

Arklow Road Trading Estate

in the London Borough of Lewisham

planning application no. DC/15/93100 & DC/15/93101

Strategic planning application stage 1 referral

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008.

The proposal

Hybrid planning application for the redevelopment of Arklow Road Trading Estate and land at Rolt Street comprising:

- Detailed planning application for the demolition of existing buildings and construction of a mixed use development in buildings ranging from 5 to 9 storeys, comprising 258 residential dwellings (Class C3), 2,794 sq.m. of commercial floorspace (Classes A1, A2, A3, B1, D1 and D2), energy centre, disabled vehicle and cycle parking, landscaping, access and associated works.
- Outline planning application for a building of up to 22 storeys, comprising up to 58 dwellings, new pedestrian access from Rolt Street, landscaping and public realm (appearance and landscaping reserved).

The applicant

The applicant is **Anthology Deptford Ltd**, the architect is **Rolfe Judd**, and the agent is **Turley**.

Strategic issues

The proposed residential development is supported in strategic planning terms; however issues with respect to **housing, children's playspace, affordable housing, urban design and tall buildings, inclusive access, sustainable development, and transport** should be addressed before the application is referred back to the Mayor at his decision making stage. **Employment and historic environment** policies are also relevant to this application.

Recommendation

That Lewisham Council be advised that while the application is generally acceptable in strategic planning terms, the application does not yet comply with the London Plan, for the reasons set out in paragraph 107 of this report; but that the possible remedies set out in that paragraph could address these deficiencies.

Context

1 On 16 October 2015, the Mayor of London received documents from Lewisham Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008 the Mayor has until 26 November 2015 to provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.

2 The application is referable under Categories 1A, 1B(c) and 1C of the Mayor of London Order 2008:

- 1A *"Development which comprises or includes the provision of more than 150 houses, flats, or houses and flats."*
- 1B *"Development (other than development which only comprises the provision of houses, flats, or houses and flats) which comprises or includes the erection of a building or buildings (c) outside Central London and with a total floorspace of more than 15,000 square metres."*
- 1C *"Development which comprises or includes the erection of a building of (c) more than 30 metres high and is outside the City of London."*

3 Once Lewisham Council has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; take it over for his own determination; or allow the Council to determine it itself.

4 The Mayor of London's statement on this case will be made available on the GLA website www.london.gov.uk.

Site description

5 The 1.0274 hectare site currently comprises a series of tightly arranged vacant industrial and warehouse units of varying sizes. The site narrows to the north-west end, in between two elevated railway lines. The embanked railway line connecting to London Bridge lies immediately south-west of the site, reducing in height to the north. Beside this is the TfL London Overground line linking New Cross with Surrey Quays. The northern boundary backs directly onto workshop units (various, small-scale storage and light industrial uses) owned by Network Rail, which form an extension to the railway arches under the Deptford Railway Viaduct, on the Greenwich-London Bridge line. The viaduct is Grade II Listed between its junctions with Gosterwood Street and Rolt Street. To the north-west is a further area of Network Rail land and accessed from Rolt Street, which has been incorporated into the development site for the outline planning application.

6 The site is largely separated from its surroundings by railway lines, apart from to the south-east where it adjoins Arklow Road, which has a mixed character, generally with commercial buildings up to seven storeys to the west, and two-three storey residential buildings to the east. Safa House, located on the corner of Arklow Road near the entrance to the site, is a vacant building, which may be incorporated into the site.

7 More widely, the area is characterised by low-rise residential use, with some mid-rise and five residential towers beyond the railway lines, to both the east and the west, of up to 24 storeys. To the north-west, accessed from Rolt Street, is the public open space of Folkestone Gardens.

8 The site has an average to good public transport accessibility level (PTAL) that varies between 2 and 4, on a scale of 1 to 6b, where 6b is the highest. The PTAL falls to 2 towards the northern end of the site. Lewisham Council is the highway authority for Arklow Road. The nearest section of the Transport for London Road Network (TLRN) is the A2 New Cross Road which is approximately 550m from the site.

9 A number of bus routes serve stops along Evelyn Street approximately 500m from the site, providing access to and from central London, Lewisham and Greenwich town centres and Canada Water Underground station. The New Cross London Overground and National Rail station is around 900m away providing access to and from central London and East London. Deptford Street is around 800m away.

Details of the proposal

10 The development comprises a hybrid planning application for the redevelopment of Arklow Road Trading Estate and land at Rolt Street comprising:

- Full planning application for the demolition of existing buildings and construction of a mixed use development in buildings ranging from 5 to 9 storeys, comprising 258 residential dwellings (Class C3), 2,794 sq.m. of commercial floorspace (Classes A1, A2, A3, B1, D1 and D2), energy centre, disabled vehicle and cycle parking, landscaping, access and associated works.
- Outline planning application for a building of up to 22 storeys, comprising up to 58 dwellings, new pedestrian access from Rolt Street, landscaping and public realm (appearance and landscaping reserved).

11 The site for the full planning application comprises the Former Arklow Road Trading Estate (hereby referred to as Plot 1) and the adjacent land to the north-west which falls under separate ownership by Network Rail (hereby referred to as Plot 2). The railway land to the north is currently vacant but most recently occupied by a haulage company. It is proposed that Plot 2 will remain in the ownership of Network Rail with an easement being granted to Anthology Deptford Limited for access rights across the site to undertake future public realm works associated with the outline application.

12 Full planning permission is being sought for Plot 1 and outline planning permission for Plot 2. The planning permission for Plot 1 seeks to provide a 9 storey marker building at Block A, while the outline planning permission seeks to provide a 22 storey marker building at Block A, along with the associated public realm upgrades on the National Rail land which will form a western piazza of the development and facilitate connection from Arklow Road through to Rolt Street.

Full Planning Permission

13 The floorspace for the full planning permission is summarised below:

| | Block A | Block B | Block C | Block D | Block E | Block F | Total |
|------------------------------|----------------|----------------|----------------|----------------|----------------|----------------|--------------|
| Residential GIA | 2,726 | 12,759 | 3,706 | 3,825 | 2,056 | 1,941 | 27,013 |
| Commercial GIA | 245 | 2,151 | 0 | 643 | 0 | 0 | 3,039 |
| Total GIA | 2,971 | 14,910 | 3,706 | 4,468 | 2,056 | 1,941 | 30,052 |
| Percentage Commercial | | | | | | | 10.1% |

14 The full planning permission application seeks to provide 287 dwellings and 3,039sq.m. of commercial floorspace in buildings ranging from 5 to 9 storeys in height. The commercial floorspace will be located at ground level to create active frontage on Arklow Road. The applicant is seeking flexibility for a range of commercial uses to be provided on site (use classes A1-A3, B1, D1 & D2).

15 The proposal also provides a new route through the site extending which will take the form of a pedestrian zone. If the National Rail land does not become available, this route will end in a caul-de-sac before reaching Rolt Street.

Outline planning permission

16 The floorspace for the outline planning permission is summarised below:

| | Block A* | Block B | Block C | Block D | Block E | Block F | Total |
|------------------------------|-----------------|----------------|----------------|----------------|----------------|----------------|--------------|
| Residential GIA | 5,603 | 12,759 | 3,706 | 3,825 | 2,056 | 1,941 | 29,891 |
| Commercial GIA | 0 | 2,151 | 0 | 643 | 0 | 0 | 2,794 |
| Total GIA | 5,603 | 14,910 | 3,706 | 4,468 | 2,056 | 1,941 | 32,685 |
| Percentage Commercial | | | | | | | 8.5% |

*Block A – Maximum permitted

17 The outline planning application seeks to provide up to 316 residential units and 2,794sq.m. of commercial floor space in buildings ranging from 5 to 22 storeys. The commercial floorspace will be located at ground floor to ensure active frontages are created.

18 The outline application proposes the extension of the pedestrian zone route though to Rolt Street, including the public realm upgrades for this extension. This will provide access through the site from Arklow Road through to Rolt Street. The outline application also seeks to alter Block A from a 9 storey mixed use building to a 22 storey residential tower. The 22 storey residential tower is reliant on the Network Rail site coming forward.

Case history

19 On 12 May 2015, a pre-application meeting was held at City Hall for the demolition of existing buildings and redevelopment with a mixed use scheme of approximately 2,300 sq.m. of commercial floorspace; approximately 280 residential units; a new public route running east-west through the site; with an eastern piazza linking to Arklow Road and a western piazza linking to Rolt Street, with a series of courtyards along the route. The GLA's pre-application advice report of 26 May 2015 concluded that the principle of residential-led development was strongly supported in strategic planning terms; however issues raised with respect to mixed use and employment space; housing; affordable housing; urban design and tall buildings; inclusive design; transport; and climate change should be fully addressed prior to the submission of any planning application.

Strategic planning issues and relevant policies and guidance

20 The relevant issues and corresponding policies are as follows:

- Principle of development *London Plan; the Mayor's Economic Development Strategy; Town Centres SPG*

- Housing *London Plan; Housing SPG; draft interim Housing SPG; Housing Strategy;; Shaping Neighbourhoods: Play and Informal Recreation SPG; Shaping Neighbourhoods: Character and Context SPG*
- Affordable housing *London Plan; Housing SPG; draft interim Housing SPG; Housing Strategy*
- Urban design *London Plan; Shaping Neighbourhoods: Character and Context SPG; Housing SPG; Shaping Neighbourhoods: Play and Informal Recreation SPG*
- Tall buildings/views *London Plan, London View Management Framework SPG*
- Ambient noise *London Plan; the Mayor's Ambient Noise Strategy;*
- Transport *London Plan; the Mayor's Transport Strategy; Land for Industry and Transport SPG*
- Crossrail *London Plan; Mayoral Community Infrastructure Levy; Use of planning obligations in the funding of Crossrail and the Mayoral Community infrastructure levy SPG*
- Inclusive Access *London Plan; Accessible London: achieving an inclusive environment SPG;*
- 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*

21 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 Lewisham Core Strategy (2011); the Lewisham Site Allocations Local Plan (2013); the Lewisham Development Management Local Plan (2014); and 2015 the London Plan (Consolidated with Alterations since 2011).

22 The following are also relevant material considerations:

- National Planning Policy Framework and the accompanying National Planning Practice Guidance.
- The draft Minor Alterations to the London Plan (2015).

Principle of development

Mixed use and employment space

23 The site is located in the Lewisham, Catford and New Cross Opportunity Area. Policy 2.13 'Opportunity Areas and Intensification Areas' and Table A1.1 of the London Plan identifies the Opportunity Area for a minimum of 8,000 new homes and an indicative employment capacity of 6,000, with scope for intensification, regeneration and renewal, and areas where poor legibility and severance should be investigated. The site is also located in a regeneration area, as defined in Policy 2.14 'Areas for Regeneration', which provides strategic support for regeneration, including employment, housing and environmental improvements.

24 The proposal includes a minimum of 2,794sq.m. of flexible commercial floorspace (use Classes A1-A3, B1, D1 & D2). The commercial floorspace is primarily located at ground level, with some first floor space in Block B buildings 3 and 4. The commercial floorspace follows the proposed route that connects Arklow Road and Rolt Street. The full planning permission application proposes a small commercial unit at the base of the tower (Block A) at the western end of the site, whilst the outline planning application has no proposal for a commercial unit here. GLA officers recommend the applicant consider providing the commercial unit at the base of the tower in Block A in the outline planning proposal. This will create active frontages along the entire proposed route.

25 London Plan Policy 4.4 'Managing Industrial Land and Premises' states a strategic aim for boroughs to adopt a rigorous approach to industrial land management, but recognises that managed release may be required to provide other uses in appropriate locations. Policy 4.1 'Developing London's Economy' provides strategic support for the provision of employment floorspace and Policy 4.2 'Offices' supports mixed use development with office provision to improve London's competitiveness.

26 The site is part of Site Allocation 9 in the Lewisham Site Allocation Local Plan, which identifies the site for mixed use employment, incorporating employment (B1 use classes, light industrial/offices) and housing, with an indicative 100 units, and 20% employment floorspace.

27 Consequently, the loss of the existing light industrial floorspace is acceptable in principle, and the re-provision of an element of employment floorspace is supported. Although the employment space will be of a different nature to that existing, it is recognised that the proposed uses are more compatible with residential uses and no local or strategic protections are in place for the current use. The re-provided employment space is 10.1% for the full planning application and 8.5% for the outline proposal. This does not meet the 20% re-provision of floorspace required by local policy. The applicant has undertaken a viability assessment which has concluded that the proposed commercial floorspace is the maximum the scheme can support.

28 It is noted that the applicant is suggesting a variety of commercial uses; however, the applicant should satisfactorily demonstrate that the type of commercial space proposed is flexible enough to accommodate a varied type of employment use and should provide examples from across London of the type of space envisioned. The applicant should also provide information showing how the servicing and day-to-day working of the employment space would sit comfortably alongside new, and existing, residential units. Details of the support that will be offered to the remaining businesses to relocate should also be provided. It is understood by GLA officers that the likely tenants of the commercial space will be a charitable organisation, new or local businesses. It is noted that the applicant has received an offer from a creative, not-for-profit organisation to lease all of the proposed commercial units.

Town centre uses

29 London Plan Policies 2.15 'Town Centres', 4.3 'Mixed Use development and offices' and 4.7 'Retail and town centres' provide the strategic policy context relating to town centres. Further guidance is provided in the London Plan supplementary planning guidance 'Town Centres'.

30 The proposal includes a not insignificant amount of commercial floorspace (minimum of 2,794 sq.m.) on a site that is not within a town centre. New Cross district town centre lies approximately 600 metres to the south. The NPPF states that when assessing applications for retail, leisure and office development outside of town centres, which are not in accordance with an up to date Local Plan, local planning authorities should require an impact assessment if the development is over a proportionate, locally set floorspace threshold, or if there is no locally set threshold, the default threshold is 2,500 sq.m. Since the site is identified for mixed use redevelopment incorporating employment uses in Lewisham Site Allocation Local Plan, the proposal is considered to be in accordance with the Local Plan and no impact assessment will be required.

Residential uses

31 London Plan Policy 3.3 'Increasing Housing Supply' recognises the pressing need for more homes in London and sets an annual target for Lewisham of 1,385 new homes per year between 2015 and 2025. As stated above, Policies 2.13 and 2.14 also support the provision of new homes. The provision of housing on this site is therefore supported in principle.

32 This scheme is proposing a total of 287 units for the full planning application and 258 for the outline application. The proposed residential accommodation is supported in strategic planning terms.

Housing

Housing choice

33 London Plan Policy 3.8 'Housing Choice' encourages a choice of housing based on local needs, while affordable family housing is stated as a strategic priority. Policy 3.11 also states that priority should be accorded to the provision of affordable family housing. The indicative mix submitted by the application is detailed below.

| Tenure | Outline planning application | Full planning application |
|-----------------------------|-------------------------------------|----------------------------------|
| 1 Bed | 121 | 134 |
| 2 Bed (3 people) | 18 | 18 |
| 2 Bed (4 people) | 96 | 103 |
| 3 Bed (5 people) | 17 | 24 |
| 3 Bed (6 people) | 6 | 8 |
| Additional units in Block A | 58 | N/A |
| Total | 316 | 287 |

34 This proposal is dominated by smaller units with only a maximum of 11% across both planning applications having three bedrooms. The applicant has stated that the proposed housing mix will address a market demand and that the development site is within an area where family-sized units are the predominant form of existing housing stock. The applicant has justified the proposed tenure mix as that it will increase housing choice within the area. Lewisham Council should be satisfied that the proposal will address a housing need within the borough.

35 London Plan Policy 3.3 (*Increasing housing supply*) affirms the Mayor's determination to work with relevant partners to increase London's housing supply by an average of 32,210 net additional homes to meet the need identified in the plan, enhance the environment, improve housing choice and affordability, and to provide better quality accommodation for Londoners. To achieve that figure, the London Plan has set an annual target of 1,385 additional dwellings in Lewisham for the ten-year period from 2015 to 2025. Therefore the provision of additional dwellings in the proposal is supported in strategic planning terms.

Density

36 London Plan Policy 3.4 'Optimising Housing Potential' states that taking into account local context and character, the design principles in Chapter 7 and public transport capacity, development should optimise housing output for different types of location within the relevant density range shown in Table 3.2. The site is within an urban location where the density matrix sets a guideline of 200-700 habitable rooms (or 45 to 260 units) per hectare on a site such as this where the PTAL ranges from 2 to 4, although the London Plan notes that these ranges should not be applied mechanistically.

37 Whilst the applicant has provided density calculations in the submitted planning statements, it should be noted that as the proposal is a mixed use development the calculation needs to be undertaken in accordance with paragraph 1.3.47 of the Housing SPG. GLA officers have calculated the density figures following the requirements in the Housing SPG and have been used to assess the density of this application. The full planning application has 287 units/759 habitable rooms on a site area for density purposes of 0.92 hectares. This equates to 312 units per hectare and 825 habitable rooms per hectare. The outline planning application proposes 316 units/836 habitable rooms on a site for density purposes of 1.02. This equates to 310 units per hectare and 822 habitable rooms per hectare. The density of the proposal is higher than the recommended ranges in the London Plan. Notwithstanding this, as stated above these ranges do not need to be applied mechanistically. The application has provided justification as to the suitability of these high densities and is proposing to provide high quality living environments for the occupiers of the development. Mindful of the urban design and residential quality assessments below, GLA officers are of the view that the proposed residential density is acceptable in strategic planning terms.

38 The tallest element of the proposal is located on the part of the site with the lowest PTAL; however it is recognised that this part of the site is the most appropriate for a taller building in terms of the local context of existing development. The hybrid planning application recognises the need for the Network Rail site (Plot 2) to provide a taller building on the site. As stated above, the full planning application suggests a 9 storey building on this site, while the outline application which includes the Network Rail site, proposes a 22 storey tower element. GLA officers welcome the applicant's response to issues raised at the pre application stage regarding the height of a building located on the northern end of the development site.

Residential quality

39 London Plan Policy 3.5 promotes quality in new housing provision and sets out minimum space standards at Table 3.3. As of 1 October 2015 the Government's technical housing standards came into effect. The Mayor intends to adopt the new technical guidance through a minor alteration to the London Plan. In advance of this the Mayor has released a policy statement setting out that from 1 October 2015 the relevant London Plan policy and associated guidance in the Housing SPG should be interpreted by reference to the nearest equivalent new national technical standard.

40 As stated above, quality issues are particularly important in a high density development and therefore the development would be expected to target the good practice standards stated in the Housing SPG. Further analysis of residential quality is detailed under 'urban design' below.

Noise

41 London Plan Policy 7.15 'Reducing Noise and Enhancing Soundscapes' seeks to minimise existing or potential adverse impacts of noise on development proposals.

42 The main noise concerns arise from mainline trains, and as discussed under 'urban design and tall buildings' the orientation of the building means that south-west facing units will look directly over the railway lines, which may be particularly problematic for single aspect units seeking ventilation. The applicant has undertaken a noise and ventilation study to accompany the application. The report concludes that the residential dwellings will achieve the ground-borne noise design aim providing vibration of the development is provided. Lewisham Council should secure the vibration isolation of the development by way of planning condition.

Children's playspace

43 London Plan Policy 3.6 'Children and Young People's Play and Informal Recreation Facilities' seeks to ensure that development proposals include suitable provision for play and recreation. Further detail is provided in the Mayor's Supplementary Planning Guidance 'Shaping Neighbourhoods: Play and Informal Recreation', which sets a benchmark of 10 sq.m. of useable child play space to be provided per child, with under-5 child play space provided on-site as a minimum.

44 The scheme proposes two areas within the two southern courtyards to be dedicated as playspace for children. The applicant is proposing to provide 530sq.m. of playspace. This exceeds the minimum 485sq.m benchmark for a child yield of 49. The type of play equipment to be provided has also been outlined. GLA officers welcome this proposal. It is recommended that Lewisham Council secure the play equipment provision by way of planning condition.

Affordable housing

45 London Plan Policy 3.12 requires borough councils to seek the maximum reasonable amount of affordable housing when negotiating on individual private residential and mixed-use schemes. In doing so each council should have regard to its own overall target for the amount of affordable housing provision. This target should take account of the requirements of London Plan Policy 3.11, which includes the strategic target that 60% of new affordable housing should be for social rent and 40% for intermediate rent or sale.

46 While the Mayor has a set strategic investment benchmark that across the affordable rent programme as a whole rents should average 65% of market rents, this is an average investment output benchmark for this spending round and not a planning policy target to be applied to negotiations on individual schemes.

47 Policy 3.12 is supported by paragraph 3.71, which urges borough councils to take account of economic viability when estimating the appropriate amount of affordable provision. The 'Three Dragons' development control toolkit appraisal might need to be independently verified. Paragraph 3.75 highlights the potential need to re-appraising the viability of schemes prior to implementation in order to take account of economic uncertainties and ensure the maximum public benefit is secured over the period of the development.

48 Lewisham Council has set an overall target as required by London Plan Policy 3.11, and expects 50% affordable housing to be provided on sites where 10 or more dwellings are proposed, with a tenure mix of 70% social rented and 30% intermediate.

49 The details provided indicate that Block C located at the southern end of the site will comprise the affordable units, fronting onto Arklow Road. The applicant is proposing to provide 40 affordable units across both planning applications. This equates to 14% for the outline planning application and 15% for the full planning application. The intent to provide affordable and market housing on the same site is strongly supported in accordance with strategic policy.

50 It is understood by GLA officers that Lewisham Council is undertaking an independent assessment of the applicants viability assessment to ascertain if this is the maximum amount of affordable housing that the scheme can support. The outcome of this assessment should be shared with GLA officers prior to the scheme being referred back to the Mayor.

Urban design

51 Good design is central to all objectives of the London Plan and is specifically promoted by the policies contained within Chapter 7 which address both general design principles and specific design issues. London Plan Policy 7.1 sets out a series of overarching design principles for development in London. Other design policies in this chapter and elsewhere in the London Plan include specific design requirements relating to maximising the potential of sites, the quality of new housing provision, tall and large-scale buildings, built heritage, views, and public realm. New development is also required to have regard to its context, and make a positive contribution to local character within its neighbourhood (Policy 7.4).

52 London Plan Policy 7.7, which relates to the specific design issues associated with tall and large-scale buildings, is of particular relevance to the proposed scheme. This policy sets out specific additional design requirements for tall and large-scale buildings, which are defined as buildings that are significantly taller than their surroundings and/or have a significant impact on the skyline and are larger than the threshold sizes set for the referral of planning applications to the Mayor. Policies 7.10 and 7.11, which set out the Mayor's approach to protecting the character of strategic landmarks as well as London's wider character, are also important considerations.

Layout

53 The proposed layout includes a series of connected blocks along the northern side of the site against the railway viaduct, and individual blocks along the southern side, against the Overground and elevated rail lines. A new pedestrian/cycle route passes in between these two ranges of buildings, introducing a new link from Arklow Road to Rolt Street. The new route is strongly supported in this location, which suffers from significant severance due to the rail lines. The success of the route is strongly dependent on the inclusion of the Network Rail land (Plot 2), which would otherwise form a cul-de-sac, only providing access to the proposed development. The applicant's inclusion of Plot 2 through the outline planning application is welcomed and will improve the functionality of the pedestrian route. However further detail should be provided on the route proposed in the full planning application which does not include Plot 2.

54 The width of the pedestrian route raises some concerns, since it narrows to 8 metres at several points. As was requested at the pre application stage, the applicant has provided a landscape masterplan for the site. The landscape masterplan indicates that vegetation will be planted along the edges of the pedestrian/cycle route and in the courtyards. This will provide a line of site the length of the proposed route. This is welcomed by GLA officers.

55 At the pre application meeting, GLA officers expressed concerns regarding the impact of the tower element in the outline application, would have on the visibility of the pedestrian route. The proposed entrance setback from the upper floors to form a double height entrance is a welcome response to these concerns. This entrance treatment will ensure that there is visibility along the entirety of the pedestrian route.

56 The spacing of the blocks needs to demonstrate how habitable rooms within each dwelling are provided with an adequate level of privacy in relation to neighbouring dwellings and a minimum distance of 18-21 metres between habitable rooms is desirable.

57 The layout also includes two piazzas at each end of the site, and four smaller courtyards alongside the pedestrian/cycle route. The provision of new landscaped open space is welcomed. As was raised at the pre application meeting publically accessible spaces should be surrounded by uses that generate pedestrian activity and overlooking. As stated above in this report, the applicant should consider the inclusion of commercial floorspace in Block A for the outline planning application. This will aid the creation of active frontages along the whole proposed route as well as bringing activity to the western piazza.

58 The eastern piazza is proposed to be surrounded by commercial uses, which is supported. GLA officers welcome the applicant's inclusion of two entrances for Blocks C and D, rather than the one that was proposed at the pre-application stage. The entrance of Block D onto one of the southern courtyards is welcome as it will increase pedestrian activity of this space.

Residential quality

59 The proposals indicate that a good residential quality will be achieved. All units are required to meet or exceed the London Plan space standards and have access to private amenity space, in this case mostly in the form of balconies. The applicant is also required to ensure that all units have at least 2.5 metres clear floor to ceiling heights, and 2.6 metres is recommended on this site in order to achieve adequate light, ventilation and sense of space. The drawings indicate that no landing is shared by more than eight units, which is welcomed. Whilst it is appreciated that the applicant intends to meet residential quality guidelines, further evidence is required for GLA officers to be able to assess this. Further information should be provided to GLA officers prior to the application being referred back to the Mayor regarding typical unit layouts and unit sizes.

60 Whilst the overall proportion of single aspect units is relatively low, care needs to be given to the south-west-facing single aspect units, which will be susceptible to overheating, particularly as noise from the railway line may limit opportunities to provide ventilation by opening windows. Further information regarding the total number and location of single-aspect units should be provided to GLA officers prior to the application being referred back to the Mayor.

Height and massing

61 The development includes a building of twenty-two storeys, which is significantly taller than its immediate context, although buildings of similar height exist beyond the railway lines to both the east and the west. GLA officers support the applicant's proposal to only provide a tall building should the Network Rail land become available which is addressed in the outline planning application component of this proposal. It is also recognised that the eastern end of the site would not be appropriate for a tall building considering the neighbouring context of low rise development, including residential use. The applicant has provided a series of views detailing the impact the tall building will have on the surrounding residential area. However, it is accepted that a twenty storey building will not impact any strategic views and its height is unlikely to raise any strategic concerns. Notwithstanding this, for a development of this height to be acceptable, all aspects of the proposal will need to be of an outstanding design quality, in accordance with London Plan Policy 7.7 'Location and Design of Tall and Large Buildings'. Critical to this will be the final choice of material and quality of detailing, and as such the local authority will need to scrutinize this carefully. Lewisham Council should also include a clause in the S106 agreement that will ensure the same calibre of architects are retained to produce all construction drawings, or a budget is allocated to allow them to review these when they are produced. The Mayor would normally expect to see a full application for a tall building, rather than an outline application, in order to properly assess the quality of the building.

Inclusive access

62 The aim of London Plan Policy 7.2 'An Inclusive Environment' is to ensure that proposals achieve the highest standards of accessibility and inclusion (not just the minimum). Inclusive design principles, if embedded into the development and design process from the outset, help to ensure that all of us, including older people, disabled and Deaf people, children and young people, can use the places and spaces proposed comfortably, safely and with dignity.

63 The design of the landscaping and the public realm is crucial to how inclusive the development is for many people. The applicant's design and access statement indicates that people of all abilities will be able to access all areas of the site. The proposals should ensure that the routes from the public transport facilities to the new entrance points are legible and clearly identifiable, and that way finding is clear to make access easy, safe and comfortable. Further information should be included in the design and access statement to 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.

64 GLA officers welcome the applicant's inclusion of providing 10% of wheelchair accessible homes across the development. However, further information should be provided regarding 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 can advise on the need in this part of the Borough for a particular size of wheelchair accessible home).

65 It is understood that the applicant has taken a restricted approach to parking and seeks to only provide blue badge car parking spaces. Further information regarding this can be found under the 'transport' section below in this report. The applicant should include a mechanism to ensure that the supply and demand of the accessible bays are regularly monitored and provision reviewed, to ensure that provision equates to the demand from disabled residents and visitors and that the bays are effectively enforced.

Sustainable development

Energy

66 The applicant has broadly followed the energy hierarchy. Sufficient information has been provided to understand the proposals as a whole.

67 Further revisions and information are required before the proposals can be considered acceptable and the carbon dioxide savings verified.

Energy efficiency standards

68 A range of passive design features and demand reduction measures are proposed to reduce the carbon emissions of the proposed development. Both air permeability and heat loss parameters will be improved beyond the minimum backstop values required by building regulations. Other features include low energy lighting and mechanical ventilation heat recovery.

69 The demand for cooling will be minimised through appropriately sized windows and internal blinds. The applicant has also provided an overheating study, this is welcomed. The overheating assessment uses the CIBSE TM52 methodology and the CIBSE TM49 weather files. The results provided show that the bedroom spaces of the typical dwellings modelled the CIBSE criteria can be met. However, for the living spaces none of the TM52 criteria are met. The

applicant has stated that additional measures will be investigated during detailed design. The applicant should review the overheating strategy now rather than later as it is important that the principles of effective ventilation are addressed at this stage as it could impact on the visual appearance and layout of the building. It was noted that the shading coefficient is very high and will offer minimal protection from solar gains during the summer months and there is concern that this will lead to overheating. The applicant should therefore investigate the inclusion of solar control glazing to ensure that the CIBSE criteria can be met for all spaces within the sample dwellings. It was also noted that an assumption of the modelling includes an enhanced ventilation rate of 3 air changes per hour, however no details of how this will be achieved has been provided. The application should provide details of the ventilation system demonstrating that air changes per hour is achievable.

70 Evidence of how London Plan Policy 5.9 has been addressed to avoid overheating and minimise cooling demand for the commercial uses should also be provided.

71 The development is estimated to achieve a reduction of 41 tonnes per annum (11%) in regulated CO₂ emissions compared to a 2013 Building Regulations compliant development.

District heating

72 The applicant has carried out an investigation and there are no existing district heating networks within the vicinity of the proposed development. The applicant has identified that the scheme is within a district heating opportunity area and within close proximity to the potential SELCHP extension. However, the applicant has stated that due to the uncertainty surrounding expansion of the network connection is not currently being proposed. The applicant has been in contact with SELCHP to discuss the possibility of the network being extended to the site. The applicant met with SELCHP in November 2014 and the energy operator indicated that there were a couple of interested parties in the Deptford area and that a potential network extension could be operational in 2017. The network operator also discussed that a feasibility study on the network extension will be undertaken which could take up to 6 months to complete. Connection to the network should be prioritised and the applicant should contact the network operator to determine the current status of the potential network extension, particularly given that the last correspondence was over a year ago.

73 The applicant has, however, provided a commitment to ensuring that the development is designed to allow future connection to a district heating network should one become available.

74 The applicant is proposing to install a site heat network connection all apartments and non-domestic building uses will be connected to the site heat network.

75 The site heat network will be supplied from a single entry centre location on the ground floor of Block D.

Combined heat and power

76 The applicant is proposing to install a 70 kW_e / 109 kW_{th} gas fired CHP unit as the lead heat source for the site heat network. The CHP is sized to provide the domestic hot water load, as well as a proportion of the space heating. Further information on the CHP system should be provided including, fraction of heat met by the CHP and suitable monthly demand profiles for heating, cooling and electrical loads. A reduction in regulated CO₂ emissions of 70 tonnes per annum (19%) for the outline planning application and 65 tonnes per annum (20%) for the full planning application will be achieved through this second part of the energy hierarchy.

77 The applicant should provide further information on the management arrangements proposed for the system, including anticipated costs, given that the management and operation of small CHP systems can significantly impact their long term financial viability.

Renewable energy technologies

78 The applicant has investigated the feasibility of a range of renewable energy technologies and is proposing to install a 34kWp roof mounted Solar Photovoltaic (PV) array. A roof layout drawing detailing the location of the PV panels has been provided.

79 A reduction in regulated CO₂ emissions of 15 tonnes per annum (4% for the outline planning application and 5% for the full planning application) will be achieved through this third element of the energy hierarchy.

Overall carbon savings

80 Based on the energy assessment submitted at stage 1, the table below shows the residual CO₂ emissions after each stage of the energy hierarchy and the CO₂ emission reductions at each stage of the energy hierarchy for each planning application.

Outline planning application

| | Total residual regulated CO₂ emissions | Regulated CO₂ emissions reductions | |
|---|--|--|-------------------|
| | (tonnes per annum) | (tonnes per annum) | (per cent) |
| Baseline i.e. 2013 Building regulations | 360 | | |
| Energy Efficiency | 319 | 41 | 11% |
| CHP | 249 | 70 | 19% |
| Renewable energy | 234 | 15 | 4% |
| Total | | 126 | 35% |

81 A reduction of 126 tonnes of CO₂ per year in regulated emissions compared to a 2013 Building Regulations compliant development is expected, equivalent to an overall saving of 35%.

Full planning application

| | Total residual regulated CO₂ emissions | Regulated CO₂ emissions reductions | |
|---|--|--|-------------------|
| | (tonnes per annum) | (tonnes per annum) | (per cent) |
| Baseline i.e. 2013 Building regulations | 332 | | |
| Energy Efficiency | 295 | 37 | 11% |
| CHP | 230 | 65 | 20% |
| Renewable energy | 215 | 15 | 5% |
| Total | | 117 | 35% |

82 A reduction of 117 tonnes of CO₂ per year in regulated emissions compared to a 2013 Building Regulations compliant development is expected, equivalent to an overall saving of 35%.

83 The carbon dioxide savings meet the target set within Policy 5.2 of the London Plan. However, the comments above should be addressed before compliance with the London Plan energy policy can be verified.

Sustainable drainage

84 The site is within Flood Zone 3a, and a Flood Risk Assessment has been prepared by JSA. This confirms that the site benefits from flood defences and that the site is outside the predicted extent of any breach in the tidal flood defences. The FRA also confirms that the site is outside the flood plain for the River Ravensbourne.

85 As an additional mitigation measure the FRA states that the development will have finished ground floor levels located at 300mm above the modelled tidal breach level. For any less vulnerable uses that are not at this level the FRA states that flood resilient design and construction will be utilised.

86 Given the nature of the risk and the residual risk mitigation measures proposed this is considered to be an acceptable approach to the flood risk at this site.

87 Whilst the site itself is at relatively low risk from surface water flooding, there are extensive areas in the vicinity of the site which are shown to be at significant risk of surface water flooding. Therefore, it will be important that the proposals reduce surface water run-off in line with London Plan Policy 5.13 (Sustainable Drainage).

88 The FRA states that the proposed development will achieve a run-off rate of 3x greenfield rates – which represents a 95.5% reduction on current rates. The FRA states that this will be achieved through the use of green roofs, permeable pavement and shallow soakaways.

89 This approach is welcomed and in principle is in line with London Plan Policy 5.13. There do not appear to be any details on how much rainwater each method will be able to manage and therefore this provision should be secured by an appropriate planning condition with the agreement of the detailed drainage regime to be agreed by Lewisham Council in consultation with Lewisham Lead Local Flood Authority.

Climate change adaptation

90 Lewisham Council should secure through planning condition that the application responds to strategic policies regarding climate change adaptation, including use of low energy lighting and energy efficient appliances, metering, high levels of insulation, low water use sanitary-ware and fittings, in addition to biodiverse roofs.

Transport

Access

91 The proposal would open up the site, increasing pedestrian permeability along a north-west/south-east axis. Pedestrian movement through the site should be prioritised and vehicle movements limited or restricted. TfL seeks clarification as to whether cyclists could also access the site from the Rolt Street entrance and cycle through the site. The design of this entrance should be carefully considered.

Cycle parking

92 The applicant has committed to complying with London Plan (2015) standards which is welcomed. Additionally, the applicant should be reminded that the London Plan Cycle Design Standards (LCDS), paragraph 3.1.6, states that at least 5% of stands out to be able to accommodate larger cycles. TfL requests that the applicant provide further details on the mix of types of cycle stands to meet accessibility requirements on types of cycle parking and serve different user needs.

93 To encourage sustainable travel by making cycling a more convenient option, staff showers, lockers and on-site changing facilities must be provided for staff in order to fully comply with the London Plan Policy 6.9. Cycle facilities should be secured by condition.

Car parking

94 TfL welcomes the car-free nature of the scheme with the provision of 17 disabled vehicle parking spaces. However, given the number of disabled vehicle parking spaces is not in accordance with the Accessible Housing SPG, TfL seeks clarification on other strategies which will be in place to cater for those with accessibility needs, pick-up/drop-off points for example.

Car club

95 TfL suggests that the developer should provide 3 years' free car club membership for all residential units at first occupation, to reduce reliance on private vehicles. This should be included in the S106 agreement.

Bus services

96 TfL now confirms that no new bus services are currently proposed for this route. However, considering the development will increase pressure on existing bus services, TfL requests a contribution of £270,000 (£90k x 3 years) for providing an additional journey on existing route of number 225.

Pedestrian and cycle access

97 TfL requests a Pedestrian Environment Review Survey (PERS) and Cycling Levels of Service (CLOS) assessment to be undertaken in order to identify where mitigation may be needed to improve the pedestrian and cycle network around Evelyn Street, New Cross station

and New Cross Road. In the event that the audits identify necessary improvements, these should then be secured through appropriate planning obligations.

98 In addition, TfL requests clarification as the detailed design of the new pedestrian access from Rolt Street. Although Plot 2 is an outline application, TfL would like to assess the proposal for a new pedestrian access and link.

London Overground Infrastructure Protection

99 The proposed site is situated in close proximity to a London Overground viaduct and some of the existing buildings are actually physically connected to the viaduct. London Overground has raised concerns and seeks planning conditions to ensure its infrastructure is well protected. TfL requests exact wording for a number of Overground infrastructure protection conditions, which have been provided to the Council and the applicant.

Deliveries and servicing

100 TfL understands that the applicant proposes a loading bay on the street some 150m away from the north of the site. However, TfL objects that the loading bay is located too far from the north of the site for delivery. TfL therefore seeks mitigations in the Delivery and Servicing Plan (DSP). A final DSP will be required, to be agreed by the Council prior to first occupation and secured through the S106 agreement.

Travel Plan and Construction Logistics plans

101 TfL welcomes the submission of a residential and workplace Travel Plan which will be an evolving document issued to residents and which promotes sustainable travel to and from the site. However, a finalised DSP will be required, to be agreed by the Council prior to first occupation and secured through the S106 agreement.

102 The applicant also includes a Construction Logistics Plan which identifies the cumulative impacts of construction traffic for the area in terms of likely additional trips and mitigation required. As the submitted CLP is for Plot 1 only, TfL requests a revised version for both Plot 1 and Plot 2. The update of the CLP should be secured by condition.

Community Infrastructure Levy

103 In accordance with London Plan Policy 8.3, 'Community Infrastructure Levy', and following consultation on both a Preliminary Draft, and then a Draft Charging Schedule, the Mayor's CIL came into effect on 1 April 2012. The proposed development is within the Lewisham where the Mayoral charge is £35 per square metre gross internal area. The estimated total charge would be £86,614.

Local planning authority's position

104 Lewisham Council's position is not yet known.

Legal considerations

105 Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008, the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged, or direct the Council under Article 6 of the Order to refuse the application, or issue a direction under Article 7 of the Order that he is to act as the local planning authority for the purpose of determining the application and any connected application. There is no obligation at this present stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments.

Financial considerations

106 There are no financial considerations at this stage.

Conclusion

107 London Plan policies on retail and town centre uses, employment, housing, affordable housing, historic environment, urban design, inclusive design, transport and climate change are relevant to this application. In general the two schemes for each application are supported in strategic planning terms. However, further information and discussion, as stated below, is required to ensure the proposal complies with the London Plan:

- **Housing:** The housing choice and density of the proposal are deemed to be acceptable in strategic planning terms although consideration should be given to the urban design and residential quality assessment outlined in this report. To mitigate the impacts of the proximity of the railway lines, Lewisham Council should secure the vibration isolation of the development by way of planning condition.
- **Children's playspace:** The applicant's proposal for child playspace provision is welcomed by GLA officers. It is recommended that Lewisham Council secure the type of play equipment, as outlined in the full planning applications design and access statement, be secured by way of planning condition.
- **Affordable housing:** The intent to provide affordable and market housing on the same site is strongly supported in accordance with strategic policy. The outcome of Lewisham Council's independent assessment of the applicant's viability report should be shared with GLA officers prior to the application being referred back to the Mayor.
- **Urban design and tall buildings:** Further detail is required to demonstrate how habitable rooms within each dwelling are provided with an adequate level of privacy in relation to neighbouring dwellings. The applicant should consider providing commercial floorspace in Block A for the outline planning application to ensure active frontages along the whole proposed route. The applicant's intent to ensure a good residential quality will be achieved is welcomed by GLA officers, further evidence is required for officers to be able to assess this. Information should be supplied to GLA officers prior to the application being referred back to the Mayor regarding typical unit layouts, unit sizes, and number and locations of single aspect units. Lewisham Council should include a clause in the S106 agreement that will ensure the same calibre of architects are retained to produce all construction drawings, or a budget is allocated to allow them to review these when they are produced.

- **Inclusive access:** Further information should be included in the design and access statements regarding 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 in the routes will be addressed. The location and number for both planning applications of wheelchair accessible units should be provided to GLA officers prior to the application being referred back to the Mayor. The applicant should include a mechanism to ensure that the supply and demand of the accessible bays are regularly monitored and provision reviewed.
- **Sustainable development:** Further revisions and information (detailed in the body of this report) are required before the proposals can be considered acceptable and the carbon dioxide savings verified. This should be submitted for assessment before the application is referred back to the Mayor. Conditions securing a commitment for sustainable drainage and climate change adaptation measures within the proposed development should be included within the application when it is referred back to the Mayor.
- **Transport:** Further information and discussion (detailed in the body of this report) regarding transport matters are required for assessment prior to the application being referred back to the Mayor.

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