

GREATER LONDON AUTHORITY

[REDACTED]
(By email)

Our Ref: MGLA120220-2622

6 March 2020

Dear [REDACTED]

Thank you for your request for information which the Greater London Authority (GLA) received on 12 February 2020. Your request has been dealt with under the Environmental Information Regulations (EIR) 2004.

You asked for:

I understand that the GLA provided Sainsbury's/Mount Anvil a pre-application response for their development proposals at New Cross Gate on October 1 2019. Can you please provide copy of this application response?

Our response to your request is as follows:

Please find attached the information the GLA holds within scope of your request. Please note that the names of some members of staff are exempt from disclosure under Regulation 13 (Personal information) of the EIR. Information that identifies specific employees constitutes as personal data which is defined by Article 4(1) of the General Data Protection Regulation (GDPR) to mean any information relating to an identified or identifiable living individual. It is considered that disclosure of this information would contravene the first data protection principle under Article 5(1) of GDPR which states that Personal data must be processed lawfully, fairly and in a transparent manner in relation to the data subject

If you have any further questions relating to this matter, please contact me, quoting the reference at the top of this letter.

Yours sincerely

[REDACTED]
Information Governance Officer

If you are unhappy with the way the GLA has handled your request, you may complain using the GLA's FOI complaints and internal review procedure, available at:

<https://www.london.gov.uk/about-us/governance-and-spending/sharing-our-information/freedom-information>

Sainsburys Site, New Cross Gate

in the London Borough of Lewisham

The proposal

Hybrid planning application for the redevelopment of the site to provide a replacement Sainsbury's supermarket, circa 1,500 homes and commercial floorspace in buildings ranging up to 33 storeys.

The applicant

The applicant is **Mount Anvil Ltd and Sainsburys** and the architect **Rolfe Judd**.

Context

1 On 3 May 2019 a request was received for a pre-planning application meeting with the Greater London Authority on a proposal to develop the above site for the above uses. On 4 June 2019 a pre-planning application meeting was held at City Hall with the following attendees:

GLA group

- [REDACTED] – Principal Strategic Planner (case officer)
- [REDACTED] – Team Leader, Planning
- [REDACTED] – Principal Strategic Planner/Urban Design
- [REDACTED] – planning officer, TfL

Local Planning Authority

- [REDACTED] - case officer

Applicant

- [REDACTED] – Mount Anvil
- [REDACTED] – Mount Anvil
- [REDACTED] – Mount Anvil
- [REDACTED] – Mount Anvil
- [REDACTED] – Sainsbury's
- [REDACTED] - A2Dominion
- [REDACTED] - Rolfe Judd
- [REDACTED] - Rolfe Judd
- [REDACTED] - Rolfe Judd Planning
- [REDACTED] - Gillespies
- [REDACTED] - Steer

2 As set out in paragraph 14 below, further meetings were held in July and August which this note also reflects.

3 The advice given by officers does not constitute a formal response or decision by the Mayor with regard to future planning applications. Any views or opinions expressed are without prejudice to the Mayor's formal consideration of the application.

Site description

4 The application site comprises a retail park located adjacent to New Cross Gate Station in the New Cross District Centre and is bounded by the A2 New Cross Road to the south, Hart's Lane/Brocklehurst Road to the west and the London Overground railway line to the east and north. A Sainsbury's Supermarket store occupies the northern part of the site with a TK Maxx, Dreams retail store and a petrol filling station to the south, with associated large areas of surface car parking.

5 The application site is identified by Transport for London's (TfL) as its preferred location for a new station interchange and worksite for the proposed extended Bakerloo Line to Lewisham along Old Kent Road which will integrate with the current London Overground and National Rail services at New Cross Gate. This preferred option was termed Option 4 and was subject to public consultation which closed in April 2017. The vacant Goodwood Road site was also considered as a potential location (Option 1) although this has not been pursued further by TfL due to, amongst other reasons, spatial constraints and proximity to existing residential dwellings. A further round of TfL consultation on the Bakerloo Line Extension (BLE) proposals is due to take place later in 2019.

6 With regards to strategic planning policy designations, the application site is within the Lewisham, Catford and New Cross Opportunity Area and District Town Centre. The designated view of Parliament Hill Summit to St Paul's Cathedral Protected Vista Extension (2A.1) extends across the south western corner of the site. An area of protected open space (Site of Importance for Nature Conservation) lies to the north west of the site.

7 At the local level, the Council's Site Allocations DPD (2013) identifies the application site (SA6) as suitable for mixed-use retail, housing, community facilities and a new station access and public space and as a site that should contribute towards improving the vitality of New Cross/New Cross Gate District Centre with opportunity to provide a strong frontage and to improve pedestrian and cycling connectivity. The Council has since produced the New Cross Area Framework and Station Opportunity Study (May 2019) which has been approved to progress to Supplementary Planning Guidance status. The Study identifies the site to deliver circa 800 residential units along with circa 21,000 sq.m. of non-residential floorspace, with 50% affordable housing provision and no tall buildings on New Cross Road, instead focusing height along the Council identified Route 1 with a new bridge provided over the railway.

8 The Hatcham Conservation Area adjoins the application site to the west and extends along the frontage of the site where it joins with the Deptford Town Hall Conservation Area. The Telegraph Hill Conservation Area lies to the south-west of the site. There are a number of listed buildings and structures in the vicinity of the site including Deptford Town Hall and Laurie Grove Baths to the south east on New Cross Road which are both Grade II listed. There are also several Grade II listed on the northern side of New Cross Road to the west.

Details of the proposal

9 The proposals seek the redevelopment of the site to provide a replacement Sainsbury's superstore, including up to 1,500 homes and circa 1,000 sq.m. of flexible commercial floorspace.

The southern half of the site would provide a replacement Sainsbury's superstore with residential above rising to up to the equivalent of 12 storeys. The Sainsbury's store is set back from New Cross Road to provide a public square, flanked by two 5/6 storey buildings with commercial uses at lower levels and residential uses above. The remainder of the proposed residential is proposed to the rear of the site in buildings ranging up to 33 storeys in height arranged around a landscaped area. A shared vehicular/ pedestrian route loops around the outer edge of the site. This element of the scheme is proposed to be submitted in outline.

Strategic planning issues and relevant policies and guidance

10 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) and the London Plan 2016 (The Spatial Development Strategy for London Consolidated with Alterations since 2011).

11 The following are relevant material considerations:

- The National Planning Policy Framework (2019) and National Planning Practice Guidance;
- The draft London Plan Consolidated Changes Version (July 2019), which should be taken into account on the basis explained in the NPPF;
- Lewisham Local Plan Consultation on main issues (October 2015); and
- New Cross Area Framework and Station Opportunity Study (May 2019).

12 The relevant issues and corresponding policies are as follows:

- | | |
|--------------------------------|--|
| • Principle of development | <i>London Plan; Town Centres SPG;</i> |
| • Transport | <i>London Plan; the Mayor's Transport Strategy; Land for Industry and Transport SPG;</i> |
| • Housing & affordable housing | <i>London Plan; Housing SPG; Housing Strategy; Shaping Neighbourhoods: Play and Informal Recreation SPG; Affordable Housing and Viability SPG;</i> |
| • Urban design | <i>London Plan; Shaping Neighbourhoods: Character and Context, Housing SPG; London Housing Design Guide; Shaping Neighbourhoods: Play and Informal Recreation SPG</i> |
| • Inclusive design | <i>London Plan; Accessible London: achieving an inclusive environment SPG;</i> |
| • Ambient noise | <i>London Plan; the Mayor's Ambient Noise Strategy;</i> |
| • Air quality | <i>London Plan; the Mayor's Air Quality Strategy;</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> |

Summary of meeting discussion

13 Following a presentation of the proposed scheme from the applicant team, meeting discussions covered strategic issues with respect to the proposed masterplan approach to delivering a mixed-use redevelopment of the wider site, including the status of the Bakerloo Line station interchange, urban design, housing and transport. GLA officer advice in respect of these issues is set out within the sections that follow, in addition to general guidance on inclusive design and energy.

14 This note reflects the scheme as presented at the pre-application meeting, incorporating changes presented to the GLA since the meeting including changes to the affordable housing offer as presented to the GLA and Lewisham Council on 18 July 2019; the massing of the buildings on site (albeit the maximum height has remained at 33 storeys) as presented to the GLA on 29 August 2019.

Principle of development

Land use and Bakerloo Line Extension

15 The application site is within the Catford and New Cross Opportunity Area which is identified in the London Plan as an area with scope for intensification, regeneration and renewal, and is an area that will strategically benefit from increased public transport connectivity through the Bakerloo Line Extension (BLE). Furthermore, local planning policy identifies both the application site and the adjacent vacant Goodwood Road site as suitable for mixed-use redevelopment including housing.

16 The site is also within a designated district town centre and as identified in London Plan Policy 2.15 and draft London Plan Policy SD7, town centres should be the main foci beyond the Central Activities Zone for commercial development and intensification, including residential development. Similarly, the development of Opportunity Areas should be prioritised and meet or, where appropriate, exceed indicative guidelines for housing and/or employment capacity in accordance with London Plan Policy 2.15 and draft London Plan Policies GG2 and SD1. The draft London Plan identifies significant opportunities for regeneration and redevelopment within the New Cross Opportunity Area, particularly around the stations, and emphasises that these opportunities would be largely contingent on the successful delivery of the BLE.

17 The proposals seek to redevelop the existing retail park site to deliver a new flagship food store, relocated toward the front of the site, small scale commercial uses and a significant number of new homes in a highly accessible location. Therefore, the proposed mix of uses are appropriate to the district town centre location and broadly reflect the strategic aspirations of London Plan and draft London Plan Policies.

18 However, since the earlier pre-application note was issued on 9 November 2017, the site has now been confirmed as Transport for London's (TfL) preferred location for a BLE station and associated worksite. TfL are planning to undertake a further round of public consultation later in 2019 which will set out a single preferred option for the scheme and form the basis of a Statutory Safeguarding Direction, subject to Central Government approval.

19 London Plan Policy 6.2B and draft London Plan Policy T3 seek to safeguard land for strategic transport improvement schemes including the Bakerloo line extension. Policy T3 states that those developments that do not or which otherwise seek to remove vital transport functions or prevent necessary expansion of identified safeguarded schemes, without suitable alternative provision being made to the satisfaction of transport authorities and service providers, should be refused. Therefore, in the absence of a suitable, alternative proposal for the station and worksite, the scheme would pose a significant threat to the potential future delivery of the BLE and would also have a consequential significant adverse impact on the planned growth for the New Cross Gate Opportunity Area as well as other parts of south-east London including old Kent Road. In this event, the development could not be supported. The advice set out within this report must therefore be caveated on this basis.

Housing

20 The development would deliver circa 1,500 new homes which would make a considerable contribution to the housing targets identified for the opportunity area and wider borough as set out in the London Plan Policies 2.13 and 3.3 and draft London Plan Policies H1 and SD1.

21 The housing mix for phase 1 is as follows:

	studio	1 bed	2 bed	3 bed	total units	total hab rooms
market	31	182	99	0	312	692
shared ownership	0	26	20	0	46	112
affordable rent	0	5	37	34	76	261
totals	31	213	156	34	434	1065

Affordable housing

22 London Plan Policy 3.12 seeks the maximum reasonable amount of affordable housing. The Mayor's Affordable Housing and Viability SPG establishes a minimum pan-London threshold level of 35% affordable housing (without grant) with a strategic target of 50%. The SPG also sets out a preferred tenure split of at least 30% low cost rent (social or affordable rent), at least 30% intermediate (with London Living Rent and shared ownership being the default tenures), and the remaining 40% to be determined by the LPA to achieve mixed and balanced communities. Draft London Plan Policy H7 sets out that other affordable housing products may be acceptable if, as well as meeting the broad definition of affordable housing, they also meet the London Housing Strategy definition of genuinely affordable housing. Schemes which provide 35% affordable housing by habitable room and meet the tenure split are eligible for a Fast Track Route, which does not require supporting viability information or a late stage review mechanism. The SPG approach is formalised within draft London Plan Policies H5, H6 and H7.

23 Phase 1 would provide 35% affordable housing by habitable room inclusive of GLA grant comprising 70% London Affordable Rent (LAR) and 30% shared ownership. It is understood that A2Dominion, who are one of the Mayor's Strategic Partners, would acquire and manage the affordable housing and the same proportion of affordable housing is proposed to be delivered in the second phase.

24 As we understand that the 35% affordable housing offer includes grant, the scheme would not be Fast Track Route compliant and would instead need to be subject to the Viability Tested Route. It is understood that the applicant may be seeking to increase its no grant offer to 35% (40% with grant). This approach would be welcomed, and in doing so, the scheme would benefit from the Fast Track Route, subject to satisfying all other relevant criteria.

25 In the event that the offer is not increased to 35% without grant, the applicant would be required to submit a viability appraisal in support of the proposed scheme. This would then be rigorously tested by the Council and its independent consultants, with all key appraisal inputs

scrutinised. Both the submitted appraisal, and the findings of the independent review, should also be shared with the GLA who will work with the Council to robustly scrutinise the viability. Any without grant affordable housing offer would also need to be confirmed and secured within the s106.

26 The delivery of LAR units is welcomed. The rent levels, associated costs and income thresholds assumed in connection with the shared ownership units would need to be confirmed to ensure that it would qualify as genuinely affordable housing in line with the SPG and draft London Plan Policy H7 and current AMR. This would then need to be secured within the s106 agreement. In terms of the proposed tenure split, a 70:30 mix in favour of LAR is consistent with the preferred tenure split as identified in Lewisham's Core Strategy Policy 1. However, the Council notes in its recent pre-application response letter of 12 September 2019 that this offer is made on the basis of habitable rooms rather than units and is therefore not yet acceptable. The applicant should continue to work with Lewisham Council to agree an appropriate tenure split.

27 In accordance with the provisions of the Affordable Housing and Viability SPG and draft London Plan, both early and late stage review will be required. However, only early stage review would be required in the event that the affordable housing offer achieves full Fast Track Route compliance.

28 The Council must publish the financial viability assessment including any review, in accordance with the SPG and to ensure transparency of information.

Residential quality, density and children's play space

29 The applicant must have regard to the residential design principles as set out in Policy 3.5 of the London Plan, draft London Plan Policy D4 and the Mayor's Housing SPG. This includes ensuring that the proposed housing achieves minimum space standards (both internal and external), maximises dual aspect units, prevents overheating, is afforded sufficient daylight/sunlight to new and surrounding units and proposes sufficient, high quality and fully accessibly open space.

30 As part of the application submission, a detailed play strategy would need to be provided, demonstrating how the scheme will meet the play space requirements set out in London Plan Policy 3.6, draft London Plan Policy S4 and the Mayor's SPG 'Shaping Neighbourhoods: Children and Young People's Play and Informal Recreation'. The applicant should ensure that sufficient space is provided in accordance with the expected child population of the completed development by utilising the GLA's Population Yield Calculator. Current calculations anticipate a child yield of between 300-400 which would equate to a playspace requirement of up to 4,000 sq.m. but would need to be verified based upon the final housing mix. Any shortfall in playspace provision must be robustly justified based on access to existing playspace provision in the immediate area. Any shortfall may be subject to a contribution in lieu as appropriate.

Urban design

31 Good design is central to all objectives of the London Plan, the objective to create a city of diverse, strong, secure and accessible neighbourhoods, to which Londoners feel attached whatever their origin, background, age or status. These objectives are mirrored in the draft London Plan, with the concept of Good Growth, growth that is socially and economically inclusive and environmentally sustainable, the bedrock of the plan. Policies contained within chapter seven of the London Plan, and chapter 3 of the draft London Plan, specifically look to promote development that reinforces or enhances the character, legibility, permeability and accessibility of

neighbourhoods. It sets out a series of overarching principles and specific design policies related to site layout, scale, height and massing, internal layout and visual impact as ways of achieving this.

32 The masterplan's layout principles are broadly supported in terms of utilising existing access routes into the site, addressing the High Street frontage with a zone of public space and commercial frontages, wrapping the supermarket box with active frontages and addressing the site's level change to enable a future east/west pedestrian connection to the station via the 'Route 1' bridge link.

33 Following a number of design focussed meetings, the main points of focus have been:

- How the proposals respond to the High Street and Lewisham's SPD urban design framework;
- How the footprint and positioning of the two tallest buildings respond to defining the central hub of public space and alignment of 'Route 1';
- How opportunities for activating the supermarket box along all four edges can be maximised;
- How the development phasing strategy and combination of detailed and outline elements will enable good practice placemaking principles;
- How the landscaping strategy is designed to create a legible and accessible connection between Hatcham Park Road and 'Route 1';
- How the residential blocks in the northern portion of the site respond to the surrounding urban grain while enabling secondary east/west routes and opportunities to maximise ground level front doors onto the street/public realm; and
- How the massing and heights of blocks respond to the wider context.

Layout

34 The relocation of the supermarket box towards the southern end of the site is recognised as a key spatial constraint and the latest layout iteration is successful in flanking the box's western edge with residential frontage to create a residential street character along Hart's Lane and in providing a sufficient setback (c.15 metres) along the eastern edge to create a zone of public realm flanked with active frontage. The applicant should ensure that a sufficient width of footway is extended to meet New Cross Road alongside the vehicular access route to the supermarket parking.

35 The arrangement of blocks along the New Cross Road frontage finds an appropriate balance between re-establishing a street frontage while introducing a public square, edged with retail frontages. The applicant has tested a number of layout configurations for a canopy structure to provide a street-based presence for the supermarket and shelter for pedestrians. Officers remain unconvinced by the inclusion of the canopy structure as it risks cluttering the public realm and creating maintenance issues. The applicant should continue to explore alternative options for a less intrusive and innovative means of signposting the supermarket on the New Cross Road frontage.

36 The pedestrian link adjacent to the supermarket, running the length of the existing residential terrace is welcomed as it helps to maximise the permeability of the square. Including a

residential lobby to serve the western most block above the supermarket box should be explored to help animate this link and provide passive surveillance.

37 The intention to include street level residential entrances to the Hart's Lane block is welcomed. Further detail is needed to demonstrate that sufficient footway width is accommodated alongside defensible space zones for ground level units.

38 As discussed, the approach to the Hart's Lane building should be continued to the blocks within the outline element to extend a residential street character around the full perimeter of the site. The applicant is encouraged to maximise the number of duplex units at ground level to help minimise the number of bedrooms facing onto the public realm and avoid single storey, single aspect units facing into the railway. Consideration should also be given to the overshadowing effects of mature trees along the western edge, with units designed accordingly to maximise daylight penetration to living spaces (i.e. increased floor to ceiling heights and dual aspect). The proportion of dual aspect units across the scheme should be maximised, with provision in the outline element to exceed 50%.

39 The alignment of the staircase and lift access to the bridge level of 'Route 1' and sizing of the opening beneath the tower needs to be fully considered to ensure a legible and welcoming connection with Hatcham Park Road. As part of this work, a sequence of views on the approach along Hatcham Park Road should be tested. Sightlines and visibility of sky through the base of the tower should be maximised in tandem with due consideration for the material treatment of the tower's soffit. The northwest corner of the supermarket block should be pulled back as far as possible to achieve this.

40 The staircase and connection with the bridge link beneath the tower has potential to form a dynamic point of focus at the heart of the scheme and as such is expected to achieve an exemplary balance of spatial proportions, material treatments and architectural quality. The northern frontage of the supermarket box should be integral to the pedestrian experience of 'Route 1' and designed accordingly to avoid expanses of servicing frontage/ventilation grills etc.

Heights/massing

41 The principle of the heights and massing arrangement across the site is supported and there is a clear rationale for locating the taller buildings to landmark 'Route 1'. The arrangement of blocks within the outline element of the scheme in the northern portion of the site creates potential for defining a residential street character around the site's perimeter with a generous area of open green space within the interior of the site. Daylight/sunlight analysis should inform the positioning of blocks to avoid any adverse overshadowing or overbearing effects to the rear of Brocklehurst Street properties. Height variation across these perimeter blocks is encouraged to avoid the risk of creating the perception of a wall of development and the intention to increase the height of blocks along the railway edge is to help reduce the massing along the western edge is encouraged.

42 The initial townscape views indicate that while the tallest buildings will result in a significant step change in scale relative to the surrounding built character, their simple form and vertical emphasis to their facades means they have potential to appear as refined additions to the skyline. The view from Fordham Park to the east is particularly successful in introducing a varied scale of townscape with a discernible gap between the towers aligning with 'Route 1'.

43 The view looking east along Hatcham Park Road could be supported subject to further work to demonstrate the architectural quality of the 8-storey building at the north-west corner of the supermarket box, as this building is an important mediator between the terrace housing and

proposed towers. Further views on the approach towards Route 1 should also be provided to give a clearer idea on the scale of the opening beneath the tower and the legibility of 'Route 1'.

44 The more challenging views are looking south-east along Brocklehurst Street (within the Hatcham Conservation Area) where the combination of competing styles of architecture to the roofline of lower rise blocks results in a heightened perception of density and should be simplified accordingly; and in the view looking north along Jerningham Road (within Telegraph Hill conservation area) where the step change in scale between proposed towers and the low-rise character of the conservation area are most apparent. Subject to securing exemplary quality of detailing and materials as part of the detailed element of the application and addressing the points raised above, the height and massing of the towers can be supported.

45 Micro-climate testing and any resulting mitigation measures should be fully incorporated into the design principles of the public realm and architecture of the taller buildings.

46 Given the site falls within extended LVMF view 2A.1, regard should be had to the London Plan draft London Plan Policies 7.11 and HC3 and verified views provided to allow GLA officers to be satisfied that no harm would be caused to this view.

Heritage

47 The Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the statutory duties 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, 'in the exercise of planning powers within a conservation area, the decision maker is required to pay special attention to the desirability of preserving or enhancing the character or appearance of that area'.

48 The NPPF states that when considering the impact of the proposal on the significance of a designated heritage asset, great weight should be given to the asset's conservation; significance can be harm or loss through alteration or destruction of the heritage asset or development within its setting. Furthermore, paragraph 197 states that the effect of an application on the significance of a non-designated heritage asset should also be taken into account in determining the application. A balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset. Policy HC1 of the draft London Plan, like London Plan Policy 7.8, states that development should conserve heritage assets and avoid harm.

49 The existing buildings on site are low rise and low density which are proposed to be replaced with a high density scheme incorporating buildings ranging up to 33 storeys. The site is also partially elevated which increases its visibility from surrounding viewpoints, especially from Hatcham and Telegraph Conservation Areas. Having regard to the indicative views presented to officers on 29th August 2019, it is clear that the scheme, as currently proposed, would result in harm to the setting of Hatcham Conservation Area and Telegraph Hill Conservation Areas and to a lesser degree, the Deptford Town Hall by virtue of its visibility in the absence of other buildings of similar height in the vicinity. The degree of harm could be tempered somewhat by simplifying the architectural treatment across the piece, as described in the urban design section of this report. Notwithstanding this, harm is likely to remain, which must be weighed against the public benefits of the scheme. The principal benefits include housing delivery (including affordable housing) as well as the regenerative benefits of developing a much underutilised town centre site including stitching the frontage back into the high street. These benefits would also need to be weighed against any disbenefits arising from constraints to the delivery of the BLE.

Inclusive access

50 The applicant will need to ensure that the development meets the highest standards of accessibility and inclusion in accordance with London Plan 7.2 and draft London Plan Policy D3 requires that design and access statements explain how the principles of inclusive design, including the specific needs of disabled people, have been addressed.

51 In line with the national housing standards, London Plan Policy 3.8 and draft London Plan Policy D3, 90% of units are proposed to meet Building Regulation requirement M4(2) and the remaining 10% of units would meet Building Regulation requirement M4(3).

52 The design of the public realm has continued to evolve. In particular, the design of the pedestrian routes through the site are generally inclusive and successfully navigates what is a challenging site from a topographical perspective. Steps should incorporate the appropriate design features (tactile paving, handrails etc.) and the any seating should incorporate backrests and armrests to ensure it is as usable for as many people as possible. Inclusive access doesn't appear to be provided to the commercial unit to the north of route one from the principal access route to the east, which should be remedied.

53 The fire safety of developments should be considered from the outset. The application should be submitted with a fire strategy, produced by a third party suitably qualified assessor in accordance with draft London Plan Policy D11. Furthermore, in line with draft Policy D5, developments should incorporate safe and dignified emergency evacuation for all building users. In all developments where lifts are installed, as a minimum at least one lift per core (or more subject to capacity assessments) should be a suitably sized fire evacuation lift suitable to be used to evacuate people who require level access from the buildings.

Environment

Energy

54 The updated GLA Energy Assessment Guidance (2018) should be followed with regards to the scope of information required within the energy assessment.

55 The residential element should target net zero carbon with at least an on-site 35% reduction in carbon emissions beyond Part L of 2013 Building Regulations and a 35% reduction in carbon emissions for non-domestic elements in line with draft London Plan Policy SI2. The zero carbon target will apply to non-domestic developments when the draft London Plan is adopted. Energy efficiency targets are 10% improvement on 2013 Building Regulations from energy efficiency for residential and 15% improvement for non-domestic.

56 In accordance with draft London Plan Policy SI4, evidence should be provided on how the demand for cooling and the overheating risk will be minimised through passive design in line with the Cooling Hierarchy.

57 The applicant has been investigating opportunities for connection to nearby existing or planned district heating (DH) networks in line with draft London Plan Policy SI3. The applicant should provide information confirming that the development is future proofed for connection to wider district networks now or in the future. The site should also be served by a single energy centre and the applicant should commit to providing a site wide heating network where all buildings/uses on site will be connected.

58 All major development proposals to maximise on-site renewable energy generation. This is regardless of whether the 35% on-site target has already been met through earlier stages of the energy hierarchy.

59 The applicant is expected to maximise carbon emission reductions on-site. However, where it is clearly demonstrated that no further carbon savings can be achieved but the site still falls short of the carbon reduction targets, a cash-in-lieu contribution to the relevant boroughs' carbon offset fund using the boroughs' carbon offset price would be required.

60 Further technical detailed comments have been provided separately to the applicant.

Flood risk and drainage

61 A Flood Risk Assessment (FRA) will need to accompany the application. The FRA should assess all sources of flood risk in relation to London Plan Policy 5.12 and draft London Plan Policy SI.12. Where the site is found to be at medium or high risk of flooding from at least one source, the FRA should also consider the need for flood resilience and emergency planning measures.

62 The drainage strategy should aim to reduce surface water discharge from the site to greenfield rates in accordance with London Plan Policy 5.13 and draft London Plan Policy SI.13. Where greenfield runoff rates are not feasible and robust justification is provided, a discharge rate of three times greenfield rate may be acceptable. The drainage strategy should maximise opportunities to use Sustainable Drainage System (SuDS) measures at the top of the drainage hierarchy set out in London Plan Policy 5.13 and draft London Plan policy SI.13. Roofs and new public realm areas present an opportunity to integrate SuDS such as green and blue roofs, tree pits, and permeable paving into the landscape, providing amenity and water quality benefits.

63 The residential components of the development should achieve a water consumption of less than 105l/person/day, in line with London Plan policy 5.15 and draft London Plan Policy SI.5. The non-residential components of the development should achieve the equivalent of an 'Excellent' rating on the water elements of BREEAM, in line with draft London Plan Policy SI.5. Water reuse should be considered for inclusion in the development to meet both water efficiency and sustainable drainage requirements.

Urban greening and environmental assets

64 The scheme incorporates an area of publicly accessible landscaped open space between the residential blocks to the northern end of the site. Smaller areas of soft landscaping are proposed within the public realm. Further details of the landscaping strategy for the site is required. The strategy should demonstrate compliance with London Plan Policy 5.10 and draft London Plan Policy G5 which seeks to promote the greening of London by incorporating urban greening within development schemes through soft landscaping tree planting, green walls and roofs. In the absence of a Borough level Urban Greening Factor (UGF), the development should aim to achieve a minimum UGF of 0.4.

65 A strip of land to the north west of the site is a designated Site of Importance of Nature Conservation (SINC). The applicant should demonstrate that the SINC would be protected from harm arising from the development in accordance with London Plan Policy 7.19 and draft London Plan G6.

Conclusion

66 The proposed mix of uses are appropriate to the district town centre location and broadly reflect the strategic aspirations of London Plan Policies 2.15, 4.7 and the wider regeneration aspirations of the Opportunity Area. However, this support is subject to the satisfactory resolution of the BLE station interchange location issue outlined within this report and GLA officers welcome continued engagement on this issue with the applicant, TfL and Lewisham Council to reach an optimal development solution that maximises the regeneration benefits whilst safeguarding the delivery of the BLE.

67 Further to the above, and in line with the London Plan, the applicant should ensure that the future planning application addresses the issues discussed in this report with respect to affordable housing; housing; urban design; heritage inclusive design; and environment.

for further information contact GLA Planning Unit, Development & Projects Team:

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██████████ **Principal Strategic Planner (case officer)**

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9 November 2017

Sainsburys Site, New Cross Gate

in the London Borough of Lewisham

The proposal

Relocation of Sainsbury's store to front of site. Location of BLE station and alternative options. Provision of new mixed-use residential led development.

The applicant

The applicant is **Mount Anvil Ltd and Sainsburys** and the architect **Rolfe Judd**.

Context

1 On 19 September 2017 a request was received for a pre-planning application meeting with the Greater London Authority on a proposal to develop the above site for the above uses. On 20 October 2017 a pre-planning application meeting was held at City Hall with the following attendees:

GLA group

- [REDACTED] – Senior Strategic Planner (case officer), GLA
- [REDACTED] – Senior Strategic Planner/Urban Design, GLA
- [REDACTED] – Principal Strategic Planner, GLA
- [REDACTED], TfL
- [REDACTED], GLA Housing & Land

Local Planning Authority

- [REDACTED] LB Lewisham
- [REDACTED], LB Lewisham

Applicant

- [REDACTED], Mount Anvil
- [REDACTED], Mount Anvil
- [REDACTED], Sainsbury's
- [REDACTED], Sainsbury's
- [REDACTED], Rolfe Judd Architecture
- [REDACTED], Rolfe Judd Planning

- [REDACTED], Steer Davies Gleave
- [REDACTED], Planet IE

2 The advice given by officers does not constitute a formal response or decision by the Mayor with regard to future planning applications. Any views or opinions expressed are without prejudice to the Mayor's formal consideration of the application.

Site description

3 The application site comprises a retail park located adjacent to New Cross Gate Station in New Cross/New Cross Gate District Centre and is bounded by the A2 New Cross Road to the south, Hart's Lane/Brocklehurst Road to the west, the London Overground railway line to the east and north. A Sainsbury's Supermarket store occupies the northern part of the site with a TK Maxx, Dreams retail store and a petrol filling station to the south, with associated large areas of surface car parking. The applicant is pursuing a masterplan approach to the wider site incorporating four sites not within the applicant's ownership on the opposite side of the railway tracks including New Cross Gate Station, Auburn Close (a Wandle Housing estate), a long-term vacant site in private ownership referred to as the Goodwood Road site and Lewisham Council owned land currently occupied by housing at the junction of New Cross Road and Goodwood Road. The applicant is in discussions with the relevant landowners with the intention of bringing forward a comprehensive scheme.

4 The application site is identified as Transport for London's (TfL) preferred location for a new station interchange for the proposed extended Bakerloo Line to Lewisham along the Old Kent Road which will integrate with the current London Overground and National Rail services at New Cross Gate. The preferred option is termed Option 4 and was subject to public consultation which closed in April 2017. TfL have stated the size and location of the proposed site would allow tunnel machinery to start from this location in addition to allowing spoil to be taken away by rail as opposed to using local roads. The consultation responses are currently being analysed. The vacant Goodwood Road site was also considered as a potential location (Option 1) although this was not pursued further by TfL at the time due to, amongst other reasons, spatial constraints and proximity to existing residential dwellings.

5 With regards to strategic planning policy designations, the application site is within the Lewisham, Catford and New Cross Opportunity Area which is identified in the London Plan as an area with scope for intensification, regeneration and renewal, particularly in central Lewisham where strategically important regeneration is already planned, and where the scope to address poor legibility, severance and traffic congestion should be investigated. The Opportunity Area is identified as being capable of delivering a minimum of 8,000 new homes and 6,000 new jobs.

6 At the local level, the Council's Site Allocations DPD (2013) identifies the application site (SA6) as suitable for mixed-use retail, housing, community facilities and a new station access and public space and as a site that should contribute towards improving the vitality of New Cross/New Cross Gate District Centre with opportunity to provide a strong frontage and to improve pedestrian and cycling connectivity. The vacant Goodwood Road site is also allocated (SA5) as a site suitable for mixed-use retail, business and housing. Both sites will need to address noise impacts from the railway. The other masterplan sites do not have any policy designations. The Hatcham Conservation Area adjoins the application site to the West and extends along the frontage of the site where it joins with the Deptford Town Hall Conservation Area. The Telegraph Hill Conservation Area lies to the south-west of the site.

Details of the proposal

7 The proposals seek a masterplan approach to deliver the comprehensive mixed-use, residential-led redevelopment of the Sainsbury's site and land on the opposite side of the railway. To enable the redevelopment the applicant proposes an alternative location to TfL's preferred location for the new Bakerloo Line Extension station and construction area on the vacant Goodwood Road site and Lewisham Council owned housing sites.

8 The applicant has set out that the redevelopment of the application site could support 1,500 new homes which would be increased to 2,500 if a comprehensive development including the Goodwood Road sites was deliverable. In addition to a significant quantum of new housing, the current masterplan objectives are to deliver 35% affordable housing, a BLE Station and Interchange on the Goodwood Road site, a new replacement 8,000 sq.m. flagship Sainsbury's store and a new public square fronting New Cross Road in addition to improved highways and pedestrian connections along New Cross Road.

Strategic planning issues and relevant policies and guidance

9 The relevant issues and corresponding policies are as follows:

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| • Principle of development | <i>London Plan; Town Centres SPG;</i> |
| • Transport | <i>London Plan; the Mayor's Transport Strategy; Land for Industry and Transport SPG;</i> |
| • Housing & affordable housing | <i>London Plan; Housing SPG; Housing Strategy; Shaping Neighbourhoods: Play and Informal Recreation SPG; Affordable Housing and Viability SPG;</i> |
| • Urban design | <i>London Plan; Shaping Neighbourhoods: Character and Context, Housing SPG; London Housing Design Guide; Shaping Neighbourhoods: Play and Informal Recreation SPG</i> |
| • Inclusive design | <i>London Plan; Accessible London: achieving an inclusive environment SPG;</i> |
| • Ambient noise | <i>London Plan; the Mayor's Ambient Noise Strategy;</i> |
| • Air quality | <i>London Plan; the Mayor's Air Quality Strategy;</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> |

10 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) and the London Plan 2016 (The Spatial Development Strategy for London Consolidated with Alterations since 2011).

11 The National Planning Policy Framework and Technical Guide to the National Planning Policy Framework and National Planning Practice Guidance are also relevant material considerations.

Summary of meeting discussion

12 Following a presentation of the proposed scheme from the applicant team, meeting discussions covered strategic issues with respect to the proposed masterplan approach to delivering a mixed-use redevelopment of the wider site, including the alternative options for the location of the Bakerloo Line station interchange, urban design, housing and transport. GLA

officer advice in respect of these issues is set out within the sections that follow, in addition to general guidance on inclusive design and energy.

Principle of development

Land use and Bakerloo Line Extension

13 The application site in New Cross/New Cross Gate District Town Centre is within the Lewisham, Catford and New Cross Opportunity Area which is identified in the London Plan as an area with scope for intensification, regeneration and renewal, and is an area that will strategically benefit from increased public transport connectivity through the Bakerloo Line Extension (BLE). Furthermore, local planning policy identifies both the application site and the adjacent vacant Goodwood Road site as suitable for mixed-use redevelopment including housing.

14 As set out above, the application site is within New Cross Town Centre which is classified in table A2.1 of the London Plan as a District Town Centre. London Plan Policy 2.15 seeks to coordinate the development of London's network of town centres so they provide the main foci beyond the Central Activities Zone for commercial development and intensification, including residential development; sustain and improve a competitive choice of goods and services conveniently accessible to all Londoners, and provide a sense of place and local identity within the capital. With regards to planning decisions, strategic policy sets out that development proposals in town centres should be in scale with the centre (London Plan Policy 4.7) and sustain and enhance its vitality and viability; accommodate economic and/or housing growth through intensification; support and enhance the competitiveness, quality and diversity of town centre services including retail, leisure and employment; promote access to public transport, walking and cycling; promote lifetime neighbourhoods, enhance the environment through urban greening, public realm improvements and links to green infrastructure and reduce delivery, servicing and road user conflict.

15 The proposals seek to redevelop the existing retail park site to deliver a new flagship food store, relocated toward the front of the site, small scale retail uses and significant number of new homes in a highly accessible location. Therefore, the proposed mix of uses are appropriate to the district town centre location and broadly reflect the strategic aspirations of London Plan policies 2.15, 4.7 and the wider regeneration aspiration of the Opportunity Area.

16 Notwithstanding, it is important to note that the proposals are wholly reliant on an alternative station location and design to Transport for London's (TfL) current preferred Option 4. The alternative option presented (Option 1) is consistent with the applicant's representations made to the BLE public consultation which are being considered by TfL as part of its analysis of the consultation responses. As part of this analysis, Atkins have been commissioned to undertake further technical work that will entail (amongst many other things) looking in more detail at the best option for a new station at New Cross Gate and for a main construction worksite(s). This technical work is programmed to be completed around March 2018 and will assist in determining whether the proposals could be considered compliant with London Plan Policy 6.2B which seeks to safeguard land for strategic transport improvement schemes. Until this work has been completed, TfL are unable to provide 'in principle' support to the proposal. All GLA advice in this note should therefore be read and considered in light of this situation.

17 Notwithstanding the above, the applicant is strongly encouraged to continue its positive engagement with GLA, TfL and Lewisham Council officers to reach an optimal development solution that enables the comprehensive redevelopment of this key town centre site within the

Opportunity Area and maximises its regeneration benefits whilst safeguarding the timely delivery of the Bakerloo Line Extension.

Transport

18 Notwithstanding the key BLE station location issue set out above, there are a number of strategic and local transport planning issues that would need to be assessed to determine whether the scale of development proposed can be considered acceptable in planning terms in both a pre and post-BLE environment.

19 London Plan Policy 6.3B states that where existing transport capacity is insufficient to allow for the travel generated by proposed developments, and no firm plans exist for an increase in capacity to cater for this, boroughs should ensure that development proposals are phased until it is known these requirements can be met, otherwise they may be refused.

20 Allowing development that would place an unacceptable burden on the public transport network would be contrary to the objective of sustainable development. In practical terms, this means ensuring that new developments that will give rise to significant numbers of new trips should be located either where there is already good public transport accessibility with capacity adequate to support the additional demand, or where there is a realistic prospect of additional accessibility or capacity being provided in time to meet the new demand. In this part of inner London, the transport network is severely capacity constrained at peak times, particularly on the Jubilee line, and London Overground to/from the south. This has significant implications on the operation of the public transport network, journey time reliability and user experience.

Rail

21 Although no detailed assessment regarding trip generation has been undertaken at this stage, the applicant is advised that crowding levels on Overground services along the East London Line (ELL) at New Cross Gate are severe over the entire 0800 – 0900 peak period, which contributes to station crowding issues at New Cross Gate, at both platform and street level, during peak periods. Canada Water station also experiences severe station crowding arising from the large interchange movements between the ELL and Jubilee line as well as local buses. The crowding levels at local stations and services make it hard for passengers to board trains in this area. An additional 1,500-2,500 new dwellings in this location is likely to generate a significant number of new peak hour trips that is likely to make what is a bad situation worse without mitigation which increases public transport and station capacity. These concerns are similarly shared for other significant development plans in the wider area including those for the Canada Water Opportunity Area and the Old Kent Road Opportunity Area.

22 Regardless of any local mitigation measures at New Cross Gate there will remain a pressing need for additional transport capacity between the New Cross area and central London given the cumulative impact of proposed development in this area. The BLE is a key means to providing new capacity to help make planned development in this part of London sustainable and therefore any development proposals must not fetter its delivery.

Bus

23 There is significant bus demand in the New Cross area, notably heading towards central London on the A2 / Old Kent Road. It is anticipated that an additional 1,500 to 2,500 dwellings will exacerbate crowding on buses further during peak periods and may require mitigation

through the provision of additional capacity and/or additional connectivity if considered appropriate.

24 Many of the routes serving New Cross have suffered from worsened journey times and reliability, both towards central London and other destinations including Lewisham and Canada Water. With the existing highway configuration and associated constraints (e.g. New Cross Gate rail bridge), coupled with growing demand for more pedestrian and cycling improvements there are likely to be limited opportunities to address these challenges. Any changes to the highway configuration in this area to facilitate the redevelopment of the site will need to be carefully considered and designed to ensure that these issues are not worsened.

25 In addition to the above, bus standing and stopping facilities operate on the application site. The loss of bus standing in particular can result in longer 'empty' running of buses which in turn adds unnecessarily to cost, congestion and emissions. In accordance with London Plan Policy 6.2, the loss of existing bus stops, standing or driver facilities, or access thereto and from, through a change of use or redevelopment will be resisted unless suitable alternative provision is agreed with TfL.

Walking & cycling

26 New Cross is a busy pedestrian area, with attractors including the local A2 retail offer, Goldsmiths University and public transport connections. As a major highway with high motor traffic flows, the A2 is a cause of pedestrian severance in the area. New Cross Gate station forecourt is a major pedestrian pinch-point where crowding and congestion is experienced. There is also high demand to cycle within New Cross and along the A2. However, the capacity and infrastructure constraints that currently exist preclude the provision of formal or dedicated cycle route infrastructure. These constraints are the chief cause of the early termination of CS5 to the west of New Cross Gate station; the narrow A2 rail bridge coupled with current highway flows means there simply is not the space to provide for cyclists. Therefore, the provision of new or improved parallel routes to the A2 for pedestrians and cyclists across the site as well as enhanced cycling connections from the site north to connect with Quietway 1, Cycle Superhighway 4 and the proposed Rotherhithe to Canary Wharf Bridge will be critical.

27 The above issues will need to be adequately addressed as part of the submission before the proposals can be supported from a transport perspective. As part of the preparation of a planning submission, it is strongly recommended that the applicant takes advantage of TfL's own pre-application planning service so more detailed conversations regarding the scoping and assessment of transport impacts can be undertaken.

Urban design

28 The principle of the comprehensive redevelopment of the site, incorporating the Sainsbury's and Goodwood Road sites, in the context of a future BLE interchange and emerging development in the wider area is generally supported and offers urban design advantages by optimising the development capacity of the Sainsbury's site. It will however be vital to ensure that any proposal takes account of TfL's proposals for the BLE which are currently under development.

29 As discussed at the meeting, an analysis of wider pedestrian movements should be undertaken that takes account of uplifts in footfall towards the station from emerging schemes (Goldsmiths' masterplan) and within the application site itself. It is noted there are limited opportunities for creating access routes into the site and in order to justify the quantum of

development, the applicant should explore means of maximising the number, legibility and width of routes, particularly along the edge of the railway line as this would need to work hard to provide safe, accessible and high quality public realm alongside servicing access. The intention to concentrate the distribution of taller buildings along the railway line would further impact on this objective.

30 The severance of the railway line is a key constraint and consideration should be given to how connections between the Sainsbury's and the Goodwood Road sites can be delivered to avoid areas of isolation and to enable development to be optimised alongside good place-making principles. This may include exploring options for a footbridge link along the line of the existing sewer, to connect Hatcham Park Road to the Goodwood Road sites or exploring options for a subterranean interchange arrangement that connects beneath the railway line. In addition, further clarity is needed on how the site can be opened up to create a north/south route to connect the development with areas to the north.

31 The wider analysis work including the High Street study and public open space analysis is welcomed and the applicant is encouraged to consider how the development can be designed to respond positively to its existing and emerging context, in terms of the scale and character of public open space, the form and height distribution of building typologies and the quality of architecture. The work undertaken on the TfL interchange study area should be fully incorporated into the scheme's layout as it progresses.

32 In terms of the proposed masterplan development zones, containing residential zones towards the north of the site to allow for retail frontage to the high street is supported. As discussed, the inclusion of a zone of south facing public space to address the high street and an identified shortfall of public open space in the wider town centre is welcomed. However, the sizing and scale of this space should be carefully considered to ensure it is well-used and avoids becoming redundant. Consideration should also be given to defining an entrance zone/threshold into the wider masterplan area from the high street. This may involve aligning retail frontages to funnel pedestrians towards the Sainsbury's block, while also providing sightlines towards the north/south route. Provision should also be made for consolidating servicing access (i.e. at basement level) to allow active frontages public realm to be maximised.

33 The provision of public open space between the new Sainsbury's and residential zone, to align with a potential connection over/under the railway and to provide a buffer between uses should also be considered.

34 The combined southern frontage of the two sites onto the high street should be designed to respond to the wider character of built form, while providing an appropriate level of enclosure/frontage to the street.

35 As the masterplan develops, officers would welcome details of indicative residential layouts, floorplans and massing models to establish how the scheme can support high residential quality and place-making. As discussed, the co-located podium model of the Sainsbury's Whitechapel scheme is a good design response in terms of providing simple and open-plan retail floorspace, wrapped with residential cores/frontages to support a strong residential character. The applicant is encouraged to explore a range of housing typologies including mansion blocks, terrace housing, mews links and perimeter blocks to help create legibility/character areas across the masterplan area, while also addressing the low-rise scale of the neighbouring conservation areas.

36 The issue of scale, massing and density was not discussed in detail at the meeting and this will need to be discussed further in consultation with the council as the proposals are developed.

Housing & affordable housing

37 The provision of residential floorspace as part of the mix of uses is supported by London Plan Policy 3.3 and will contribute towards the delivery of London's housing requirements and the Council's minimum target of 1,385 homes per year between 2012 and 2025.

Affordable housing

38 London Plan Policy 3.12 seeks the maximum reasonable amount of affordable housing. The Mayor's Affordable Housing and Viability SPG establishes a minimum pan-London threshold level of 35% affordable housing (without grant) with a strategic target of 50%. The SPG also sets out a preferred tenure split of at least 30% low cost rent (social or affordable rent significantly less than 80% of market rent), at least 30% intermediate (with London Living Rent and shared ownership being the default tenures), and the remaining 40% to be determined by the LPA. Lewisham Council Core Strategy Policy 1 seeks 50% affordable housing on all site capable of providing 10 or more homes and sets out that this is a starting point for negotiations. Final contributions will be subject to viability testing. Any future planning application will be expected to accord fully with the local policy target as a minimum, and to ensure affordable housing is maximised. GLA officers strongly encourage early engagement with the applicant on the nature of the housing provision, including affordable housing, to ensure any future planning permission accords with strategic policy.

39 In accordance with the SPG, where a scheme proposes 35% affordable housing with a compliant tenure split, a viability report need not be prepared and submitted to the GLA. Nevertheless, if an offer of less than 35% is made, the applicant will be required to submit a viability appraisal in support of the proposed scheme. This should be rigorously tested by the Council and its independent consultants, with all key appraisal inputs scrutinised, including: benchmark land value; developer profit margin (relative to scheme risk); build costs; assumptions regarding rental levels, income thresholds and, sales values, in addition to testing grant funding scenarios and alternative tenure mixes. Both the submitted appraisal, and the findings of the independent review, should also be shared with the GLA who will work with the Council to robustly scrutinise the viability. In accordance with the SPG, an early stage review will be required and, if after further interrogation the maximum level of affordable provision is still below 35%, a late stage review will also be required. This approach will however need to be reviewed in light of the draft London Plan which will be published for consultation in November 2017.

40 The Council must publish the financial viability assessment including any review, in accordance with the SPG and to ensure transparency of information. The applicant is strongly encouraged to meet the 35% benchmark in order to simplify the planning process. Any existing affordable housing on the Goodwood Road sites must be reprovided within the proposed development and the applicant should note that these units will not be counted towards the 35% threshold target.

Residential quality, density and children's play space

41 While not discussed in detail at the meeting, given the quantum of development proposed, any future development will need to demonstrate exemplar residential design. As part of any future planning application submission, a detailed housing schedule which demonstrates full compliance

with the Mayor's space standards, in addition to a detailed assessment of the units against the baseline and good practice standards within the Mayor's Housing SPG would be expected.

42 It is acknowledged that the proposed development would likely exceed the residential density guidance set out within London Plan 3.4 and associated Table 3.2. Notwithstanding the above, GLA officers acknowledge that these ranges should not be applied mechanistically and that PTAL alone is not an appropriate measurement to inform residential density. It is also important to acknowledge that the site is within an identified Opportunity Area and is therefore a location where residential output and densities should be optimised and one where development proposals should contribute towards meeting, or where appropriate, exceeding the minimum guidelines for housing, in accordance with London Plan Policy 2.13. However, in order to be justified, in accordance with paragraph 1.3.41 of the Mayor's Housing SPG any development will need to be of exemplar design, deliver sufficient play and amenity space and must provide the fullest contribution towards affordable housing.

43 As part of the application submission, a detailed play strategy would be expected, demonstrating how the scheme will meet the play space requirements set out in London Plan Policy 3.6 and the Mayor's revised supplementary planning guidance 'Shaping Neighbourhoods: Children And Young People's Play And Informal Recreation'. The applicant should ensure that sufficient space is provided in accordance with the expected child population of the completed development. Door-stop play provision is expected on-site for the under-five's as a minimum (10 sq.m. per child), and following a review of existing facilities in the immediate area, it may be necessary to also provide on-site play for older children, and/or provide a financial contribution to the provision, or improvement, of off-site play facilities.

Inclusive access

44 While not discussed at the meeting, the applicant will need to ensure that any future development meets the highest standards of accessibility and inclusion in accordance with London Plan 7.2, which requires that design and access statements explain how the principles of inclusive design, including the specific needs of disabled people, have been addressed.

45 In line with the national housing standards, London Plan Policy 3.8 outlines that 90% of units should meet Building Regulation requirement M4(2) and the remaining 10% of units meet Building Regulation requirement M4(3). This should be provided and plans identifying the location and typical unit layouts for the Category 3 units should be submitted as part of any future planning application. The remainder of the units should be compliant with M4(2). GLA officers will seek to advise the Council to secure this provision by way of planning condition as part of any future consultation on a planning application for this scheme.

46 The design of the landscaping and the public realm will be fundamental to how inclusive the development will be for many people and this should be given detailed consideration as the design is developed. The design and access statement should show how disabled people access and move through any public open spaces and each of the entrances safely, including details of levels, gradients, widths, surface materials of the paths and seating proposed. Any shared surfaces should include routes and areas where vehicles would not be able to enter with the carriageway rather than pavement being shared between vehicles and pedestrians.

Energy

47 Again, while not discussed in detail at the meeting, the following comments should be addressed as the scheme develops. Updated energy assessment planning guidance is available on the GLA website (March 2016). This provides further information on the revised targets to

take into account Part L 2013 of the Building Regulations. It also provides details on the information that should be included within the energy statement to be submitted at the application stage. The Mayor will apply the zero carbon (as defined in section 5.2 of the Housing SPG) for residential development.

48 The carbon emission figures should be reported against a Part L 2013 baseline. The above-mentioned guidance provides details on presenting carbon emission information separately for domestic and non-domestic elements of the development in light of the zero carbon target for domestic development.

49 The applicant should commit to meeting Part L 2013 by efficiency measures alone and sample SAP full calculation worksheets (both DER and TER sheets) and BRUKL sheets including efficiency measures alone should be provided to support the savings claimed.

50 Evidence should be provided on how the demand for cooling and the overheating risk will be minimised through passive design in line with Policy 5.9. The applicant should particularly consider how best to mitigate any restrictions posed by, for example, local air quality or noise issues associated with the A2 and railway lines, and single aspect units. Dynamic overheating modelling in line with CIBSE Guidance TM52 and TM49 is recommended and an area weighted average for the actual and notion cooling demand should be provided. A domestic overheating checklist is included in the GLA's energy guidance which should be completed and used to identify potential overheating risk and passive responses early in the design process. The completed checklist should be included in the appendix of the energy statement.

51 The applicant should fully investigate opportunities for connection to nearby district heating networks and the applicant should liaise with the Council's energy officer to investigate potential opportunities for connection. The site should be served by a single energy centre and site wide heat network that is suitable for connection to wider district networks now or in the future. All uses on the site should be connected to the network and a drawing/schematic demonstrating these connections should be provided. Where a site wide heating network is not deemed to be feasible the rationale for this should be provided.

52 A plan showing the size and proposed location of the energy centre should be provided and the applicant should follow the energy hierarchy when considering the potential for CHP and renewable energy technologies. In line with Policy 5.7 the applicant should investigate the inclusion of on-site renewable energy generation.

Conclusion

53 The proposed mix of uses are appropriate to the district town centre location and broadly reflect the strategic aspirations of London Plan policies 2.15, 4.7 and the wider regeneration aspirations of the Opportunity Area. The masterplan approach including the Goodwood Road sites presented by the applicant offers urban design advantages by optimising the development potential of the land surrounding the station and would enable a more comprehensive urban design solution. However, this support is subject to the satisfactory resolution of the BLE station interchange location issue outlined within this report and GLA officers welcome continued engagement on this issue with the applicant, TfL and Lewisham Council to reach an optimal development solution that maximises the regeneration benefits whilst safeguarding the delivery of the BLE.

54 Further to the above, and in line with the London Plan, the applicant should ensure that the future planning application addresses the issues discussed in this report with respect to

affordable housing; housing; urban design; inclusive design; sustainable development; and transport.

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