

22 December 2015

**Catford Greyhound Stadium, Adenmore Road**

in the London Borough of Lewisham

planning application no. DC/15/94002

**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**

Erection of a part 5, part 19 storey building (Block A) to provide 92 residential units and 390sq.m. of flexible retail/commercial space (Use Classes A1/A2/A3/A4 & B1), and the creation of a public plaza between Catford and Catford Bridge stations, together with landscaping and other public realm works, cycle and refuse storage and associated works at Adenmore Road.

**The applicant**

The applicant is **BDW Trading Limited**, and the agent is **bptw Planning**.

**Strategic issues**

The **principle of development** has previously been agreed, and the amendments to the scheme meet current standards and improve the overall residential quality which is welcome. However, further information and discussion is required on **housing, affordable housing, urban design, inclusive access, sustainable development** and **transport** to ensure compliance with London Plan policies.

**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 89 of this report; but that the possible remedies set out in that paragraph could address these deficiencies.

**Context**

1 On 17 November 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 28 December 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 Category 1C of the Mayor of London Order 2008:
- 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](http://www.london.gov.uk).

## **Site description**

- 5 Block A of the former Catford Green Greyhound Stadium site forms part of a wider 4.26 hectare development site located to the west of Catford town centre. Catford Green has planning permission for thirteen blocks of up to eight storeys in height, comprising 589 residential units, a community centre and approximately 500 sq.m. of commercial floorspace. The development area between Block A and Blocks T and U is currently under construction, with development scheduled to be completed in late 2016.
- 6 The wider site is bounded to the south by the A205 South Circular (which forms part of the Transport for London Road Network), Catford Bridge Station and Catford Station, to the north by Ladywell Fields, a public park, and to the east and west by railway tracks, which are elevated on the western boundary. The land beyond the railway tracks to the west and east is residential in character, with a section of Ladywell Fields to the northwest. Ravensbourne River enters the south of the site and runs north for approximately 40 metres before entering Ladywell Fields.
- 7 The site of Block A is situated to the south of the wider Catford Green development and is approximately 0.7 hectares. The site has direct frontage onto Adenmore Road and Westdown Road which are both borough roads. Adenmore Road adjoins the South Circular, which is part of the Transport for London Road Network. The nearest part of the Strategic Road Network is over 2 kilometres from the site.
- 8 Waterlink Way, a spine route for pedestrians and cyclists linking the southern end of the borough with the north, runs through the southern part of Catford Green. The site is also on London Cycle Network (LCN) routes 21 and 22. The residents of the Catford Green development will also benefit from the new footbridge over the railway line linking with Catford town centre. This bridge is currently being delivered as s106 obligation from the original consent.
- 9 Block A has a public accessibility level (PTAL) of 6b, measured on scale of 1 to 6b, where 6b is the most accessible.

## **Details of the proposal**

- 10 This application proposes the erection of a part 5, part 19 storey building to provide 92 residential units and 390 sq.m. of flexible retail/commercial space (Use Classes A1-A4 and B1). The proposal also includes the creation of a public plaza between Catford and Catford Bridge stations, landscaping and other public realm works, cycle and refuse storage and associated works.

## **Case history**

- 11 On 2 April 2008, the former Mayor considered a report on the wider development site at the former Catford Green greyhound stadium for:

- *'The construction of 589 residential units, commercial floorspace and a community centre in 13 blocks, rising to a maximum of eight storeys in height on the site of the former Catford Greyhound Stadium, including the land in between the railway line and the South Circular (A205) comprising 216 one bedroom and 311 two bedroom self-contained flats; 39 three bedroom and 23 four bedroom houses/maisonettes, as well as use classes A1/A2/B1 retail/commercial floorspace (508 sq.m.) and a use class D1 community centre (298 sq.m.) together with associated landscaping, including river naturalisation and creation of a public plaza between Catford and Catford Bridge Stations, provision of a footbridge to Doggett Road, an electricity sub-station, bin stores, 649 cycle spaces and 248 car parking spaces.*

12 The former Mayor advised that the principle of the proposal was supported but that the proposals raised a number of strategic planning issues. On 25 June 2008 the Deputy Mayor, Government Relations, considered an updated report and subsequently advised Lewisham Council that the applications had responded positively to a number of concerns raised previously, however the energy strategy raised serious strategic concerns and further information was required on other strategic issues. On November 2008 the current Mayor considered a further report on the proposals and advised Lewisham Council that the Mayor was content for the Council to determine the case itself, subject to any action that the Secretary of State may take. Planning permission was subsequently granted in January 2009.

13 A section 73 application to vary this planning permission was granted in January 2014, which amended the site layout, appearance, massing and layout of the individual blocks. This was not seen by the Mayor because the original application was submitted prior to 2008, and therefore subject to the GLA's old powers. There have been various other s73 applications to vary conditions, and in relation other blocks.

14 A pre-application meeting was held between the applicant and GLA officers, and attended by Lewisham Council officers on 13 May 2015 to discuss the amendment of Block A to the consented scheme. The applicant was advised that the proposed amendments were generally acceptable, subject to clarification and further details on aspects of the scheme, including viability, detailed design, transport and energy.

## **Strategic planning issues and relevant policies and guidance**

15 The relevant issues and corresponding policies are as follows:

- |                           |  |
|---------------------------|--|
| • Land use principles     | <i>London Plan</i>   |
| • Housing                 | <i>London Plan; Housing SPG; draft interim Housing SPG; Housing Strategy; Shaping Neighbourhoods: Play and Informal Recreation SPG; Shaping Neighbourhoods: Character and Context SPG</i>            |
| • Affordable Housing      | <i>London Plan; Housing SPG; draft interim Housing SPG; Housing Strategy</i>   |
| • Urban design            | <i>London Plan; Shaping Neighbourhoods: Character and Context SPG; Housing SPG; draft interim Housing SPG; London Housing Design Guide; Shaping Neighbourhoods: Play and Informal Recreation SPG</i> |
| • Inclusive access        | <i>London Plan; Accessible London: achieving an inclusive environment SPG</i>  |
| • Sustainable development | <i>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</i>               |

- Transport
- CIL

*London Plan; the Mayor's Transport Strategy*

*London Plan; Mayoral Community Infrastructure Levy*

16 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).

17 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

18 The existing planning consent establishes the principle of the development. This proposal comprises the complete redesign of Block A, replacing the consented 8 storey block with a podium block of 5 storeys and a landmark tower of 19 storeys. Whilst the alteration to the approved planning permission is generally acceptable in strategic planning terms, the acceptability is subject to the issues set out in this report.

## Housing

19 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 42,000 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 residential accommodation on this site is supported in strategic planning terms.

### Housing choice

20 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	Consented mix		Proposed mix	
	Number	% of units	Number	% of units
1 Bed	23	25%	29	32%
2 Bed	69	75%	62	67%
3 Bed	0	0%	1	1%
<b>Total</b>	<b>92</b>		<b>92</b>	

21 The scheme for Block A has a range of unit sizes, although the overall provision of family units is low at 1%. GLA officers do note that the applicant has increased this from the previous consented scheme, which proposed 0% of family sized units, however it is disappointing that the applicant has not provided more family sized units. The applicant should confirm how the revised mix has been arrived at and the Council should confirm that it reflects its own housing requirements and its understanding of local demand.

### Density

22 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 a central location where the density matrix sets a guideline of 650 to 1100 habitable rooms (or 140 to 405 units) per hectare on a site such as this where the PTAL is 6b, although the London Plan notes that these ranges should not be applied mechanistically. The Catford Green scheme as approved has a density of 391 habitable rooms per hectare.

23 The site area for Block A currently includes a large amount of on-site publicly accessible open spaces, which serves to artificially lower the density calculations of the proposed development. Therefore GLA officers request a bespoke method for calculating density figures, this should be agreed with Lewisham Council and density figures supplied to GLA officers prior to the application being referred back to the Mayor. GLA officers recommend that the site area for density purposes exclude the river way and the proposed public plaza. Density calculations will also need to be undertaken in accordance with paragraph 1.3.47 of the Mayor's Housing SPG.

### Residential quality

24 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.

25 Quality issues are particularly important in tall buildings and therefore the development would be expected to target the good practice standards stated in the Housing SPG. GLA officers note that the amendment from the original consented scheme has resulted in improved residential quality which is welcome. Further analysis of residential quality is detailed under the 'urban design' section of this report.

### Children's playspace

26 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 playspace to be provided per child, with under-5 child playspace provided on-site as a minimum.

27 The applicant is proposing to provide 60 sq.m. playspace on the roof terrace of the podium element of the building which will provide for children 11 and under, which is welcome. Older children will be able to access playspace located in nearby parks. The applicant should provide information on how older children will access facilities off-site. It is recommended that Lewisham Council secure the play equipment provision by way of planning condition.

## **Affordable housing**

28 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.

29 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.

30 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.

31 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.

32 In terms of affordable housing the approved masterplan (as amended in 2014) secured 29.4% of units as affordable, split 65:35 between affordable rent and shared ownership (113 affordable rent and 60 shared ownership units). None of the approved affordable units were located in Block A, but this block did contribute to the wider viability case at the time. In the current scheme, the applicant is not proposing any affordable units to be located within the current proposal. Given that this block is part of a wider masterplan scheme that has already been the subject of a recent viability review as part of the s73 application, not providing any affordable housing within the Block A proposal is acceptable in strategic planning terms.

## **Urban design**

33 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, 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).

34 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 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.

35 As noted in the pre application report, the reduction of the consented schemes footprint is welcome. This has resulted in a significant increase of the public realm to the north between the railway and river edges, and a larger and better-defined area of public space immediately to the east of Catford Station. The public realm strategy provides information on the width of the pedestrian route adjacent to the river edge, which indicates that this is wide enough to provide activity along the river's edge, which is welcome.

36 The proposed ground floor layout is also welcome. The applicant has consolidated servicing and back of house services along the western edge of the building and alongside the railway edge. This proposal enables active frontages to be maximised to all public facing edges of the block. The provision of two ground floor commercial units is also welcome as it will encourage activity along the proposed public plaza and the pedestrian route along the river edge.

37 The proposed amendments to the consented scheme results in an improved standard of residential accommodation within Block A. The proposed design results in all units meeting or exceeding the Mayor's minimum space standards, as set out in Table 3.3 of the London Plan, an increase in the number of dual aspect units and all units designed to achieve a minimum of 2.5 metre internal floor to ceiling heights, which is welcome. The orientation of units results in predominantly east/west aspects, which is supported.

38 The amendments have also reduced the number of units sharing the same core (from sixteen to eleven) in relation to the extant scheme. This is welcome, however it is disappointing that the applicant has not improved on this to achieve no more than eight units sharing the same core, in accordance with the best practice principles of the Mayor's Housing SPG. The applicant should revisit the podium element of the design and work to reduce the number of units sharing the same core on the lower levels of the residential component to eight or lower. This could be achieved by providing two cores, one for the tower element and another for the podium component, or reconfiguring the unit layout for the lower floors. As stated previously, a design of this height is expected to achieve outstanding design quality, and to achieve this, the proposal should not exceed eight dwellings per floor accessed from a single core.

39 The principle of a simple building form consisting of a lower five storey podium element with a taller element above in this highly accessible location is supported. However the applicant could further explore reducing the massing of the five storey podium element with a slight increase to the taller element. This could also help to reduce the number of units per core.

40 The development includes a building of 19 storeys, which is significantly taller than its immediate context. GLA officers are of the view that a tall building located on this site is appropriate, although consideration should be given to the issues raised in this report. The applicant has provided a series of views detailing the impact the proposal will have on the surrounding area. However, it is accepted that a 19 storey building will not impact any strategic views and its height is unlikely to raise any strategic concerns. Lewisham Council should ensure they are satisfied with the impact the building will have on the surrounding area. Notwithstanding this, for a building 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. GLA officers would like to see further visualisations of the building to ensure that the quality of the detailing and choice of material is appropriate for a building of this height. It is also expected that the local authority will scrutinize this carefully. A clause should be included 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 get produced.

## **Inclusive access**

41 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.

42 The design of the landscaping and public realm is crucial to how inclusive the development is for many people. The applicant's landscape strategy 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 entrances are legible and clearly identifiable, and that way finding is clear to make access easy, safe and comfortable. The applicant's public realm strategy provides information regarding levels, gradients and surface materials of paths and how they are providing segregation from traffic and turning vehicles, and how any level changes in the routes will be addressed. This is welcomed by GLA officers.

43 GLA officers welcome the applicant's inclusion of providing 10% of wheelchair accessible or easily adaptable homes across the development. The applicant has indicated that these will be provided across all tenure types proposed in the scheme which is also welcome and will provide disabled and elderly people similar choices to non-disabled people. The drawings of the proposal submitted by the applicant illustrate where these units will be located. The applicant has also indicated that all units will meet Lifetime Homes standards, which is also welcome. As set out in the Mayor's Housing Standards Policy Transition Statement, the Council should secure compliance with building regulations M4(2) and M4(3).

44 The applicant is proposing to provide a car free scheme and has indicated that blue badge parking is available on Westdown Road, which is located close to the site between the crossing of the river and the bridge carrying the railway line over the road. The applicant has indicated that there will be a path that runs along the western side of the river that will provide step-free access to the lobby of Block A, which is welcome. The applicant should provide further details regarding how any potential disabled residents will access public transport from the subject site prior to the application being referred back to the Mayor.

## **Sustainable development**

### Energy

45 This application concerns a part 5-storey, part-19 storey block being added to an already existing and emerging development with its own heat network.

46 The applicant has cited savings referenced to both 2010 and 2013 building regulations. However, only the later can be considered, and the relevant savings (23.59%) fall well below the target value.

47 The applicant has broadly followed the energy hierarchy to reduce carbon dioxide (CO<sub>2</sub>) emissions. However, the savings from energy efficiency measures are rather vague and that is an area for requesting clarification and a more vigorous attempt to raise the overall result.

48 The cooling hierarchy has been broadly followed, but the applicant is requested to back this up with results drawn from dynamic modelling.



49 No renewables are included, with the applicant pointing out the difficulty for a high rise block of achieving anything more than a negligible result. However, since the development falls so far short of the overall target, the applicant should further investigate the incorporation of PV in order to maximise the CO<sub>2</sub> emission savings realised on-site.

#### Energy efficiency standards

50 The applicant states a commitment to compliance for this development meeting Part L 2013 by efficiency measures alone.

51 The exact combination of measures is not finalised, but a combination of enhanced U-values, reduced thermal bridging losses are cited. Zonal controls, and very well insulated hot water tanks are also included. The final package of measures has not been fully decided, consequently as part of that process the applicant should be seeking a combination of measures that achieves greater savings.

52 The demand for cooling will be reduced through the integration in the design of recessed balconies and deep reveals; there may be some limited use of high performance glazing. Green roofs for the lower rise buildings will provide some protection against overheating. The dwellings have openable windows so that natural ventilation is the principle source of summer cooling. However, mechanical ventilation also provides background ventilation, only some of which integrates heat recovery.

53 Although the applicant has followed the cooling hierarchy, this should be accompanied by an evidence base drawn from dynamic modelling. For the retail part of the development, high efficiency lighting and ventilation are proposed, although the exact combination of measures is again not finalised.

54 The development is estimated to achieve a reduction of 3.05 tonnes per annum (approximately 2.5%) in regulated CO<sub>2</sub> emissions compared to a 2013 Building Regulations compliant development, as shown in the table below.

#### District heating

55 There is a communal heat network that has already been installed at the site. This has been configured to serve all 589 units in the consented scheme. The proposed development will connect to this network.

56 The applicant is requested to confirm explicitly that all 92 dwellings and all of the 390sq.m of non-domestic floorspace will connect to the network.

#### Combined heat and power

57 The already existent heat network has a 210kW<sub>e</sub> gas-fired CHP unit has the lead heat source for the overall site heat network. The savings for this development arising from the CHP are therefore a proportion of the savings estimated for the whole development.

58 The CHP is sized to run for 8 hours per day during the hottest 3 summer months and 17 hours during the remainder of the year, providing approximately 60% of the overall heat demand. There are two 30,000 litre storage vessels to assist the best utilisation of the CHP.

59 A reduction in regulated CO<sub>2</sub> emissions of 25.53 tonnes per annum (approximately 21%) will be achieved through this second part of the energy hierarchy (see table below).

### Renewable energy technologies

60 The applicant has investigated the feasibility of arrange of renewable energy technologies and has concluded that for this development they could achieve very little.

61 The applicant concludes that the 19 storey block has little potential for inclusion of renewables with the 5 storey part of the development will have a green roof. However, particularly given the substantial shortfall in not reaching the 35% target, the applicant should reconsider opportunities for renewables, in particular PV.

### Overall carbon savings

62 The table below shows the residual CO<sub>2</sub> emissions after each stage of the energy hierarchy and the CO<sub>2</sub> emission reductions at each stage of the energy hierarchy.

	Total residual regulated CO <sub>2</sub> emissions	Regulated CO <sub>2</sub> emissions reductions	
	(tonnes per annum)	(tonnes per annum)	(per cent)
Baseline i.e. 2013 Building regulations	121.17		
Energy Efficiency	118.12	3.05	2.52%
CHP	92.59	25.53	21.07%
Renewable energy	92.59	0	0%
<b>Total</b>		<b>28.58</b>	<b>23.59%</b>

63 A reduction of 28.58 tonnes of CO<sub>2</sub> per year in regulated emissions compared to a 2013 Building Regulations compliant development is expected, equivalent to an overall saving of 23.59%.

64 The CO<sub>2</sub> savings do not meet targets set within Policy 5.2 of the London Plan. As such, the applicant needs to investigate further opportunities for carbon emissions savings.

### Flood risk

65 The Flood Risk Assessment and Drainage Strategy, prepared by WYG, confirms that the site is located within Flood Zones 1, 2 and 3. The areas to be developed are located within Flood Zone 1.

66 Topographical survey data shows the existing ground level where the proposed block will be built is above the extreme (1 in 1000 year) flood level. However, it is notable that the site is generally surrounded by extensive areas within Flood Zones 2 and 3, which is likely to mean that during a significant flood event this site may be cut off from the local area.

67 The FRA confirms that the site is not currently at significant risk of surface water flooding. Whilst there are areas at high risk of surface water flooding surrounding the site, these are separated from the site by areas of higher ground.

68 The FRA recommends mitigation measures to manage the residual flood risk for the development:

- future occupants register with the Environment Agency's flood warning service, 'Flood Line' and;

- finished floor levels will be kept to a minimum of 150mm above surrounding ground levels.

69 The overall approach is considered to comply with London Plan Policy 5.12. These measures should be secured via an appropriate planning condition.

#### Sustainable drainage

70 Due to the risk of groundwater contamination, infiltration of surface water has been eliminated as a potential sustainable drainage method. Surface water will instead be discharged into the River Ravensbourne at a greenfield run off rate of 5 litres per second.

71 Proposed attenuation storage to facilitate this includes:

- permeable paving with subgrade storage, oversized pipes and/or below ground attenuation tanks as part of the Site drainage system; and
- a green roof providing further attenuation of rainwater (contributing to London plan Policies 5.10, 5.11 and 7.19).

72 These will be capable of storing sufficient surface water for up to the 1 in 100 year (plus climate change) event.

73 This approach is considered to be compliant with London Plan Policy 5.13. These aspects of the proposals should be secured via an appropriate planning condition.

74 Consideration could, however, be given to rainwater harvesting to serve the commercial parts of the building.

#### Climate change adaptation

75 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**

#### Road network

76 TfL would expect a Delivery and Service Plan (DSP) and a Construction Logistics Plan (CLP) to be secured by condition to appropriately manage any potential adverse effects on the Transport for London Road Network and borough highway. These Plans should either be new documents specifically for Block A or suitable updated versions of the existing plans covering the remainder of the development.

#### Car parking

77 TfL understands that the development is car free, which is consistent with the original consented scheme. Residents will be exempt from parking permits and this should be secured as part of the planning obligations and conditions. However, to demonstrate compliance with London Plan policy, the developer should clarify their proposed arrangements for parking by disabled residents and visitors.

### Cycle parking

78 The level of cycle parking proposed for residential units has been increased so that it complies with London Plan (2015) standards. TfL also request that cycle parking is provided for the commercial use to accord with these standards. Cycle changing facilities (such as showers) should also be provided and secured by condition.

### Public realm

79 As part of the development of Catford Green, Adenmore Road would be closed to traffic permanently (except limited servicing for Block A and Catford Station) and the developer is working with Lewisham Council to secure the necessary approvals to enable this to take place. The design should accord with TfL's Station Public Realm Design Guidance (2015), Streetscape Guidance, and London Cycle Design Guidance. TfL also requests that further details are provided of this aspect of the Catford Green scheme including how cyclists and pedestrians would be safely catered for (including existing cycling routes), the arrangements for necessary access for servicing of Block A, taxi drop off/pick up for the stations, and disabled provision for the stations as well as the residential scheme.

80 TfL considers legibility of the development and in particular the new public realm and pedestrian/cycle routes could be enhanced with Legible London signage. Furthermore there is an existing walking and cycling route under the south circular, connecting the site and Waterlink Way, which would benefit from an improvement. TfL requests that a financial contribution (sum to be agreed with TfL) is secured as part of the s106 agreement for these enhancements.

81 It is understood that the developer/Lewisham Council may wish to make some improvements to the footway and route between the site, Adenmore Road, and the South Circular. Subject to an appropriate s278 agreement with TfL this aspect of the proposals is welcomed as being necessary to improve access for residents and visitors.

### Public Transport

82 This development would be unlikely to have a significant impact upon public transport capacity. However the proposed closure of Adenmore Road and pedestrian links to the development from the west crossing Ravensbourne Park should be carefully designed to ensure that TfL bus operations are not adversely impacted.

### Travel Planning

83 A travel plan should be secured, enforced, monitored and reviewed as part of the s106 agreement.

### Community Infrastructure Levy (CIL)

84 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 Lewisham where the Mayoral charge is £35 per square metre gross internal area.

## **Local planning authority's position**

86 Lewisham Council's position is not yet known.

## Legal considerations

87 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

88 There are no financial considerations at this stage.

## Conclusion

89 London Plan policies on housing, affordable housing, urban design, inclusive access, sustainable development, and transport are relevant to this application. In general the proposal is 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 of the proposal is 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. The applicant should confirm how the revised mix from the consented scheme has been arrived at and the Council should confirm that it reflects its own housing requirements and its understanding of local demand. Bespoke density calculations are also required that take into account the amount of public accessible open space that the proposal is providing, the site area for density purposes should be agreed with Lewisham Council and density figures supplied to GLA officers.
- **Affordable housing:** The applicant is not making any provision for affordable housing on this site, which is in line with the original consented scheme. It is understood that the scheme is providing 29.4% of affordable housing across the wider Catford Green scheme and this has been independently assessed.
- **Urban design:** The design of the scheme is generally of a high quality with an appropriate layout that improves on the extant scheme. However the applicant should revisit the design of the residential component of the podium to reduce the number of units per core in line with the 'good practice' standards of the Mayor's Housing SPG. Lewisham Council should confirm that the proposal for a tall building does not negatively impact on the local context of the development site.
- **Inclusive access:** The inclusive design provisions are welcome. As set out in the Mayor's Housing Standards Policy Transition Statement, the Council should secure compliance with building regulations M4(2) and M4(3). Further details are required regarding how disabled residents will access public transport options as no blue badge parking will be provided on-site.

- **Sustainable development:** Further information and discussion (detailed in the body of this report) are required before the proposals can be considered to be acceptable and the carbon dioxide savings verified. This should be submitted for assessment before the application is referred back to the Mayor. Conditions securing commitment for climate change adaptation measures 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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