

## **EIP88, issue 13, NSP71: Aylesham Centre and Peckham Bus Station: Question 10.85 Representation**

**Q 10.85 “What evidence and assumptions of density/building heights have informed the indicative capacity of the site to accommodate a mix of uses including some 850 new homes? Is the indicative capacity reflective of the site’s location within the Borough View of St Paul’s Cathedral from One Tree Hill?”**

My submission relates to my series of wide-ranging criticisms of the proposed NSP. In particular I commented at some length on P16 (tall buildings), arguing that the section on the Aylesham Centre is rooted in the efficient use of land and should at least have regard for the social consequences; and that the NSP’s commitment to working with local people to achieve a series of targets set out in section 10 relating to site allocations had not been met. In particular that the proposed target for the number of dwellings was more than double than that envisaged in the PNAAP, and was unacceptably dense. Finally I noted that the schedule of proposed sites (Appendix C) was missing from the online version of the PNAAP (EIP31). This is a document to be read in conjunction with the NSP, and which advocated only 400 dwellings on the Aylesham site.

In its response to several comments on the NSP proposals for the Aylesham site, the Council relies upon its Sites Methodology Paper (SMP), a document which appears not to have been open for dedicated consultation, but relies only on the opportunity for interrogation of its consequences in the shaping of the NSP. The SMP was devised to consider what would be an acceptable relationship between buildings meeting the needs for housing, employment and ‘town centre use’ and proportional open space. Capacity is considered in section 3. It speaks of “broad parameters” for the size of buildings to be “based on notional massing and then translating this into a floorspace estimate”. A calculation is expressed in section 3.7 as “Site area\*percentage built footprint\*average number of storeys\* 85%=indicative floorspace”. This algorithm, used repeatedly for site allocations, relied on the accuracy of “notional” massing. In the case of the Aylesham Centre it has been translated into an indicative capacity of 850 homes in NSP 71, a figure more than double the 400 units envisaged in PNAAP1 and the local plan adopted schedules (March 2016).

Provision for public open space is considered in 3.17. It is said that sites of sufficient size (the Aylesham Centre is 31,330 m<sup>2</sup>) should accommodate public open space to serve new users generated by development. This could address deficiencies in the quantity and accessibility of open space.

None of the SMP methodology is explained in the proposed NSP: neither in its general policy, nor in the detail of site allocations. It sets out aims only in principle, e.g. SP2 “Ensuring that buildings have a positive relationship with the public realm”; SP6 “leading the way in providing spaces for people to connect with nature”; P16 “design must have a positive relationship with the public realm”; P58 Major developments must “provide green infrastructure”. P17 admits that densities that are “too high” could have a harmful impact on the environment and quality of life. Site allocation NSP71 offers no explanation of its stated indicative residential capacity of 850 units. Like the rest of the NSP, it is to be read in conjunction with PNAAP. Policy 25 of the consultation version of

the latter paper looked to retain the current character of the area, with most development being similar to existing heights, which in most of the action area was 2 to 4 storeys, but said there could be a taller element on sites where there was sufficient space to accommodate a tall building fronting generous realm. One such was the Aylesham Centre, which was seen as having the potential for a taller building of between 6 and 10 storeys. Curiously, in the approved 2014 version of the PNAAP this was changed to 'up to 20 storeys'. It was said that a local landmark was required to provide definition. But this is made subject to it being not only of exceptional design but linked to "an improved and generous public space", a requirement brought out in NSP 71.

My submission is that evidence for the assumptions of density and building heights is lacking; that the basis for such assumptions has never been opened to consultation; and is in conflict with PNAAP1. That from a common sense point of view the provision of 850 homes, assuming an average of three persons per unit, would result in an occupancy of 2,550 new residents, augmented by persons shopping at Morrison's supermarket, which in a circumscribed area would be inimical to social well-being. And that a 20-storey tower encouraged by NSP 71 is not linked with improved and generous open space. I cannot compute the extent of open space in relation to that devoted to buildings and their height, but from the plan put out from Tiger Developments, it appears to be very limited, largely devoted to walkways one of which is a bus route .

**I contend that neither NSP 71 nor the SMP is sound, in that the methodology used in determining indicative residential capacities is not adequately explained in the SMP, and that the number of dwellings cited in NSP 71, presumably determined from the SMP process, is not supported by coherent evidence, and is not in line with the previously approved PNAAP1. I submit that a coherent explanation of the methodology used to calculate indicative residential capacities should appear in the NSP , and in respect of the Aylesham Centre should be reduced to 400 dwellings, to conform to PNAAP1 and allow for generous public space.**

A particular feature of NSP 71, in relation to its indicative capacity, is its acceptance of a building of up to 20 storeys, notwithstanding its location. The site is accepted in the proposed NSP as being within the Borough View of St Paul's Cathedral from One Tree Hill (LV5). This view is of historic significance. It features in John Evelyn's Diary, which commends the view from Sir Thomas Bond's manor house, then near to centre of the medieval village.

**I contend that NSP71 is not sound in that the possibility of a building of up to 20 storeys in height in the Aylesham Centre, although surprisingly approved in PNAAP 26, is, in the context of maximising the site's indicative capacity, antagonistic to P16, 2 (4).**

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