green Belt and industrial land.
- 8.29 The quantum of residential development on the Site is supported through its accessibility to public transport and local amenities; its strategic identification as an Opportunity Area and its partial location within the Housing Zone. As stated above, the Development Plan and relevant material considerations support the principle of residential development on the Site, but it also supports the principle of maximising the potential of such sites (in terms of residential outputs) to meet identified need.

Affordable Housing

Policy Context

NPPF

- 8.30 Chapter 5 of the NPPF states that plans should assess and policies should reflect the need for housing to meet a range of needs, including affordable housing. Where a need for affordable housing is identified, it should generally be provided on site. It also expects major housing developments to deliver at least 10% of all homes to be available for affordable home ownership, including shared ownership.

London Plan

- 8.31 Policy H4 (Delivering affordable housing) of the London Plan sets a strategic target of 50% for all new homes across London to be genuinely affordable. To assist with this aim, the Mayor requires major developments to provide affordable housing through the threshold approach, set out in Policy H5. Policy H5 requires a minimum of 35% of housing to be delivered as on-site affordable housing. The 35% target applies to Habitable Rooms – rooms which are intended to be used for sleeping, cooking, living or eating purposes. A number of criteria are set out to enable a scheme to be eligible for a "Fast-Track" route, but this does not apply to this site, given that it is an estate redevelopment.
- 8.32 Policy H8 of the London Plan sets the affordable housing requirements for estate redevelopment proposals. These include:
- Demolition of affordable housing 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.
 - All development proposals that include the demolition and replacement of affordable housing are required to follow the Viability Tested Route and should seek to provide an uplift in affordable housing in addition to the replacement affordable housing floorspace.

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Local Plan

- 8.33 Policy CS10 (Housing Need) of the requires the maximum reasonable amount of affordable housing. In particular a minimum of 35% of units to be affordable housing, of which a target of 70% will be social rented housing and 30% will be intermediate housing, unless otherwise agreed.

Assessment

- 8.34 The proposed approach to affordable housing has been developed to respond to the above planning policies. Policy H8 of the London Plan, which is specific to estate regeneration proposals involving the demolition of affordable homes, is considered to be the primary affordable planning policy for assessing the amount and mix of affordable housing proposed at the site. The remainder of this policy assessment is structured according to the tests set out in Policy H8. It also takes into account the relevant requirements of the extant Coralline Walk consent.

Establishing the existing Affordable Housing to be re-provided

- 8.35 The Housing Zone S106 requires a minimum quantum of affordable housing (16,249 sqm GIA) to be delivered across the Housing Zone Consents to re-provide the existing provision. Southmere Village which is one of the Housing Zone consents, is currently being delivered and is programmed to achieve practical completion in 2022/23. Southmere Village (Phase 1 of the Housing Zone Consents) alone will deliver 26,160 sqm NIA (approximately 32,700 sqm GIA) of affordable floorspace which far exceeds the baseline re-provision requirement in the Housing Zone consents S106.
- 8.36 The affordable housing reprovision for the Coralline Walk element of the application site has therefore been satisfied already, meaning that Policy H8 will only apply to the existing stock north and south of Wolvercote Road. The total existing quantum of affordable housing floorspace is 29,890 sqm (GIA)², which is all social rent/London Affordable Rented tenure. This floorspace will be reprovided at the site to satisfy Policy H8.

Rehousing Approach

- 8.37 Peabody's current rehousing plans assume that Lesnes Estate residents who express a desire to stay on the estate will move into new homes built as part of the development pursuant to the Housing Zone Consents. Residents on an Assured Social and Secure Tenancy will be offered the same tenancy rights that they currently have for their new home, and their rent will be regulated according to the same principles that are applied now.
- 8.38 As illustrated by Figure 11 below, the intention is for residents currently living in the north-west of the Wolvercote Road part of the Site to be offered new homes in Southmere Village (Housing Zone consents Phase 1); residents in the north-east will be offered new homes in Binsey Walk (Housing Zone consents Phase 2); and residents in the south will be offered new homes within the Coralline Walk part of the Application Site (which will be delivered as the new Phase 3). There are currently 61 social rented households living within the Site who would be rehoused in Phase 3.

² This figure applies only to the cumulative total GIA of affordable residential units. It does not include common areas and circulation spaces

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Figure 11 – Rehousing Approach for Existing Residents at the Site



Source: Design and Access Statement by Macrenanor Lavington

- 8.39 This means that, with the exception of the first sub-phase of Coralline Walk which may be used for some of the site's rehousing requirement, the application site will generally provide housing for households that currently do not live on the site. This is positive as it means that almost all of the affordable housing delivered at the Lesnes Estate site will be additional – meaning it will allow Thamesmead to support more households, including those currently on LB Bexley's housing list.

Affordable Housing Proposal

- 8.40 In line with Policy H8, the redevelopment proposals for Lesnes Estate will include:
- Up to 61 homes at Social Rents for existing Lesnes Estate tenants who wish to stay in South Thamesmead (or less if not all these residents wish to remain living in the area);
 - 29,890 sqm³ (which is the total GIA of the existing affordable homes) less the households identified in A above, at London Affordable Rents; and
 - Shared ownership tenure housing to achieve a minimum of 35% affordable housing across the whole Application Site (by habitable room).
- 8.41 The affordable housing proposals set out in A-C will result in the below tenure mix when applied to the illustrative scheme for the Site.

³ This figure applies only to the cumulative total GIA of affordable residential units. It does not include common areas and circulation spaces, which will be provided over and above this figure

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Table 7 – Illustrative Affordable Housing Tenure Mix

MEASURE	SOCIAL RENT/ LONDON AFFORDABLE RENT	SHARED OWNERSHIP	TOTAL AFFORDABLE	MARKET	TOTAL
Floorspace (sqm)	30,003 (60%)	20,374 (40%)	50,377 - 36%	87,780 - 64%	138,157
Units	368 (57%)	279 (43%)	647 - 35%	1,202 - 65%	1,849
Habitable rooms	1,397 (63%)	837 (38%)	2,221 - 38%	3,605 - 62%	5,826

Existing vs Proposed Affordable Housing

- 8.42 Table 8 below compares the total amount of affordable housing at the site before and after development. This demonstrates that, in accordance with Policy H8, the proposals not only re-provide the quantum of affordable on site but significantly increase the amount of affordable housing through introducing an intermediate housing product.

Table 8 – Existing vs Proposed (Illustrative) Affordable Housing

MEASURE	EXISTING SCHEME	PROPOSED (ILLUSTRATIVE) SCHEME	DIFFERENCE
Floorspace (sqm)	29,890	50,377	+20,487 (69%)
Units	411	647	+236 (57%)
Habitable rooms	1,858	2,221	+363 (20%)

- 8.43 Overall, the proposed development provides significantly more affordable floorspace, units and habitable rooms than the existing site – and this does not even account for the fact that additional affordable homes are currently being delivered in the wider South Thamesmead area, which themselves deliver a net gain in affordable homes.
- 8.44 Only a very small proportion (up to 11%) of new affordable homes will be used for rehousing, the rest will support households beyond the existing Lesnes Estate, including Bexley nominations.

South Thamesmead Context

- 8.45 Given the need to create mixed communities, it is worth considering the Lesnes Estate affordable housing proposals in the context of the local area.
- 8.46 Table 9 below summarises the proposed tenure mix of Peabody’s development plans in the local area. It demonstrates that 43% of new homes being built by Peabody will be affordable. Within this, more than half of affordable housing (56%) will be for London Affordable Rent or Social Rent.

Table 9 – South Thamesmead New Development – Tenure Mix

PHASE	SOCIAL/LONDON AFFORDABLE RENT	INTERMEDIATE	PRIVATE	TOTAL
Southmere Village	181	111	242	534
Binsey Walk (as intended by outline consent)	92	123	114	329
Lesnes	368	279	1,202	1,849

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Total	641 (24%)	513 (19%)	1,558 (57%)	2,712
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- 8.47 It is also important to put these new developments in the context of the South Thamesmead Estate, which includes older stock which is not identified for redevelopment. Table 10 summarises the tenure of the estate and demonstrates that 54% of all homes in the estate will be affordable, and 78% of those will be provided at social or London affordable rents.

Table 10 – Retained and new housing in South Thamesmead – Tenure Mix

SUB-AREA	SOCIAL/LONDON AFFORDABLE RENT	SHARED OWNERSHIP	FREE/LEASEHOLD	PEABODY MARKET RENT	OTHER*	TOTAL
Southmere	395	0	200	25	3	623
Parkview	837	0	250	31	5	1,123
New Build	641	513	1,558	0	0	2,712
Total	1,873 (42%)	513 (12%)	2,008 (45%)	56 (1%)	8 (0%)	4,458

* Other covers guardian properties

- 8.48 Overall, the proposals for Lesnes Estate will contribute positively to the creation of a more mixed community at South Thamesmead, which does and will continue to provide a significant proportion of affordable housing.

Viability

- 8.49 One of Peabody's key objectives for the site, and for its development interests more generally, is to maximise the delivery of affordable housing. Emerging and adopted planning policy requires estate regeneration developments to deliver the maximum viable amount of affordable housing, and as such we have tested the viability of the emerging proposals to identify what this means in the context of the proposed development.
- 8.50 The Financial Viability Assessment (FVA) submitted alongside this application acknowledges that bringing forward regeneration on the Site is challenging due to the low market values and high rehousing costs. Based on an appraisal of the illustrative scheme, the FVA indicates that the re-provision of existing affordable housing only (i.e. A and B in the section above), as required by Policy H8, would be financially unviable. Notwithstanding this, Peabody is committed to bringing forward a development that improves the quality of housing at the site for new and existing households and improves the quality of the place for its residents and the wider community.
- 8.51 As a provider of affordable housing, Peabody has looked at ways to both re-provide and increase the amount of affordable housing at the Site, whilst ensuring that the development is still deliverable. The FVA indicates that it is not possible for the proposed development to support the provision of any more London Affordable Rented (LAR) housing at this time, as this would result in the scheme being more financially unviable and ultimately undeliverable.
- 8.52 The FVA also demonstrates that providing additional shared ownership accommodation (i.e. C in the section above) can increase the amount of affordable housing delivered at the Site whilst also ensuring that the development is still deliverable. When compared with market housing, the additional grant funding generated by the shared ownership together with savings on marketing costs, sales agent and legal fees, finance costs and CIL means that the impacts on viability are not sufficient to compromise the

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delivery of the scheme, but also allow it to contribute to the creation of a mixed and balanced community in Thamesmead, in accordance with the London Plan.

- 8.53 Whilst the scheme as it stands is currently unviable (in that it achieves a very low level of profit), Peabody hopes that the position will improve through increased values in the surrounding area as a result of its current investments in Thamesmead. There are a number of regeneration areas in London where regeneration has led to above average residential value growth which support this optimism, as demonstrated in the Financial Viability Appraisal. As per Policy H8, the phased development will be subject to viability review, meaning that it may be possible to increase the amount of affordable housing over 35% should the viability position improve.

Summary

- 8.54 The proposals exceed the requirements of the London Plan (both existing and emerging) by:
- Re-providing the existing affordable housing floorspace at the application Site;
 - Re-providing affordable housing in accordance with the tenure requirements set out by Policy H8 – i.e. with existing residents staying on the site being offered social rent housing on existing terms and the remaining stock being provided as London Affordable Rent housing.
 - Providing more than the maximum viable amount of affordable housing in addition to the re-provided floorspace and demonstrating this through the submission of a Financial Viability Assessment.
 - The proposals also meet the London Plan objectives for ensuring a mixed and balanced community in South Thamesmead, as demonstrated by Table 10 above.

Tenure Mix

Policy Context

London Plan

- 8.55 London Plan Policy H10 advocates that schemes should generally consist of a range of unit sizes and be based upon robust local evidence of need where available.

Local Plan

- 8.56 Policy CS10 of LBB's Core Strategy states that as with market housing, the affordable housing mix should reflect the need for a variety of dwelling sizes. It goes on to outline the housing mix requirement as shown in Table 11. It should be noted that this is based on data from 2009 and is therefore considered to be out of date.

Table 11 – CS10 Unit Mix

UNIT SIZE	MARKET HOUSING	INTERMEDIATE HOUSING	SOCIAL HOUSING
1 bed	33%	9%	12%
2 bed	24%	22%	19%
3 bed	42%	69%	33%
4 + bed	1%	0%	36%

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Assessment

- 8.57 Given that the scheme is currently in outline, the residential mix is not proposed to be fixed at this stage to ensure that it can be provided to meet local housing needs as each phase comes forward. However, Table 12 provides an indication of the mix for the Illustrative Scheme.

Table 12 – Indicative Proposed Mix (Illustrative Scheme)

UNIT SIZE	MARKET HOUSING	INTERMEDIATE HOUSING	SOCIAL HOUSING
1	30%	30%	25%
2	55%	55%	30%
3	15%	15%	30%
4	0%	0%	15%

- 8.58 In comparison to the existing unit mix (66% one and two bed units), the proposals seek to create a more balanced unit mix. The predominant unit size is therefore 2-bed (4 person) units. The South East London Strategic Housing Market Assessment (2014) acknowledges that for LB Bexley the greatest demand exists for 2-bed units, and as such the proposals positively respond to this at this stage.
- 8.59 Any RMA will look to justify the mix based upon the latest housing need data available to ensure compliance with the relevant policies at the time.

Amenity Provision

Policy Context

London Plan

- 8.60 Policy D6 (Housing quality and standards) requires that a minimum of 5 sqm of private outdoor space should be provided for 1-2 person dwellings with an extra 1 sqm provided for each additional occupant.

Local Plan

- 8.61 Saved policy H6 (Residential Development – Amenity Space) requires residential developments to provide adequate usable on-site amenity space.

Assessment

- 8.62 The current Site provides a total of 28,508 sqm of open space, comprised of 1,584 sqm of hardscaping, 23,284 sqm of public green space and 3,660 sqm of private gardens. Based upon the Illustrative Masterplan, it is considered that the proposals could increase the amount of useable open space on the site by 21,620 sqm. This open space could be provided in a variety of types, providing a much wider range of different spaces for residents and visitors to utilise. The following types of open space are provided across the scheme:

- Playable pocks and planted swathes
- Raingardens
- Linear open spaces
- Podium Gardens
- Neighbourhood Gardens
- Squares
- Private Gardens

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■ Abbey Way Local Park

- 8.63 The indicative scheme provides a total of 46,790 sqm of open space, which has been used to inform the parameter plans for open space to ensure that sufficient public realm is provided.
- 8.64 In terms of playspace, based upon the unit mix of the illustrative scheme, 8,139 sqm of playspace is required. The Illustrative Masterplan would provide 8,701 sqm, which is in excess of the GLA policy target.
- 8.65 At this stage, the unit mix is not known, so the quantum of private amenity space, communal open space and playspace is not confirmed, but any future RMA will be expected to be in compliance with any future policy guidance.

PROVISION OF COMMERCIAL USES

Policy Context

NPPF

- 8.66 Paragraphs 91 and 118 of the NPPF promote mixed use developments and encourages multiple benefits from the use of land in urban areas.
- 8.67 Chapter 7 relates to town centres and states that LPAs should apply a sequential test to planning applications for main town centre uses that are not in accordance with an up-to-date local plan. In addition, the NPPF states that when assessing planning applications for retail, leisure and office development outside of town centres, which are not in accordance with an up-to-date Local Plan, LPAs should require an impact assessment subject to local thresholds.

London Plan

- 8.68 London Plan Policy SD7 (Town centres: development principles and Development Plan Documents) repeats the NPPF requirement for sequential assessments and impact assessments for 'main town centre' uses out of designated town centres.

Local Plan

- 8.69 The need for a sequential and impact assessment for relevant developments is also reflected in Policy CS14 of the Core Strategy. For LB Bexley there is no locally set threshold, and so the default threshold of 2,500 sqm as stipulated in the NPPF applies.
- 8.70 'Saved' UDP Policy 13 states that residential developments of over 25 dwellings or more should have good access to local shopping and community facilities.

Material Considerations

- 8.71 The Thamesmead and Abbey Wood Opportunity Area Framework (2019) states that developments along Harrow Manorway should deliver new active frontage to complement the existing local retail offer and provide services for the community.

Policy Assessment

- 8.72 This outline planning application proposes 0 - 3,225 sqm of commercial floorspace, covering Class E and public house uses, to be located at ground floor level in the eastern part of the development, along Harrow Manor Way and/or the quiet way. The maximum quantum of commercial space proposed is equal to the amount approved in the 2016 extant outline planning permission for Coralline Walk.

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- 8.73 The rationale for having the flexibility to deliver some commercial space in the new development remains as per the approved scheme. The principal reason for including this proposal in the scheme is to enable the delivery of small-scale amenities if these are not already provided within easy walking distance to the Site, to reduce the need to travel, as promoted by the NPPF. As such, any commercial space proposed is not considered to compete with emerging or existing commercial hubs, such as Wilton Road and Southmere Village. A secondary reason for including commercial uses in the scheme is to allow for some ground floor level activity to contribute to placemaking and to add some vibrancy and vitality to the main north-south route in the scheme ('the quietway').
- 8.74 A sequential assessment and a town centre impact assessment have not been undertaken because the commercial floorspace proposed does not exceed the extant planning permission.
- 8.75 A sequential test was not undertaken for the extant planning permission as it is only proposed to support the sustainability of the main residential development, as per the NPPF and other local and strategic planning policy documents referenced above. In this case hundreds of more homes are proposed with no additional commercial space proposed, which further strengthens the position taken in 2016.
- 8.76 An impact assessment was undertaken which examined the potential implications of commercial development for nearby centres. This assessment concluded that any trade diversion from existing centres is likely to be negligible as a result of the proposed development and is more likely to complement and support these centres as a consequence of the increased residential population in the area, which is significantly increased as result of this new proposal.
- 8.77 Overall, the small scale of commercial floorspace proposed together with its relationship to the substantial levels of new housing proposed means that the proposed application will not compromise the town centre objectives of planning policy. If anything, this proposal is more positive from this perspective than the extant planning permission at the Site which includes the same amount of commercial space and less housing.

SCALE AND APPEARANCE

Design Approach

Policy Context

NPPF

- 8.78 The NPPF (paragraph 124) notes that *'the creation of high-quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities'*.

London Plan

- 8.79 Policy D1 of the London Plan (London's form, character and capacity for growth)) requires design to consider the form, layout, experience, quality and character of new development. In terms of form and layout, it requires new design to use land efficiently, facilitate active travel and manage impacts of servicing. Regarding experience, it encourages safe and inclusive environments which provide active frontages, generate liveliness and interest, and which provide attractive and inviting spaces that can be used for social interaction, play and relaxation. In terms of quality and character, Policy D1 requires high quality architecture which pays attention to detail, responds to local character and heritage, whilst also designing for safety, flexibility, sustainability and urban greening.

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- 8.80 Further to this, Policy D3 (Inclusive design) requires new development to deliver an inclusive environment that meets the needs of all Londoners, and D7 (Public realm) reinforces the requirements of Policy D1 in terms of the quality, safety, inclusivity, activity of the public realm and its ability to promote active travel.

Local Plan

- 8.81 Saved' policy H3 'Character of Local Residential Area' requires residential development, and other development in primarily residential areas, to be compatible with the character or appearance of the area in which it is located and the following criteria should be satisfied:
- The layout, scale and massing, elevational treatment, and materials of buildings, should be compatible with the local character or appearance;
 - The spaces around buildings (including roads) and their hard and soft landscaping and plot separations should be compatible with the local character or appearance and fulfil clear and useful functions.
- 8.82 Saved policy ENV42 (Accessible Design) seeks to ensure that all applications for, amongst other things, the construction of new buildings or premises or the laying out of external areas, to which the public will have access or in which people will be employed, shall make adequate provision for the needs of people with disabilities.

Material Considerations – National Estate Regeneration Guidance Design Principles

- 8.83 The Estate Regeneration Good Practice Guide contains a Design and Quality Checklist that has been used to inform the general layout of the proposals. The guidance includes six questions which should be considered during estate masterplanning schemes. These include:
- a. Streets and movement
 - b. Safe and secure environment
 - c. A green infrastructure
 - d. Character
 - e. Quality internal environments
 - f. Environmental sustainability
- 8.84 At this stage, the application is submitted in outline, so the final details of the proposed materials will be decided at through RMA(s). However, the application is submitted with a Design Code to ensure that a high-quality development is delivered within key parameters set by the outline application.
- 8.85 The vision for the design approach to Lesnes Estate was developed by focussing on what it will be like to live in this area in the future, and what sense of place the masterplan will foster for its future residents. Key aspects of the approach include:
- Creating a well-connected site that enhances the permeability of the site to the surrounding area; creating a strong hierarchy and typology of streets throughout the proposal to assist with wayfinding and navigation. The streets are also intended to lead to welcoming entrances into the neighbourhood, enhance social encounters, play and creative use of the public space.
 - Building upon the qualities of the wider existing landscape context; it is the ambition to create a leafy, playable and well-connected landscape of public realm.
 - Integration of the site into the context, using building volumes, typologies and uses that reflect the immediate surroundings and create a positive transition between old and new urban fabric.

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- Creating a new residential neighbourhood with two-character areas; the western quarter, relating to the mixed use Southmere Village and commercial Harrow Manorway and the eastern quarter reflecting the Abbey Way park.

8.86 Given the location of the Site within an Opportunity Area but also within an existing suburban, residential area, great thought has been given to how the design approach can work to bring these two typologies together. A strong sense of place anchors the design approach that has been taken across the Site and the intention is to reflect the suburban location and the connectivity of the Site to inner London as well as the green infrastructure that surrounds the site.

8.87 The above principles have drawn upon Estate Regeneration National Strategy Good Practice Guide to deliver a high-quality development. Compliance with this guidance is demonstrated in Table 13.

Table 13 – Compliance with National Estate Regeneration Guidance

CRITERIA	DESIGN RESPONSE
A: does the masterplan adhere to good urban design principles?	Yes, strong design principles have been embedded within the Design Code to create a development that is well-considered, improving the public routes through the site, improving legibility and creating meaningful green space.
B: is the masterplan designed with safety and security in mind?	Yes, the new routes have been placed to improve natural surveillance on the Site to enable an improved feeling of safety for residents and passers through.
C: is a high quality landscaping strategy in place?	Yes, the proposals will result in a significant increase in landscaping across the Site. The approach to landscaping is covered at length within the Design Code to ensure that key principles are retained in any RMA. Such principles include: <ul style="list-style-type: none"> • A clear hierarchy of spaces is proposed and visible through subtle changes in planting, tree species, planting height, and the choice of hard landscape. • Public areas are inviting, welcoming and offer an array of social, play and recreational opportunities inclusive to all. • A blend of public, semi public and private areas to the Podium Gardens offer a varied approach and clear language throughout the whole estate
D: is it necessary to change the identify and character of the estate?	There is a strong character and sense of community within the Site that the proposals draw upon and develop to ensure a development that is sensitive to local residents whilst improving the environment of the estate.
E: are the new homes designed to meet the needs of local residents whilst complying with technical standards?	Yes, improving the estate for existing residents has been at the forefront of the reason Peabody is bringing forward the proposal. The new homes have been designed to ensure any existing tenant who is being rehomed as part of the scheme will receive a home that meets their needs. Some homes currently on the Site do not meet the National Space Standards and suffer from poor insulation and energy performance. All new homes will meet Peabody's sustainability aspirations and relevant technical policy requirements.
F: does the masterplan take account of local environmental policy requirements?	Yes, please see later Section of this Planning Statement.

8.88 The design approach taken to the estate regeneration is therefore considered to be in compliance with policy guidance at all levels.

Public Realm

8.89 In terms of the space around buildings, within the Design Code, principles have been set out to establish a hierarchy of streets and nodes of public realm for the site. The intention is to create a movement pattern which is clear, connected and permeable to allow connection between the estate and the

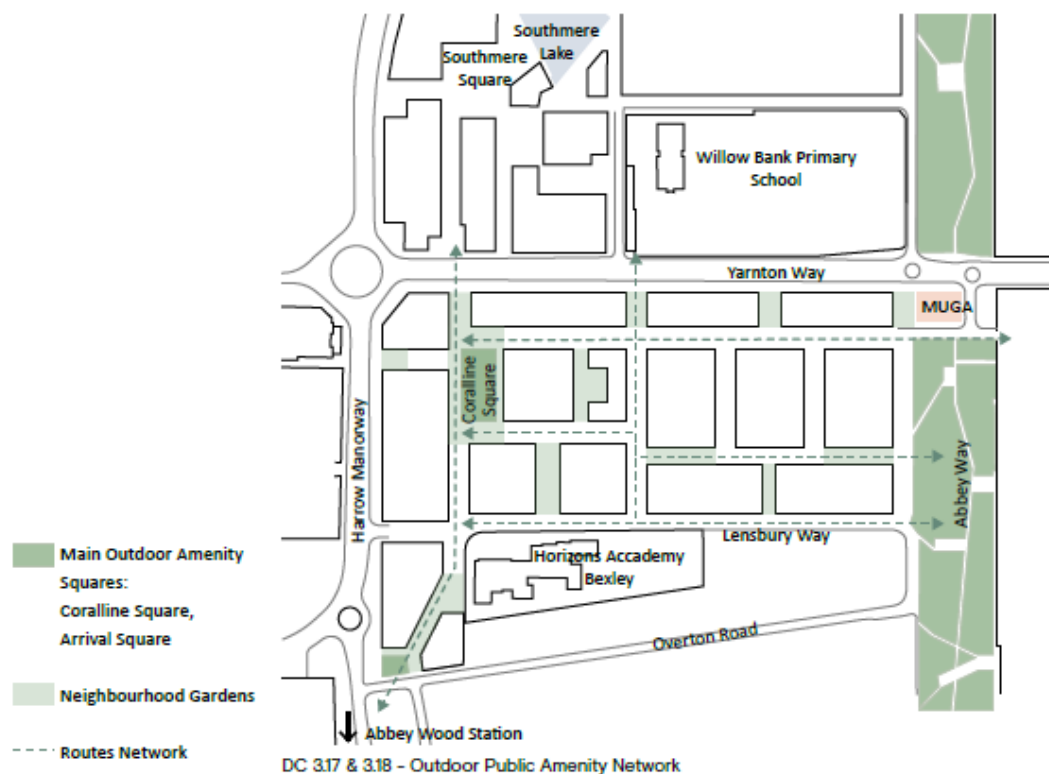
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surrounding public spaces. The proposed hierarchy is intended to create the following functions of spaces across the site:

- Walks – providing direct north/south links with potential for recreational activity
- Rides – linear movement corridors for easy connections
- Creeks – streets that are also intended for incidental play
- Squares – outward looking spaces which invite social interactions
- Gardens – private spaces for residents' use
- Glades – road junctions providing pockets to sit, play and rest within the site

8.90 The intent of the outline application is to build upon the qualities of the wider existing landscape context to create a leafy, playable and well-connected network of public realm. This will be achieved through establishing two main green spaces within the site; a new square within the western quarter of the development and a revitalised Abbey Way Park in the east. Figure 12 below shows the provision of different typologies of public realm within the proposals.

Figure 12 – Outdoor Amenity Network



Source – Design Code by Macreannor Lavington and Farrer Huxley

8.91 By following these principles, it is considered that the development will provide high quality public realm and spaces between the buildings that reflect the historic marshland character of the site whilst creating useable gardens. In this way, it is considered that the proposals are compatible with, and enhance, the local character.

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Density

Policy Context

NPPF

8.92 Paragraph 122 states that planning decisions should support development that makes efficient use of land, taking into account:

- the identified need for development, and the availability of land suitable for accommodating it;
- local market conditions and viability;
- the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;
- the desirability of maintaining an area’s prevailing character and setting, or of promoting regeneration and change; and
- the importance of securing well-designed, attractive and healthy places.

London Plan

8.93 London Plan Policy D3 (Optimising site capacity through the design-led approach) requires development to make the most efficient use of land and be designed at the optimum density, which will be influenced by:

- The site context, including surrounding built form, uses and character;
- The site’s connectivity and accessibility by walking, cycling, and existing and planned public transport to jobs and services (including both PTAL and access to local services);
- The capacity of surrounding infrastructure.

8.94 The supporting text to policy D3 adds that *‘for London to accommodate the growth identified in this Plan in an inclusive and responsible way every new development needs to make the most effective use of land. The design of development must optimise site capacity’*.

Local Plan

8.95 Policy CS01 (Achieving sustainable development) states that the Council will seek to exceed the London Plan housing target by maximising the potential of the Thames Gateway and the Opportunity Areas, ensuring that higher density, mixed use developments are located in town centres and other accessible locations with supporting infrastructure. Supporting paragraph 3.3.5 notes that high quality, high density development is welcomed in all the identified sustainable growth areas of the geographic regions.

8.96 Paragraph 3.3.1 of the Bexley Growth Strategy notes that the intensification of development is a key component of the Growth Strategy and that the greater the connectivity, the higher the density is possible; however, greater density also demand high quality design to ensure development’s provide an appropriate living environment. The Growth Strategy sets out a range of housing typologies:

- **Suburban medium** – 35-95 units per hectare. This typically includes a mix of town houses and some flats with off street parking and a higher proportion of family homes. This type of development is already fairly well represented in Bexley. Suburban Medium is a good way to intensify existing suburbs

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- **Urban medium** – 45-170 units per hectare. This typology generally includes a greater proportion of flats to houses and fewer family dwellings. Buildings are also generally higher at 3 to 6 storeys with some taller elements. These developments tend to have less parking.
- **Urban high** – 45-260 units per hectare. This typology illustrates the top density range in Bexley's growth areas and includes predominantly flatted development in four to eight storey mansion blocks and lower parking levels. It seeks to utilise the most connected locations within easy reach of key transport nodes. A few locations in the borough would be appropriate for a focussed cluster of towers of approximately 15 storeys.

Assessment

- 8.97 The Design Code and illustrative Masterplan for the site aim to increase residential density compared to the current estate, whilst ensuring that the scale of the new neighbourhood is appropriate for the context and creates an attractive environment. The outline planning application is to deliver up to 1,950 units and up to 3,225 sqm of Class E uses in buildings of up to 51m in height. Should the maximum quantum of development be provided on the Site, this would equate to c. 201 units per hectare (excluding the area of the Site covered by Abbey Way Park. This sits comfortably within the "Urban High" definition set out in the Bexley Growth Strategy but is higher than the surrounding density of the existing context. The following sets out an assessment as to why the proposed density is considered acceptable.

Local context

- 8.98 It is acknowledged in the OAPF that the intention of the development of the Thamesmead Estate in the 1960s was to create higher density living, which is demonstrated by the existing densities within the estate, for example with the high-rise tower blocks along Yarnton Way. In this way, the character of Thamesmead is different to the more suburban nature of the rest of the borough. Therefore, we consider the redevelopment and improvement of the site can continue to provide higher densities than may be seen in the surrounding area, whilst improving the quality of the existing environment.
- 8.99 Part of the site falls within the Abbey Wood and South Thamesmead Housing Zone, as well as the Opportunity Area. Paragraph 7.6.5 of the Housing SPG states that "a number of housing zones overlap with opportunity areas and town centre boundaries in some boroughs, helping to speed up the realisation of housing capacity in locations the London Plan identifies as being suitable for significant redevelopment and higher density development". This part of the site benefits from an outline consent where a density of 181 dwellings was previously considered acceptable; the slightly higher proposed density of c. 201 dwellings per hectare is also accompanied by a number of improvements to the existing consent, as explored earlier in this Statement.
- 8.100 For reference, the Housing Zone consents reflect a density of 164 dwellings per hectare, if built out to the maximum parameters, so the proposed density of 201 units is considered to be commensurate with the surrounding character and respond better to the emerging context established by the Housing Zone development and the Cross Quarter development.

Location within an Opportunity Area

- 8.101 Opportunity Areas are identified in the London Plan as the areas that will see the most significant change and have the potential to deliver a substantial amount of the new homes and jobs that London needs. Within the OAPF for the Abbey Wood and South Thamesmead Opportunity Area, the site is identified as having the potential for change, indicating that it is important for achieving the aims of increased housing and job delivery within the area.

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Connectivity and surrounding infrastructure

- 8.102 The Site is in close proximity to Abbey Wood Station and is well connected by a number of bus routes. The principle of higher density development in areas of high transport accessibility is reflected in Bexley's Core Strategy and is supported by the NPPF and London Plan. The site has PTAL rating of 5, as manually tested by Stantec, and its accessibility is highest along Harrow Manor Way owing to its proximity to the train station and bus stops, and also Yarnton Way which is a route for a number of buses. The design and density of the proposed development responds to the variation in connectivity and accessibility across the site, with the highest density housing being located in the easternmost part of the site, and some high-density elements also being proposed along Yarnton Way.

The major transport improvements that are committed around the site will improve the accessibility of the area and provides further support for the principle of high-density residential development in this location.

Design approach

- 8.103 The development has been designed to respond positively to the local context. Throughout the design process, the proposals have been subject to significant engagement through design charettes with the local authority to ensure that the proposed layout and quantum of development is acceptable. The development contains significant amounts of green space that provide sufficient space between buildings and protects the amenity of future occupiers.
- 8.104 Overall, the development is in-keeping with the surrounding residential context and is of a high-quality and innovative design. It is considered that the proposed design of the site effectively optimises development on an accessible, brownfield site, whilst responding to the local context.

HEIGHT AND MASSING

Policy Context

London Plan

- 8.105 London Plan Policy D9A (Tall buildings) requires that boroughs should develop local definitions for tall buildings and should identify appropriate locations for their delivery within local plans, taking account of the visual, functional, environmental and cumulative impacts of tall buildings, as well as the level of public transport accessibility – ensuring they are delivered in well-connected locations.
- 8.106 The definition of a tall building will vary between and within different parts of London and each local authority but should not be less than six storeys/18m. Where there is no definition of a tall building, D9 will apply to buildings of six storeys/18m.
- 8.107 Policy D9B states that tall buildings should only be developed in locations that are identified as suitable in Development Plans.
- 8.108 In assessing visual impacts in plan making and development proposals, Policy D9C states that tall buildings should address the following
- a. The view of buildings from different distances need to be considered including:
 - i. long-range views – these require attention to be paid to the design of the top of the building;
 - ii. mid-range views from the surrounding neighbourhood – particular attention should be paid to the form and proportions of the building;
 - iii. immediate views from the surrounding streets – attention should be paid to the base of the building.

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- b. whether part of a group or stand-alone, tall buildings should reinforce the spatial hierarchy of the local and wider context and aid legibility and wayfinding;
- c. architectural quality and materials should be of an exemplary standard to ensure the appearance and architectural integrity of the building is maintained through its lifespan;
- d. proposals should take account of, and avoid harm to, the significance of London's heritage assets and their settings. Proposals resulting in harm will require clear and convincing justification, demonstrating that alternatives have been explored and there are clear public benefits that outweigh that harm. The buildings should positively contribute to the character of the area;
- e. buildings in the setting of a World Heritage Site must preserve, and not harm, the Outstanding Universal Value of the World Heritage Site, and the ability to appreciate it;
- f. buildings near the River Thames, particularly in the Thames Policy Area, should protect and enhance the open quality of the river and the riverside public realm, including views, and not contribute to a canyon effect along the river;
- g. buildings should not cause adverse reflected glare.
- h. Buildings should be designed to minimise light pollution from internal and external glazing

8.109 Policy D9 continues that when assessing functional impacts, tall buildings should address:

- a. the internal and external design, including construction detailing, the building's materials and its emergency exit routes must ensure the safety of all occupants;
- b. buildings should be serviced, maintained and managed in a manner that will preserve their safety and quality, and not cause disturbance or inconvenience to the surrounding public realm. Servicing, maintenance and building management arrangements should be considered at the start of the design process;
- c. entrances, access routes, and ground floor uses should be designed and placed to allow for peak time use and to ensure there is no unacceptable overcrowding or isolation in the surrounding areas;
- d. it must be demonstrated that the capacity of the area and its transport network is capable of accommodating the quantum of development in terms of access to facilities, services, walking and cycling networks, and public transport for people living or working in the building;
- e. jobs, services, facilities and economic activity that will be provided by the development and the regeneration potential this might provide should inform the design so it maximises the benefits these could bring to the area, and maximises the role of the development as a catalyst for further change in the area;
- f. buildings, including their construction, should not interfere with aviation, navigation or telecommunication, and should avoid a significant detrimental effect on solar energy generation on adjoining buildings.

8.110 Policy D9 also sets out a number of environmental considerations that tall buildings should address:

- a. wind, daylight, sunlight penetration and temperature conditions around the building(s) and neighbourhood must be carefully considered and not compromise comfort and the enjoyment of open spaces, including water spaces, around the building;
- b. air movement affected by the building(s) should support the effective dispersion of pollutants, but not adversely affect street-level conditions;
- c. noise created by air movements around the building(s), servicing machinery, or building uses, should not detract from the comfort and enjoyment of open spaces around the building.

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- 8.111 The above impacts should be considered cumulatively (i.e. by assessing proposed, consented and planned tall buildings). The policy also adds that public access areas should be incorporated into tall buildings, where appropriate, particularly more prominent tall buildings where they should normally be located at the top of the building to afford wider views across London.
- 8.112 The supporting text to Policy D9 notes that tall buildings can form part of a plan-led approach to facilitating regeneration opportunities and managing future growth, contributing to new homes and economic growth, particularly in order to make optimal use of the capacity of sites which are well-connected by public transport and have good access to services and amenities.

Local Plan

- 8.113 Policy CS01 (Achieving Sustainable Development) requires that the height, mass and setting of the development enhances the character of the surrounding locality. It states that 'whilst the majority of the borough is not considered appropriate for tall buildings, potential may exist for such development to be considered, for example: in locations which benefit from good public transport accessibility, exhibit an existing local built character that would allow for taller buildings, would not cause harm to heritage assets and the wider historic environment, and would not increase the risks of flooding, subject to further detailed area/site analysis and meeting various criteria'.

Material Considerations

- 8.114 As set out in paragraph 8.104, the Bexley Growth Strategy provides a range of housing typologies and heights depending on where a site is located. The station area is considered one of the few locations in the borough that would be appropriate for a focused cluster of towers up to approximately 15 storeys, provided that they are iconic and located directly around Abbey Wood station, acting as way finders. Medium density housing will be located in the east of the growth area, to the south of Yarnton Way, and around Southmere Lake. We consider that the Site falls within the Urban High typology given the surrounding environment and the Opportunity Area allocation. In such locations, predominantly flatted development of four to eight storeys could be acceptable.
- 8.115 The Coralline Outline Consent also forms a material consideration given that blocks of up to 57.7 m have previously been deemed acceptable within the surrounding context.

Assessment

- 8.116 Parameter Plan 06 sets out the maximum heights that any future reserved matters scheme could deliver, with the tallest element being a landmark building of 51m in height on Yarnton Way, replicating where the tallest building is consented through the extant Coralline consent. Buildings of up to 44m (c. 13 storeys) are proposed along Harrow Manorway, stepping down to 34m (c. 10 storeys) in the centre of the site and 15m (c. 6 storeys) on Lensbury Way facing the existing residential development. The tallest element of the development is proposed on a small portion of Yarnton Way at 51m (c. 15 storeys) to allow for a single landmark building to be located between Coralline Square and Yarnton Way, stepping down to 38m (c. 12 storeys) along the majority of the road frontage. These heights are all considered as maximums within the parameter plans and in reality it is likely that the prevailing height across the Site will be six storeys whilst allowing for some taller elements to assist with wayfinding. The intention is for varied massing to bring interest to the frontages and character to the streetscape. This is secured within the Design Code.

Tall Building Definition – D9A

- 8.117 In assessing the proposed development in the context of the above policies, it is first necessary to consider what might be defined as a 'tall building' in this context. Supporting paragraph 3.9.3 to Policy D9A of the London Plan defines a tall building as those that are 'substantially taller than their

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surroundings and cause a significant change to the skyline'. It is noted that in large areas of extensive change, such as Opportunity Areas, the threshold for what constitutes a tall building should relate to the evolving context. It also states that where there is no definition of a tall building, D9 will apply to buildings of six storeys/18m.

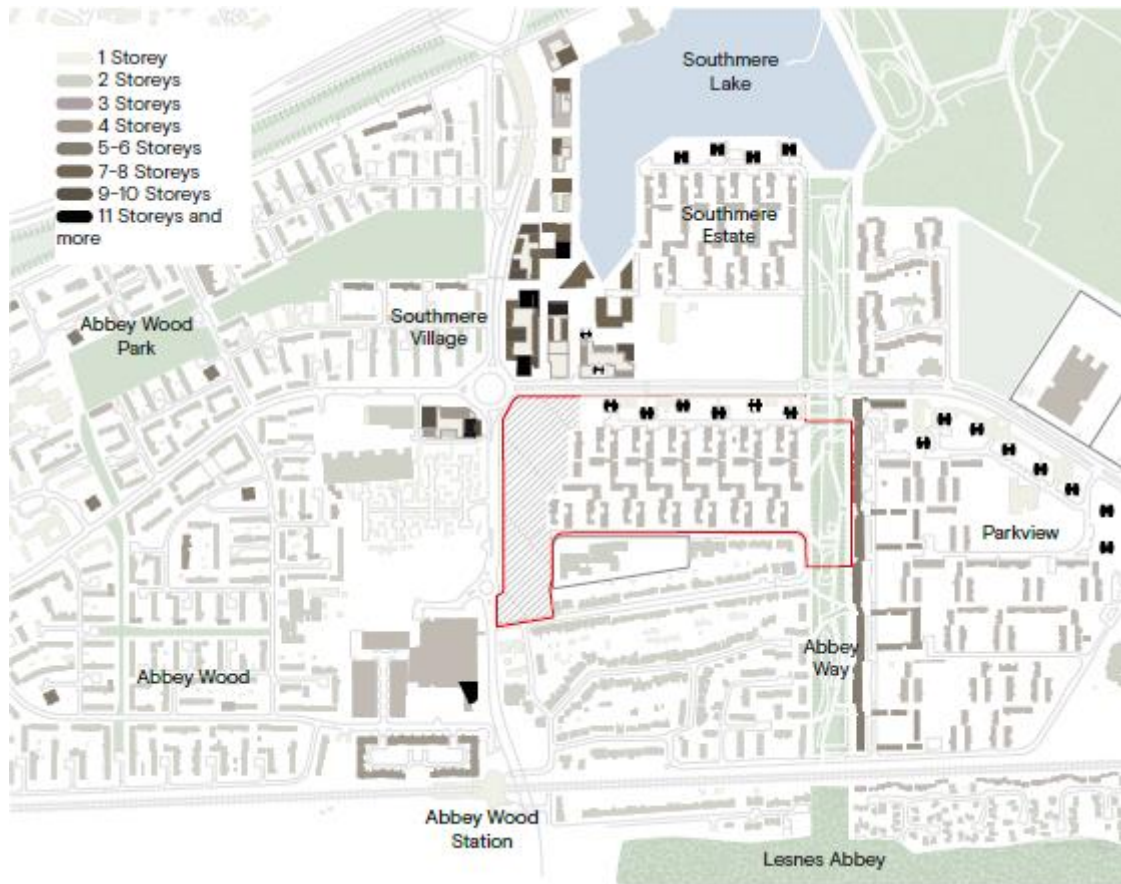
- 8.118 Bexley's Core Strategy does not was adopted in 2012 and pre-dates the London Plan. It does not include a definition of 'tall building' and therefore anything taller than six storeys/18m will be considered tall in the context of Policy D9 of the London Plan.
- 8.119 The parameter plans set out the following maximum heights for the different development zones. Although the Design Code contains restrictions to prevent all of the buildings from being the maximum height, it is considered that the height of the proposed development will be considered tall in the context of Policy D9.

Tall Building Location D9B

- 8.120 Policy D9 states that tall buildings should only be developed in locations that are identified as suitable in Development Plans. Core Strategy Policy CS01 sets out the following location tests that are all addressed by the Site:
- i. **benefit from good public transport accessibility** – the Site has a PTAL of 5 and satisfies this test;
 - ii. **exhibit an existing local built character that would allow for taller buildings** – the Site currently accommodates tall buildings and many more are being constructed or are in approved in the area, which is described further in paragraphs 8.140.
 - iii. **would not cause harm to heritage assets and the wider historic environment** – the Site includes no heritage assets and the proposals would preserve the setting of nearby heritage assets, as explained further in paragraphs 8.143.
 - iv. **would not increase the risks of flooding** – the Site is located within Flood Zone 3; however, benefits from the Thames Barrier flood defences. Mitigation measures are proposed to be included within any future RMA, so the development will not increase the risks of flooding, as set out in paragraph 8.231.
- 8.121 Expanding on ii. above, the buildings on the site range from three storeys houses to 13-storey towers. There are seven further tower blocks to the east of Abbey Way park. Figure 13 below shows the existing site context, with the approved massing at Southmere Village currently under construction for up to 14 storeys alongside the Cross Quarter scheme which proposes two towers of 21 and 13 storeys.

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Figure 13 – Emerging Building Height Context

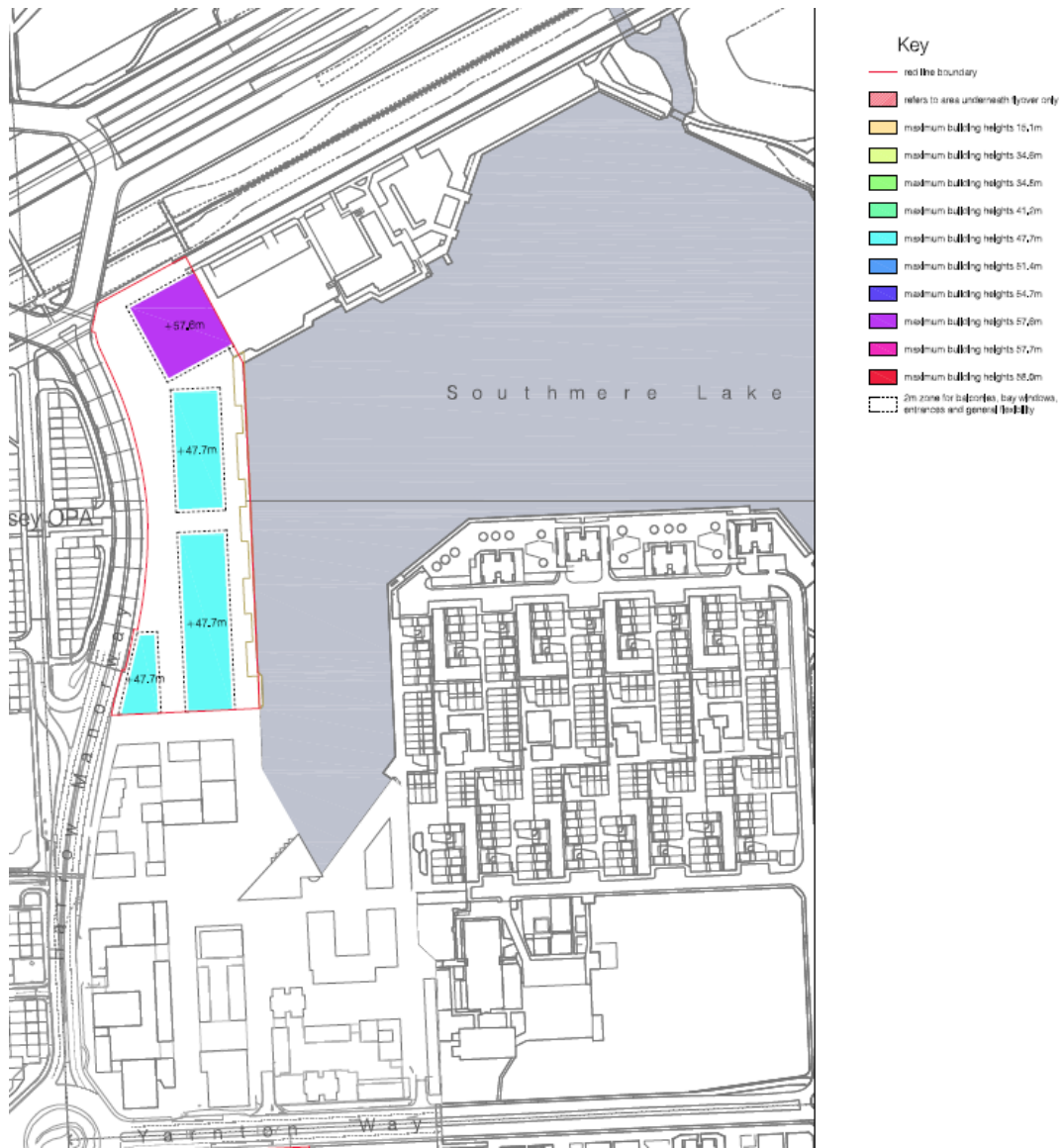


Source: Design and Access Statement prepared by Mareannor Lavington

- 8.122 The emerging context of development is also important in considering whether the proposals constitute a tall building. The map below demonstrates the heights of buildings within the existing and surrounding context. It can be seen that the Housing Zone consents have established the principle of taller buildings along the east side of Harrow Manorway between Abbey Wood train station and Binsey Walk. The proposals at Southmere Village, which are currently on site, range between four and 14 storeys and the maximum height established by the Coralline OPA is 57.7m. Figures 14 and 15 below indicates the approved maximum heights for the Housing Zone.

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Figure 14 – Approved Binsey Walk Building Heights



Source – Max. Building Height and Massing Parameter Plan by Proctor and Matthews Architects and Mecanoo

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Figure 15 – Approved Coralline Walk Building Heights



Source – Max. Building Height and Massing Parameter Plan by Proctor and Matthews Architects and Mecanoo

- 8.123 Figure 15 demonstrates that part of the Application Site has previously secured outline consent for buildings of 54.7m.
- 8.124 Within the committee report for the outline Housing Zone applications (October 2016), it is stated that 'the location of the three sites within the Thamesmead and Abbeywood Opportunity Area and the site's current and proposed PTAL ratings mean that in principle they are suitable for taller buildings. The area already benefits from tall buildings.'
- 8.125 The proposals for Lesnes have sought to build upon the height and layout principles established as part of the Housing Zone consents to ensure that a holistic approach is taken to development of this area, and so that cumulative impacts can be appropriately assessed.
- 8.126 To reflect the consented Coralline scheme, the majority of the taller buildings are proposed along Harrow Manorway to establish a strengthened link between Abbey Wood station and North Thamesmead, and also to create a new route to the Southmere Village local centre. This reflects the following principles that were established through the Coralline consent, and the proposed heights are an important part of ensuring these principles can be delivered:
- The new buildings having active frontages along Harrow Manorway and the main north/south route through the site ('The Quietway').
 - Strong east-west connections
 - Visual and spatial permeability between the Quietway and Harrow Manorway
 - Marker buildings in strategic locations to terminate views, aid orientation and identify main pedestrian routes through the development.

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- 8.127 Taking the above context into account, the highest possible building of 15 storeys is considered to sit comfortably within the surrounding context.

Tall Building Impacts – D9C

- 8.128 The relevant planning policies for tall buildings differ slightly in their detail and extent, but taken collectively can be considered to cover the following topics, each of which are addressed in turn below:

- location and capacity for growth;
- local character;
- strategic/ local views;
- heritage;
- wayfinding and legibility;
- architectural quality;
- ground floor use,
- design and permeability;
- public access;
- local regeneration benefits;
- safety;
- microclimate;
- interference with aviation/telecommunications.

Location and capacity for growth

- 8.129 As described earlier in this statement, the site is located within an Opportunity Area and is noted to be a site of potential change. In accordance with the London Plan's 'Good Growth' policies, such areas are key to creating sustainable, mixed-use places that make the best use of brownfield land and will see the most significant change to accommodate London's growth. Given this status, it is considered that the location of the site is suitable in principle for a tall building.

Local character

- 8.130 As described above, the layout and maximum heights set by the parameter plans for the outline application have been designed to take account of the immediate surrounding character of the Housing Zone consents, and to ensure that the key design principles established by these consents is carried through into this application.
- 8.131 Thought has been given to the placement of the taller buildings to ensure that they enhance the local character of the site and improve the visual appearance of the surrounding area. It is considered that the proposed building heights strategy responds well to the surrounding character and make a positive contribution to the streetscape.

Strategic/local views

- 8.132 The Site is not located within a strategic viewing corridor of any of the London View Management Framework (LVMF) views. The TVIA that is submitted as part of the EIA notes that the proposed development would bring about direct changes to the fabric of the townscape within the site boundary and the character of the application site. However, at every viewpoint that is assessed, the Assessment concludes that the impact of the change to the view would be beneficial.

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Heritage

- 8.133 The Site does not include any listed buildings and it is not located within a conservation area. However the Site lies within the setting of Lesnes Abbey. The Cultural Heritage Report submitted as part of the EIA concludes that the proposed development represents a likely neutral change to the wider setting of relevant built heritage assets meaning that it will not alter the significance of any of the assets.

Wayfinding and legibility

- 8.134 A key principle for Peabody is increasing permeability and legibility of the existing estate and this has informed the parameter plans to indicate where taller elements are acceptable. The taller buildings along Harrow Manorway are intended to ease wayfinding between the Southmere Village local centre, the proposals and Abbey Wood Station as part of the creation of the new north-south route through the site. The 15-storey element on Yarnton Way is intended to act as a point of arrival to the newly created Coralline Square and demark a key area within the wider development site. Where the taller buildings are placed on the site is also intended to assist with distinguishing between the two proposed character areas of the site; the busier western quarter which is reflective of the nature of Harrow Manorway, with height stepping down in the quieter eastern quarter to reflect the Abbey Way park.

Architectural quality

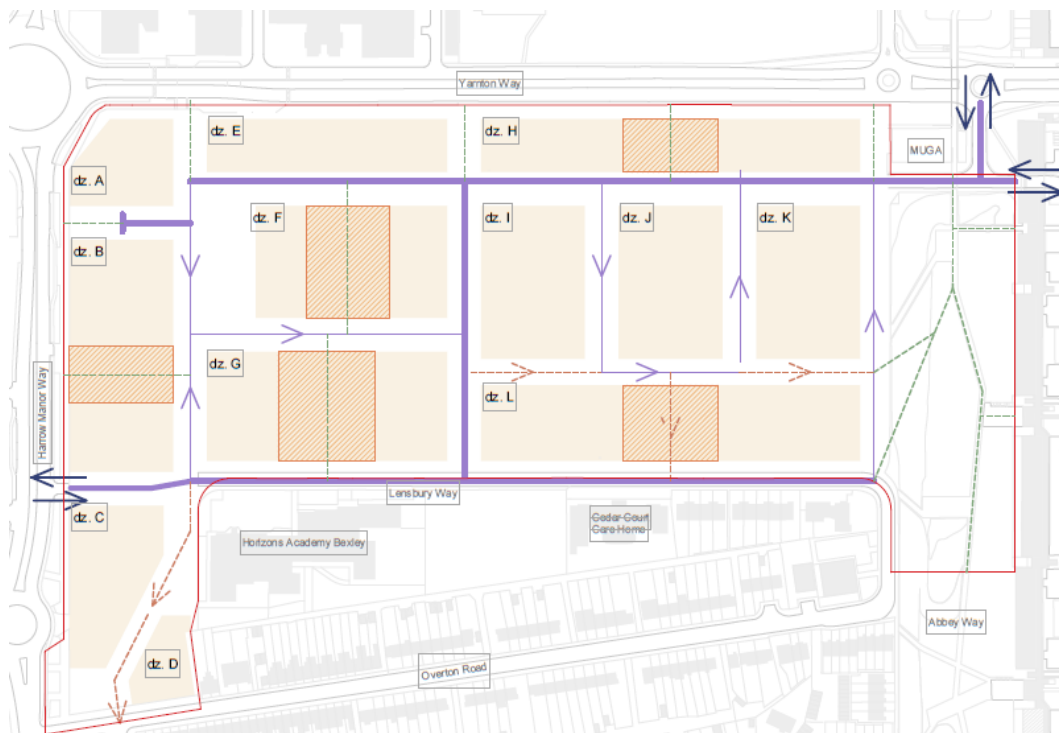
- 8.135 Whilst the application is in an outline form, the Design and Access Statement and Design Code ensure that the proposed buildings will be of high architectural quality and will represent an improvement to the design of the existing buildings.

Ground floor use, design and permeability

- 8.136 Currently on site, there are no active frontages at ground floor. Indeed, most of the frontages comprise of garages with living space on the first floor. The estate was initially designed in this way for flooding reasons. The parameter plans for the outline consent establish the principle of commercial uses along Harrow Manorway and part of Yarnton Way to provide activation along the Quietway that is proposed to link Abbey Wood Station to Southmere Village.
- 8.137 One of the key aspirations of the development is to re-engrain a clear street hierarchy which establishes permeability, legibility and clear wayfinding through the development. This is done by clearly distinguishing public, private and shared private spaces as well as creating a clear hierarchy of streets for different purposes, as set out in the Design section of this Statement. This increased permeability is demonstrated in Figure 16 below.

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Figure 16 – Proposed Roads and Movements



Source - Proposed Roads and Movements Parameter Plan by Macreannor Lavington

Public Access

- 8.138 Whilst no public access is proposed to the tall buildings on site, the principle of the approach to the public realm is to open up the estate through the creation of new streets and public spaces. This approach is explained above under 'Design Approach'. A key benefit of the proposed layout and placement of taller elements is also the creation of the new north-south route from the station to the south.

Microclimate

- 8.139 A Desktop Wind Study has been prepared as part of the Environmental Statement. This document tests a range of scenarios, including the Illustrative Masterplan and recommends mitigation measures that are incorporated into the Design Code to ensure that microclimate is sufficiently addressed as part of the OPA. Each RMA will be subject to additional testing.

Safety

- 8.140 The OPA is supported by a Fire Statement which sets out how the buildings will function fire safety. The Masterplan has been informed by fire safety requirements and the submitted statement, when supplemented by detailed versions to be secured via subsequent RMAs, will meet the requirements of London Plan policies D12 and D5.

Local regeneration benefits

- 8.141 The proposed development will deliver a wide range of significant local regeneration benefits. In summary these include:
- **Estate regeneration** – the current estate and living environment will be improved for future and current residents. Any residents living on the site at the moment will only be rehomed once in the

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process of the redevelopment. A number of homes on the site at the moment are below national space standards and have issues with heat retention. Reproviding these homes will increase the standard of living for existing and future residents as well as ensuring that homes are able to endure well beyond the current life of the expectancy of the existing buildings.

- **Affordable housing** – the development will provide a minimum of 35% affordable housing, which based upon the indicative unit mix equates to 647 units in a mix of social rent for existing tenants (61 units), London Affordable Rent (307 units) and Intermediate Rent (279 units). Residents on an Assured Social and Secure Tenancy will be offered the same tenancy rights that they currently have for their new home and their rent will be regulated according to the same principles that are applied now. This means that, with the exception of the first sub-phase of Coralline Walk which may be used for some of the site’s rehousing requirement, the application site will generally provide housing for households that do not live on the site currently. This a significant benefit as it means that almost all of the affordable housing delivered at the Lesnes Estate site will be additional – meaning it will allow Thamesmead to support more households, including those current on LB Bexley’s housing list.
- **Housing delivery and contribution to aims of the Opportunity Area** – the Bexley Growth Strategy sets out how the borough will deliver 31,500 new homes to 2050. In addition, although there are various growth scenarios set out in the OAPF, the London Plan indicates that the Opportunity Area will deliver 8,000 new homes and 17,500 new jobs. This development would contribute significantly towards these targets, show confidence in the housing market in Bexley and catalyse additional development in the area.
- **Creating mixed communities** – following the redevelopment of the estate and the Housing Zone, 54% of all homes will be affordable. Currently, within the existing stock, there is a mix of social rent and lease/freeholders but limited shared ownership homes. The development will improve the mix of the wider Thamesmead Estate, contributing positively to the creation of a more mixed community at South Thamesmead.
- **Permeability** – the development proposes an important new north-south connection through the site to connect north Thamesmead to Abbey Wood. New east-west routes are also created, and the legibility of the estate as a whole will be much improved. Pedestrian routes are also greatly improved to remove reduce reliance on the private car within the area and encourage more sustainable modes of transport. Throughout the proposed Design Code, it is suggested that taller elements should be placed at key entrance points to the site to announce arrival to the site.
- **Jobs** – with the delivery of up to 3,225 sqm of Class E space, this has the potential to deliver between 161 and 268 jobs based upon the HCA Employment Density Guide.
- **Greening and landscape** – the development will provide significant urban greening and biodiversity improvements. The Masterplan Scheme is anticipated to deliver a 52% net gain in biodiversity at the site. The proposed landscape masterplan introduces many new areas for outdoor play, recreation and incidental learning opportunities and the development will deliver a new public square for residents.
- **Community infrastructure funding**: the development is estimated to generate a payment of between £6-9 million, potentially more with indexation.
- **Ground floor activation** – by nature of the date of its construction, the majority of homes on the estate are built above garages, meaning there is very little interest or engagement at the ground floor. The development will enliven these frontages, particularly along key thoroughfares of the development.

8.142 Although the proposed buildings on Site can be considered tall under the definition of Policy D9, the above policy assessment demonstrates that the OPA can comply with the relevant policy tests.

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Townscape, Heritage and Views

Policy Context

Legislation

- 8.143 Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires that when considering whether to grant planning permission for development which affects a listed building or its setting, the decision maker shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.
- 8.144 Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 also provides that, in respect of development affecting conservation areas, special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.

NPPF

- 8.145 When determining applications, paragraph 192 of the NPPF requires Local Planning Authorities to account for:
- The desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
 - The positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
 - The desirability of new development making a positive contribution to local character and distinctiveness.
- 8.146 Paragraph 193 of the NPPF states that 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. The more important the asset, the greater the weight should be. The NPPF confirms that significance can be harmed or lost through development within its setting.

London Plan

- 8.147 Policy HC1 (Heritage conservation and growth) states development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings, should also be actively managed. Development proposals should seek to avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process.
- 8.148 Policy HC3 (Strategic and Local Views) of the sets out policy guidance for the management of such views.

Local Plan

- 8.149 In order to protect the quality of the built environment, through 'saved' policy ENV39 (Strategic Views) the London Borough will seek to ensure that all new developments, including highway improvements, are satisfactorily located and are of a high standard of design and layout. In determining applications for development, the London Borough is to consider the extent to which the proposal (inter alia):
- Is compatible with the character of the surrounding area, would not prejudice the environment of the occupiers of adjacent property, or adversely affect the street scene by reason of its (a) scale, (b) massing, (c) height, (d) layout, (e) elevational treatment, (f) materials and/or (g) intensity of development;

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- Is appropriately landscaped, including the retention of appropriate trees and shrubs and the incorporation of public art where relevant;
- Takes due account of the need to deter crime, both against individuals and against public or private property whilst maintaining an attractive environment

Assessment

- 8.150 The application is accompanied by a Townscape Heritage and Visual Impact Assessment that has been prepared by Landscape Visual. The majority of views are wireline given that appearance will be secured via a future RMA. The TVIA assesses the proposed development in its maximum form i.e. based upon the parameter plans and also assesses it against a proposed alternative being the Coralline outline planning consent.
- 8.151 The TVIA assesses 23 views. In all circumstances, once the development is completed, it will have a beneficial impact on the assessed views.
- 8.152 The assessment concludes that townscape effects of moderate significance would occur on the host Townscape Character Area ('TCA') of Thamesmead Modernist Housing and Parkland where the proposed development would result in wholesale change within the application site. The effect would be beneficial, with the creation of distinct character areas which respond to the immediate context of the development. The proposed development would be a positive addition to the existing and emerging townscape context, with the creation of new north-south and east-west routes across the application site, providing wider connections to adjacent open spaces and Abbey Wood station. There would be a significant improvement to permeability and legibility of pedestrian circulation in particular to and from the adjacent townscape areas.
- 8.153 The proposed development would also result in effects of moderate significance on the Thamesmead Phase 1 development; however, the effect would be beneficial as well as bringing connectivity to the two areas through the creation of the north-south link.
- 8.154 Indirect townscape effects of moderate significance would also occur on the adjacent TCAs of Abbey Wood Mixed-Uses and Abbey Wood Harrow Manorway Regeneration. The scheme would result in a positive addition to views from these TCAs. The effect on townscape character would be beneficial.
- 8.155 To the south of the proposed development, indirect effects of moderate significance would occur within the Lesnes Abbey Open Space and Woodland TCA, which contains the ruins of Lesnes Abbey (listed building and SAM). The maximum parameters of the proposed development would be prominent in views north from the elevated ground of the TCA. The stepped profile of the parameters, gaining height to the north and west would help to reduce the impacts of the parameters on views from the TCA. The effect on townscape would be beneficial.
- 8.156 Overall, the assessment concludes that the proposed development would have significant and beneficial effects on the changing townscape of Abbey Wood and South Thamesmead. The proposed development would bring about significant improvements to aspects of townscape, such as permeability, legibility and green infrastructure. The location of the taller parameters to the north and west, creating new edges to Harrow Manorway and Yarnton Way, responds to the wider regeneration proposals for the neighbourhood, with the scheme parameters stepping down to the east and south to respond to the existing open space at Abbey Way and suburban lower-rise housing.

TRANSPORT AND SERVICING

- 8.157 The Transport Assessment prepared by Stantec and submitted in support of this application sets out further information on the potential highways impacts and proposed mitigation. The key elements of this, as well as the relevant development plan policy are summarised below.

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Policy Context

London Plan

- 8.158 Policy SI7 (Reducing waste and supporting the circular economy) requires that referable applications should promote circular economy outcomes and aim to be net zero-waste. A Circular Economy Statement should be submitted, to demonstrate adequate and easily accessible storage space to support recycling and re-use; how much waste the proposal is expected to generate; and how and where the waste will be handled.
- 8.159 Policy T7 (Deliveries, servicing and construction) encourages development to facilitate sustainable freight deliveries and servicing, including through the provision of adequate space for servicing, storage and deliveries off-street. Delivery and Servicing Plans will be required and should be developed in accordance with Transport for London guidance and in a way which reflects the scale and complexities of developments.

Local Plan

- 8.160 Policy CS16 (Reducing the Need to Travel and the Impact of Travel) states that the London Borough will seek to minimise the need for travel and distances people travel, thereby reducing the time, costs and environmental effects of transportation and improving accessibility and quality of life for residents by ensuring developments are equipped to benefit from new technology, which helps generate more sustainable travel patterns; and promoting travel awareness campaigns, workplace travel plans, area based travel plans and car clubs.
- 8.161 Policy CS20 (Sustainable Waste Management) states that in new development, the Council will ensure that waste is managed in ways that protect human health and the environment. The supporting text continues to state that in new development, the focus will be on accommodating space for waste, including the sorting of waste within scheme design and well-connected communal areas where waste can be collected.

ASSESSMENT

Impact

- 8.162 The Transport Assessment sets out the overall methodology for assessing the likely impacts arising from the proposed development. The trip generation is split into residential and Class E. The methodology and mode share was agreed with LB Bexley in Technical Note 010 and 010A.
- 8.163 The proposed trip generation for the residential development, based upon the maximum scheme parameters is a total of 1,309 movements in the AM peak and 854 movements in the PM peak. It is estimated that 45% of these will be via train, 24% via bus and 18% via driving.
- 8.164 For the commercial development, there is a total of 1,120 trips in the AM peak and 1,167 in the PM peak. These trips are expected to be local and mainly from within the development. All junctions are indicated to operate within capacity once the development is operational, with the exception of two. The Knee Hill / Woolwich Road / Brampton Road / Bostall Hill junction is indicated to be over capacity but mitigated by a change in cycle time. The Harrow Manor Way / Sainsburys Access junction is also indicated to operate over capacity but a mitigation scheme that increases the entry width without affecting kerb lines will also mitigate any impact.
- 8.165 Overall, it is considered that the development includes sufficient mitigation so as to not result in a residual service transport impact. In fact, positive impacts are encouraged by the landscape led approach and promotion of walking and cycling across the Site. As a result, the site also now aligns more closely with the Healthy Streets indicators.

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- 8.166 Therefore, it can be concluded that the proposed site will improve the way people within the area travel and will reduce negative impacts on health and the environment.

Parking Provision

Car parking

- 8.167 A maximum of 780 car parking spaces are proposed for the development (equating to a ratio of 0.40 spaces per unit). The car parking will be provided in a mix of indoor podium car parking spaces and on-street parking spaces. This compares to the 603 spaces provided for 756 units within the current Lesnes and Coralline Estate at a ratio of 0.79 spaces per unit.
- 8.168 There have been many ongoing discussions to date regarding the parking ratio at design charrettes, in pre-application meetings and via the scoping process, with the understanding that 0.4 car parking spaces per unit would be acceptable. In future, should demand for parking decrease as the PTAL improves car parking spaces could be reallocated to landscaping subject to approval from LB Bexley. This is justified due to the high PTAL for the site in future, the existing consent for a 0.4 spaces per unit parking ratio for Coralline Walk and that it aligns with TfL and GLA policies.
- 8.169 The London Plan states that sites with a PTAL of 5 or 6 should be car free. This site has a highest PTAL of 6. With the implementation of the masterplan and the provision of BRT in future, calculations show the site can achieve a majority PTAL of 5 with more of the site scoring at this level, whilst the previous outline consent for the Coralline walk site had a parking ratio of 0.4. All this considered it is believed there is a justification for a parking ratio of 0.4.
- 8.170 This ratio will vary across the site with the final phase, the closest to the station, is proposed to have a parking ratio of 0.34 and Phase 4, the furthest from the station proposed to have a ratio of 0.47 car parking spaces per unit.
- 8.171 Disabled parking will be provided initially for 3% of all units, equating to 56 spaces. Future provision to increase this to 10% can also be delivered and 185 spaces will be allowed for in future, if needed.
- 8.172 20% of all parking spaces will also be provided with active electric charging facilities. These will be located primarily in the podium spaces in the early phases. All remaining 80% of spaces will be provided with a passive provision with the option to convert all spaces in future.

Car Club

- 8.173 Zipcar have been engaged to gauge interest in providing car club spaces within the Proposed Site. Zipcar have indicated that they would be interested in providing the spaces, and specifically stated that up to 5 car club spaces could be provided for a site of this size with three-year membership provided.

Cycle Parking

- 8.174 The proposed cycle parking for the development will be in accordance with the standards as outlined in the London Plan and London Cycle Design Standards (LCDS). It is anticipated that providing policy compliant and good quality cycle parking will help to encourage cycling to and from the development. This is secured in the Design Code.

Healthy Streets

- 8.175 The site proposals are aimed at addressing all the Healthy Streets Indicators and the Mayor's Transport Strategy. The development proposals will look to meet all healthy streets indicators, which are listed below:

- Pedestrians from all walks of life

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- Easy to cross
- Shade and shelter
- Places to stop and rest
- Not too noisy
- People choose to walk, cycle and use public transport
- People feel safe
- Things to see and do
- People feel relaxed
- Clean air.

8.176 These indicators best align with the vision of encouraging active travel as much as possible, improve health and well-being of existing and new residents as part of the landscape design.

Delivery and Servicing

8.177 Most of the vehicle trips associated with the commercial spaces will be delivery and servicing trips. The Transport Assessment indicates that a total of 57 two-way movements will be generated daily.

8.178 Delivery and servicing trips to the site will be for residential units as well as the commercial Class E units. The majority of delivery and servicing trips to the residential units will be from day to day activity such as groceries and Amazon type deliveries, Refuse Vehicles will also add to the number of trips. Refuse stores are located on the ground floor in each building and the refuse vehicle is able to access all bin stores across the site.

8.179 Three illustrative loading bays are proposed within the site for servicing vehicles to service the residential development. These alongside appropriate on street locations will serve delivery of bulky items, removals vans and others. The Illustrative Locations are shown in Figure 4.9 of the Transport Assessment.

8.180 For smaller vehicles with a lower dwell time, empty on street parking spaces and appropriate on street locations around the development can also be used along with the loading bays.

8.181 The Assessment considers that the commercial, business and/or services units are not likely to attract large numbers of vehicle trips.

Waste Management

8.182 The operational waste strategy for the scheme will be to follow a reduce, reuse, recycle hierarchical approach.

8.183 It is expected that waste will be effectively segregated and recycled on site through provision of appropriate bins and recycling storage which shall be collected by the local council/provider on a regular basis from centralised waste refuses stores on a plot by plot level.

8.184 The overall waste strategy will be further detailed at the design stage for the subsequent reserved matters application(s) and will ensure that the waste management arrangements are able to react to any changes in best practice regarding opportunities to recycle and any potential to establish a circular economy for operational waste. This will meet the local policy requirement set within Policy CS20 - Sustainable Waste Management, and DP23 Waste Management in New Developments.

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ENERGY AND SUSTAINABILITY

Minimising Carbon Dioxide Emissions

Policy Context

London Plan

- 8.185 Policy SI2 (Minimising carbon dioxide emissions) states that major development should be net zero-carbon. This means reducing greenhouse gas emissions in operation and minimising both annual and peak energy demand in accordance with the following energy hierarchy:
- 1) be lean: use less energy and manage demand during operation
 - 2) be clean: exploit local energy resources (such as secondary heat) and supply energy efficiently and cleanly
 - 3) be green: maximise opportunities for renewable energy by producing, storing and using renewable energy on-site
 - 4) be seen: monitor, verify and report on energy performance
- 8.186 Policy SI4 (Managing Heat Risk) requires that major development proposals should demonstrate how they will reduce the potential for internal overheating and reliance on air conditioning systems in accordance with the London Plan Cooling Hierarchy.

Local Plan

- 8.187 Policy CS08 (adapting to climate change) of the Bexley Core Strategy states that all development should contribute to the delivery of sustainable development by planning for, adapting to, and mitigating the impacts of climate change by reducing the carbon emissions related to the construction and operation of all development.
- 8.188 Policy CS09 (Using Bexley's Resources Sustainably) seeks to maximise the effective and efficient use of natural and physical resources, whilst contributing to the health and wellbeing of the community and the environment more broadly. The London Borough is to do so by applying the requirements outlined in national and strategic planning policy, in particular the requirements of the London Plan with regard to open space; energy and water supplies and resources; air and water quality; water and sewerage infrastructure and noise reduction. In addition, the London Borough is also to (inter alia) enhance and promote green infrastructure, make best use of existing physical infrastructure, investigate options across the Borough for sustainably managing water supplies and maximising the opportunities to improve the health of the environment.

Assessment

- 8.189 Given that the application is submitted in outline and is due to come forward over the next 10+ years, the policy position and targets may change. However, at this stage the Energy Statement submitted with the application illustrates the initial feasibility study undertaken on each part of the energy hierarchy and how carbon emissions will be minimised over the lifetime of development. The proposed design approach is robust by considering the carbon dioxide emissions targets that are likely to be in place when the RMAs come forward.
- 8.190 Using SAP 10 calculations at the 'Be Lean' stage, the development achieves reductions below the baseline of 21% for the domestic buildings and 17% for the non-domestic buildings. The 'Be Clean' stage is relevant to schemes connecting to a local district heat network. Whilst the heating hierarchy has been followed, the proposed development is not relying on a connection to the local district heat

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network. The proposed approach is to future proof the development to allow connection to a suitable third-party low carbon heat network if one becomes available. Although we consider it to have limited weight at this stage given the early stage of the Local Plan process, the Draft Bexley Local Plan Policy D19 (decentralised energy) notes that there is an opportunity for a heat network to supply the Thamesmead Estate, so this could be considered in the future. The Energy Statement also sets out four potential feasible options for the site at the RMA stage.

- 8.191 Following the 'Be Green' stage, the project will achieve a minimum total cumulative on-site reduction of 35% below the baseline for the domestic buildings and where possible will look to exceed this. Further savings may also be achievable via additional onsite measures that can be investigated at the time of a RMA.
- 8.192 In terms of overheating, the following measures are proposed to reduce the demand for cooling across the site:
- Reducing the amount of heat entering the building in the summer. One option for this is external shading on the critical facades. High performance solar control glazing could also be selected for each building type.
 - Minimising internal heat gains through efficient design. An option for the RMA is to consider ultra-low temperature ambient loop networks for the residential buildings and very low temperature distribution networks for commercial buildings to reduce heating system heat gains to internal spaces.
 - Manage the heat within the building through consideration of exposed thermal mass and night-time purge ventilation or connection points for ceiling fans.
- 8.193 Each RMA will be assessed against the relevant policies and legislature at the relevant time.

SUSTAINABLE DESIGN AND CONSTRUCTION

Policy Context

London Plan

- 8.194 Policy SI7 (Circular Economy) requires that referable applications should promote circular economy outcomes and aim to be net zero-waste. A Circular Economy Statement should be submitted, to demonstrate:
- how all materials arising from demolition and remediation works will be re-used and/or recycled;
 - how the proposal's design and construction will enable building materials, components and products to be disassembled and re-used at the end of their useful life;
 - opportunities for managing as much waste as possible on site;
 - adequate and easily accessible storage space to support recycling and re-use;
 - how much waste the proposal is expected to generate, and how and where the waste will be handled.

Local Plan

- 8.195 Policy CS08 (adapting to climate change) states all development should contribute to the delivery of sustainable development by planning for, adapting to, and mitigating the impacts of climate change, by reducing the carbon emissions related to the construction and operation of all development.

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- 8.196 Policy CS09 (Using Bexley's resources sustainably) encourages development that seeks to maximise the effective and efficient use of natural and physical resources, while contributing to the health and well-being of the community and the environment.
- 8.197 Policy CS20 (Sustainable waste management) requires development to support the council's objectives of sustainable waste management and its contribution to sustainable communities.

Assessment

- 8.198 A Sustainability Statement is submitted alongside the application to demonstrate compliance with relevant sustainability considerations and proposed routes for their implementation. The Statement intends to set out principles that will be reviewed at the submission stage for each RMA.
- 8.199 The Sustainability Statement sets out nine key sustainability principles that are intended to be delivered through a range of sustainability strategies, which are embedded in the future detailed scheme through the Design Code. The Sustainability Statement considers each of the requirements of London Plan Policy 5.3, as well as the various requirements of Bexley's Local Plan in relation to climate change, using resources appropriately, green infrastructure, waste management and biodiversity.
- In terms of the Circular Economy, Appendix 2 of the Sustainability Statement sets out a Circular Economy Statement for the proposals. This sets out a number of circular economy aspirations and goals that will be considered as part of the RMA. These include:
 - Maximising the residual value on the existing site and existing materials through minimising resource consumption and reusing/recycling materials wherever possible.
 - Maximising lifetime value of the new buildings, infrastructure and public realm. This includes employing, where practicable, offsite fabrication to reduce waste and lean design carried out to reduce the quantum of material used.
 - Designing in adaptable and flexible systems in terms of services and interior layouts.
 - Managing waste that arises from demolition and excavation, construction and operation.
- 8.200 The Circular Economy Statement sets out considerations that must be reviewed as part of the future RMAs, thereby ensuring that the principles of the circular economy as set out in Policy SI7 will be met as far as possible at RMA stage.

OTHER ENVIRONMENTAL CONSIDERATIONS

- 8.201 The application is accompanied by an Environmental Statement, submitted in accordance with the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (EIA Regulations 2017). A request for a scoping opinion was submitted on 23 March 2020.
- 8.202 Under the EIA Regulations 2017, the proposed development is not Schedule 1 development, for which EIA would be mandatory. However, it is of a type listed within the descriptions of development contained within Schedule 2, falling under category 10(b) urban development projects (including the construction of shopping centres and car parks, sports stadiums, leisure centres and multiplex cinemas). A development is considered to be Schedule 2 development if any part of it lies within a 'sensitive area' or if it meets or exceeds the relevant thresholds and criteria for that category of development. The thresholds and criteria for category 10(b) projects are i) 1 hectare (ha) for non-dwelling house development, ii) development which includes more than 150 dwellings and iii) where the total application site is greater than 5ha.
- 8.203 The proposed development does not lie within a sensitive area, as defined in the EIA Regulations; however, on the basis that the proposals exceed criteria ii) and iii), the proposed development is

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considered to be Schedule 2 development and therefore would fall within the scope of the EIA Regulations.

- 8.204 In the interest of undertaking a robust and transparent assessment of the likely significant environmental effects of the proposed development, it was proposed that an Environmental Statement (ES) be voluntarily submitted to LB Bexley, in conjunction with the outline planning application. The content of the ES is set out in the Introduction chapter to this statement.

Biodiversity, Ecology and Urban Greening

Policy Context

London Plan

- 8.205 London Plan Policy G5 (Urban greening) states that major development proposals should contribute to the greening of London by including urban greening as a fundamental element of site and building design. It adds that Boroughs should develop an Urban Greening Factor (UGF) to identify the appropriate amount of urban greening required in new developments, and in the interim, the Mayor recommends a target score of 0.4 for developments that are predominantly residential.

Local Plan

- 8.206 Policy CS17 (Green Infrastructure) relates to green infrastructure, which includes open spaces, and states that they will be protected, enhanced and promoted as a valuable resource.
- 8.207 Policy CS18 (Biodiversity and Geology), aims to protect and enhance its biodiversity and geological assets, whilst complying with national and regional policy and guidance.

Assessment

- 8.208 The DAS contains details of how the Illustrative Masterplan seeks to achieve an Urban Greening Factor of 0.4 through the installation of a range of different landscaping interventions, including the planting of over 13,000 new trees, 15,150 sqm of semi-natural vegetation and 9,250 sqm of amenity grassland amongst other features to deliver a total of 35,934sqm features to contribute towards the UGF score. Any future RMA will seek to achieve 0.4 by following the guidance set in the DAS and Design Code.
- 8.209 In terms of biodiversity net gain, the Design Code sets out detailed guidance to ensure a high-quality species rich landscape is delivered across the Site. The Illustrative Masterplan is capable of providing a 95% net gain in biodiversity, which is in compliance with relevant planning policies.

Drainage and Flood Risk

Policy Context

London Plan

- 8.210 Policy SI13 (Sustainable Drainage) requires development to utilise sustainable urban drainage systems (SUDS) unless there are practical reasons for not doing so. Proposals should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible in line with the drainage hierarchy. In addition to the above drainage requirements, Policy SI15 (Water Infrastructure) encourages new development to incorporate processes for recycling on-site water and limiting water usage.

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Local Plan

- 8.211 Policy CS17 (Green infrastructure) requires green infrastructure, including open spaces and waterways to be protected, enhanced and promoted as valuable resources.
- 8.212 Policy CS18 (Biodiversity and geology) sets out that development shall protect and enhance Bexley's biodiversity and geological assets, whilst complying with national and regional policy and guidance.

Assessment

- 8.213 The site is located within Flood Zone 3, which indicates that the site is within a high probability for flooding, although it does benefit from flood defences. In terms of surface water flooding, the majority of the site is predicted to be at a very low risk, although there are isolated areas of low, medium and high risk of surface water flooding are present along Wolvercote Road and Lensbury Way, although these are primarily confined to the roadways.
- 8.214 Due to the location within Flood Zone 3, PPG requires that the Sequential and Exception Tests are considered. With regard to the Sequential Test, Thamesmead and Abbey Wood is identified as an Opportunity Area (OA) within the London Plan (2016). Thamesmead and Abbey Wood is also identified as a sustainable growth area within LB Bexley's Core Strategy (2012) and Local Plan Consultation Document (2019), and the site is identified as a 'potential site of change' in the Thamesmead and Abbey Wood Opportunity Area Planning Framework (2019). In accordance with Paragraph 162 of the NPPF, as the Lesnes Estate site is located within an area allocated in development plans through the Sequential Test, it is not necessary to apply the Sequential Test again.
- 8.215 To pass the Exception Test, it should be demonstrated that the development would provide wider sustainability benefits to the community that outweigh flood risk and that the development will be safe for its lifetime without increasing the vulnerability to flood risk elsewhere.
- 8.216 The FRA considers that the proposed development provides significant sustainability benefits which outweigh the flood risk. It also sets out mitigation measures to ensure that the Exception Test is demonstrated. These include:
- Use of existing strategic flood defences.
 - Building design, including placing less vulnerable uses, such as commercial uses, on the ground floor and in the case of residential dwellings, placing living rooms and kitchens on the ground floor.
 - The finished ground floor levels should be set at a minimum of 1.15m AOD. Finished floor levels of the first floor of the development should be set a minimum of 2.80m AOD to mitigate against the risk of flooding in the event of a future.
- 8.217 In terms of surface water drainage, the FRA presents a strategy to intercept surface water runoff close to the source using a range of drainage features. These will then convey surface water in open SuDS features, where spatially permitted, or via new and existing below ground drainage. SuDS features will be required across the development and will be holistically incorporated into the overall design to achieve the necessary water quality, amenity and biodiversity improvements. Proposed SuDs for inclusion in future RMAs include green roofs, rain gardens, tree pits, swales and permeable paving.
- 8.218 In conclusion, the future users of the proposed development will be safe from flooding and there will be no detrimental impact on third parties. The proposal complies with the NPPF and local planning policy with respect to flood risk and is an appropriate development at this location.

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Wind

Policy Context

London Plan

- 8.219 Policy D8 sets out that the public realm should be designed to take account of environmental conditions and microclimate, including wind impacts. Policy D9 in relation to tall buildings also requires wind impacts to be considered, which is covered earlier within this Section.

Assessment

- 8.220 A Desktop Wind Study has been prepared as part of the Environmental Statement. This document tests a range of scenarios, including the maximum parameter massing as a worst-case scenario, alongside the Illustrative Masterplan as a more realistic expectation of the massing that could come forward on the Site.
- 8.221 The maximum development scenario would generate a range of wind conditions, ranging from suitable for sitting to uncomfortable for use during any season. Mitigation measures would therefore be required to ensure comfortable and safe wind conditions for pedestrians and residents of the proposed development. Appropriate mitigation measures will need to be tested at RMA stage.
- 8.222 The Illustrative Masterplan would also require mitigation measures; however, with mitigation, there would be no areas that would be unsafe for use due to wind. The full detail of mitigation measures that would be required for the Illustrative Scheme is provided within the Environmental Statement.

Air Quality

Policy Context

London Plan

- 8.223 Policy S11 (Improving air quality) states that development proposals should not lead to further deterioration of existing poor air quality; create any new areas that exceed air quality limits; reduce air quality benefits that result from the Mayor's or boroughs' activities to improve air quality; or create unacceptable risk of high levels of exposure to poor air quality.

Local Plan

- 8.224 Saved' Policy ENV41 'Air Quality' states that the London Borough will have regard to national and local Air Quality Strategies in seeking to ensure that proposals for development do not compromise air quality objectives. The London Borough is to require an applicant to prepare an Air Quality Assessment where a development has the potential to impact air quality in the surrounding area.

Assessment

- 8.225 An Air Quality Assessment has been submitted with the OPA. Based upon the traffic movements anticipated by the scheme, based upon movements within the Transport Assessment, the development is considered to be air quality neutral. A full Air Quality Assessment would be submitted with each RMA to demonstrate compliance with the relevant policies.

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Contamination

Policy Context

London Plan

- 8.226 Policy SD1 (opportunity areas) requires that appropriate measures be taken to deal with contamination that may exist so that land can be safely used.

Local Plan

- 8.227 Saved policy ENV40 (Contaminated Land) states that the London Borough will require applicants to survey sites that are known or suspected to be contaminated to determine the source of any pollutants and any remedial measures necessary to prevent these causing hazards either during construction or through subsequent use of the site.

Assessment

- 8.228 A Phase 1 Environmental Assessment has been submitted with the application to assess the potential for soil and/or groundwater contamination, both at and in the vicinity of the site, and to assess its significance in terms of risks to human health in the context of the proposed redevelopment of the site. This was a desk-based study and no sampling or analysis of soils, waters or other material was carried out.
- 8.229 The report concludes that the overall contamination risk is low to medium for residential use, prior to any mitigation measures. The potential for ground contamination cannot be completely discounted; however, the likelihood of significant site-wide impact being present is limited and no issues have been identified within this assessment that should preclude the proposed residential use of the site.
- 8.230 To ensure that any contamination is appropriately addresses, a Phase II ground investigation should be completed to confirm ground conditions and the ground gas regime at the site. Subject to those findings, the report sets out a number of proposed mitigation works to reduce unidentified risks to an acceptable level and render the site suitable for its intended use to ensure the proposed RMA will be in compliance with the above policy framework.

AMENITY

Daylight/ Sunlight, Overshadowing and Solar Glare

Policy Context

London Plan

- 8.231 Policy D9 (Tall buildings) states that the impact of buildings should be carefully considered in relation to environment, visuals and function and should not cause unacceptable harm.

Local Plan

- 8.232 There is no specific policy relating to daylight and sunlight within the Core Strategy or Saved UDP Policies; although saved policy ENV39 (Strategic Views) requires that the proposed development must not prejudice the environment of the occupiers of adjacent property.

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Building Research Establishment (BRE) Guidelines

- 8.233 The BRE handbook acknowledges that for an urban context, its numerical guidelines should be interpreted flexibly since natural light is only one of many factors in site layout design and amenity provision. Its targets therefore should not be applied mechanistically by LPAs in determining planning applications.

Assessment

- 8.234 A Daylight, Sunlight and Overshadowing Assessment has been undertaken as part of the OPA to establish the effects of the development upon surrounding the daylight and sunlight received by surrounding occupiers and any impact from overshadowing. An internal assessment has also been taken on the illustrative scheme to demonstrate that a future scheme on the Site could achieve an acceptable level of daylight and sunlight. A full and updated assessment would be provided at the RMA stage once the detailed design is known. However, the Design Code includes a number of features to ensure that any future scheme has an acceptable impact on surrounding occupiers and also on the internal environment of the future development. Such measures include:
- Orientation, mass and form must allow for regularly occupied spaces to have natural daylight.
 - The massing design should prioritise daylight/sunlight access to amenity spaces from a south and south west position to maximise sunlight.
 - North-facing single aspect units should be minimised.
 - Tall elements of more than six storeys should not impact daylight/sunlight within development blocks.
 - The relationship between building heights, their distance and floor to ceiling height must be tested at RMA stage to ensure adequate daylight.
 - Projecting balconies could be staggered on the façade so that they are above bedroom windows to facilitate access to daylight for living spaces and kitchens.
- 8.235 The daylight and sunlight assessment highlights that the existing surrounding occupiers have high levels of daylight due to the underdeveloped nature of the current Site, particularly given that the majority of buildings on Coralline Walk have been demolished. This causes daylight levels to be higher than would be expected for an urban environment. There are also a small number of surrounding properties which have windows that are constrained by overhanging balconies/awnings that reduce the level of daylight they receive.
- 8.236 The assessment has been undertaken for the purposes of the Environmental Statement on the worst-case scenario which assess the maximum development parameters. The Design Code contains measures to prevent the development coming forward within its maximum parameters, so it is more appropriate to assess the illustrative masterplan, given that this is a realistic expectation of the impacts of the development.
- 8.237 In terms of the impact on surrounding occupiers, the assessment of the illustrative masterplan assess the impacts on the Horizon School, Willow Bank School, existing properties along St Martin's Close, Maran Way and Overton Road, the Thistlebrook Travellers site and the future development at Southmere Village. The assessment of the illustrative masterplan indicates that, with regards to daylight, all properties on Maran Way, Lensbury Way (with the exception of no. 150), 17-119 Overton Road, 22-50 Overton Road and Block D1 and D2 of Southmere Village all meet either the relevant VSC or NSL tests for daylight. On the remaining properties, where exceedances to the BRE guidance exist, they are isolated or impacted by existing conditions described above. Therefore, the impact is considered acceptable given its context.

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- 8.238 For sunlight impacts, all surrounding properties with the exception of the Horizon's Academy and Blewbury House are fully BRE compliant. Horizon's Academy sees 50% of windows meeting the BRE requirements, with the remaining three windows experiencing a 40% reduction in APSH. However, these windows are overhung by awning/eaves and so are disproportionately impacted. Blewbury House achieves 96% compliance with BRE guidelines which is considered acceptable given the existing low levels received by remaining windows due to an existing, constrained outlook.
- 8.239 With regards to overshadowing of local amenity spaces, the illustrative scheme is fully BRE compliant.
- 8.240 In terms of the internal assessment of the level of daylight and sunlight that the future occupiers of the development can expect to receive a good level of daylight and sunlight availability. As inevitable for urban regeneration schemes, there are constrained areas where daylight potential will be lower; however, these areas typically in constrained locations such as lower levels or at inward facing corners of courtyards. The scheme will be subject to further design iterations and this process will consider designing the detailed scheme sensitively in order to achieve a good rate of compliance. However, the report concludes that the proposed development will provide good daylight and sunlight conditions within the proposed development.

Privacy and outlook

Policy Context

London Plan

- 8.241 Policy D3 (Optimising site capacity) requires that the form and layout of a proposed development must deliver appropriate outlook, privacy and amenity.

Material Considerations

- 8.242 Standard 28 of the Housing SPG sets out that design proposed should demonstrate how habitable rooms within each dwelling are protected with an adequate level of privacy in relation to the neighbouring property, the street and other public spaces. There is no specific policy regarding the distance that should be maintained between dwellings.
- 8.243 Standard 29 of the Housing SPG requires developments to minimise the number of single aspect dwellings. Single aspect dwellings that are north facing or which contain three or more bedrooms should be avoided.

Local Plan

- 8.244 Saved policy H7 (Residential Development – Privacy and Outlook) states that residential development should provide a reasonable degree of privacy and outlook for space within and outside dwellings.

Assessment

- 8.245 The parameter plans ensure that there is a minimum distance that can be retained between the development blocks proposed and the surrounding context. Between the majority of the blocks, an 18m distance is maintained, but there is one instance where the minimum distance is 14m. This is between development zone L and I/J/K where the proposed maximum height is six storeys and the 14m is between habitable rooms, rather than between balconies or between balconies and habitable rooms, in accordance with the Housing SPG. To ensure that adequate privacy is maintained between habitable rooms, the design code sets out a number of requirements including that the distance between any projecting balconies should not be less than 14m and that the projecting balconies be staggered to

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protect privacy. It also states that balconies should not be projecting on the facing elevations of development zones L and I/J/K.

- 8.246 The Housing SPG states that 'in the past, planning guidance for privacy has been concerned with achieving visual separation between dwellings by setting a minimum distance of 18-21m between facing homes. These can still be useful yardsticks for visual privacy but adhering rigidly to these measures can limit the variety of urban spaces and housing types in the city and can sometimes unnecessarily restrict density.'
- 8.247 In establishing the layout for the site, the appropriate widths for streets was a significant consideration and driven by daylight/sunlight impacts and overlooking studies. 14m is considered to provide a comfortable distance between development zones and to not unduly restrict density of development. The DAS provides examples of where this has worked successfully in other locations. Further, it is more than likely through guidance provided in the design code that development zone L will be bought forward as a housing typology in order to provide a range of unit sizes on the site. In that case, the development zone boundary can move up to 10m from the boundary of I/J/K, so 14m is a worst-case scenario.
- 8.248 To provide privacy the residential units and a transition between the public pathways and the private residential entrances, the Parameter Plans and Design Code allow for a planted privacy zone at the ground floor of proposed development blocks. These privacy zones are intended to vary between the different areas of the development and can vary from 1 – 3m as set out on Parameter Plan 03.
- 8.249 Due to these proposed measures, the proposals are considered to comply with the relevant policy requirements.

Noise

Policy Context

London Plan

- 8.250 Policy D14 (Noise) states that to reduce, manage and mitigate noise to improve health and quality of life, residential and other non-aviation development proposals should manage noise by a number of measures including avoiding significant adverse noise impacts on health and quality of life; reflecting the Agent of Change principle; and mitigating and minimising the existing and potential adverse impacts of noise as a result of new development.

Local Plan

- 8.251 Saved policy H3 (Character of local residential area) requires residential development to be compatible with the character of the area within which it is located. Residential development will not normally be permitted in locations which are, or are expected to be become, subject to excessive noise.

Assessment

- 8.252 An operational noise assessment has been provided by Accon UK in support of the application. This assesses operational noise impacts on surrounding occupiers, as well as the potential noise impacts for future tenants of the proposed development.

Surrounding occupiers

- 8.253 In terms of operational noise from fixed plant, the assessment requires that These items of plant should be appropriately selected for the required purpose, located away from noise sensitive receptors, as far as reasonably practicable, and ensure that any enclosures or attenuators are suitably designed to ensure that the cumulative plant sound of all proposed units results in a low impact at the nearest on-site and

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off-site noise sensitive receptors. This will need to be assessed under a future RMA in relation to the noise limits set out in Table 5.1 of the report.

- 8.254 Noise generated by the use of the flexible use areas will need to be mitigated by consideration of the sound insulation properties of walls and floors to ensure that the internal noise levels in habitable rooms attached to the proposed flexible use areas does not exceed acceptable levels.

Future tenants

- 8.255 The target for external amenity areas (i.e. balconies and communal open spaces) is a noise level below 55 dB LAeq,16hr. For internal noise levels, within habitable rooms, these should achieve a noise level below 35 dB LAeq,16hr during the daytime and 30 dB LAeq,8hr during the night-time. During the night-time, maximum noise levels should not normally exceed a level of 45 dB LAFmax more than ten times per night.
- 8.256 Externally, the assessment notes that the site is generally at medium risk of adverse noise effects during the daytime and night-time, with the areas of greatest adverse noise effect being those closest to Yarnton Way and Harrow Manorway. To mitigate this, good acoustic design is limited to building envelope design, such as glazing, where standard double glazing is not sufficient. The noise assessment sets out the specification that would be required.
- 8.257 In terms of external public areas, the target noise level for external amenity areas is met in the proposed new Coralline Square and the existing Abbey Way amenity area, with traffic noise negligible. However, the target noise levels are predicted to be exceeded in the Arrival Square to the south west of the site. This area is not considered to require noise mitigation given that the character of the space will be transitory.
- 8.258 The private balconies will require mitigation given that the target noise level is exceeded at facades around the edge of the site. If balconies are provided in this area they will require noise mitigation to meet the guidance within BS 8233. Noise mitigation measures will be finalised at a later stage of the design process. The report concludes that there should be no objection to granting outline planning permission for the proposed residential development on noise grounds.

Construction

Policy Context

London Plan

- 8.259 Policy T7 (Deliveries, servicing and construction) encourages development to facilitate sustainable freight deliveries and servicing.

Assessment

- 8.260 A Draft Construction Logistics Plan has been provided as part of the Transport Assessment. The aim of this document is to minimise the impacts of construction related vehicle movements and facilitate sustainable construction travel to and from the proposed development. Further objectives include ensuring that the construction materials can be delivered in a safe, efficient and environmentally friendly way to ensure compliance with Policy T7.
- 8.261 A demolition and construction noise and vibration assessment has also been undertaken as part of the Environmental Statement. This concludes that there should not be any significant noise impacts as a result of HGVs arriving and departing from the Site. However, general noise mitigation measures should be followed to ensure that any potential for an adverse noise impact is kept to a minimum.

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8.262 Overall, this demonstrates that the construction impacts of the Site can be appropriately mitigated to apply with relevant policies to protect surrounding amenity.

9 Section 106/Community Infrastructure Levy

- 9.1 Section 106 of the Town and Country Planning Act 1990 (as amended) allows the entering into of an obligation, by agreement or otherwise, between the local planning authority and any person interested in the land for the purposes of:
- (a) restricting the development or use of the land in any specified way;
 - (b) requiring specified operations or activities to be carried out in, on, under or over the land;
 - (c) requiring the land to be used in any specified way; or
 - (d) requiring a sum or sums to be paid to the local planning authority (or, in a case where section 2E of the 1990 Act applies, to the Greater London Authority) on a specified date or dates or periodically.
- 9.2 Regulation 122 of the Community Infrastructure Levy Regulations 2010 (as amended) states that planning obligations may only constitute a reason for granting planning permission for the development if the obligation is:
- (a) necessary to make the development acceptable in planning terms;
 - (b) directly related to the development; and
 - (c) fairly and reasonably related in scale and kind to the development.
- 9.3 Paragraph 54 of the NPPF states that 'Local planning authorities should consider whether otherwise unacceptable development could be made acceptable through the use of conditions or planning obligations'. Paragraph 56 reinforces the requirement that planning obligations meet the tests set out in regulation 122 of the CIL Regulations.
- 9.4 It is envisaged that the following Heads of Terms will be required as part of the s106 agreement, each of which are considered to meet the terms in regulation 122 of the CIL regulations.
- 9.5 A number of obligations upon the applicant will be secured through the imposition of planning conditions. The following is not intended as being a comprehensive list of Peabody's commitments in connection with this proposed development but merely the ones that a legal agreement is applicable to:
- Affordable housing;
 - Carbon offset payment;
 - Travel Plan;
 - Highways improvements;
 - Car club;
 - Employment and Training;
 - Biodiversity enhancements;
 - Legal costs, administration and monitoring.

COMMUNITY INFRASTRUCTURE LEVY (CIL)

- 9.6 Under the terms of the Planning Act 2008 (as amended) and Community Infrastructure Regulations 2010 (as amended), the Mayor of London's Community Infrastructure Levy (MCIL2) and Bexley Community Infrastructure Levy will be chargeable on this application commencement. This will be calculated in accordance with the Mayor's and Bexley's adopted Community Infrastructure Levy Charging Schedules at the point of determination of this application and will be charged upon commencement of the development.

9 Section 106/Community Infrastructure Levy

London Borough of Bexley CIL

- 9.7 The London Borough of Bexley CIL Charging Schedule was adopted in 2015 and is applied to certain uses over 100 sqm gross internal floorspace.
- 9.8 The schedule includes a £40 sqm CIL rate for residential uses (Use Class C3) (plus any indexation). The CIL Regulations 2010 (as amended) provide relief from the levy on those parts of a chargeable development which are intended to be used as affordable housing (as defined by CIL Regulation 49). Where any of the proposed development is provided as affordable housing, it is anticipated that this floorspace will be exempt from CIL charge.
- 9.9 The commercial uses that could be provided on the ground floor are liable for a payment of £10 per sqm, unless these are proposed as medical uses.

Mayoral CIL

- 9.10 The Mayoral CIL2 Charging Schedule came into effect on 01 April 2019. The CIL charge for Bexley is £25 per sqm additional floorspace over 100 sqm gross internal area. Social housing benefits from relief from MCIL.

10 Conclusion

- 10.1 This Planning Statement has assessed the proposed development against the Development Plan and other relevant planning policy and guidance at national, regional and local policy level. The scheme provides a high quality and sustainable development that is in line with planning policies at national, regional and local levels.
- 10.2 This outline planning application is submitted on behalf of Peabody and seeks permission for the redevelopment of the existing estate for residential development to improve the quality of the residential environment for existing and future tenants.
- 10.3 The Site's location within the TAWOA indicates that it is positioned in an area identified for housing growth and intensification within the Development Plan. This is further supported by the Site's brownfield status and the material considerations referenced above which indicate that the Site has specifically been identified as being appropriate for new development and change at the local and regional level.
- 10.4 The specific type and form of regeneration proposed at the Site has been developed over a number of years, through engagement with residents and local stakeholders. In the resident ballot to consider whether residents were in favour of Lesnes Estate being included within Peabody's regeneration plans, 68.4% of residents participated and 70.2% voted in favour of the proposals.
- 10.5 It is envisaged that residents currently living in the north-west of the Wolvercote Road part of the Site will be offered new homes in Southmere Village (Phase 1); residents in the north-east will be offered new homes in Binsey Walk (Phase 2); and residents in the south will be offered new homes within the Coralline Walk part of the Application Site (Phase 3). There are currently 61 social rented households living within the Site who would be rehoused in Phase 3.
- 10.6 This means that, with the exception of the first sub-phase of Coralline Walk, the application site will generally provide housing for households that do not live on the site currently. This is positive as it means that almost all of the affordable housing delivered at the Lesnes Estate site will be additional – meaning it will allow Thamesmead to support more households, including those current on LB Bexley's housing list. Based upon the indicative housing mix, this will result in an additional 586 units of affordable housing, split between London affordable rent and shared ownership. The different mix of tenures provided will help to deliver mixed communities in Thamesmead.
- 10.7 Alongside the benefit of estate regeneration, the development also delivers the following public benefits:
- Delivery of up to 1,950 residential units over the development period
 - Increasing permeability through the site and improving connections through the estate. Part of this is creating an important new north-south connection through the site to connect north Thamesmead to Abbey Wood. Pedestrian routes are also greatly improved to remove reduce reliance on the private car within the area and encourage more sustainable modes of transport.
 - Jobs – with the delivery of up to 3,225 sqm of Class E space, this has the potential to deliver between 161 and 268 jobs based upon the HCA Employment Density Guide.
 - Greening and landscape – the development will provide significant urban greening and biodiversity improvements. The Indicative Scheme is anticipated to deliver a 52% net gain in biodiversity at the site. The proposed landscape masterplan introduces many new areas for outdoor play, recreation and incidental learning opportunities and the development will deliver a new public square for residents.
 - Community infrastructure funding: the development is estimated to generate a payment of between £6-9 million, potentially more with indexation.
 - Ground floor activation – by nature of the date of its construction, the majority of homes on the estate are built above garages, meaning there is very little interest or engagement at the ground floor. The development will enliven these frontages, particularly along key thoroughfares of the development.

10 Conclusion

- 10.8 For Peabody, the redevelopment of the Site is much more than a growth objective; it reflects the opportunity to provide new, high quality residential development and complimentary uses that will make the estate, and the wider Thamesmead estate, an attractive place to live, work and visit. Engagement with the existing community to understand needs is a key objective for Peabody. Peabody feels that they are submitting a scheme that accords with relevant Development Plan documents (insofar as they are consistent with the NPPF) and other material considerations, and which fundamentally seeks to reflect the needs of existing residents on the estate.