

Convoys Wharf, Deptford

in the London Borough of Lewisham

planning application no. DC/13/83358

Additional neighbourhood representations

1. Since the Representation Hearing report was finalised and published the Mayor has received 5 additional representations of objection to the scheme, including detailed submissions from the Pepys Community Forum and Tenants Action Group. Further to this, the online petition of objection (set up by Deptford Is) has now reached 2,005 signatures. The Mayor has also received one additional representation of support for the scheme, and one additional representation of comment.
2. The additional representations reiterate issues already set out within the response to consultation section of the Representation Hearing report (reference D&P/0051c/03). Accordingly, GLA officers conclude that the additional representations do not raise any material planning issues which have not already been considered within the Representation Hearing report.

Additional representations from Lewisham Council

3. On 26 March 2014, Lewisham Council's Strategic Planning Committee considered an update report from the Council's planning officers. The purpose of the update report was to inform the Committee of the progress that had been made in addressing the issues previously raised by Lewisham Council (discussed in paragraphs 159 to 160 of the Representation Hearing report).
4. The Council's committee report states that since the Strategic Planning Committee previously considered the scheme, Lewisham planning officers have been working with the GLA and applicant team to secure changes to the scheme and other matters in accordance with the conclusions and recommendations of the Committee. The update acknowledges that modest progress had been made in addressing the issues previously raised by the Council, however, Lewisham Council's view is that the changes to the scheme have not gone far enough in terms of addressing its concerns. In particular, the Council's committee report states that the Council has concerns over the layout and massing of buildings in a number of key locations – where, in the Council's view, these fail to respond appropriately (or in a meaningful way) to the heritage assets on the site. The Committee also made clear its view that the proposed masterplan response to the Sayes Court Garden and Build the Lenox community projects was inadequate; the terms proposed for accommodating these projects were unacceptable; and, that collectively these circumstances would fail to secure the futures of these projects.
5. Following consideration at the Strategic Planning Committee meeting (and in summary), the Council stated that in its' view the application should not be approved in its current form, and that amendments should be secured prior to determination in relation to the following matters:
 - Scale, massing and relationship with historic buildings and spaces: Reduce the height of buildings around the Olympia building (at masterplan plots three, six and eight) to achieve an

acceptable urban scale and an appropriate relationship of new buildings with historic buildings and spaces, in particular to the Olympia building. Amend the siting of masterplan plots two and three to safeguard the visual connection of the Olympia building with the river.

- Community projects: Amend development parameters at masterplan plot sixteen to allow for meaningful incorporation of the Sayes Court Gardens project by amending the minimum plot dimensions, and minimum building height, to accommodate the John Evelyn Centre horticultural centre (and primary school), removing the southern and eastern buildings, and provision of an area of one hectare exclusively for the horticultural programme (the one hectare of space should not include primary school playground/outdoor play space, or existing areas of Sayes Court Park). Commission an independent feasibility study to accommodate the Build the Lenox project (within the Olympia building, Double Dry Dock and wharf), the study should also consider how a permanent home for the Lenox would be provided.
- Transport and access: The New King Street/Evelyn Street/Deptford High Street junction should be designed to provide a direct single all-red phased pedestrian crossing.
- Community benefits: An increased level of financial contributions should be secured, particularly with respect to: Community Trust; secondary school; open space; and, public realm improvements linking the site to Deptford Station. Secure financial contributions towards the capital cost of works (public transport, school, public realm) not limited to a funding cap and to local projects not limited to a specified list.
- Sustainability: Secure a policy compliant scheme in respect of Code for Sustainable Homes and BREEAM ratings.

6. Lewisham Council also made a number of detailed recommendations with respect to planning conditions, planning obligations and clarifications of matters of fact. These matters are addressed below.

Consideration of additional representations from Lewisham Council

7. The updated representations made by Lewisham Council are considered under the associated sections below.

Scale, massing and relationship with historic buildings and spaces

8. GLA officers note that Lewisham Council maintains its concerns with the proposed scale and massing of the scheme and the relationship of the masterplan to historic buildings and spaces. GLA officers have set out their own assessment of the proposal within the Representation Hearing report (refer to the sections on urban design and heritage).

Community projects

9. GLA officers note that Lewisham Council seeks revisions to parameters at masterplan plot sixteen to provide greater flexibility to accommodate the John Evelyn Centre (and primary school), and to allow for the delivery of a greater expanse of open space in support of Sayes Court Garden CIC's proposed horticultural programme. It is also noted that the Council seeks a feasibility study to assess the potential to accommodate the Build the Lenox project within the Olympia building, Double Dry Dock and wharf.

10. GLA officers are of the view that the proposed parameters for masterplan plot sixteen are acceptable in their own right. Notwithstanding this, it is recognised that Sayes Court Garden CIC are of the view that the parameters proposed would preclude delivery of its horticultural programme (because its open space requirements would not be met).

11. Further joint negotiations between the applicant, the Council, and the community group will take place with a view to identifying a flexible open space solution. GLA officers propose to facilitate such discussion as part of detailed work on the proposed section 106 legal agreement.

12. Following further discussions with The Lenox Project CIC, and the applicant, it is proposed to secure an independent feasibility study to objectively assess the strengths and weaknesses of undertaking the Build the Lenox Project at the Olympia building and at the wharf. The scope of the study is proposed to be jointly agreed between the applicant, Lewisham Council and The Lenox Project CIC, and GLA officers seek to secure this as part of the section 106 legal agreement.

Transport and access

13. GLA officers note that Lewisham Council maintains its position that a direct single all-red phased pedestrian crossing should be provided at the New King Street/Evelyn Street/Deptford High Street junction.

14. The Mayor is advised that the proposed detailed design of the New King Street/Evelyn Street/Deptford High Street junction is still being explored. Transport for London (TfL) is committed to working with Lewisham Council and the applicant in order to reach a mutually agreeable design solution that would enhance this junction - particularly for pedestrians. An all-red phase option is proposed to be considered as part of this process, along with various others.

Community benefits

15. Whilst Lewisham Council acknowledges that GLA officers have secured an additional £1,700,000 towards local community benefits and infrastructure, it is noted that the Council seeks an increased level of financial contributions (particularly with respect to: Community Trust; secondary school; open space; and, public realm improvements linking the site to Deptford Station). However, as discussed in the mitigating the impact of development section of the Representation Hearing report (and having also had regard to the financial viability of the scheme), GLA officers are of the view that the planning obligations proposed are necessary to make the development acceptable in planning terms; directly related to the development; and fairly and reasonably related in scale and kind to the development. Accordingly, GLA officers have not sought additional contributions in the areas identified by the Council.

16. GLA officers are committed to continued joint working with the Council, and the applicant, on the detailed drafting of the section 106 - to ensure that local priorities are appropriately prioritised within the provisions of the agreement, and that the delivery of the proposed community benefits would occur in a timely fashion. For the avoidance of doubt, GLA officers confirm that it is proposed to secure both capped financial contributions and those linked to a specification (as itemised in paragraph 29 below).

Sustainability

17. Lewisham Council seeks a policy compliant scheme in respect of Code for Sustainable Homes and BREEAM ratings. As discussed in paragraph 394 of the Representation Hearing report, GLA officers propose to secure sustainability standards (BREEAM 'very good' and Code for Sustainable Homes 'Level 4') by way of planning condition. Whilst Lewisham Core Strategy Policy 8 requires Code for Sustainable Homes 'level 4', it also seeks to secure BREEAM 'excellent' ratings for all

minor and major non-residential development. This matter is addressed within the sustainability section below.

Planning conditions, planning obligations and clarifications of matters of fact

18. In response to Lewisham Council's representations, and as discussed within the Representation Hearing report, GLA officers propose to secure: control of retail floorspace; Olympia conservation management plan; and, maximum use of the river for construction logistics by way of planning condition/planning obligation as appropriate. Further to this, a number of additional conditions and obligations are also proposed as set out within the associated sections below.

Other representations received

Tower Hamlets Council

19. In response to the Mayor's consultation on revised plans, Tower Hamlets Council stated that, having considered the relevant information, it has no objection to the application.

English Heritage (informal comments)

20. Nigel Barker, Planning and Conservation Director London, stated that the Representation Hearing report fairly presented English Heritage's views on the outline application. Nigel Barker noted that GLA officers had reasonably concluded that the impact of the proposal would not adversely impact on the outstanding universal values of the Maritime Greenwich World Heritage Site, however, it was queried whether the impact of the scheme on the Listed Buildings within the World Heritage Site had been given the due special regard. This matter is addressed within the heritage section below.

Factual updates, clarifications and corrections

21. This section sets out various factual updates, clarifications and corrections which need to be considered in conjunction with the Representation Hearing.

Environmental Impact Assessment

22. As discussed within paragraph 31 of the Representation Hearing report, the proposal is treated as Environmental Impact Assessment development for the purposes of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011. The applicant has submitted an Environmental Statement, which, in conjunction with other supporting documents (such as the Design Guidelines), identifies the measures necessary to mitigate the environmental impact of the proposed development. For the avoidance of doubt, GLA officers confirm that an adequate assessment has been undertaken in accordance with the EIA Regulations 2011.

23. Furthermore, as discussed in paragraph 425 of the Representation Hearing report, GLA officers are satisfied that the proposed development would acceptably mitigate its own environmental impact, and, when relevant cumulative impacts are taken into account, the proposal would result in a positive impact on the local environment as a result of the significant regenerational benefits of the scheme.

Heritage

Impact on Listed Buildings within the Maritime Greenwich World Heritage Site

24. The Maritime Greenwich World Heritage Site is occupied by numerous highly graded Listed Buildings, including: National Maritime Museum (Grade I); Royal Naval College Queen Mary's Quarter (Grade I); Royal Naval College South West Building King William's Quarter (Grade I); Royal Naval College North East Building Queen Anne's Quarter (Grade I); and, Royal Naval College North West Building King Charles Quarters (Grade I). Various historic public realm features within the World Heritage Site are also Listed.

25. As demonstrated within the Environmental Statement, the proposal would be visible in the setting of Listed Buildings within the World Heritage Site. In particular, the visualisation of the townscape view from the Royal Naval College, Greenwich, demonstrates that the proposal would be seen in conjunction with the Royal Naval College North East Building Queen Anne's Quarter (Grade I), and; posts and railing to Riverside Terrace (Grade II). As discussed in the representation hearing report (paragraphs 338 and 383), these elements of the World Heritage Site dominate the foreground of this view, and the proposal would appear distant, and secondary in the background. For the avoidance of doubt it is confirmed that, having had special regard to the desirability of preserving Listed Buildings, their settings and any features of special architectural or historic interest which they possess, GLA officers are satisfied that the proposed development would conserve the significance of Listed Buildings at the Maritime Greenwich World Heritage Site, and not cause harm to the settings of Listed Buildings at the Maritime Greenwich World Heritage Site. Accordingly, the conclusion in paragraph 385 of the Representation Hearing report is reached.

Transport

26. For the avoidance of doubt, GLA officers are satisfied that data and modelling outputs within the Transport Assessment are sufficiently robust to allow for the outline application to be determined. Notwithstanding this, in accordance with TfL guidelines, it is proposed to undertake further multi-modal traffic flow simulation modelling (known as VISSIM). This modelling will test finer detail at different scales of operation (network, corridor and junctions) in order to inform the iterative highway design process, in conjunction with Cycle Superhighway proposals (on Evelyn Street in particular), Convoys Wharf access arrangements, Quietway proposals and Deptford High Street public realm improvements.

Sustainability

27. Whilst the submitted energy strategy broadly accords with the approach of Lewisham Core Strategy Policy 8, GLA officers note that the proposal is at variance from part 4 of Policy 8 (which seeks to secure the BREEAM 'excellent' standard for all minor and major non-residential development). Therefore, in correction to paragraphs 1 (ix.) and 394 of the Representation Hearing report, GLA officers confirm that the proposed energy strategy does not comply with Core Strategy Policy 8. However, having had regard to the overall characteristics of the energy strategy (which ensures that the proposal would achieve compliance with Building Regulations Part L through efficiency measures alone, and appropriately prioritises connection to a district heat network in accordance with the London Plan energy hierarchy); and, the intention to ensure that the build costs of business/commercial space within the scheme would not undermine the delivery of affordable workspace, GLA officers are satisfied that the proposed BREEAM 'very good' standard is acceptable in this instance.

Planning conditions

28. Further to paragraph 3 of the representation hearing report, GLA officers propose the following additional conditions:

- Assessment of the structural integrity of the existing jetty, and remedial works, where necessary, to enable maximum river use for construction logistics and subsequent implementation of the proposed jetty park and access to the new riverbus pier.
- River hydrology modelling of the new jetty proposed at masterplan plot 21.
- Three-storey shoulder height at southeast interface of plot one with the Double Dry Dock open space and Master Shipwrights House and Dockyard Office (Grade II*).

Planning obligations

29. In response to matters raised by Lewisham Council, and for the avoidance of doubt, GLA officers propose to itemise a number of additional detailed section 106 agreement heads of terms. Furthermore, with a view to informing proposed section 106 discussions, a number of existing heads of terms are expanded upon. For ease of reference, a comprehensive list of all proposed section 106 heads of terms is provided below:

- Wharf infrastructure and activation;
- Local employment and training initiatives (including the delivery of affordable business space at subsidised rents) - £1,500,000;
- Secondary and post sixteen education - £440,000 (with a top up to £881,000 subject to viability review);
- Primary school - delivery of a two form entry primary school, with an option for increased capacity to three form entry (option available until 12 months before relevant reserved matters application is to be submitted);
- Local open space - £560,000;
- Local heritage and public art - £300,000;
- Community Trust - £250,000 for the purposes of providing community services and/or facilities;
- Community projects - commitment to projects, agreement of terms and £250,000 (Subject to community project business plan approval by the local planning authority in consultation with the applicant. If a business plan is not approved, this sum will be added to the Community Trust);
- Independent feasibility study for the Lenox Project at Olympia building and wharf site (£20,000);
- Communications infrastructure (including monitoring and mitigation) - £20,000;
- Provision of Controlled Parking Zone - £250,000;
- Highways works to Evelyn Street (including at Deptford High Street/New King Street/Watergate Street, Prince Street/Abinger Grove, Grove Street and Oxestalls Road junctions to accommodate development traffic and support walking and cycling and access to public transport) - works to a specification to be agreed;
- Highway works to New King Street (to accommodate development traffic, enable two way bus operations and promote walking and cycling) - works to a specification to be agreed;
- Highway works to Prince Street and Grove Street to accommodate development traffic and the diverted bus route and support walking and cycling - works to a specification to be agreed;

- Highway works to northern section of Deptford High Street between Deptford Station and the Evelyn Street/New King Street (to support walking, cycling and access to public transport) - £500,000;
- Any further highway works to accommodate development traffic and support walking, cycling and public transport agreed as necessary following detailed modelling and assessment;
- Pedestrian and cyclists improvements to Deptford Church Street/A2 junction - £20,000;
- Riverbus service - £3,000,000;
- A new and a diverted bus service (plus capacity enhancements to existing services on Evelyn Street) - £5,750,000;
- New and enhanced off-site bus stops - £147,500;
- Travel Plan for each use (including Travel Plan measures, car club spaces with free membership for residents, coordinator and monitoring) - £10,000 towards monitoring;
- School Management Plan;
- Delivery of on-site spine road (including site accesses at Grove Street and New King Street, and a pair of bus stops);
- Delivery of Thames Path extension and a network of public pedestrian and cycle links within the site and accesses thereto;
- Management and maintenance of site spine road, river pier and access (including Thames Path extension and pedestrian and cycle links to adoptable/agreed standards);
- Delivery of river pier for timetabled passenger services and associated land facilities and access;
- Rights of access to spine road, river pier, Thames Path and pedestrian and cycle links (equivalent to adoption);
- Implementation of approved site Parking Management Plan (including drop off/pick up arrangements, delivery and servicing and service management plans, and construction logistics and travel plans);
- Maximising use of the river for transport during demolition, site clearance and construction;
- Car parking ratio review;
- Occupiers of the development to be ineligible to apply for local parking permits;
- Section 278 agreement with the relevant Highway Authority to facilitate delivery of highway works;
- Property agreement with relevant land owner(s) to facilitate delivery of off-site highway improvement works and pedestrian and cycle links (including New King Street widening);
- Modelling and assessment of local and strategic highways impacts (including upon buses, pedestrians and cyclists);
- Safeguarding of sites for two cycle hire docking stations;
- Method Statement for wharf infrastructure construction;
- Delivery of at least 15% affordable housing and a review mechanism;
- Marketing strategy for residential units (commitment to market new homes first or first equal to Londoners);
- Social infrastructure (including specification of school and delivery of health facility or commuted sum);
- Cultural Steering Group;
- Delivery of commitments within the Cultural Strategy;
- Connection to Pepys Park;
- Design Panel;
- Archaeological works;
- Energy strategy (including prioritisation of SLCHP connection, and details of air quality abatement technologies where on-site CHP option would be pursued);
- Flood Risk Alleviation Strategy;

- Biodiversity measures (including fenders);
- Air quality monitoring - £100,000;
- Code of Construction Practice (to include adherence to pollution prevention guidance);
- Delivery of on-site public open space (including jetty park) and management and maintenance of this;
- CCTV scheme;
- Communal areas management plan;
- Temporary public access routes;
- Public access areas management plan;
- Commercial/business space management and delivery strategy;
- Site Waste Management Plan; and,
- Section 106 monitoring, legal and professional costs.

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