

Planning Statement Addendum

Aylesham Centre

Document ref. AC04B

1. Introduction and Purpose

- 1.1 On behalf of our client, Berkeley Homes (Capital) Plc. ('the Applicant'), we hereby submit further information in support of planning application ref. 24/AP/2074 (the 'Application'), which seeks permission for the comprehensive redevelopment of the Aylesham Centre and associated car park and petrol filling station at Hanover Park, London, SE15 5EW ('the Site').
- 1.2 This Statement comprises a further addendum to the Planning Statement (document ref. AC04) and the Planning Statement Addendum (document ref. AC04A). It should be read in conjunction with both of these Statements.
- 1.3 The purpose of this Statement is to provide an assessment of the Proposed Development against the changes to national planning policy as set out in the new National Planning Policy Framework (NPPF) (2024) and associated updates to the Government's Planning Practice Guidance (PPG), which were published following the submission of the amendments to the Application (including the Planning Statement Addendum) in December 2024. It also considers the Accelerating Housing Delivery Practice Note published by the GLA in December 2024.

2. NPPF (December 2024)

- 2.1 The new NPPF was published on 12 December 2024 and is a material planning consideration in the determination of the Application, superseding the previous December 2023 version. A detailed assessment of the NPPF (2023) is provided in the Planning Statement (ref. AC04) and Planning Statement Addendum (document ref. AC04A), the latter of which makes reference to proposed changes to the 2023 version of NPPF that the Government consulted on earlier in 2024.
- 2.2 The new (2024) NPPF maintains in-principle support for the Application but, importantly, includes a number of significant policy changes which provide substantial additional support. We summarise the key points of most relevance to the Application below:
 - **Presumption in favour of sustainable development** – Paragraph 11(c) is maintained, which for decision making means approving development proposals that accord with an up-to-date development plan without delay. For the reasons set out in the Planning Statement (document ref. AC04) and Addendum (document ref. AC04A), the Proposed Development is clearly in accordance with the Development Plan affecting the Site including site allocation ref. NSP74, and there are no obvious material considerations as to why a decision should be made other than in accordance with the development plan. Accordingly, the Application should be approved without delay.
 - **Delivering a Sufficient Supply of Homes** – The policy aim (as set out in Section 5) is to meet housing needs (in full), as calculated via a revised standard method. The revised method identifies

an annual housing need for London of 87,992, which is 68% higher (+35,705 homes) than currently planned for in the London Plan (2021) and borough level local plans (including the Southwark Plan (2022)). These increased figures will be captured in due course in the forthcoming review of the London Plan which will set an updated housing target for London Borough of Southwark (LBS). For comparison purposes, average annual completions in London over the period 2021-2024 were 35,533, just 40% of local housing need when assessed under the new standard method. The need to substantially increase housing supply (in the context of this) is a material consideration in the determination of the Application.

- **Making Effective Use of Land** – Paragraph 125(c) continues to require decisions to give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs. This has been revised to require that such proposals should be approved unless *substantial harm would be caused*, which should be considered in conjunction with the NPPF as a whole including paragraph 215 (designated heritage assets). On the basis that the Proposed Development has been assessed to not cause substantial harm in heritage or other policy terms, the default position is that the Application should be approved. Consistent with this, we note that paragraph 130 of the 2023 NPPF (which suggested that significant uplifts in density resulting in built form wholly out of character with the existing area may be inappropriate) has been deleted, which removes previous policy restrictions over the densification of urban areas.

3. Accelerating Housing Delivery, Planning and Housing Practice Note (December 2024)

- 3.1 This is a material consideration in the determination of the Application.
- 3.2 It has been prepared in recognition of the current viability challenges facing housing delivery in London, with build cost inflation, interest rates, market conditions, and the sale of affordable homes to Registered Providers all cited. It is focussed on increasing the provision of affordable homes and wider housing delivery.
- 3.3 As per London Plan policy, the Note continues to encourage applications to follow the Fast Track Route. It also continues to reiterate that applications proposing a lower level of affordable housing than the relevant threshold for the Fast Track Route should be considered under the Viability Tested Route to assess the maximum viable level of affordable housing. As set out in the Planning Statement Addendum (document ref. AC04A), this approach to affordable housing is entirely policy compliant.

Avison Young
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