

GREATER **LONDON** AUTHORITY
Development, Enterprise and Environment

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Our ref: D&P/3253/JF01
Date: 4 November 2013

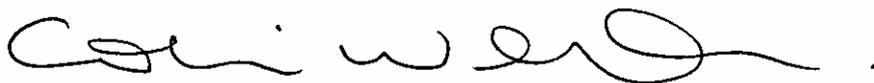
Dear Jonathan,

**Town & Country Planning Act 1990 (as amended); Greater London Authority Act 1999 & 2007; Town & Country Planning (Mayor of London) Order 2008
Former Territorial Army Centre, Parkhurst Road, Islington
LB: Islington
Our reference: D&P/3253**

Further to the pre-planning application meeting held on 18 October 2013, I enclose a copy of the GLA's assessment which sets out our advice and matters which will need to be fully addressed before the application is submitted to the local planning authority.

The advice given by officers does not constitute a formal response or decision by the Mayor with regard to future planning applications. Any views or opinions expressed are without prejudice to the Mayor's formal consideration of the application.

Yours sincerely,



Colin Wilson
Senior Manager – Development & Projects

cc Alex Williams, TfL

D&P/3253/01

4 November 2013

Former Territorial Army Centre, Parkhurst Road, Islington

in the Borough of Islington

The proposal

Demolition of the existing buildings and redevelopment to provide approximately 161 residential units in buildings rising to ground floor plus six storeys.

The applicant

The applicant is **Parkhurst Road Ltd**, and the architect is **AHMM Architects**.

Context

1 On 19 September 2013 a request was received for a pre-planning application meeting with the Greater London Authority on a proposal to develop the above site for the above uses. On 18 October 2013 a pre-planning application meeting was held at City Hall with the following attendees:

GLA group

- Jonathan Finch – Strategic Planner (case officer), GLA
- Euan Mills – Senior Strategic Planner / Urban Designer, GLA
- Lyndon Fothergill – Principal Strategic Planner, GLA
- Pak-Lim Wong, TfL

Local Planning Authority

- Victor Grayson, London Borough of Islington

Applicant

- Andrew Pollard, Parkhurst Road Limited (Applicant)
- Kate Ives, Parkhurst Road Limited (Applicant)
- Sean Cook, Parkhurst Road Limited (Applicant)
- Robert Romanis, AHMM (Architect)
- Russell Vaughan, Transport Planning Practice (Transport)
- Mark Brian, Wallace Whittle (Sustainability)
- Jonathan Murch (Savills)

2 The advice given by officers does not constitute a formal response or decision by the Mayor with regard to future planning applications. Any views or opinions expressed are without prejudice to the Mayor's formal consideration of the application. Please note that the quality of the advice you receive will be dependent upon the documentation that you let us have in advance of the meeting.

Site description

3 The irregular shape site measures approximately 0.58 hectares in size and is located to the south west of Holloway Road at 65-69 Parkhurst Road, in the London Borough of Islington. The site forms part of a larger impermeable urban block bound to the north by Tufnell Park Road, to the east by Holloway Road, to the west by Chambers Road/Crayford Road/Carleton Road and to the south by Parkhurst Road. Holloway Road Underground Station is approximately 800 metres to the south east and the site records an excellent public transport accessibility level of six (on a scale of one to six, where six is excellent).

4 It is currently occupied by a number of utilitarian buildings ranging from one to three storeys in height plus large areas of hardstanding associated with its former use by the Ministry of Defence, as a Territorial Army (TA) training centre, with the main three storey TA building fronting Parkhurst Road. The only pedestrian and vehicle access is from Parkhurst Road, however, due to the nature of its previous use, the site is currently secure with no public or community access. A small portion in the south east corner of the existing TA site will be retained for the construction of a new Cadet Centre, however, this falls outside of the site boundary in discussion.

5 The surrounding area is predominantly residential with the building stock characterised by varying ages and architectural styles, ranging from the four storey post-war local authority housing estate McCall House immediately to the north of the site, a five storey inter-war local authority housing estate building to the west, Victorian housing and the post-war local authority housing of three to four storeys at Holbrooke Court to the east, and 1980-90's private housing to the area to the south. The properties at 35 to 63 Parkhurst Road fall within the Hillmarton Conservation Area which is characterised by three to four storey semi-detached villas developed in the 1850-60's. Except from these properties, the majority of the conservation area is located further south around the junction of Camden Road and Hillmarton Road.

Details of the proposal

6 The proposal is for the demolition of the existing buildings on the site and redevelopment to provide approximately 161 residential units in buildings rising from ground plus six storeys.

Strategic planning issues and relevant policies and guidance

7 The relevant issues and corresponding policies are as follows:

- Principle of development *London Plan*
- Housing *London Plan; Housing SPG; draft Revised Housing Strategy; Shaping Neighbourhoods: Children And Young People's Play And Informal Recreation SPG*
- Urban design *London Plan; Shaping Neighbourhoods: Character and Context, draft SPG; Housing SPG; London Housing Design Guide; Shaping Neighbourhoods: Play and Informal Recreation SPG*

- Inclusive Design *London Plan; Accessible London: achieving an inclusive environment SPG; Planning and Access for Disabled People: a good practice guide (ODPM)*
- Sustainable development *London Plan; Sustainable Design and Construction SPG; Mayor's Climate Change Adaptation Strategy; Mayor's Climate Change Mitigation and Energy Strategy; Mayor's Water Strategy*
- Transport *London Plan; the Mayor's Transport Strategy; Land for Industry and Transport SPG*

8 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is the 2011 Islington Core Strategy; 2011 Islington Proposals Map; 2013 Islington Development Management Policies Plan; 2013 Islington Site Allocations Plan; and, the 2011 London Plan and 2013 Revised Early Minor Alteration to the London Plan.

9 The following are also relevant material considerations:

- The National Planning Policy Framework and Technical Guide to the National Planning Policy Framework.

Principle of development

10 The proposals are for a residential development on a currently underutilised site located in a predominantly residential area. The proposed redevelopment will provide 161 residential units and will contribute towards meeting London's strategic housing need in accordance with London Plan policies on increasing London's housing supply. The Council's aspirations for the site are established in the allocation for Site NH5 in its adopted Site Allocations DPD 2013, which identifies the site as a suitable location for the potential intensification of residential accommodation to help meet the borough's housing need and the possible continued Ministry of Defence use on part of the site.

11 Therefore, the principle of the residential redevelopment at this location, is in general accordance with local and strategic planning policy and is supported.

Housing

Affordable housing

12 As part of the pre-planning application submission to the GLA, the applicant has indicated that 25% of the total housing provision (33 of 161 units) would be affordable. In accordance with London Plan Policy 3.12, the applicant will be required to demonstrate that any future planning application delivers the maximum reasonable amount of affordable housing. As part of this, the supporting viability report is expected to be independently assessed on behalf of the Council, with the results to be shared in full with GLA officers.

Tenure

13 The 2013 Revised Early Minor Alterations to the London Plan, clearly establish affordable rent within the definition of affordable housing set out in Policy 3.10, and make clear that for the purposes of affordable housing targets, and specifically the 60:40 affordable housing split, affordable rent is categorised as helping to meet the 60% social housing component. Given that, as noted in the Mayor's Housing Supplementary Planning Guidance, for

at least the duration of the 2011-15 investment round, Government anticipates that funding of social rent provision will only be supported in limited circumstances. In order to maximise overall affordable housing delivery in line with London Plan requirements, the proposal is expected to maximise the delivery of affordable rent units.

14 The submitted housing schedule indicates that the proportion of affordable housing will be delivered on a 70:30 (social rented:intermediate) tenure split in accordance with the Council's affordable housing policy. Whilst it is recognised that a tenure split of 70:30, is not strategically compliant with London Plan policy 3.11, it is acknowledged that there will be local variations in housing need and that the Council within its Core Strategy seeks a tenure split of 70:30. Further discussion and confirmation of how the mix has been arrived at, demonstrating that it meets local need whilst also maximising overall provision should be provided. In accepting a 70:30 split, the maximisation of affordable housing has to be taken into account in line with London plan policy 3.12. Therefore before the tenure split can be accepted, the applicant is requested to apply a policy compliant tenure split scenario to the scheme's viability assessment to indicate whether there would be a difference of affordable quantum, if a strategically compliant tenure split was applied. Confirmation of any discussions held with Registered Social Landlords should also be provided and the details of how rent levels inputted to the toolkit have been established.

Housing choice

15 According to the indicative residential schedule, the residential mix achieves a 78% provision of family housing within the social rent component of the scheme, responding positively to the strategic aims of London Plan Housing policies 3.8 and 3.11, and strategic guidance set out within the Mayor's Housing SPG (2012) and the London Housing Strategy (2010).

Density

18 London Plan policy 3.4 requires development to optimise housing output for different locations taking into account local context and character, the design principles in Chapter 7 and public transport capacity. Table 3.2 provides density guidelines in support of this. The application site is in an urban London setting and has a public transport accessibility level (PTAL) of six, and in such a context the London Plan density matrix shown in table 3.2 of the London Plan would suggest that the development should achieve a residential density in the region of 200 to 700 habitable rooms per hectare.

19 The supporting material calculates the residential density by dividing the number of habitable rooms (476) by the area of the site in hectares (0.58 ha), which results in a density of 820 habitable rooms per hectare. Whilst this exceeds the recommended London Plan density guidelines for this site, as discussed at the meeting, it is acknowledged that the density ranges recommended in Table 3.2 of the London Plan should not be applied mechanistically and that PTAL alone is not an appropriate measurement to determine residential density. In line with London Plan policy 3.4 other factors such as local context, design, transport capacity, social infrastructure and amenities such as open space and play space should also be taken into consideration when optimising housing potential. A scheme of this density would be expected to achieve the highest quality of design in order to be considered acceptable and is paramount as the scheme develops further. Further comments on the scheme's design are provided below.

Residential quality

20 The material provided indicates that the emerging residential quality of the scheme is good. The proposed 'gallery access' approach is supported, as this provides light and ventilation from both sides of the units effectively creating a high proportion of dual aspect units. However, it is

critical to the success of this approach that all the ground floor units have entrances directly from the public realm. It is also critical that each landing is not shared by more than eight households per floor in order to ensure a good sense of ownership over the communal spaces. The provision of the maisonette typology situated at the entrance to the development is strongly supported. Detailed plans illustrating all the aspects above are required for officers to assess the residential quality of the scheme.

21 The applicant confirmed at the meeting that all the residential units will comply with the Mayor's minimum space standards set out in table 3.3 of London Plan and the Housing SPG, which is supported. This should be demonstrated by the submission of a residential schedule at the application stage.

22 The proposed building layout will provide a well-overlooked courtyard that will provide communal amenity space for future residents. However, officers raise concern that public access to this courtyard will undermine its role as a private space and should be addressed.

Children's play space

23 As part of the application submission, a detailed play strategy would be expected, demonstrating how the scheme will meet the play space requirements set out in London Plan Policy 3.6 and the Mayor's revised Supplementary Planning Guidance 'Shaping Neighbourhoods: Children And Young People's Play And Informal Recreation'. The applicant should ensure that sufficient space is provided in accordance with the expected child population of the completed development. Door-stop play provision is expected on-site for the under-five's as a minimum, and following a review of existing facilities in the immediate area, it may be necessary to also provide on-site play for older children, and/or provide a financial contribution to the provision, or improvement, of off-site play facilities. It is understood that Area Landscape Architects have been appointed to produce a landscape strategy which is welcomed. The strategy should demonstrate how the above will be achieved and is paramount given the high residential density of the scheme.

24 Based on the indicative residential mix presented above, and the methodology within the Mayor's Shaping Neighbourhoods: Play and Informal Recreation SPG (2012), GLA officers have calculated an expected child population of 66 for the development. Based on this, the Mayor's SPG indicates that the development would need to make a total provision of 663.5 sq.m. of children's play and informal recreation space for all ages. This figure differs from that which has been provided in the pre-application material (640 sq.m.) and therefore clarification is sought as to how the alternative figure has been calculated.

25 The scheme proposes a communal amenity space to the north east of the site which will provide 430 sq.m. of 'local playable space' to meet the play requirements of 0-11 year old children. This figure is SPG compliant when based on the applicant's calculated child yield, however, according to GLA officer's calculation this space would need to be 450 sq.m. in order to meet the SPG standards. However, in accordance with the SPG, priority should be given to the onsite provision of door-stop play for children under five, and this requirement could be met within the proposed 'local playable space' provision. All child yield calculations and resultant requirements should be clarified in accordance with Shaping Neighbourhoods: Children And Young People's Play And Informal Recreation SPG prior to any future planning application to ensure a high quality residential environment for the scheme.

Urban design

26 As described above, the site forms part of a large currently impermeable and illegible urban block. It is also understood, that the area has recently been subject to antisocial behaviour issues. In this context, the site provides a significant opportunity to address both these issues through the provision of a new route through the site that will provide important passive surveillance and will be discussed in further detail below.

Layout

27 The approach of using the proposed built form to define and overlook the open spaces is supported. The location of a building fronting directly onto Parkhurst Road is welcomed, as this provides good quality street frontage and clearly marks the entrance to the development. However, officers raise strong concerns that the current scheme presents a missed opportunity to improve the wider permeability of the area, and that the current layout will result in the development becoming 'gated' in the future, much like the existing residential developments to west and east.

28 As discussed at length during the meeting, the site is well-suited to providing a new north-south route linking Parkhurst Road to McCall House and Tufnell Park Road. In the absence of any route for a considerable distance along Parkhurst Road or Tufnell Park Road, such a route would make a very positive contribution to the local urban fabric by breaking-up the large urban block; significantly increasing permeability and knitting the proposed residential scheme into its context. It is also important to note, that the provision of such a route could help address the local antisocial behaviour issues associated with rear of McCall House, encouraging more natural surveillance along this route.

29 It is disappointing that this opportunity has not been realised in the current proposals and GLA officers note that the Council also support the incorporation of a new north/south route as part of this scheme. The applicant is therefore strongly encouraged to revise the layout in order to create a clear and legible route through the scheme, that is well overlooked and activated by the proposed development. The applicant is advised to consider 'chamfering' the northern block in order to create a clear line of site from the rear of McCall House, south west towards the proposed 'local playable space' where the route could join the currently proposed entrance road, creating a strategic route through the area that would resolve many of the issues raised above.

Height, massing and scale

30 It is noted that the proposed height of seven storeys at the rear of the site is taller than the contextual height. Whilst, this height itself does not raise significant strategic concerns, the distribution of the height does not reflect the hierarchy of the surrounding streets and spaces. An alternative distribution of building heights where taller elements are primarily fronting onto Parkhurst Road and the potential new route through the site would create a more legible environment and needs to be considered.

Inclusive design

Residential units

31 At the meeting the applicant confirmed that all new homes will meet Lifetime Home standards and that 10% will be wheelchair accessible in accordance with strategic policy, which is welcomed. Compliance with these standards should be demonstrated on plan, using a sample

of flat layouts, as part of the design and access statement submitted with any future planning application. The applicant should refer to the quality and design standards set out in the Mayor's Housing Supplementary Planning Guidance, and ensure that the wheelchair accessible units meet the best practice guidance set out in Annex Two of the SPG. It should be clear on the plans where the wheelchair accessible homes are located and how many there are. These should be distributed across tenure types and sizes to give disabled and older people similar choices to non-disabled people (unless the council through their Accessible Housing Register work can advise on the need in this part of the borough for a particular size of wheelchair accessible home).

Public realm

32 The design of the landscaping and the public realm is crucial to how inclusive the development is for many people. The proposals should ensure that the routes from the public transport facilities to the proposed entrance points are legible and clearly identifiable to make access easy, safe and comfortable. The design and access statement should show how disabled people access each of the entrances safely, including details of levels, gradients, widths and surface materials of the paths and how they are segregated from traffic and turning vehicles, and how any level changes on the routes will be addressed.

Parking

33 The provision and future management of blue badge parking bays for the residents should be in accordance with the advice in the Lifetime Homes standards and the Wheelchair Housing Design Guide, and these bays should be located as close as possible to the relevant entrances and cores. The applicant should note the need for a blue badge accessible space for each wheelchair unit. A managed approach to the provision of disabled parking within overall parking provision should be adopted, ensuring that sufficient spaces can be provided for future demand, and should take into account local need. This approach should be developed as part of the overall parking management strategy, which should form part of any future planning application.

Sustainable development

General information

34 Please note from 1 October 2013, the Mayor will apply the 40% carbon reduction target (beyond Part L 2010) as set out in London Plan Policy 5.2 for 2013-2016. This target will apply to all stage one planning applications received by the Mayor on or after 1 October 2013. Updated energy assessment planning guidance is available on the GLA website. It provides further information on the introduction of the 40% improvement on 2010 Building Regulations target. See link below: <http://www.london.gov.uk/priorities/planning/strategic-planning-applications/preplanning-application-meeting-service/energy-planning-gla-guidance-on-preparing-energy-assessments>

35 The proposed climate change mitigation and adaptation measures within the scheme are still at a relatively early stage. Whilst general advice is provided below, as discussed at the meeting, GLA officers would welcome the opportunity to informally review the proposed sustainability measures, and in particular the energy strategy, as these start to emerge in more detail.

Energy strategy

36 In accordance with London Plan policy 5.2 the applicant should provide a full energy assessment which complies with the principles of the London Plan energy hierarchy which follows the format and guidance in the GLA September 2013 Guidance on preparing energy assessments. The applicant confirmed this approach at the meeting and is welcomed.

Be lean

37 It is unclear from the information provided prior to the meeting what reductions will be achieved from energy efficiency alone. The applicant should confirm that the scheme will meet Part L 2010 building regulations through energy efficiency measures alone. This should be expressed in tonnes per annum and in percentage terms as set out in the GLA energy assessment guidance. This should be evidenced via modelling.

Be clean

38 At the meeting, the applicant confirmed that there are no existing or planned district heat networks in the vicinity of the site but that the scheme will be designed to allow future connection to one, should one become available. This is supported in accordance with London Plan policy, and is welcomed.

39 A centralised heat network is proposed that will link all residential units. A schematic showing the route of the network linking all buildings should be provided. The applicant should confirm that the site will be served from a single energy centre and provide further information on the location and floor area of the energy centre.

40 The use of a Combined Heat and Power (CHP) plant is proposed. The applicant should confirm the sizing of the units and this should be supported by a load profile. Details of the CHP electricity sales strategy should also be provided.

Be green

41 The applicant should confirm which renewable technologies will be adopted in the scheme. At the meeting the use of photovoltaic (PV) panels was discussed. Further details regarding the total area of PV to be installed and a roof drawing showing their location should be provided.

Regulated CO₂ savings

42 The material submitted prior to the meeting estimates that the site will achieve a 25% reduction in carbon emissions. However, at the meeting it was suggested that the development will achieve a 40% reduction in carbon emissions as required by the London Plan target for 2013-2016. The applicant should clarify this and confirm that the savings are based on regulated savings only.

43 As suggested by the submitted material, the on-site carbon savings fall short of the targets within Policy 5.2 of the London Plan. If this in fact the case, the developer should ensure that the short fall in carbon reductions is met off-site in liaison with the Council.

44 The applicant should confirm the regulated carbon dioxide emissions and savings at each tier of the energy hierarchy using the format in Tables 1 & 2 of the GLA energy assessment guidance.

Transport

45 As the site has an excellent public transport accessibility level (PTAL 6), the 'car free' nature of the development, with the exception of accessible units, is supported. The final level of parking spaces for the accessible units should be agreed with the Council, but should not exceed the London Plan maximum standards.

46 The proposals would deliver over 300 cycle parking spaces which is welcomed. All spaces should be in a safe, secure and covered location that is conveniently accessible to cyclists.

47 The details of site access arrangements, access to car, and cycle parking and the servicing area should be fully described in the formal submission including swept path analysis. A stage one safety audit should also be undertaken for the proposed arrangement, including vehicles accessing and exiting Parkhurst Road, which forms part of the Transport for London Road Network. This is to ensure that the risk of conflict with other vehicles and vulnerable road users will be kept to a minimum.

48 A pedestrian environment review system (PERS) audit should be undertaken between the site and local amenities, including shops and public transport facilities to identify any needs for pedestrian improvements.

49 The current level of activities on the existing site, and those anticipated for the new TA cadet centre on the retained part of the existing Ministry of Defence site should be clarified in the final submission of a transport assessment. The intention to submit a travel plan is welcomed. The travel plan should be produced in accordance with the current TfL travel planning guidance.

50 A parking management plan and delivery and servicing plan should be included in any future planning application submission. Since the proposal does not include gating the vehicular access to Parkhurst Road, the parking management plan and delivery & servicing plan should include robust measures to ensure that any vehicle activity on the site would not adversely impact Parkhurst Road. A framework construction logistics plan should also be submitted as part of any future planning application.

51 The applicant should note that Transport for London may seek a financial contribution toward the Nags Head junction improvement, once further details are provided and reviewed.

Community Infrastructure Levy

52 In accordance with London Plan policy 8.3, Community Infrastructure Levy, the Mayor agreed to commence CIL charging for developments permitted on or after 1 April 2012. It is noted that the proposed development is within the London Borough of Islington, where the Mayoral charge is £50 per square metre Gross Internal Area (GIA). See the 2010 regulations: <http://www.legislation.gov.uk/ukdsi/2010/9780111492390/contents> as amended by the 2011 regulations: <http://www.legislation.gov.uk/ukdsi/2011/987/made>.

53 London borough councils are also able to introduce CIL charges which are payable **in addition** to the Mayor's CIL. Please note that the Council is in the process of introducing its own borough CIL. See the Council's website for further detail: http://www.islington.gov.uk/services/planning/planningpol/community_infrastructure_levy/Pages/islington-community-infrastructure-levy-cil.aspx

Conclusion

54 The principle of the residential redevelopment of this site is strongly supported. However, officers raise concerns that the current layout presents a missed opportunity to improve the wider permeability of the area and to make a positive contribution to the existing urban fabric. The applicant is strongly encouraged to reconsider the current design in order to realise this significant opportunity. In addition to the above, the further issues raised regarding housing, urban design, inclusive design, sustainable development and transport should be addressed. Further meetings focussing on the design of the scheme are also encouraged.

for further information, contact Planning Decisions Unit:
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