

# Land north of Reginald Road and south of Frankham Street, Deptford

in the London Borough of Lewisham

planning application no. DC/16/095039

## 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

Demolition of the former caretaker's house on Frankham Street and 2-30 Reginald Road, conversion and extension of the former Tidemill School buildings and the construction of three new buildings ranging from 2 to 6 storeys at Land North of Reginald Road & South of Frankham Street SE8, to provide 210 residential units (78 x one bedroom, 97 x two bedroom, 27 x three bedroom, 8 x four bedroom) together with amenity space, landscaping, car and cycle parking.

## The applicant

The applicants are **Family Mosaic** and **Sherrygreen Homes** and the architect is **Pollard Thomas Edwards**.

## Strategic issues

The principle of the residential redevelopment of this site is supported. However, there are a number of outstanding strategic planning concerns relating to **affordable housing, housing, urban design, flooding, inclusive design, climate change** and **transport**.

## Recommendation

That Lewisham Council be advised that, whilst the principle of the residential development of the site is supported, the application does not comply with the London Plan, for the reasons set out in paragraph 58 of this report. However, the resolution of those issues could lead to the application becoming compliant with the London Plan.

## Context

1 On 8 February 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 17 March 2016 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 the following Categories of the Schedule to the Order 2008:

- Category 1A: Development which comprises or includes the provision of more than 150 houses, flats, or houses and flats.

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 the application 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 The 1.26 hectare site is located to the south of Reginald Road and to the north of Frankham Street. There is a mixture of buildings on the site, including the former Tidemill Primary School, playground, car park, hardstanding and open space, as well as a local authority residential block. To the west of the site is Deptford Town Centre, which generally comprises two and three storey mixed use properties fronting the High Street. The surrounding areas to the north, south and east generally comprising medium density housing in a variety of styles. The site lies in between Deptford High Street (west) and Deptford Creekside (east) Conservation Areas.

6 The site is allocated as part of a wider regeneration site, the Giffin Street Redevelopment Area, in Lewisham's Site Allocations Local Plan document. The wider site includes the land to the north of Giffin Street. Giffin Street itself runs parallel to Frankham Street, to the north, in between the two parts of the wider redevelopment site. The allocation for the overall site is for mixed use commercial/creative floorspace, the relocation of Tidemill School, relocation of library, housing and community use. The northern part of the redevelopment area, the "Lewisham Lounge", has been built out and comprises the relocated Tidemill School, leisure and community uses.

7 At its closest, the application site is located 190 metres north of the A2 Blackheath Road, which forms part of the Transport for London Road Network (TLRN) and around 400 metres south of the A200 Creek Road which forms part of the Strategic Road Network (SRN). The application site is positioned within a reasonable walking distance from several rail stations including Deptford National Rail Station, Deptford Bridge DLR station, the Greenwich DLR/National Rail station and New Cross Overground station. The site currently has a public transport accessibility level (PTAL) of 5 (on a scale of 1 to 6 where 6b is the most accessible) indicating the site has very good accessibility. This is forecast to improve to a PTAL rating of 6a by 2021 which indicates an excellent level of accessibility. The application site also enjoys good accessibility by cycle, being close to several existing or proposed strategic routes including Quietway 1 and Cycle Superhighway 4.

## **Details of the proposal**

8 Full planning permission is sought for the redevelopment of the site with three new blocks up to six storeys and the conversion of the existing school buildings, to provide 210 residential units. Also proposed are associated amenity space, public realm, landscaping, car and cycle parking.

## **Case history**

9 The application scheme considered here was subject to formal pre-application discussions with GLA officers, including a formal pre-application meeting on 24 March 2015. GLA officers supported the principle of a residential development proposal, subject to further consideration being given to the

interaction between the buildings and the public realm. The key strategic concern raised was affordable housing and the relationship with the Amersham Vale site.

## Strategic planning issues and relevant policies and guidance

10 The relevant issues and corresponding policies are as follows:

- |                             |   |
|-----------------------------|---|
| • Housing                   | <i>London Plan; Housing SPG; Housing Strategy; Shaping Neighbourhoods: Play and Informal Recreation SPG; Shaping Neighbourhoods: Character and Context SPG; Social Infrastructure SPG</i> |
| • Affordable housing        | <i>London Plan; Housing SPG; draft interim Housing SPG; Housing Strategy</i>  |
| • Density                   | <i>London Plan; Housing SPG; Housing Strategy</i>   |
| • Urban design and heritage | <i>London Plan; Shaping Neighbourhoods: Character and Context SPG; Housing SPG; 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 and parking     | <i>London Plan; the Mayor's Transport Strategy</i>  |
| • Crossrail                 | <i>London Plan; Crossrail SPG; Mayoral Community Infrastructure Levy</i>  |

11 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 (June 2011), Development Management Policies (November 2014) and Site Allocations (June 2013), as well as the London Plan (Consolidated with Alterations since 2011). The National Planning Policy Framework and Technical Guide to the National Planning Policy Framework, are also relevant material considerations.

## Principle of residential development

12 The Tidemill School previously occupied the buildings on the site, but this has been relocated to the north of Giffin Street as envisaged by the Lewisham Site Allocations Local Plan. As such, the proposal would not result in the loss of social infrastructure and accords with London Plan Policy 3.16.

13 The principle of residential development on this site is supported. Policies 3.3 and 3.4 of the London Plan recognise the need for housing in London and Table 3.1 sets an annual target of 1,385 homes in Lewisham for the period 2015–2025. The proposed 210 units would provide a welcome contribution towards meeting this target and is supported.

## Housing

14 The application proposes a total of 210 residential units and a detailed housing schedule is provided in Table 1 below. These figures do not however take into account the loss of existing housing on the site, comprising 16 flats, so the net increase in unit numbers proposed is 194. The proposed housing would however make a welcome contribution towards meeting the housing need of the borough and London generally, and is supported in line with London Plan Policy 3.3.

unit type	number	% of total scheme
1 bed	78	37
2 bed	97	46
3 bed	27	13
4 bed	8	4
total	210	100

Table 1: housing schedule

### Affordable housing

15 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, having regard to viability, the availability of public subsidy and phasing of development. In doing so each council should have regard to its own overall target for the amount of affordable housing provision. This target should also take account of the requirements of London Plan Policy 3.11, which include the strategic target that 60% of new affordable housing should be for social rent or affordable rent and 40% for intermediate rent or sale. Policy 3.12 makes it clear that affordable housing should normally be provided on site, unless an exception can be demonstrated.

16 The applicant proposes on site affordable housing at 19% when measured by habitable room and has submitted a Viability Report to demonstrate that this is the maximum reasonable contribution. The Council should appoint an independent consultant to confirm this position and their report should be provided to GLA officers. Furthermore, the applicant and the Council should confirm that the tenants of the existing flats will be rehoused within the development and express the overall percentage of affordable housing as a net increase on this basis.

17 The proposed tenure split of 76:24 in favour of affordable rent is broadly in accordance with Lewisham's Core Strategy, but the Council should confirm that this split reflects local needs. It is noted that the proposed affordable mix is weighted towards affordable rented family accommodation, which is the London Plan priority, although it is stated that the 42% target normally sought by Lewisham's Local Plan cannot be met. However, a related scheme known as Amersham Vale has delivered a higher proportion of 63% family units, so considering the two schemes together the overall level of family affordable housing is acceptable.

18 The Council should also secure a review mechanism in the S106 agreement to enable an additional affordable housing contribution to be sought, should viability improve.

### Housing choice

19 London Plan Policy 3.8, together with the Mayor's Housing SPG, seeks to promote housing choice and a balanced mix of unit sizes in new developments. The proposal, as currently submitted, includes 35 family units, equating to more than 17% of overall housing provision. The Council should confirm that the mix responds appropriately to local housing need.

### Density

20 The site is urban in character and therefore, given the site's PTAL rating of five, the density guideline set out in Table 3.2 of the London Plan is 45-260 units per hectare, or 200-700 habitable rooms per hectare. The proposed development would result in a density of 167 units per hectare or 500 habitable rooms per hectare. This is comfortably within the density range, and the high residential quality and provision of amenity space reinforces that this density is appropriate.

### Housing quality and amenity

21 London Plan Policy 3.5 promotes quality in new housing provision, with further guidance provided by the Mayor's Housing SPG. From the submitted documents it is clear that the majority of units will meet or exceed the minimum internal space standards. The exceptions are three units within the converted school buildings, with minor 2.5 sq.m. shortfalls for two 1 bed flats and a modest 5.6 sq.m. shortfall for one 2 bed duplex. Having regard to the overall quality of these units and the constraints of converting an existing building, these minor shortfalls are acceptable. The proposed external amenity space would meet London Plan standards, although a number of the units in the converted school buildings would not have access to private balconies due to design constraints. It is however noted that the standard of communal amenity space for each block is high and all residents would therefore have access to significant provision of high quality amenity space, so overall this is acceptable.

22 Key factors such as floor-to-ceiling heights, orientation, maximising ground-floor individual access points, and number of units per core, are also essential to achieving high residential quality, and are also of particular importance when assessing residential quality. It is clear from the submitted documentation that the residential layouts have generally been designed to ensure that the standard of accommodation will be high, which is welcomed, although there are some concerns regarding ground floor entrances and floor to ceiling heights as set out in the urban design section below.

### Children's play space

23 London Plan Policy 3.6 seeks to ensure that development proposals include suitable provision for play and recreation. Further detail is provided in the Mayor's Shaping Neighbourhoods: Play and Informal Recreation Supplementary Planning Guidance, including a benchmark requirement for 10 sq.m. of play space per child. Based on the child yield methodology set out in this SPG, the applicant has calculated that the development will be home to 60 children, 23 of which are expected to be under five years old. The application proposes a variety of play spaces within the communal courtyards and open spaces of the development, with a total area well in excess of the 600 sq.m. required by the Mayor's SPG.

24 This is welcomed, although the applicant should confirm which parts of the amenity and open space will be provided as children's play space and clarify the total area for each use, to ensure that play space does not impinge on the communal amenity space provision for other residents. The Council should secure the details of this play space by condition and if necessary seek a financial contribution towards off site play space provision for older children.

## **Urban design**

25 Good design is central to all objectives of the London Plan and is specifically promoted by the policies contained within chapter seven 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.

### Layout and public realm

26 The scheme design is well laid out, creating a permeable and legible network of streets and spaces with good definition between public and private space through well-defined perimeter blocks and boundary treatments, incorporating retention of the historic school buildings. The central green spine and pocket garden in the south east corner would provide adequate mitigation for the loss of green space resulting from the redevelopment and would provide a welcome contribution to public open space in Deptford. The proposed open spaces provide a good balance of hard and soft landscaping to ensure that they are usable and give a green setting to the development. The streets

and spaces have been designed to accommodate cyclists and pedestrians, with minimal intrusion by vehicles, which is supported. It is noted that extensive work has been undertaken on the landscaping proposals and it will be important that this attention to detail is carried through into the final scheme, to ensure that the public realm is of the highest quality.

27 The applicant has generally responded positively to comments made by GLA officers at pre-application stage and the level of active public frontage is welcomed, but there are some concerns remaining with regard to maximising ground floor entrances in particular areas of the masterplan. As mentioned during pre-application discussions, it is essential that the proposed green spine and pocket garden feel active and welcoming. The applicant is therefore requested to re-orientate the cores for Blocks B2 and D to face out onto these spaces or increase ground floor unit entrances to increase activity and animation in these areas. Furthermore, there are concerns over the relationship with spaces to the side of units B1.0.1 and B3.0.1, which do not have natural surveillance or activity from within the scheme. The applicant should amend the layout of these maisonettes to orientate ground floor windows and entrance doors to these areas, to make these spaces more secure and animated.

#### Residential quality

28 As mentioned above, the quality of the residential accommodation proposed is generally considered to be high, with all the blocks meeting London Plan guidance for dual aspect, orientation and number of units per core. There is however a concern over the proposed floor to ceiling heights in the extended school building. The proposed duplex roof extension to the main school building would have low clearance of 2.25 metres on the upper floor. Noting the design constraints of extending the existing building, this should be increased to at least 2.4 metres to improve residential quality. The shortfalls in the annex building are acceptable, on balance, as these affect individual floors in mezzanine units, which have almost double height living areas to compensate.

#### Scale and massing

29 The height and massing of the development is supported and is generally in keeping with the surrounding context of the site. The modest extensions to the school buildings would also have an acceptable relationship with those buildings and the scheme as a whole.

#### Architectural treatment

30 The proposal comprises new buildings of a contemporary design, which would sit alongside the retained and extended former Tidemill School buildings. The new architecture would be of a high standard, incorporating a regular pattern of windows and projecting balconies, with upper floors recessed on some blocks. The attention to detail paid to the brickwork, balconies and boundary treatments at this stage is welcomed and is supported by bay studies showing balustrade, garden wall and other construction detailing for approval. The school buildings would be sympathetically extended in a contemporary style, using a mixture of traditional and modern materials, which is considered to be an appropriate design response. The architectural approach and materiality responds appropriately to the site surroundings, would result in a high quality and durable appearance and is supported. Materials and the quality of detailing will however have a significant impact on overall quality in the completed scheme. The Council is therefore strongly encouraged to secure the retention of the architects during detailed design phases, in addition to utilising appropriate conditions securing design detail and materials.

### **Heritage**

31 London Plan Policy 7.8 'Heritage Assets and Archaeology' states that development should identify, value, conserve, restore, re-use and incorporate heritage assets where appropriate. The

Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the tests for dealing with heritage assets in planning decisions. In relation to listed buildings, all planning decisions should “*have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses*” and in relation to conservation areas, special attention must be paid to “*the desirability of preserving or enhancing the character or appearance of that area*”.

32 The NPPF states that when considering the impact of a proposal on the significance of a designated heritage asset, great weight should be given to the asset’s conservation, and the more important the asset, the greater the weight should be. Significance is the value of the heritage asset because of its heritage interest, which may be archaeological, architectural, artistic or historic, and may derive from a heritage asset’s physical presence or its setting. Where a proposed development will lead to ‘substantial harm’ to or total loss of the significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss. Where a development will lead to ‘less than substantial harm’, the harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.

33 The proposal is located between and borders on to two conservation areas (CAs), Deptford High Street CA to the west and Deptford Creekside CA to the east. It is also noted that the former Tidemill School buildings have been identified as heritage assets and are proposed by the Council to be included within an extended conservation area boundary and to be locally listed. As mentioned above, the scale and massing of the proposal is commensurate with the surrounding areas and the new buildings would be constructed of similar materials to the blocks of the Crossfield Estate adjacent to the site and within the Deptford Creekside CA. The development would be largely screened from the main setting of the Deptford High Street CA as it is located to the rear of commercial properties fronting the High Street. The proposal would therefore not harm the setting of either adjacent conservation area and would actually enhance the character and appearance of the area through the creation of the new pocket garden within the Deptford Creekside CA, along with the removal of unsightly open storage areas, construction of new high quality buildings and the refurbishment of the historic school buildings.

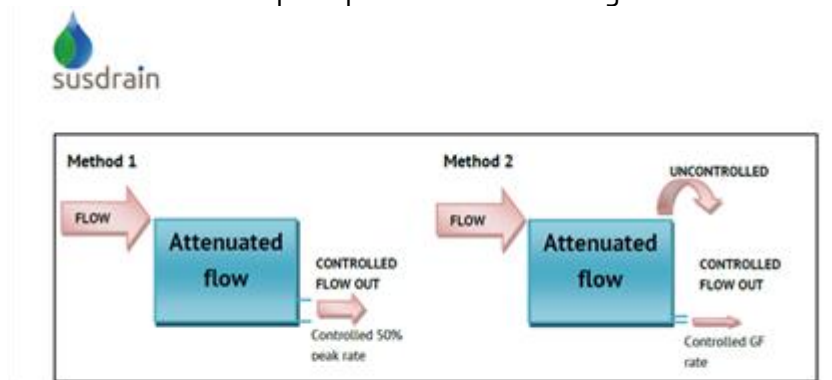
## **Flooding**

34 The site is identified in the Flood Risk Assessment (FRA) as within Flood Zone 2, with flooding from the River Ravensbourne reaching depths of 200-500 millimetres on the site during the 0.1% annual probability fluvial flood event. A Flood Evacuation Plan has been developed for the site and the FRA also proposes flood resistant and resilient measures and that future occupants register with the Environment Agency flood warning service. The FRA also confirms that parts of the site are at high risk of surface water flooding, particularly along Frankham Street. Because of the fluvial and pluvial flood risk, building utility services should be located in flood proof rooms/enclosures.

35 The high surface water flood risk in parts of the site make the application of London Plan Policy 5.13 (sustainable drainage) particularly important. Discharge to Deptford Creek (50m to the south-east) would require crossing third party land and so the FRA considers this approach to be unfeasible. In addition, infiltration methods have not been proposed due to the development being located within a groundwater protection zone, and made ground at the site being contaminated. The FRA also states that open water SUDS will not be adopted by Thames Water, and so these have not been proposed. It is not clear why adoption by Thames Water should be necessary for these measures and it this should be considered given the large areas of open space and landscaping proposed.

36 As a result, the FRA proposes two storage tanks (a 240m<sup>3</sup> tank for the 30 year event and a 186m<sup>3</sup> tank for the remaining flows up to the 100 year event plus 30% allowance for climate

change), restricting discharge to 14.7l/s for the 1 in 100 year event. Any tanked attenuation should be designed to meet the Method 2 principle set out in the diagram below:



From Susdrain Factsheet "Designing attenuation storage for redeveloped sites", by Anthony McCloy  
[http://www.susdrain.org/files/resources/fact\\_sheets/01\\_15\\_fact\\_sheet\\_attenuation\\_for\\_redeveloped.pdf](http://www.susdrain.org/files/resources/fact_sheets/01_15_fact_sheet_attenuation_for_redeveloped.pdf)

37 The FRA also proposes 0.2 hectares of green roofs wherever possible. These should be designed to maximise stormwater retention, for example using rainwater harvesting for irrigation purposes. In addition to these measures, which should be secured by the Council via appropriate planning conditions, the proposed development could also include Design for Exceedance, i.e. some areas of open space/low vulnerability uses, such as car parks, designed to flood during longer return period storms.

## Inclusive design

38 In accordance with London Plan Policy 3.8, the applicant has confirmed through the submission documents that all of the residential units will meet Category 2 (accessible and adaptable) standards. However, only 19 (9%) of the units will be designed to be fully adaptable and adjustable to wheelchair users (Category 3), falling below the 10% London Plan requirement. The applicant states that there has been an over-provision of accessible units at the related Amersham Vale development, but as discussed at pre-application stage each scheme should meet the policy requirement in its own right. This should be achievable given the extensive new build development proposed, so the applicant is requested to provide two additional units to meet Category 3. As set out in the London Plan, the Council should secure compliance with building regulations M4 (2) and M4 (3) by condition.

39 There are eleven blue badge spaces proposed within the scheme, which falls short of the requirement for one space per accessible unit. However, reallocation of on street spaces has been identified to make up the difference, which is welcomed, although the applicant should confirm that a total of 21 spaces can be provided both on and off site, in order to cater for the uplift of units required.

## Climate change - adaptation

40 The proposal includes a number of measures in response to strategic policies regarding climate change adaptation, which are welcomed. Measures proposed include high air tightness, low water use sanitary-ware and fittings, rainwater harvesting, automatic external lighting, biodiverse planting, green roofs and SUDS methods to hard surfaced areas. The Council should impose conditions to ensure that these measures are implemented as part of the development.



## Climate change - mitigation

### Energy efficiency

41 The applicant has broadly followed the London Plan energy hierarchy to reduce carbon dioxide emissions, and 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 with heat recovery. The applicant is also proposing a number of improvements to the refurbished building, this is welcomed.

42 The demand for cooling will be minimised through shading from balconies and solar control glazing. The applicant should provide evidence of how London Plan Policy 5.9 has been addressed to avoid overheating and minimise cooling demand. Dynamic overheating modelling in line with CIBSE Guidance TM52 and TM49 weather files is recommended.

43 The development is estimated to achieve a reduction of 9 tonnes per annum (5%) in regulated carbon dioxide emissions for the new build compared to a 2013 Building Regulations compliant development. The applicant is also estimating a significant reduction in carbon dioxide emissions for the refurbished building following the inclusion of the proposed energy efficiency measures, which is welcomed.

### District heating and renewables

44 The applicant has carried out an investigation and there are no existing or planned district heating networks within the vicinity of the proposed development. 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.

45 The applicant is proposing to install a site heat network. However, the applicant should confirm that all apartments and non-domestic building uses will be connected to the site heat network. A drawing showing the route of the heat network linking all buildings on the site should be provided. The site heat network will be supplied from a single energy centre. Further information on the floor area and location of the energy centre should be provided

46 The applicant is proposing to install a 90 kW<sub>e</sub> / 161 kW<sub>th</sub> 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. A reduction in regulated carbon dioxide emissions of 40 tonnes per annum (23%) for the new build will be achieved through this second part of the energy hierarchy. The applicant is also proposing to connect the CHP to the refurbished building, which is fully supported. The applicant should provide 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.

47 The applicant has investigated the feasibility of a range of renewable energy technologies and is proposing to install 525 sq.m. (80 kWp) of photovoltaic (PV) panels on the roof of the development. A roof layout has been provided. In addition, the applicant is also proposing to include 216 sq.m. (33 kWp) of PV panels on the roof of the refurbished building, which is welcomed. A reduction in regulated carbon dioxide emissions of 18 tonnes per annum (11%) for the new build will be achieved through this third element of the energy hierarchy.

## Summary

48 A reduction of 67 tonnes of carbon dioxide per year in regulated emissions compared to a 2013 Building Regulations compliant development is expected, equivalent to an overall saving of 39%. The applicant is also predicting a significant reduction in carbon dioxide emissions for the refurbished building, which is fully supported. The carbon dioxide savings exceed the target set within Policy 5.2 of the London Plan. However, the comments above should be addressed before compliance with London Plan energy policy can be verified.

## **Transport**

### Parking

49 The car free nature of the scheme, with the exception of blue badge spaces, is supported. Eleven blue badge parking spaces have been provided within the development. Reallocation of surrounding on-street spaces to blue badge spaces has been identified to bring the development into line with London Plan requirements which is supported by TfL. Provision for active and passive electric vehicle charging points (EVCPs) and a car parking management plan will also need to be provided and secured by condition. Further, TfL expects that occupiers should be exempt from applying for any on street parking permits.

### Cycling

50 Cycle parking has been provided to London Plan standards. However, some modifications to the proposal are required in terms of access and location of these spaces before it can be confirmed that the application is in accordance with London Plan policy 6.9.

### Trip generation

51 Trip generation has been assessed using a single survey data point which is not considered reliable or representative of the development. TfL has requested further analysis of trip generation and mode share to determine the potential impacts on the highway or public transport networks. Depending on the outcome of this analysis, contributions may be sought to mitigate impacts on the bus network in accordance with London Plan Policy 6.3.

### Travel planning, freight and servicing

52 The applicant has provided a draft Travel Plan for the development. Therefore, in accordance with London Plan policy 6.3 the final Travel Plan and all agreed measures therein should be secured, enforced, monitored and reviewed as part of the S106 agreement. A delivery and servicing plan (DSP) and a construction logistics plan (CLP) should also be secured by condition.

### Mayoral Community Infrastructure Levy and Crossrail

53 In accordance with London Plan Policy 8.3, the Mayor has agreed a CIL Charging Schedule which came into operation on 1 April 2012. The Mayor CIL rate for the London Borough of Lewisham is £35 per sqm.

## Summary

54 In conclusion, in order to ensure that the proposed development complies with the transport policies in the London Plan, TfL has requested further information to assess the potential impact on the public transport network and alterations to the scheme in relation to car and cycle parking. In

addition, a Travel Plan, CLP, DSP and CPMP will need to be secured by condition or S106 agreement.

## Local planning authority's position

55 The Council is currently considering the application.

## Legal considerations

56 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. 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

57 There are no financial considerations at this stage.

## Conclusion

58 London Plan policies on housing, urban design, heritage, inclusive design, flooding, climate change, and transport are relevant to this application. The principle of the residential redevelopment of this site is supported. However, a number of strategic concerns are raised, and consequently the application does not accord with London Plan Policy:

- **Affordable housing:** it is not possible at this stage to determine whether the proposal provides the maximum reasonable contribution to affordable housing, in accordance with London Plan Policy 3.12. The Council should secure a review mechanism in the S106 agreement.
- **Housing:** the Council should confirm that the housing mix meets local requirements and the applicant should address concerns regarding residential quality and play space, in accordance with London Plan Policies 3.5, 3.6 and 3.8.
- **Urban design:** the applicant should seek to address concerns relating to ground floor entrances and floor to ceiling heights, to ensure compliance with London Plan Policies 3.5, 7.3 and 7.5. The Council should impose conditions to ensure that high quality materials, detailing and landscaping are secured.
- **Flooding:** the applicant should provide clarification with regard to building design and SUDS, in order to address the requirements of London Plan Policies 5.12 and 5.13. The Council should secure the details of a drainage scheme, including green roofs and rainwater harvesting, by condition.
- **Inclusive design:** the applicant should increase the provision of wheelchair accessible homes to meet London Plan standards and confirm that on street blue badge spaces can be provided, in accordance with London Plan Policy 3.8.

- **Climate change:** the energy strategy does not accord with London Plan policies 5.2, 5.6 and 5.9. Further information is required regarding overheating, site wide heat network and CHP.
- **Transport:** to ensure compliance with London Plan policies 6.1, 6.2, 6.3, 6.9 and 6.13 the applicant should provide further information to assess the potential impact on the public transport network and make alterations to the scheme in relation to car and cycle parking. In addition, a travel plan, construction logistics plan, delivery and servicing plan and car parking management plan will need to be secured by the Council through condition or S106 agreement.

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