Sherwood court, Thurston Road
in the London Borough of Lewisham
planning application no. DC/12/80762/X

Strategic planning application stage 1 referral (new powers)

The proposal
Erection of two 13-storey buildings, comprising 168 student housing units (500 bed spaces) with associated communal facilities and 662 sq.m. of employment floorspace.

The applicant
The applicant is Trademark Homes Ltd, and the architect is Weston Williamson.

Strategic issues
The principle of a student-led mixed-use development is in the interest of good strategic planning in London. However, further information and clarification is required on the principle of development, inclusive access, climate change, noise and transport to ensure compliance with London Plan policies.

Recommendation
That Lewisham Council be advised that while the application is generally acceptable in strategic planning terms the application does not comply with the London Plan, for the reasons set out in paragraph 74 of this report; but that the possible remedies set out in paragraph 76 of this report could address these deficiencies.

Context

1. On 9 August 2012 the Mayor of London received documents from Lewisham Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008 the Mayor has until 19 September to provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor’s use in deciding what decision to make.

2. The application is referable under Category 1C of the Schedule to the Order 2008: “Development which comprises or includes the erection of a building more than 30 metres high and is outside the City of London”.

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

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

**Site description**

5 The site is located to the west of Lewisham town centre with the Transport for London road network A20 Loampit Vale running just to the south of the site. The site is bound directly to the north by the train line and to the south by Thurston Road. The site is located within a reasonable distance of both Lewisham mainline train station and the DLR station, which both offer frequent services and connections to central London. Numerous bus routes are located along Jerrard Street, Loampit Vale and Thurston Road. The main Lewisham shopping area is located to the east of the site. The site is currently occupied by 6 low-rise industrial warehouse units and a repair garage.

6 The surrounding area is characterised by small industrial units to the east, a large retail unit occupied by Matalan and MFI with some small scale Victorian housing to the south, and predominately residential areas to the north and west of the site.

7 On the eastern boundary of the site there is a pedestrian/cycle way under the railway linking Lewisham town centre (via a shared pedestrian/cycleway along Thurston Road) with the primarily residential area to the north which forms part of Waterlink Way. To the immediate east of this link is the site for the Thurston Road bus stand. This stand would replace all the existing standing and driver facilities at Lewisham bus station. Planning permission was granted for this stand in 2009 as part of the Lewisham Gateway scheme, a significant mixed use regeneration of the northern end of the town centre. Funding for the development has recently been approved and it is currently anticipated that works will commence next year on the Thurston Road stand, replacement of the existing large roundabout where the A21 splits from A20 with a ‘low H’ junction arrangement and the first phase of residential on land including the bus station which adjoins the railway stations.

**Details of the proposal**

8 Erection of two 13-storey buildings, comprising 168 student housing units (500 bed spaces) linked by a 2-storey podium with associated communal facilities and 662 sq.m. of employment floorspace.

**Case history**

9 A pre application meeting was held between the GLA and the applicant on 4 November 2008 to discuss the redevelopment of the site for a new building with a 2-storey base and three towers ranging in height from 10 to 18-storey, comprising 1,975 sq.m. of commercial floorspace and 187 residential units. After which the applicant was advised that “The principle of redeveloping this site from its current employment / industrial use for a mixed-use, residential and commercial use within the Lewisham Town Centre is acceptable in strategic planning policy terms. However, there are a range of strategic planning issues that would need to be addressed in more detail before this application could be favourably presented to the Mayor”. 
A further pre application meeting was held between the GLA and the applicant on 3 April 2012 to discuss the redevelopment of the site for student accommodation. After which the applicant was advised that “Whilst the principle of the redevelopment of the site is acceptable, the issues raised in this report need to be addressed before an application is submitted”.

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

11 The relevant issues and corresponding policies are as follows:

- **Principle of use**  London Plan
- **Urban design**  London Plan;
- **Inclusive access**  London Plan; Accessible London: achieving an inclusive environment SPG; Planning and Access for Disabled People: a good practice guide (ODPM)
- **Climate change**  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
- **Transport**  London Plan; the Mayor’s Transport Strategy

12 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is the Lewisham Core Strategy 2011, the Lewisham Unitary Development Plan 2004 and the 2011 London Plan.

13 The following are also relevant material considerations:

- The Lewisham Council Area Action Plan (preferred options document)
- The draft Revised Early Minor Alteration to the London Plan

**Principle of use**

14 The site is located within the Lewisham Area Action Plan as the railway strip in the Loampit Vale town centre area and identified as appropriate for commercially led mix-use development, although sensitive design could make some residential uses acceptable.

15 London Plan policy 3.3 seeks provision of at least an annual average of 33,400 additional homes across London up to 2015/16. Table 3.1 sets annual average housing provision monitoring targets for London boroughs, of which Lewisham’s is 1,105 additional homes per year between 2011 and 2021. As such Lewisham Council should ensure that the site is not required for residential development to meet its housing targets.

16 London Plan policy 3.8h states that strategic and local requirements for student housing meeting a demonstrable need are to be addressed by working closely with stakeholders in higher and further education and without compromising capacity for conventional homes.

17 The London Plan recognises in paragraph 3.52 that London’s universities make a significant contribution to its economy and labour market and that it is important that their attractiveness and potential growth are not compromised by inadequate provision for new student accommodation. It also recognises that the provision of purpose-built student housing may reduce pressure on other
elements of the housing stock currently occupied by students, especially the private rented sector. The SHLAA/HCS has identified capacity for over 17000 student places 2011-2021.

18 The provision of student accommodation is therefore supported.

19 Paragraph 3.53 sets out that addressing the demands for student accommodation should not compromise the capacity to meet the need for conventional dwellings, especially affordable family homes, or undermine policy to secure mixed and balanced communities. It recognises that this may raise particular challenges locally and especially in parts of inner London where almost three quarters of the capacity for new student accommodation is concentrated. Student accommodation should be secured as such by planning agreement or condition relating to the use of the land or to its occupation by members of specified educational institutions. If the accommodation is not robustly secured it will normally be subject to the requirements of affordable housing policy.

20 As such the wording for the planning agreement or condition to secure the use of this building solely for student accommodation will need to be submitted when the application is referred to the Mayor.

21 The loss of local employment land is not a strategic planning issue. However, it is understood that the existing building is rented by several Evangelical Churches. Policy 3.16 of the London Plan seeks to protect places of worship. Proposals which would result in a loss of social infrastructure in areas of defined need without realistic proposals for reprovision should be resisted. It is not clear whether there is a need for the existing places or worship to be reprovided. Further information on this should be provided before the application is referred back to the Mayor.

**Urban design**

22 Good design is central to all objectives of the London Plan, in particular 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. Policies contained within chapter seven 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.

23 The proposed development is reasonably well designed, optimising the potential of the site, responding well to the site’s constraints and opportunities and contributing to creating a legible and active public realm. However, there are a number of elements that require further consideration for its design to fully comply with London Plan policies. The following comments refer to these and other aspects of the proposal and where appropriate provide suggestions for amendments.

**Site Layout**

24 The proposed development sits on a 0.31Ha linear site bound by a railway line to the north and Thurston Road to the south. Thurston Road is an important and well connected street that links Lewisham to Deptford. A strategic cycle and pedestrian route runs along the eastern edge of the site.

25 The development proposes the creation of a linear building built to the back of the footway with two small spaces at either end and one podium space in the middle. The provision of the
space to the east of the site is welcomed as it is well located in the wider urban structure marking the convergence of Thurston Road, Jerrard Street and the strategic pedestrian and cycle route, is on the main approach to the site, and will be well activated by the commercial unit proposed on the ground floor. However, consideration needs to be given to the impact that the service access cutting through the space will have on it, and an alternative location for this needs to be considered. Consideration should also be given to making this a more overtly green space given the overall character and density of this development. A green and soft landscaped approach to the east plaza would offset and compliment the rather dark colour of the main building.

Locating parking and service uses at the rear of the building is strongly supported. However, as outlined above, consideration needs to be given to how the access of service vehicles into this space can be mitigated so as not to compromise the quality of the pedestrian environment in the public realm.

The ground floor uses of the building are well laid out ensuring that uses that line the northern side of Thurston Road will provide good levels of pedestrian activity and overlooking on to the public realm which is welcomed. However, consideration needs to be given to extending the built form towards the railway line at the eastern end of the building to screen the service area and improve overlooking where the existing pedestrian underpass is located.

**Scale, height, and massing**

The proposed development is made up of two thirteen storey high towers sitting on a two storey podium. The height of the towers is significantly taller than the surrounding contextual height. However this site, along with others in the town centre, is identified as being suitable for tall and relatively dense development. Within this wider planned context and given their separation from surrounding lower scale buildings by railway lines the scale is considered acceptable in principle subject to detailed design.

Due to the scale and visibility of the buildings they will only be acceptable if they are of an outstanding architectural quality, with exceptionally high quality materials and detailing. The current proposals are committed to delivering that quality, through the use of reflective brickwork and clearly articulated window reveals and ventilation panel details which should give depth and texture to the elevations.

The presence of the podium is strongly supported as this has the potential to provide continuous enclosure on to the public realm.

**Inclusive Access**

The aim of London Plan policy 7.2 is that proposals aim for the highest standards of accessibility and inclusion (not just the minimum) and that the design process has from the outset considered how everyone, including disabled and Deaf people, older people, children and young people, will be able to use the places and spaces that are proposed.

The applicant is proposing to provide 49 wheelchair accessible bed spaces in a variety of accommodation styles from 6-bed clusters to studios which is supported. This equates to 10% of total number of bed spaces. The applicant has supplied detailed plans illustrating how each of these bed spaces would be wheelchair accessible.

It is noted that on floors two to eight the wheelchair accessibly studios have been provided in place of a communal kitchen/sitting area. As such floors with wheelchair accessible units will have less communal living space. As such GLA officers are concerned students in the wheelchair
accessible rooms and those on the same floor as wheelchair accessible rooms will have insufficient communal space. The applicant is asked to submit justification for the proposed layout.

34 Access to the front of the building is via stairs or ramp and access to the back of the building is via a platform lift. Each tower has two lifts to access the upper floors. Disabled parking is located to the rear of the building.

35 The design and access states the fitting out of the commercial units to provide wheelchair accessible bathrooms and platform lift will be carried out by the future occupier. To ensure compliance with London Plan policy 7.2 the provision of these facilities should be secured by condition.

**Climate change mitigation**

**Be lean**

36 A range of passive design features and demand reduction measures are proposed to reduce the carbon emissions of the proposed development. Both air permeability and heat loss parameters will be improved beyond the minimum backstop values required by building regulations. Other features include energy efficient lighting and mechanical ventilation with heat recovery. The demand for cooling will be minimised through the use of solar glazing.

37 The development is estimated to achieve a reduction of 135 tonnes per annum (18%) in carbon dioxide emissions compared to a 2010 Building Regulations compliant development. This appears high and should be evidence via modelling. The applicant should also confirm the savings in regulated carbon dioxide emissions.

**Be clean**

38 The applicant states that the Loampit Vale Town Centre which is within proximity of the proposed development has been identified as a potential future cluster area for a district heating scheme. Direct connection is not immediately viable. The applicant has, however, provided a commitment to ensuring that the development is designed to allow future connection to a district heating network should one become available.

39 The applicant is proposing to install a site heat network connecting the student accommodation to supply the domestic hot water. However, the applicant should also commit to providing space heating via the site heat network infrastructure.

40 Electric heating is proposed for the student accommodation. The use of electric heating is not London Plan compliant as this approach stops the space heating load being supplied by a district heating network in the future.

41 The site heat network will be supplied from a single energy centre. Further information on the floor area and location of the energy centre should be provided.

**Combined Heat and Power**

42 The applicant is proposing to install a 65 KW, gas fired combined heat and power plant to supply the domestic hot water requirements of the student accommodation. A reduction in carbon dioxide emissions of 104 tonnes per annum (17%) will be achieved through this second part of the energy hierarchy.
43 The applicant should optimise the size of the combined heat and power size to provide a proportion of the developments space heating as well as the domestic hot water load and provide updated regulated carbon dioxide savings estimates.

Be green

44 The applicant has investigated the feasibility of a range of renewable energy technologies and is proposing to install 50 sq.m. of roof mounted photovoltaic.

45 A reduction in regulated carbon dioxide emissions of 3 tonnes per annum (0.6%) will be achieved through this third element of the energy hierarchy

Overall carbon savings

46 The estimated regulated carbon emissions of the development are 522 tonnes of carbon dioxide per year after the cumulative effect of energy efficiency measures, combined heat and power and renewable energy has been taken into account. This equates to a reduction of 242 tonnes of carbon dioxide per year in regulated emissions compared to a 2010 Building Regulations compliant development, equivalent to an overall saving of 32%.

Climate change adaptation

47 Chapter five of the London Plan includes policies to promote and support the most effective adaptation to climate change. These include policies to minimise overheating and contribution to heat island effects; minimise solar gain in summer; contribute to flood risk reductions, including applying sustainable drainage principles; minimise water used; and protect and enhance green infrastructure. Policies 5.3, 5.9 to 5.12, 5.15 and 6.13 of the London Plan require all development proposals to include sustainability measures within developments. Further guidance on this policy is given in the London Plan Sustainable Design and Construction SPG.

48 The applicants has submitted a sustainable design and energy report. However, the report focuses on energy and does not address issues such as living roofs, sustainable urban drainage, rainwater harvesting or other proposed sustainability measures. There is no assessment of the scheme against the Mayor’s Sustainable Design and Construction matrix contained in the SPG.

49 As such it is not evident which sustainability measures will be included in this proposal to comply with London Plan policies 5.3, 5.9 to 5.12, 5.15 and 6.13.

Noise

50 Reducing noise pollution and protecting scoundscape quality contribute to improving quality of life. Policy 7.15 of the London Plan states development proposals should seek to reduce noise by separating new noise sensitive development from major noise sources wherever practicable through the use of distance, screening, or internal layout in preference to sole reliance on sound insulation.

51 During the pre-application process the applicant was advised that the development would need to take account of the proposed bus shelter on the former traveller’s site. However, the submitted noise assessment does not appear to take account of the approved bus stand to be provided to the immediate east of Waterlink Way. It is intended that all standing buses will be relocated from the existing Lewisham Bus Station to the new site on the Thurston Road in early 2013. This new facility adjacent to the proposed development would have a high frequency of bus
movements throughout the day and night and furthermore buses would access the stand via Jerrard Street.

52 The noise assessment should be revised to take account of the permitted bus stand to take account of this significant noise source which could have a detrimental impact upon the quality of life of the proposed student residents. As such until a full assessment is carried out it is not possible to ascertain whether the proposal complies with London Plan policy 7.15.

**Transport**

**Car parking**

53 A car free development is proposed with the exception of four parking spaces for blue badge holders. Given the high public transport accessibility level of the site and the nature of the development such a scheme is welcomed being in accordance with London Plan Policy 6.13 which encourages car-free developments in locations with high public transport accessibility. However, further justification is sought that adequate parking provision has been made for disabled residents, staff and visitors. A car free scheme should be complemented by excellent provision for other modes.

54 The proposed exempting of residents and staff from applying for on-street parking permits within the vicinity of the site, is welcomed. This should be secured through condition or the section 106 agreement. Consideration should be given to active and passive provision for electric vehicle charging infrastructure at the parking spaces serving the scheme.

**Trip generation**

55 The submitted transport statement does not accord with TfL’s Transport Assessment Best Practice Guidance (April 2010). Neither the trip generation assessment nor the public transport capacity assessment is thorough enough to enable TfL to fully assess the likely impact of these proposals. Notwithstanding this and in light of the location, nature and scale of the development, it is accepted that the local highway network including the nearby section of the Transport for London Road Network should be able to accommodate any additional trips.

56 Further clarification is sought as to the potential use of buses by residents of the development. TfL has concerns that the significant demand identified in the transport statement for bus travel may be focussed upon only a few routes and especially if there is more peak time travel than anticipated capacity issues could arise. This matter needs to be addressed in order for the application to be in conformity with London Plan Policy 6.3.

**Bus stops**

57 To ensure compliance with London Plan policy 6.7, especially given the anticipated usage of buses by residents, an audit should be undertaken of the closest bus stops to the development to identify any improvements necessary to ensure that the bus users associated with the development have suitable facilities. Improvements should include accessibility measures (see TfL Bus Priority Team Technical Advice Note BP1/06 available from TfL’s website: [http://www.tfl.gov.uk/assets/downloads/businessandpartners/accessibile_bus_stop_design_guidance.pdf](http://www.tfl.gov.uk/assets/downloads/businessandpartners/accessibile_bus_stop_design_guidance.pdf) and possibly a new or relocated stop for services towards Deptford as well as shelters, information and posts. The cost of the identified works is expected to be borne by the applicant, unless these are to be provided through other schemes in time to meet the needs of the Sherwood Court bus users, and secured through the section 106 or other legal agreement.
Walking/Cycling

58 The transport statement indicates that walking and cycling are likely to be important modes of transport. Appropriate provision to should therefore be made to support these modes. It is disappointing that a PERS audit has not been undertaken. TfL would suggest that further consideration is given to the need for improvements to be made to other walking routes, in addition to the small section of Waterlink Way immediately adjoining the site to which the applicant has already committed. In particular those links with Lewisham College and Goldsmiths College, being the two establishments nearest the development and at which residents are anticipated to study, should be assessed. The timing of improvements of the links with Lewisham town centre and public transport secured through other schemes should also be considered to ensure their delivery when needed by the Sherwood Court development. Any necessary improvements to walking and cycling routes should be secured through condition/section 106 agreement.

59 Further discussion should take place regarding the Lewisham Gateway Local Improvements included in the statement and the alterations and improvements to Thurston Road proposed as part of the scheme. These discussions should include the potential need to alter the Thurston Road/Jerrard Street junction to better accommodate the development, the Waterlink Way and the new Thurston Road bus stand.

Cycle parking

60 A total of 312 cycle parking spaces are proposed for the student accommodation i.e. a space for 62% of residents. This level of provision would be below that necessary to accord with London Plan Policy 6.9 and Table 6.3 for a residential development. However in the light of the evidence provided by the applicant and the proposed monitoring process via the travel plan, it is considered to be an acceptable initial level of provision for residents provided space is identified on the site for additional parking should this be required.

61 As well as the secure parking for residents, consideration should also be given to ensuring that there is suitable visitor and staff cycle parking and spaces for motor cycles. Confirmation is also required that all staff on site will have access to convenient shower and changing facilities. spaces will be located to the front and side of the Academy with the majority undercover.

Travel planning and management

62 In line with London Plan policy 6.3, the commitment to a travel plan is welcomed. However the submitted plan should be re-assessed in the light of the comments elsewhere in this report and further developed once residents are confirmed. Lewisham Council should secure, enforce, monitor, review and ensure the funding of the travel plan through the Section 106 or similar legal agreement.

63 The proposed arrangements for managing the arrivals and departures of students at the beginning and end of the academic year are welcomed as is the intended management of day to day servicing and blue badge and cycle access and parking. A detailed management plan should be secured by condition. It will be important to ensure that bus services, including the operation of stops and stands, as well as general traffic on Thurston Road and Jerrard Street are not disrupted.

64 As there is a wide choice available to residents of public transport and high expected demand, the inclusion of real time travel information within the scheme should be considered.
Servicing, deliveries and freight

65 Off street servicing of the student accommodation and A1/A2/B1 units is only possible by transit vans and other vehicles of similar or smaller size. The applicants should therefore be asked to demonstrate that on street unloading and loading is feasible for larger vehicles without compromising the safe and efficient use of Thurston Road by all modes including the bus stop adjoining the site and put forward appropriate management proposals for on and off street servicing and a Delivery and Servicing Plan should be required by condition.

66 The proposed construction delivery plan is also welcomed. To ensure full compliance with London Plan policy 6.14 ‘Freight’ the plan should be a detailed standalone document that enables construction impacts to be managed, minimising impact on the highway network and transport system. Similarly, this will need to be secured by condition and approved by Lewisham Council in consultation with TfL prior to the commencement of any construction.

Community Infrastructure Levy

67 The Mayor has introduced a London-wide Community Infrastructure Levy (CIL) to help implement the London Plan, particularly policies 6.5 and 8.3. The Mayoral CIL formally came into effect on 1 April 2012, and it will be paid on commencement of most new development in Greater London that was granted planning permission on or after that date. The Mayor’s CIL will contribute towards the funding of Crossrail.

68 The Mayor has arranged boroughs into three charging bands. The rate for Lewisham is £35/sq.m. The required CIL should be confirmed by the applicant and council once the components of the development or phase thereof have themselves been finalised. See the 2010 regulations: http://www.legislation.gov.uk/ukdsi/2010/9780111492390/contents as amended by the 2011 regulations: http://www.legislation.gov.uk/uksi/2011/987/made

69 London borough councils are also able to introduce CIL charges which are payable in addition to the Mayor’s CIL. Lewisham Council has yet to adopt a scheme.

Local planning authority’s position

70 The application is likely to be considered by Lewisham Council’s planning committee in September 2012.

Legal considerations

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

Financial considerations
There are no financial considerations at this stage.

**Conclusion**

London Plan policies on are relevant to this application. The application complies with some of these policies but not with others, for the following reasons:

- **Principle of development:** The provision of student accommodation is supported in line with policy 3.8 of the London Plan. However, Lewisham Council should ensure the site is not required to meet its housing targets identified in policy 3.3 of the London Plan. It is also not clear whether there is a need for the existing places of worship to be reprovided in line with policy 3.16 of the London Plan.

- **Urban design:** The proposed development is reasonably well designed, optimising the potential of the site, responding well to the site’s constraints and opportunities and contributing to creating a legible and active public realm. However, there are a number of elements that require further consideration for its design to fully comply with London Plan policies.

- **Inclusive access:** In line with policy 7.2 the applicant is proposing to provide 49 wheelchair accessible bed spaces in a variety of accommodation styles from 6-bed clusters to studios which is supported. This equates to 10% of total number of bed spaces. However GLA officers are concerned students of the wheelchair accessible rooms and those on the same floor as wheelchair accessible rooms will have insufficient communal space. The applicant is not proposing to fit the commercial units with wheelchair accessible toilets or a platform lift.

- **Climate change mitigation:** Further information is required to ensure the proposal complies with the energy policies in chapter five of the London Plan.

- **Climate change adaptation:** Information on proposed sustainability measure have not been included in the application documents. As such it is not clear whether the proposal will comply with London Plan policies 5.3, 5.9 to 5.12, 5.15 and 6.13.

- **Noise:** The submitted noise assessment does not take account of the approved bus stand adjacent to the site. As such it is not possible to ascertain whether the proposal complies with London Plan policy 7.15.

- **Transport:** TfL is satisfied in principal with the development. However, additional information and clarification together with necessary mitigation measures as detailed in this report are required to ensure that the development is compliant with the London Plan policies.

Whilst the application is broadly acceptable in strategic planning terms. On balance, the application does not comply with the London Plan.

The following changes might, however, remedy the above-mentioned deficiencies, and could possibly lead to the application becoming compliant with the London Plan:

- **Principle of development:** Lewisham Council should ensure the site is not required to meet its housing targets identified in policy 3.3 of the London Plan. The wording for the planning agreement or condition to secure the use of this building solely for student accommodation and information on the reprovision of the existing places of worship should be submitted before the application is referred back to the Mayor.
• **Urban design:** The impact of the service access on the public realm should be further considered together with consideration of extending the built form to the railway line and further greening of the public realm.

• **Inclusive access:** The applicant is asked to submit justification for the proposed layout of wheelchair accessible rooms and communal living space before the application is referred back to the Mayor. To ensure compliance with London Plan policy 7.2 the provision of a wheelchair accessible toilet and platform lift in the commercial units should be secured by condition.

• **Climate change mitigation:** The applicant should provide updated regulated carbon dioxide emission and savings estimates at each tier of the energy hierarchy as well as the overall savings before the application is referred back to the Mayor.

• **Climate change adaptation:** Details of the sustainability measures proposed as part of scheme should be submitted before the application is referred back to the Mayor.

• **Noise:** The noise assessment should be revised to take account of the permitted bus stand to take account of this significant noise source. It should be submitted for assessment before the application is referred back to the Mayor.

• **Transport:** The additional information, clarification and necessary mitigation measures detailed in this report should be submitted before the application is referred back to the Mayor.

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