

## Surrey Canal Triangle

in the London Borough of Lewisham

planning application no. DC/11/76357/X

### Strategic planning application stage 1 referral (new powers)

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008

### The proposal

The applicant seeks outline planning permission for a mixed-use development, retaining the existing Millwall FC stadium ('The New Den') and incorporating minor extensions, and the development of up to 250,000 sq.m of new building floorspace. This would incorporate:

- A maximum of 2,500 flats.
- Sporting/leisure uses of up to 15,800 sq.m.
- A hotel of up to 15,000 sq.m (150 rooms).
- Employment space of up to 15,000 sq.m.
- Community use floorspace (intended to act as a multi-faith community centre) of up to 10,000 sq.m, and a crèche up to 400 sq.m.
- Up to 3,600 sq.m retail uses intended for neighbourhood shopping
- Up to 3,500 sq.m. of cafe/restaurant uses and 300 sq.m. of hot food takeaway floorspace.

### The applicant

The applicant is **Renewal New Bermondsey Two**, and the masterplanning architect is **Studio Egret West**.

### Strategic issues

This will be a mixed-use, sport and residential-led development that promises to deliver **regeneration benefits** to this part of London, while helping to deliver Mayoral policies on **sport and health**.

There are concerns regarding the level of development proposed, particularly its **density** as the site currently has **poor accessibility**, although the delivery of **Surrey Canal Road Overground Station** and other **transport** works would lead to accessibility improvements.

The scheme is also an outline scheme, which is not unreasonable considering the lengthy build timeframe and its scale, although it does include **tall buildings** and there is limited detail on appearance. Other **design** elements are generally acceptable, as is the impact on **strategic**

**views**, and inclusive **access**, although there are some minor outstanding issues.

The level of **affordable housing** and **family housing** is relatively low but requires a detailed review of the scheme's viability. Issues of **access**, **biodiversity**, ambient **noise** and **flooding** are generally acceptable but may require additional information to ensure compliance with the London Plan.

## **Recommendation**

That Lewisham Council be advised that the application does not comply with the London Plan, for the reasons set out in paragraph 142 of this report; but that the possible remedies set out in paragraph 143 of this report could address these deficiencies.

## **Context**

1 On 14 February 2011, 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 25 March 2011 to provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.

2 The application is referable under the following categories of the Schedule to the Order 2008:

- Category 1A: "1. Development which comprises or includes the provision of more than 150 houses, flats, or houses and flats."
- Category 1B: "1. Development (other than development which only comprises the provision of houses, flats, or houses and flats) which comprises or includes the erection of a building or buildings— ... (c) outside Central London and with a total floorspace of more than 15,000 square metres."
- Category 1C: "1. Development which comprises or includes the erection of a building of one or more of the following descriptions— ... (c) the building is more than 30 metres high and is outside the City of London."

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

4 The environmental information for the purposes of the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 1999 has been taken into account in the consideration of this case.

5 The Mayor of London's statement on this case will be made available on the GLA website [www.london.gov.uk](http://www.london.gov.uk).

## **Site description**

6 The site is located adjacent to Surrey Canal Road and Ilderton Road, and to the boundary with the London Borough of Southwark. The nearest section of Transport for London Road Network (TLRN) is the A2 Old Kent Road at the southern end of Ilderton Road. The site is currently served by only one bus route, the P12, which is considered to be within acceptable

walking distance of the site's south-western edge and is operated by single-decker vehicles along Ilderton Road. South Bermondsey railway station, to the northwest of the application site, is also within an acceptable walking distance and offers regular services to London Bridge, West Croydon and Beckenham Junction and currently Victoria.

7 The site, also known as Surrey Canal Triangle, includes Millwall Football Club's stadium (The New Den), and the rectangle of land bounded by Surrey Canal Road and Rollins Street. The site is characterised by poor accessibility, in part due to the severance of multiple rail lines through the area, including on two edges of the site. Residential and industrial uses abut the site, and the boundary of the London Borough of Southwark runs close to the western edge of the site.

8 The land is designated as a site for mixed-use development within the emerging Lewisham Core Strategy of the Local Development Framework, having previously incorporated a strategic industrial land designation. Industrial uses currently occupy the areas of the site not used by the stadium and ancillary uses.

9 Access to the site is constrained by the aforementioned rail lines. Restricted match-day access is available directly from South Bermondsey station, but the general access between the site and station is circuitous. Road access is also limited from the west and the north, owing to the limitations of the rail viaducts, with the route from the north passing underneath three separate viaducts. A cycle path runs along the line of an abandoned railway track, utilising a modern footbridge over Surrey Canal Road, which alternatively skirts and dissects the eastern side of the site.

10 Phase 2 of the East London Line extension, which will follow the abandoned rail route, will shortly commence construction. The route will run between Highbury & Islington and Clapham Junction stations, with services scheduled to commence in 2012. A station is proposed immediately south of Surrey Canal Road, although this is subject to funding and is not part of the proposed extension schedule. However, enabling works during the line's construction will enable the station to open at a later date without disruption to the line's service.

## **Details of the proposal**

11 The proposal seeks to replace the majority of the buildings on the site, the exceptions being the stadium, and an area of existing industrial land close to the site's south-eastern corner. It incorporates part of the route for the proposed East London Line Phase 2 extension, and the future site of Surrey Canal Road station, as well as the retained Millwall stadium and related uses. It also seeks to improve existing routes and create new ones around the site, and improvement of connectivity with adjoining sites and uses.

12 The scheme proposes a mix of uses, with the two dominant uses being residential (up to 2,500 flats of between one and four bedrooms) and large-format, indoor sporting facilities (approximately 13,700 sq.m, incorporating at least 12 indoor sporting uses, including cricket, five-a-side football, swimming and basketball.). Other uses include a mix of employment types, community uses, a hotel, and a multi-faith community centre (approximately 5,000 sq.m.). The aims of the application are to redevelop the existing site, improve both physical and social links to the surrounding areas, seek to improve levels of amenity in these areas, and provide needed accommodation for the uses listed above.

13 The development would be the subject of a comprehensive masterplan, which would provide a new street pattern and other routes, open spaces and new landscaping, and additions to the existing stadium building. A number of new buildings would be constructed, including several tall buildings of potentially more than ten storeys, and up to approximately 25 storeys. The

applicant has committed to a proposed upgrade of Bridge House Meadows, within walking distance of the south of the site and adjacent to the site of the proposed station.

14 The application has been submitted in outline format.

## Case history

15 The applicant has been engaged in pre-application discussions with GLA officers. Pre-application meetings were held at City Hall on 30 April 2010 and 21 December 2010; these were also attended by officers from Lewisham Council. Additionally, the applicant and architect presented the scheme to the Deputy Mayor, Policy and Planning, at a pre-application presentation held on 28 July 2010.

## Strategic planning issues and relevant policies and guidance

16 The relevant issues and corresponding policies are as follows:

- Regeneration *London Plan; the Mayor's Economic Development Strategy*
- Mix of uses *London Plan*
- Transport *London Plan; the Mayor's Transport Strategy; PPG13*
- Parking *London Plan; the Mayor's Transport Strategy; PPG13*
- Employment *London Plan; PPS4; Industrial Capacity SPG*
- Housing *London Plan; PPS3; Housing SPG; Providing for Children and Young People's Play and Informal Recreation SPG, Housing Strategy; Interim Housing SPG; Housing SPG EiP draft*
- Affordable housing *London Plan; PPS3; Housing SPG, Housing Strategy; Interim Housing SPG; Housing SPG EiP draft*
- Density *London Plan; PPS3; Housing SPG; Interim Housing SPG; Housing SPG EiP draft*
- Tall buildings/views *London Plan; RPG3A, Revised View Management Framework SPG*
- Urban design *London Plan; PPS1*
- Access *London Plan; PPS1; Accessible London: achieving an inclusive environment SPG; Planning and Access for Disabled People: a good practice guide (ODPM)*
- Sustainable development *London Plan; PPS1, PPS1 supplement; PPS3; PPG13; PPS22; draft PPS Planning for a Low Carbon Future in a Changing Climate; the Mayor's Energy Strategy; Mayor's draft Climate Change Mitigation and Adaptation Strategies; Mayor's draft Water Strategy; Sustainable Design and Construction SPG*
- Biodiversity *London Plan; the Mayor's Biodiversity Strategy; PPS9; draft PPS Planning for a Natural and Healthy Environment*
- Ambient noise *London Plan; the Mayor's Ambient Noise Strategy; PPG24*
- River Thames/flooding *London Plan; Mayor's draft Water Strategy; PPS25, RPG3B*

17 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 2004 Lewisham Unitary Development Plan and the London Plan (Consolidated with Alterations since 2004).

18 The following are also relevant material considerations:

- The draft replacement London Plan, published in October 2009 for consultation.

- The Lewisham Core Strategy (submission stage).

## **Regeneration / mix of uses**

19 The site is within the indicative boundary Lewisham/Catford/New Cross Opportunity Area, and although a strategic framework has not been drawn up for the area, the London Plan supports the use of these sites to support strategic growth and deliver a large proportion of London's residential and employment growth. The applicant has supplied a comprehensive regeneration statement that sets out the proposed benefits for the existing community, noting the deprived nature of many of the surrounding areas, and through new facilities and job opportunities, there would be benefits for residents. Access to the site from the closest areas would be dependent on the improvement and creation of linkages, specifically through the railway viaducts.

20 The site currently contains low-grade employment uses, and there is potential for improvement in the built environment. Nonetheless the existing industrial accommodation on the site serves a sector of the economy – with a scarcity of this form of accommodation close to central London – and while the application represents intensification of the land in accordance with London Plan growth principles, the sustainability of existing employment uses must be acknowledged. The applicant has stated in its Statement of Community Engagement that current tenants are aware of the scheme and timeframe for delivery, and that it will prepare a relocation strategy to assist them, should outline permission be granted. The applicant's industrial unit availability report notes that there are suitable alternative premises available within the area. A commitment to the relocation strategy should be reflected within the draft section 106 agreement or conditions of approval.

21 New employment uses would also be provided, although these would not be on the scale envisaged by the Council's Core Strategy, which states that up to 20% of the proposed floorspace should be for employment-based uses. This issue is examined in more detail in the employment section of this report.

22 The proposal has regeneration benefits for the immediate area, but with the current levels of severance by the railway lines, the benefits for adjoining areas are less marked. Similarly, the development would impact on areas within the London Borough of Southwark due to the proximity of the borough boundary and the form of buildings and quantum of uses proposed. Nonetheless, the principle of sport-led redevelopment is a novel one, with potential benefits in providing regional-level sporting facilities that would benefit surrounding deprived areas. The creation of new sports uses complies with the Mayor's planning and economic strategies, and is strongly supported. The Mayor will expect the section 106 agreement to contain various triggers to ensure delivery of the sports facilities as proposed.

23 The site would be subject to crowding on event days at the stadium, which has the potential with other uses around the site to cause significant congestion, but the application illustrates a reasonably effective events strategy that would go some way to maintaining a balance between the requirements of visitors to the site, and the needs of residents.

24 The provision of a new multi-faith community centre is also supported. This has the potential to replace the facilities or at least work in conjunction with many of the existing faith groups in the area, some of which are operating without the benefit of planning permission.

25 The proposed level of retail provision reflects the applicant and Council's desire to limit the site's offer to local and neighbourhood-level shopping, and is acceptable in relation to the proposed scale of development.

26 A specific concern with the proposal, which was expressed at pre-application stage, is the level of development proposed, in relation to the accessibility of the site. Although the currently poor site accessibility could be improved, particularly with the opening of a new station, this would not be sufficient to support the proposed numbers of people that would be generated by such a large development. Although this is examined in more detail within the following section of this report, accessibility remains a significant issue and is the Mayor's most pressing concern.

## **Transport and parking**

### **Comments from Transport for London**

27 The application was the subject of pre-application discussions with Transport for London (TfL) and with GLA officers, which confirmed that the key strategic issue is the poor accessibility of the site and the current lack of public transport infrastructure, to justify in planning terms, the proposed quantum of development in the area according to the London Plan policy 3C.1 and the density matrix. The requirement for a sustainable development on this site relies on the need for a significant increase in the level and attractiveness of public transport infrastructure and greatly improved connections with the surrounding area, local centres and strategic interchanges with other public transport modes to minimise trip generation by private vehicles. Whilst some matters raised previously at the pre-application stage have been addressed satisfactorily, additional work, as contained within TfL's initial comments made on the application dated 1 March 2011 to Lewisham Council, is required for TfL to support the proposals in principle. Those comments are further summarised below.

#### Accessibility

28 Accessibility to the site is currently constrained by the multiple railway lines crossing through the area and the lack of permeability. Whilst match-day access to The New Den, which is at the core of the development site, is available for away supporters directly from South Bermondsey station, the general pedestrian and cycle access to much of the site from South Bermondsey and elsewhere is circuitous. Some of the route infrastructure is in very poor condition and lacks of surveillance such that users feel vulnerable.

29 Road access is also limited from the west and the north, owing to the limitations posed by the railway viaducts and arches, with the main entrance being from Zampa Road, off Ilderton Road to the west. Bolina Road, the only route between the site and the area to the north, passes in tunnels underneath several railway viaducts, and has both height and width restrictions. It is in very poor condition and can only be used by cars and small vans. The northern side of the site is also subject of works associated with the delivery of the on-going Thameslink 2000 project which is due for completion by 2017/18. These are due to include changes to Bolina Road and some of the surrounding railway bridges.

30 Phase 2 of the East London Line (ELL) extension works, which will follow a former rail route passing through the site that is currently used as a pedestrian and informal cycle path, is to commence construction imminently. The route will run between Highbury & Islington and Clapham Junction stations, with services scheduled to commence by end of 2012. However there is no funding available as part of TfL's current investment plan nor via the Department for Transport to deliver a station at Surrey Canal Road within the site.

31 It has been estimated that the site records a low public transport accessibility level (PTAL), of 2, on a scale of 1-6, where 1 is classed as very poor. Accessibility of the site and methodology to calculate its level were extensively discussed at pre-application stage. Although TfL acknowledged its limitations, it was nevertheless requested that PTAL methodology be followed

with no allowance made for public transport nodes beyond the maximum walking distance from the site. Despite the applicant's proposal to fund Surrey Canal Road station and bus service enhancement for the site, TfL remains sceptical that this particular site will reach an overall PTAL of 4. Furthermore, the Victoria to London Bridge railway service calling at South Bermondsey station will be withdrawn at the end 2012 and this should be reflected in the future PTAL calculation. Meanwhile and as further detailed below, some areas of the bus strategy put forward raise concerns over the workability and acceptability of the proposals. Revisions to the bus strategy will therefore need to be assessed to respond to the transport demand arising from the development and in relation to the PTAL value of the site.

### Car parking

32 TfL supports the car restraint based approach proposed for the site and in light of the site location, accepts the proposed residential (0.3 space per unit), retail, business and hotel parking provision provided that appropriate provision is made for non car modes. The provision of electric vehicle charging points in line with Policy 6.13 'Parking' of the Mayor's draft replacement London Plan, and the provision blue badge and car club spaces is also supported. However, the method of control of the 50 spaces allocated for use by Millwall FC, to ensure that they are retained for operational use by the club only, is questioned. This control management should form part of a car park management plan, to be secured through the s106 agreement or planning condition.

33 In addition, justification for the parking provision suggested for the community and leisure elements is still outstanding and in the absence of this information, provision is excessive. This is even more relevant as provision for the proposed D2 use has increased from 78 to 104 spaces compared to that proposed at the pre-application stage. Given that the polyclinic is likely to attract visitors throughout the weekday and the multi-faith centre will be likely to be used primarily in the evenings and at weekends, the applicant should consider whether there is a potential for car parking to be shared between the two uses.

34 As discussed at pre-application stage, a controlled parking zone (CPZ) should be in place prior to development commencing on site, in order to manage potential overspill efficiently. Whilst the implementation of a CPZ on site, in common with many other development sites in the North Lewisham area, is currently being investigated by Lewisham Council, the applicant's commitment to secure its monitoring and funding through planning conditions or obligations is supported. In the event that a CPZ is implemented, the applicant will be required to commit to ensuring that no residents or other occupiers of the scheme being eligible for parking permits. This should be secured by section 106 agreement. Additionally, the applicant should also provide information whether it has been engaged in similar discussions with Southwark Council regarding any potential overspill across the borough boundary.

### Trip generation & traffic impact

35 Detailed comments were provided as part of TfL's letter to the Council, dated 1 March 2011, which stated that additional information is required for the trip generation assessment to be considered sufficiently robust and subsequently be acceptable. The amount of development needed to trigger the opening of the Surrey Canal Road station remains ambiguous. Although for numerous reasons, including cost and for marketing purposes but also given the proposed phasing and delivery strategy, TfL and the Mayor strongly believe that the station should be provided from the first phase of the scheme. Unless this is confirmed, however, the applicant will need to submit an alternative mode share for consideration. This should omit the station to enable identification of potential bus demand in the interim, should occupation occur prior to the station's delivery, and allow for capacity enhancement to be adequately addressed and phased.

36 Similarly, TfL questioned the modelling work for which clarification and additional information are needed. Assessment of the operations of the Rotherhithe New Road with Old Kent Road is currently omitted from the transport assessment and should therefore be undertaken. Furthermore, TfL is concerned by the results that have been presented. Those show that the Ilderton Road / Surrey Canal Road junction operates well above capacity in all scenarios. Likewise, the Rotherhithe New Road / Ilderton Road junction operates well above capacity in both weekday scenarios despite the modelling assuming that pedestrian crossings are never used. The Old Kent Road / Ilderton Road junction in the weekend assessment reveals similar unacceptable results. It is also disappointing that no assessment of the new signals proposed on Surrey Canal Road, nor their potential impact on the existing Surrey Canal Road / Ilderton Road signalised junction have been carried out. Given the proximity of these two sets of signals, the applicant is encouraged to give further consideration to their acceptability particularly in terms of bus journey times, which will also be impacted by the capacity issues at other junctions outlined above.

### Public transport

37 Further discussion is required with Lewisham and the applicant to identify the most practical strategy from the range of options presented, which both addresses the anticipated demand for public transport arising from the development over each phase, and ensures an appropriate PTAL level to support the density of development that is proposed. In order to assist the on-going work on this, the PTAL value for each phase of the development, based on the centre point of each development plot and the mitigation and interventions that are being provided at each stage, should therefore be submitted. Notwithstanding the detailed comments made on trip generation and modal split, the transport assessment identifies the requirement for an additional five buses per hour (bph) service to be provided to accommodate the future bus demand generated by the development. This is not consistent with the preferred Option Three, which suggested an additional 22 bph. The applicant would be required to 'pump-prime' changes to the existing bus network to accommodate demand; any solution would subsequently need to be funded by TfL and must therefore be sustainable. As such, running more than four times the required number of additional buses as implied by Option Three would be unlikely to be sustainable and would thus not be agreed by TfL even if the applicant was willing and able to 'pump-prime' such a significant increase in services.

38 To date, TfL has indicated that the applicant's proposed changes to route 381 would disadvantage too many existing passengers, resulting in additional walking distances and journey times, and should be disregarded. The proposed changes to extend and increase the frequency on route 168 were discussed. Initial TfL's assessment revealed that a frequency increase to 11 bph would be required from the existing 9 bph service. Extending this particular route at such increased frequencies would therefore result in an additional peak vehicle requirement of eight, at a total cost of £8.8m. However, this option would only cover demand for Old Kent Road and Central London, while ignoring the need to provide capacity to other areas. TfL has identified that in addition, changes to the P12 route would be required, and initial investigation found that P12 service enhancements will cost £3.3m over a five-year period. An alternative to address the issues with route 168 would be to provide a new route, still with a frequency of 5 bph. Considering a modest length return trip of 90 minutes, this would require an additional eight peak vehicles at a similar (to the 168 extension) total cost of £8.8m (£220k per bus per year over 5 years). As such, TfL would want to secure a combination of several bus service improvements as per the above, which would result in a total requirement of £12.1m over the five year period, through the s106 agreement.

39 Given the physical and height restrictions imposed by the railway bridges and arches, the applicant should provide confirmation that it will be possible to run a double decker bus through the site. Any bus strategy for the site should allow for the provision of double deck bus services.

In the event that this is not possible due to constraints within and/or outside the site, the peak vehicle requirement and thus the contribution via the section 106 agreement could increase.

40 As a result of any bus strategy for the development and as identified in the transport assessment, it is highly likely that additional bus infrastructure will be required. Existing bus stops on Ilderton Road would need to be upgraded to current accessibility standards, and provision of new stops, stands and shelters in other necessary locations should also be secured through the s106 process. Whilst the exact location of these facilities will need London Buses approval and will depend on routing and peak vehicle requirements, these are expected to be located in accessible areas for pedestrians and include the best possible link to a future Surrey Canal Road station. Areas for shelters will need to be identified as will driver rest facilities, including toilets of a minimum acceptable dimension. TfL would expect to secure the provision of these facilities in the s106 agreement and welcomes further discussion on all of the above bus related matters and the strategy. Where such infrastructure and/or bus routes would be on private land instead of the highway, then TfL will expect appropriate property provisions to also be included in the s106 agreement.

41 The applicant's commitment to fund the construction of Surrey Canal Road station is welcomed. This route would be served by four trains per hour, in each direction. Whilst discussions have taken place between TfL, the applicant and Lewisham Council to understand station delivery costs in more detail, it is estimated that they are currently in the order of £10m. This is over and above the passive provision included within the contract which is about to be awarded for the construction of the railway itself. Therefore unless Lewisham Council is in a position to contribute towards the cost of this new station, the applicant will be expected to cover it in full. Given the reliance of the development on the new station for its accessibility to the transport network, and its acceptability in planning terms, TfL expects the level of development that can be built to be capped, until the new station is open. The applicant's commitment to fund a localised marketing campaign at the time of opening Surrey Canal Road station is also supported. All of these commitments should therefore be secured by obligations within the s106 agreement.

42 Due to timescale, the applicant has also been made aware that it is no longer possible to construct a new station to open at the same time as the ELL phase 2. It is also unlikely that an enhanced service level over and above 4 trains per hour would be possible in the short to medium term because of constraints elsewhere on the rail network. TfL will nevertheless work with the applicant to progress the delivery of the station and would welcome further discussion on this matter.

#### Coaches and taxis

43 Coach parking facilities would be provided on site for away supporters on match days or for use by other proposed uses on site outside match days. It is proposed that loading bays provided for various development plots or on-street unrestricted parking could also be used if additional coach parking is required. However the potential for overspill parking from the rest of the development or the implementation of a CPZ may jeopardise this. A coach management strategy is therefore required for the site, to be secured by way of condition. In addition, while other nearby locations should be identified, the use of the O2 coach park for any longer term coach parking that is found necessary should be considered for it to be used as an overflow, should all of the on site and other local parking become full.

44 Although a pick up / drop off area capable of accommodating three taxis is proposed on Surrey Canal Road close to the new station entrance, exact details of the proposed facilities should be provided to clarify whether the proposal refers to private hire vehicles as well as taxis. The intention to provide a formal taxi rank will be supported, but a more general area where private

hire vehicles could wait for trade would be resisted. The exact location of the facility needs further discussion as it is currently out of the sight-line of the station and there are levels issues to overcome. Additionally, consideration for a call up device system to respond to the hotel demand should be investigated.

### Pedestrians and cyclists

45 The improved pedestrian audit (PERS) submitted as part of the application is welcomed. Significant improvements would be required to pedestrian facilities in and around the site to provide links to transport nodes such as South Bermondsey and Surrey Quay stations and areas such as New Cross or Old Kent Road, where further transport services are available. Although the applicant's intention to carry out improvements is supported, details are required of what these measures may entail, and how and when they will be delivered. These pedestrian links to existing stations, other transport links and facilities are particularly important given the uncertainties highlighted around the timing of the delivery of Surrey Canal Road station. They should be secured by s106 agreement which should cover obtaining the necessary agreements with landowners such as Network Rail for the provision of the enhanced links.

46 The improvements proposed for Surrey Canal Road are supported; however advice as to how the substantial difference in grade between the footway and carriageway will be overcome is still outstanding. Following Lewisham Council's recent agreement to fund the structure of the three proposed underpasses as part of the railway works, the applicant is encouraged to consider with Lewisham the need for these to have surface finishes, lighting and suitable entry treatment to enable their use. Similar consideration should be given towards the upgrading of links between the development and Bridge House Meadows, given that the latter is proposed as being the main public open space to serve these proposals. These works should also be included in the s106 agreement.

47 Additionally and as advised previously, pedestrian wayfinding should be improved in and around the site, especially given the complexities caused by the railway lines and other impediments to movement. Provision of Legible London signage in and around the site should therefore be secured through the s106 agreement.

48 The proposed level of residential cycle parking would comply with London Plan standards and is therefore welcomed. The principle of a mixture of private / public facilities for the non-residential element also compliant with London Plan is supported but details should be provided to understand how this has been calculated and in particular assumptions made about visitor numbers. This is particularly relevant for the D1 and D2 uses as provision does not seem to match the trip generation figures.

49 As per the pedestrian comments made above, cycling improvement measures should be provided in more detail to ensure these are sufficient and satisfactory to enhance cycle use and access, including its link with the proposed Cycle Superhighway route 4.

### Travel planning, servicing and construction

50 Travel planning advice was provided at pre-application stage. It is therefore disappointing that despite inclusion of limited information within the transport assessment, no stand-alone travel plan framework has been submitted as part of the application. The applicant is strongly encouraged to submit a plan for review at the earliest opportunity. The information presented is currently insufficient, and once submitted, the travel will need to be assessed under ATTrBuTE. The plan should also be secured through the s106 agreement.

51 The provision of loading bays for each plot able to accommodate a 16.5m articulated HGV is supported. Although reference to a delivery strategy is made within the transport assessment, the submission of a delivery servicing plan (DSP) is requested and should seek to rationalise servicing with the aim to reduce the total number of trips made and avoid critical times on the highway network.

52 The transport assessment covers construction details in outline, including details of routes to and from the site and locations of loading bays, which is welcomed. Notwithstanding this, a construction logistics and management plan (CLMP) is required, which should seek to minimise highway and traffic impact during the course of construction.

53 Both the DSP and CLMP should include booking systems, consolidated or re-timed trips, secure off-street loading and drop-off facilities, possible mode shift from road to rail if feasible, use operators committed to best practice such as FORS or similar, swept path analysis demonstrating sufficient access for delivery vehicles, and finally any temporary restrictions that may be in place during the Olympics period for construction.

54 The Olympic Route Network (ORN) and Paralympic Route Network (PRN) will operate during the Olympic and Paralympic Games period between June and September 2012. During this period, there will be an impact on construction works, utility works and highway licensed activities (for example, skips and building materials) if they affect the roads designated as a part of the ORN/PRN and some of the surrounding streets. Other routes might also be affected and will also be required to be clear of any kinds of obstruction. These are not yet finalised, but will be advised as further information becomes available. Given this, highway works and licences could therefore be affected on occasions during the Games period. Requests to utility providers to provide any additional water, gas, electricity or telecommunications connections should also be made sufficiently well in advance of this period. This note is for information only and is provided without prejudice to the legal rights of the Olympic Delivery Authority or any other relevant authority whether under the London Olympic Games and Paralympic Games Act 2006, planning, traffic or highway legislation or otherwise.

## **Employment**

55 As part of the Council's Local Development Framework Core Strategy submission, the loss of the site as strategic industrial land was to be mitigated by 20% of the site's proposed floorspace to be designated as employment land (specifically B1 office, B2 general industrial, B8 warehouse/storage uses). The creation of creative industries and incubation units is supported, as would be the provision of enterprise units within the scheme.

56 Existing employment uses on the site are relatively low-grade and there is a low density of employment. As noted within the previous section, the Mayor will expect relocation assistance for existing tenants that would be required to move as a result of the development.

57 The proposed mix of uses would contribute to an overall level of uses. Uses would include the proposed sports uses, hotel, and other public facilities such as the multi-faith centre and community facility. While these uses would provide varying densities of employment capacity, and would be unlikely to be as dense as office use, there is a question of the attractiveness of the site for such dense employment uses, and whether a mixed-use development of the type proposed would be better positioned to deliver the Mayor's strategic planning priorities. In this case, although the proposed employment generating uses comprise 20% of all proposed floorspace, only around 6% of the total floorspace would be dedicated 'B' class employment uses. Nonetheless, the applicant has attempted to make this lower proposition attractive, by supporting the development of flexible floorspace to adapt to a range of employment uses, the inclusion of low

cost/business incubation floorspace, as well as initiatives to support local employment and training, both of which would be included within the section 106 agreement.

58 As of December 2010, the applicant assessed that there were 183 jobs on the site (excluding Millwall FC and Millwall Community Scheme), which equates to 427 potential workspaces based on the assessment methodology. The proposed scheme could potentially deliver between 933 and 1,946 on-site jobs (direct jobs in employment uses, discounting those related to construction and development of the scheme).

59 As part of its Local Development Framework and as an ongoing review, Lewisham Council has examined the potential of its major sites within the north of the borough (including Convoys Wharf, and the application site) to deliver a suitable level of employment land, based on emerging proposals for these sites. The strategic target for employment land provision is 20% of all floorspace, but this is unlikely to be achieved, which is a source of concern for the Council. While this is not specifically a result of this development, it is unfortunate that the development could not deliver a greater level of employment floorspace to contribute to the overall target. However it is acknowledged that although 20% provision of 'pure' employment floorspace has not been delivered, 20% of all development floorspace has employment-generating capacity. It is also noted that the proposed uses would offer flexibility and benefits to the community through regeneration and health, while delivering an increased level of floorspace compared with existing development. Therefore, on balance, the proposed level of employment space is acceptable.

## Housing

60 Residential use would be a major component of the scheme, with values expected to help the delivery of the sporting and community uses. The applicant is requesting permission for up to 2,500 homes, occupying a total floorspace of between 150,000 sq.m. and 200,000 sq.m. of the final development, (which would have a floorspace of up to 250,000 sq.m). In common with the remainder of development, the residential accommodation would be delivered in five phases, between 2014 and 2024.

61 The development specification commits to the delivery of the housing proportions which are generally in accordance with the illustrative example (taken from the design and access statement) as set out below. The specification sets a slight variance in the percentages, of around +/-2%, which would be finalised at the detailed matter stage.

	<b>Indicative number of units</b>	<b>Percentage of overall development</b>
<b>One bedroom</b>	875	35%
<b>Two bedrooms</b>	1,250	50%
<b>Three bedrooms</b>	250	10%
<b>Four bedrooms</b>	125	5%
<b>Total</b>	<b>2,500</b>	<b>100%</b>

62 Up to 10 % of units would be market housing single-person units. Studio units are currently not referred to in the space standards as set out in the draft replacement London Plan or the Housing SPG. This issue was the subject of some debate at the draft replacement London Plan Examination in Public, where developers advocated that there is a need for this form of accommodation at the lower end of the market housing range. The Council should demonstrate

that there is a need for this form of accommodation in this location, and may also wish to consider whether they should be provided for a specific purpose – such as for first-time buyers – and if so, whether such a condition should be binding in perpetuity.

63 The scheme would deliver approximately 375 family sized units, or around 15% of the total provision. Given that this site represents one of the major contributors to Lewisham Council's housing targets, the London Plan seeks a larger proportion of family units. The Council has requested an independent assessment of the scheme's viability, which will be viewed by GLA officers, who in conjunction with Council officers will examine opportunities for additional family housing provision.

#### Children's play space

64 Policy 3D .13 of the London Plan sets out that "the Mayor will and the boroughs should ensure developments that include housing make provision for play and informal recreation, based on the expected child population generated by the scheme and an assessment of future needs." Using the methodology within the Mayor's supplementary planning guidance 'Providing for Children and Young People's Play and Informal Recreation' it is anticipated that there will be approximately 1,050 children within the development. The guidance sets a benchmark of 10 sq.m. of useable child playspace to be provided per child, with under-5 child playspace provided on-site. As such the development should make provision for 1.05ha of playspace, based on the scenario providing a level of housing as described within the affordable housing section, below

65 This development proposes 5330 sq.m. of play space, the majority of which would be within the site, aside from a small area to the north of Bridgehouse Meadows, just outside the site boundary. A comprehensive play space strategy proposes spaces for children of all ages within the site, much of which would be contained within various buildings at podium level. The proposals also include a local equipped area play (LEAP) facility in the northern section of the site, and a nearby private outdoor area of open space associated with a creche facility, which has not been included in the calculations.

66 The unique conditions of the site, which would experience crowding events, renders the provision of the full level of play space difficult. In this case it would be appropriate to look to nearby spaces to cater for overflow recreational requirements. The commitment to improve Bridgehouse Meadows, which is accessible from most parts of the site within a five-minute walking distance, is welcomed and would be of benefit to existing surrounding communities.

67 Within the site, it is appropriate to contain the majority of play space facilities within semi-private or communal space environments, available for access by residents of the attached buildings. The applicant has followed this approach. The on-site play space provision would be located in the most residential-focused part of the development and aid in the neighbourhood enhancing qualities proposed there. There could also be passive play opportunities imbued throughout the landscaping throughout the rest of the scheme

68 In summary, although the proposal does not achieve the recommended on-site level of space set aside within the site, the applicant has provided a reasonable approach to provision which is logical and appropriate to the site conditions. There would be adequate provision of play space within building spaces, and provision within nearby facilities that would be improved as a result of the proposal. As such, the proposed level and type of play space provision is acceptable.

## Affordable housing

69 London Plan Policy 3A.10 requires borough councils to seek the maximum reasonable amount of affordable housing when negotiating on individual private residential and mix-use schemes. In doing so, each council should have regard to its own overall target for the amount of affordable housing provision. Policy 3A.9 states that such targets should be based on an assessment of regional and local housing need and a realistic assessment of supply, and should take account of the London Plan strategic target that 35% of housing should be social and 15% intermediate provision, and of the promotion of mixed and balanced communities. In addition, Policy 3A.10 encourages councils to have regard to the need to encourage rather than restrain residential development, and to the individual circumstances of the site. Targets should be applied flexibly, taking account of individual site costs, the availability of public subsidy and other scheme requirements.

70 Policy 3A.10 is supported by paragraph 3.52, which urges borough councils to take account of economic viability when estimating the appropriate amount of affordable provision. The 'Three Dragons' development control toolkit is recommended for this purpose. The results of a toolkit appraisal might need to be independently verified

71 The proposed level of provision, based on the figures / provision range illustrated within the development specification and based on the maximum provision of 2,500 homes, would result in the following proportions:

	<b>One bedroom inc.studios</b>	<b>Two bedrooms</b>	<b>Three bedrooms</b>	<b>Four bedrooms</b>	<b>Total</b>
<b>Market housing</b>	800 (32%)	1,000 (40%)	160 (6.5%)	40 (1.5%)	2000 (80%)
<b>Affordable provision</b>	88 (3.5%)	203 (8%)	93 (3.5%)	116 (4.5%)	500 (20%)
<i><b>Intermediate % of total aff.</b></i>	<i>34 (1.5%) 7%</i>	<i>80 (3%) 16%</i>	<i>48 (2%) 9.5%</i>	<i>38 (1.5%) 7.5%</i>	<i>200 (10%) 40%</i>
<i><b>Social rented % of total aff.</b></i>	<i>54 (2%) 11%</i>	<i>123 (5%) 25%</i>	<i>45 (2%) 9%</i>	<i>78 (3%) 16%</i>	<i>300 (12%) 60%</i>
<b>Total</b>	<b>888 (36%)</b>	<b>1,203 (48%)</b>	<b>253 (10%)</b>	<b>156 (6%)</b>	<b>2,500 (100%)</b>

72 The provision of 20% affordable housing across the scheme is lower than Lewisham's Core Strategy figure. The low figure is disappointing but it is understood that there are viability issues as well as benefits inherent within the proposal. GLA officers would therefore wish to view the viability analysis and third-party assessment findings prior to a decision on the application.

73 The level of affordable rented family housing would be approximately 25%. This is lower than the Housing SPG target of 42%. Given that there is unlikely to be any grant available for social rented housing and that grant funding for the new model of affordable housing cannot be assumed, the applicant should set out the implications of not securing grant on the delivery of affordable housing for this scheme, and the implications on which affordable housing products will be provided. The agreed housing strategy should also take account of the Homes and Community Agency's affordable housing programme framework, as well as changes to definitions of affordable housing. Further discussions with the Council and the applicant regarding the final housing strategy for this site, including the types of affordable housing to be provided, and how delivery

will be secured through the section 106 agreement, are therefore required. The Mayor will continue to expect the scheme to provide the maximum reasonable level of affordable housing, with an appropriate tenure split. Given the above, the currently proposed split of 80:20 should also be proven as the most acceptable.

74 The section 106 agreement would provide various triggers for the provision of affordable housing at each phase. Additionally, given the long delivery time for the later phases, it would be prudent for the Council to consider a stepped approach to affordable housing provision whereby there would be provision of a reassessment of the type and amount of affordable housing at each phase. This would take account of changing economic circumstances over the delivery time frame, and the potential for settlement or further changes in the funding/grant framework.

## Density

75 The interim Housing SPG states that “where schemes have a substantial proportion of non-residential uses, density assessment via habitable rooms per hectare is not usually an appropriate measure. In these circumstances, plot ratio is likely to be a more appropriate” (paragraph 3.34). The development would achieve a plot ratio of 2.5 based on a site area of 10.05 hectares. This is an appropriate figure for this form of development. However, this area includes the existing stadium, and the SPG also states that plot ratio should generally only be relied upon where the level of non-residential uses exceeds 35% of development.

76 The applicant’s illustrative density calculations use the same site area (including the stadium) and base the density level on dwellings per hectare, using the ‘Greenwich’ method as recommended by officers. The example offered proposes a cumulative final residential provision of 71% of total floorspace (152,010 sq.m. residential floorspace) which would provide a residential density of 352 dwellings per hectare. This level would be subject to variance based on the level of residential floorspace provided – for example, the maximum scenario of development of all 2,500 dwellings, on 200,000 sq.m of the permitted maximum floorspace level of 250,000sq.m (allowing for 20% non-residential floorspace) would result in a level of around 312 dwellings per hectare.

77 The London Plan density matrix recommends that developments with a public transport accessibility level (PTAL) of 2-3 and an urban character provide a density within a range of 45-170 dwellings per hectare. Both of the above density scenarios exceed this figure. However, a rise in the PTAL to 4, based on transport improvements, would offer a range of 45-260 dwellings per hectare, which is still exceeded by the scenarios.

78 The high density of the scheme is a concern, especially given Transport for London’s scepticism that the site’s public transport accessibility level is unlikely to reach a level of 4 (good). It is however noted that the earliest phases of the development would likely be within the density tolerances of the matrix; it is only when the residential-focused later phases continue that the levels are exceeded. It is worth noting that Lewisham’s LDF Core Strategy policy for this site states that up to 2,500 dwellings could be provided, which is the maximum level of residential development proposed within the current scheme.

79 Density levels are provided as a guide for development rather than a rule. Design should be appropriate for the site, which in turn would provide a density outcome. The London Plan aim to optimise, rather than maximise development, is important here; specifically, the design of the proposed scheme, as noted in the following sections, is of a high standard but is of a particularly large scale. GLA and TfL officers have not yet reconciled the appropriateness of the development and its design, with the very high density and accessibility.

80 Additionally, as already noted, the site area calculation includes the large area used by the existing stadium. It may be more relevant to calculate a net density figure based on the net site area of each phase.

## **Tall buildings / views**

81 London Plan policies 4B.8 and 4B.9, which relate to the specific design issues associated with tall and large-scale buildings, are of particular relevance to the proposed scheme. These policies set out specific additional design requirements for tall and large-scale buildings, which are defined as buildings that are significantly taller than their surroundings and/or have a significant impact on the skyline and are larger than the threshold sizes set for the referral of planning applications to the Mayor. Strategic protected views and panoramas are identified within the London View Management Framework (LVMF) SPG.

82 Of particular importance to this scheme is its impact on strategic views, particularly the Blackheath Point London Panorama, and impacts on the views around World Heritage Sites at Greenwich Maritime and the Tower of London. The applicant's environment statement assesses these impact of the proposed development views, as well as other medium and short-range views towards the site.

83 The view from Blackheath Point indicates that the development will protrude above the skyline, but this will appear in context against existing development. The protected vista and view of St Paul's Cathedral would not be detrimentally affected.

84 The viewpoint from Greenwich is at the Thames foreshore adjacent to the Royal Naval College. The proposed development would be largely hidden by the indicative scheme at Convoys Wharf, should that development be built in its currently proposed form. Should that development not proceed, the proposed scheme height and scale would appear similar to that of other development visible along the Thames foreshore and surrounds. As such, there would be no detrimental impact on the character of the World Heritage Site.

85 At the pre-application stage, the applicant was also asked to consider the strategic London Panorama from the General Wolfe statue at Greenwich Hill. The viewpoint is further north than the viewing location at Blackheath Point, with the proposal located some distance south of St Paul's Cathedral in that view. The proposal in the view from Greenwich Hill would also appear spatially separated from the protected view of the Cathedral, and would be unlikely to have a detrimental impact in the overall context of the LVMF Panorama. Based on the information provided within the statement, and officers' assessment of the proposals, an assessment from Greenwich Hill is not considered necessary.

86 The view from the Tower of London World Heritage site is from the north-eastern pedestrian deck of Tower Bridge. At this level, which is higher than the general public areas around the Tower of London and river foreshore, the proposed development would be obscured by existing development on the St Saviour's Dock and Bermondsey Wall river foreshore, and as such would have no detrimental impact on the World Heritage Site.

87 Mid-range locations where the development would be clearly visible in distant views include Burgess Park in Peckham and Stave Hill in Rotherhithe, where the proposal would appear in context as part of the townscape. There would be a more immediate impact in the short-range views indicated within the statement, although these would be unlikely to affect strategic planning issues. The Mayor will take the comments of Lewisham Council, and neighbouring local authorities, into account should the application be referred back to him for determination.

88 While there is no presumption against tall buildings in this location on the basis of impact on strategic views, tall buildings in this location would act as a marker, along with other nearby and memorable structures such as SELCHP and the New Den stadium, to orientate train travellers approaching London. The potential of the site to act as a London gateway justifies the Mayor's expectations that development must be of the highest design quality.

## Urban design

### General principles

89 This is an outline application and as such full design detail has not been provided. The CABE / English Heritage *Guidance on tall buildings* states: "Tall buildings should not be supported by local planning authorities unless it can be demonstrated through the submission of fully justified and worked-up proposals that they are of excellent architectural quality and in the appropriate location (para 5.1)."

90 There are several application documents that have been submitted by the applicant in an attempt to provide assurance that a scheme of high quality design would be delivered. These include the parameter plans, which are approvable documents and address issues such as minimum and maximum building heights, location of uses and building footprints, and measures within the section 106 agreement. A delivery specification, which sets out the principles of design (including principles for residential floorspace and design of other uses), forms part of the environmental statement. Illustrative plans add detail to the above and are provided for information only. The design and access statement provides the greatest level of design detail, but again is for information only. Nonetheless the document would be referred to as part of the consideration of detailed matters of each phase, and the statement explains the intentions for each element of the proposal.

91 The applicant and Council also intend to establish a design panel that would have an advisory role on reserved matters and other detailed aspects of the scheme. Although detailed matters applications are not referred back to the Mayor, it is intended that the panel would have GLA officer representation. The applicant and Council may wish to consider formalising this arrangement within the section 106 agreement.

92 Officers advised the applicant at the pre-application stage that the Mayor would be wary against accepting the principle of a development of this scale in outline form. While the level of information provided, especially within the detailed and comprehensive design and access statement, go some way to alleviating concerns, they do not mitigate them completely. In the applicant's defence, the development would be phased over a particularly long time frame, and it would be unreasonable to expect a detailed scheme to address matters of housing provision, viability and design that may not be relevant in fifteen years' time. A workaround solution suggested to the applicant was to submit a hybrid application, which would be in outline form, with the first phase in detailed form, to offer assurances as to the quality of design, although this has not been undertaken. As such, the Mayor is being asked to decide on the basis of the application's outline format and the strength of the accompanying material.

93 Officers are satisfied that the scheme would deliver a high standard of development, providing that the commitment to this delivery is maintained throughout the development period. The standard of the outline application and masterplan is strong. The parameter plans would enable limited room for deviation of layout, building shape, height and use, which will enable a degree of certainty towards the final outcome.

## Layout

94 It is clear that the site will have a definite urban character in its intended form. The scale of the buildings, and the strong and clear armature, would create a development that is easy to navigate and have the potential to create a welcoming environment. Buildings have been planned to act as markers around the site – such as a matching pair of rotunda buildings to aid legibility of the proposed Overground station and the stadium, large-format sports uses around the stadium. The uses have a logical layout and their positioning of the various uses within the proposed scheme is supported.

95 Many of the buildings' lower floors would be used for non-residential uses, as a response to the presence of the surrounding railway viaducts. Buildings with large footprints are a necessary function of the proposed sporting and community uses. Car parking is an additional constraint in a scheme of this scale, and while much of the proposed car parking would be at below-ground level, there are limited numbers of on-street bays, and some at ground and above ground level within building footprints. However all residential dwellings would have access from a core accessed from street level.

## Scale and massing

96 The approach to the massing, scale and height of the development has been based on wayfinding, response to the existing context, and the creation of a new urban character. The proposal would provide the former and latter of these successfully, using tall buildings and various structures as marker points for various happenings around the site, such as the two station locations; and providing a dense development with clearly identified streets and spaces, potential for active frontages and interesting architecture. The main contextual influence is the existing stadium, a bulky, large scale use, which the proposed buildings do not emulate but instead provide a successful juxtaposition of slender tower forms on low-rise podia. Apart from this, there are limited contextual elements that have been taken from the existing surrounding architecture, although other elements, such as the constrained access, have been addressed within the proposed design.

97 Within the site, it is appreciated that the tall buildings will be an important element of the site layout, and used as a defining piece of its structure. However, the purpose of the cluster of tall buildings at the northern point of the site (the 'Bolina' buildings), by the improved access point to South Bermondsey Station remains unclear. Although they signal the entrance to the station and propose a high density next to a station, it is questioned whether the neighbourhood-building aspirations of this area could potentially be achieved by lower buildings.

98 The design and access statement sets out a massing strategy to be adopted across the site, whereas all proposed buildings would adopt a 'ground, middle and upper' approach, dividing each building into 'zones' that provide clear functions and give the scheme legibility. This approach would particularly useful given the towers-on-podia approach to the design, necessitated by the large-format ground floor uses. Importantly, the detailed design must ensure that the various elements have sufficient connections to each other, both in terms of function and appearance. For example, residential access should be 'door to door' from street to front door via a single core. Residential entrances should be clearly visible within the overall building context and not ambiguous among other ground floor uses. Such features would help residents to feel connected with the street and neighbourhood.

## Appearance and public realm

99 Appearance is a detailed matter, although the applicant has provided illustrative material within the design and access statement, both directly through the use of computer generated images and sketches, and indirectly through the massing and scale of the buildings. Buildings would have a modern appearance, with the large-scale floorspace representing a particular challenge in terms of active frontages and ensuring that they are attractive to look at, while contributing positively to the new character. Through the use of examples for each building zone, the applicant has set out the proposed appearance of the various new buildings, with the proposed parameter plans outlining an appropriate extent of active frontage, GLA officers are confident that the applicant is committed to delivering buildings with a high quality appearance.

100 With the adoption of high density there is a responsibility to provide a corresponding level of open space within the scheme. The improvement of Bridge House Meadows is welcomed, although this is outside the site boundary and would require most residents to cross Surrey Canal Road and pass under the Overground line. However the upgrading of this space would also benefit existing local residents. Play space and other open areas would be incorporated into the on-site landscaping strategy, with indicative street tree, other soft landscaping and hard landscaping proposals outlined in the design and access statement.

101 The current direct 'away' fans route between the station and the stadium entrance would be retained, and fall outside the application boundary. Integration of the existing Millwall FC into the development is welcomed.

102 The development of the multi-faith centre is supported, as is the amount of public space surrounding major crowd generation areas such as the centre, the station and fans' routes. The scale of the public realm is likely to be adequate to cope with football match crowds. The multi-faith centre would be another source of crowd events, with potential for events of up to 1,500 people per event, and potentially more when combined with other events.

103 The applicant engaged a former senior Metropolitan Police Service officer now acting as a management consultant, specialising in the security, policing and command of large scale sporting and leisure events in London, to provide a policing assessment as part of the application. It notes that crowds of more than 11,000 football supporters are not uncommon at the New Den on match days, which occur 26-30 times a year. The report makes several recommendations, notably that effective management of the site and development would be key, and that it would be unlikely that there would be clashes between football supporters and multi-faith centre attendees. Nonetheless the Mayor seeks further assurances that such clashes be potentially avoided, and that the Council should consider a condition limiting the number of multi-faith centre events catering to larger numbers of people, or to avoid clashing with match day events.

104 Although the applicant's submission notes that Metropolitan Police has been consulted regarding the site layout and uses, the Mayor will consider the consultation response and the response of the community regarding safety fears and implications should the application be referred back to him.

105 The introduction of a linear water feature within the plans is welcomed, and would add both character and legibility to the scheme.

## Residential quality

106 Residential unit sizes would comply with the space standards as set out within the draft replacement London Plan. Indicative floorplan layouts suggest that the proposal would contain a large number of dual aspect flats. Although the majority of residential development would comply

with the emerging standards of the draft replacement SPG, the applicant's design and access statement identifies two areas where there will be issues of non-compliance:

- "While every effort will be made to bring daylight and natural ventilation into internal corridors it may not always be possible as priority has been given to ensuring that the homes make the most of the aspects from each building. Corridor lengths will be kept to a minimum."
- "On this urban site north facing single aspect homes have been limited to below 10% of the provision. Therefore although avoided if possible some homes may not receive direct sunlight. This will be limited to the smaller home sizes."

107 Given that this is an outline proposal, there is potential for variance on these issues, and would be considered at detailed matters stage, when the draft replacement Housing SPG is likely to have been adopted. Given that the Mayor would require a scheme of this density to offer the highest possible design quality, the provision of such a high number of north-facing single-aspect dwellings will be unacceptable.

108 The need to ensure that residential development is suitably sited with regard to noise sources is reiterated. An issue that will potentially affect residential quality is noise from the stadium and crowd events, as well as retained industrial uses across the railway, and the railway lines. This has implications for housing orientation and building cooling (i.e. having opening windows for ventilation, against fixed windows to restrict noise). The draft Housing SPG and London Housing Design Guide recommends that no single-aspect dwelling be located in an area categorised with NEC 'C' or 'D' ratings, where noise levels are greatest. However the noise section within this report notes that the majority of development would be located outside such areas.

109 The inclusion of the tall building elements at the rear of the site within the final phase is a concern, as this is likely to involve construction traffic and other disturbance to residents of the remainder of the site, but offer the quantum necessary to realise the development of Surrey Canal Road Overground Station at an early phase of the development. The earlier phases also include the development of the sports uses, providing these for use by the community at the earliest opportunity, which is welcomed.

110 Incorporation of communal residents' recreation areas at podium level, to provide respite from match-day crowds, is welcomed.

## **Access**

111 Inclusive design principles – if embedded into the development and design process from the outset – help to ensure that all of us, including older people, disabled and deaf people, children and young people, can use the places and spaces proposed comfortably, safely and with dignity. The aim of London Plan Policy 4B.5 (Policy 7.2 in the draft replacement London Plan) is to ensure that proposals achieve the highest standards of accessibility and inclusion (not just the minimum).

112 The design and access statement sets out a comprehensive assessment of the accessibility of the proposal, looking specifically at the access needs of disabled people and applying the principles of inclusive design, which is welcomed. This approach should continue at the detailed design stage and in all the reserved matters applications to ensure that the final built scheme is as accessible as implied within the statement.

113 Also welcomed is the commitment to meet best practice standards, including with regard to Lifetime Homes and wheelchair accessible housing, sports facilities, car parking, and the public realm. This commitment could usefully be included in the development specification, for example to include reference to BS 8300:2009 and Sport England's Accessible Sports Facilities Design Guide, along with a commitment to meet inclusive design principles throughout the development process and to monitor and manage how inclusion will be maintained. The local planning authority will need to ensure that the detailed designs which follow in the reserved matters applications do in fact meet these standards.

114 The commitment to set up a consultative access forum with an independent chair and representatives from a wide range of relevant disability and sports organisations is also very welcome and will help to ensure that the scheme continues to address and integrate the highest standards of accessible and inclusive design. This commitment along with the details of how the group will work should be included in the section 106 agreement. It may be appropriate to ensure that the chair of the consultative access forum attends the proposed design panel to ensure consistent and appropriate design advice. A role for the consultative access forum should be to assess the proposed best practice standards to ensure that the standards are comprehensive and will address the various proposals and facilities, that their particular personal and technical expertise is used to assist the design team as they develop the detailed design, that they are consulted on the reserved matters applications and able to independently comment on them to the local planning authority (this is a similar model to that successfully used by the Stratford City Consultative Access Group in Newham). This forum should be set up as soon as possible.

115 It is not yet clear where the 10% of wheelchair accessible homes will be located and whether the split between one and two bed homes (188 private, 10 affordable intermediate and 14 affordable socially rented) and three and four bed homes (21 private, 6 affordable intermediate and 11 socially rented) is based on any up to date needs assessment of disabled and older people for this size and tenure mix.

116 The commitment made in the development specification that 10% of all hotel rooms provided will be designed to be accessible for wheelchair users is welcomed. This is in line with policy 4.5 of the draft replacement London Plan.

117 The Mayor welcomes the commitment in the design and access statement that the public realm will be designed to provide a clear and inclusive environment suitable for disabled people, older people and children in pushchairs, including the design of street furniture, any level changes and paying particular attention to the needs of visually impaired pedestrians in the design of vehicular movements in any shared space areas. This commitment should be conditioned to ensure it is followed through in the detailed design as the indicative information currently available is likely to change as the scheme progresses, as should the commitment to monitor and review the supply and demand of blue badge parking bays to ensure provision meets the needs of disabled residents, employees and visitors. The proposed consultative access group should be consulted on the design of the public realm, particularly the 'safe zone' area in the shared space routes given the particular needs of visually impaired pedestrians.

118 The applicant has begun to consider the implications of the concept of a Lifetime Neighbourhood and has included in the development specification that this concept will be incorporated into the Proposed Development by providing accessible routes from car parking to all building entrances and publicly accessible areas. However the Lifetime Neighbourhood concept goes beyond ensuring the accessibility of public routes, to creating neighbourhoods where access to public transport, basic amenities, local shops, places to meet and relax and green and open spaces are within easy reach of homes and where public toilets and accessible seating is consciously planned into proposals from the outset, helping to build cohesive, successful and

sustainable communities (see paragraph 7.5 in the draft replacement London Plan). It would be helpful if the development specification could further spell out how these Lifetime Neighbourhood principles will be addressed in the development, to help ensure that families with children, older people and disabled people can enjoy and fully participate in the life of the community. No mention has been made as to whether this would be an appropriate location for specialised housing that meets the needs of older people.

119 An initial assessment has been undertaken of the existing access barriers in the surrounding and connecting streets but it is not clear whether and how the proposals will address these barriers and ensure that the routes to the public transport facilities in the area are accessible. It is disappointing that there are currently no plans to provide step-free access to all the adjacent stations, which should be the long term aim.

## **Climate change**

120 A range of sustainability measures are proposed. These include the incorporation of passive solar design, extensive green roof provision, and transport and design aspects as previously discussed. Rainwater could potentially be used for irrigation and communal toilet facilities, with the potential for grey water recycling in later phases. Sustainable drainage would be incorporated, with linear water features throughout the site providing drainage routes and design benefits. In order to achieve the highest level of sustainable design, the Mayor recommends that design features mentioned within the documentation but not within the development specification should be conditioned by the Council.

121 The use of a centralised waste collection scheme, which involves an underground vacuum system, separation of waste types and fewer rubbish collections, is highly sustainable. Waste could potentially be processed at the adjacent SELCHP facility. The incorporation of this technology is strongly supported.

## **Energy**

122 The applicant has broadly followed the energy hierarchy. Sufficient information has been provided to understand the proposals as a whole, but although proposals are broadly acceptable, further information is required before the carbon savings can be verified.

### Be lean: energy efficiency standards

123 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 would be improved beyond the minimum backstop values required by building regulations. Other features would include mechanical ventilation with heat recovery and low energy lighting. The development is estimated to achieve a reduction of 500 tonnes per annum (9%) in regulated carbon dioxide emissions, compared with a 2010 Building Regulations compliant scheme.

### Be clean: district heating

124 The applicant states that the preferred energy strategy for Surrey Canal is to connect to SELCHP and supply heat throughout the Site using a district heating network. The applicant states that discussions on connecting Surrey Canal to SELCHP are on-going and a Statement of Intent has been received. The applicant should continue to prioritise connection to SELCHP, and confirm that the facility will have adequate capacity, given the potential for cumulative connections from other development (such as development at Canada Water).

125 The applicant states that a site wide heat network would distribute heat around the site. A single energy centre located in the Plot Orion is proposed to serve the development, and a plan showing the indicative route of the network has been provided. The applicant should confirm that all buildings/uses will be connected into a single site-wide communal heating network. Commitment to the site wide heat network should be secured as part of the planning permission.

126 A reduction in regulated carbon dioxide emissions of 2,900 tonnes per annum (57%) could be achieved should connection to SELCHP proved viable.

#### Be clean: combined heat and power

127 A 1MW onsite gas fired combined heat and power (CHP) operation, topped-up with gas fired boilers is proposed as an alternative option if the SELCHP connection is not possible. The applicant states that the CHP would utilise a large thermal store and supply both domestic hot water and space heating demand. The applicant should provide further information on the footprint of the energy centre. This should be secured by condition.

128 The applicant should confirm the regulated carbon savings that second part of the energy hierarchy would achieve.

#### Be clean: cooling

129 High efficient electric chillers are proposed to provide the cooling requirements of the development. Heat-fired driven chillers using heat from either SELCHP or on-site CHP plant are also being proposed. The implementation of this last option would be confirmed at detailed design stage.

#### Be green: renewable energy technologies

130 3000 sq.m. of photovoltaic panels (PV) are proposed. Roof drawings showing the indicative locations has been provided. A reduction in regulated CO<sub>2</sub> emissions of 100 tonnes per annum (approximately 4.5%) would be achieved through this third element of the energy hierarchy.

#### Energy summary

131 The overall carbon savings after the cumulative effect of energy efficiency measures, connection to SELCHP or on-site CHP and renewable energy is not clear. The applicant should clearly confirm the regulated carbon dioxide savings. In addition, the following clauses are supplied for inclusion in the section 106 agreement or planning conditions:

- Definition: "Surrey Canal District Heating network": The district heating network connecting every apartment and building/individual use or occupation in the Surrey Canal development.
- Definition: "Surrey Canal Energy Centre": The energy centre, of no less than [800] m<sup>2</sup>, supplying all the heat for the Surrey Canal District Heating network including space heating and domestic hot water requirements
- Clauses: Clause 1: Upon the occupation of the 750th new apartment within the Surrey Canal development, the Surrey Canal Energy Centre shall be installed and operational and shall thereafter be the sole heat supply point for the Surrey Canal District Heating network.

## **Biodiversity**

132 The site presently has limited ecological value, although the surrounding areas are valuable. Railway land often acts as important corridors for biodiversity within urban areas. Some of the adjacent corridors are sites of importance for nature conservation (SINCs). The biodiversity study supporting the application found that protected nearby species include bats and black redstarts although there are no roosts or nests on the site, and the site offers limited habitat value in its current form.

133 Parts of the site would be disrupted as a result of East London Line extension (ELLX) and Thameslink works, and Bridgehouse Meadows (which is to be designated as a SINC) would be enhanced following the ELLX works.

134 The development would incorporate a range of features to encourage a greater biodiversity in and around the site. Aside from the previously discussed water features and green roofs, which would potentially attract birds and invertebrates, there would be the various soft landscaping throughout the site which would have a similar effect. Scheme lighting would be directed away from the railway embankments.

## **Ambient noise**

135 Assessment of current noise levels included Millwall FC match events at the New Den stadium and has been assessed against the PPG24 Noise Exposure Categories. The majority of receptor points are within category B, which requires noise to be taken into account as a factor in scheme design. A minority of sites close to Surrey Canal Road are within category C, where noise is more of a concern.

136 Noise modelling of the completed development takes account of its effects, such as changed traffic patterns. Mitigation measures are proposed to be incorporated within the design of the proposal, including the provision of wintergardens instead of balconies for the minority of units where noise would be an issue. Such units should offer dual-aspect orientation.

## **River Thames / flooding**

137 In common with a large part of south London, the site is within Flood Zone 3a, which is classified as land assessed as having a 1 in 100 or greater annual probability of river flooding, or a 1 in 200 or greater annual probability of tidal flooding (>0.5%) in any year. The presence of defences along the River Thames, including the Thames Barrier, reduces the risk of flooding to a potential 1 in 1,000 year event.

138 Mitigation measures are proposed by the applicant, which include provision of a sustainable urban drainage system, and the majority of ground floor uses designated as non-residential uses. Other options, such as provision of higher-floor refuge areas, designation of evacuation routes, and construction of floor levels above the prevailing ground level, are available. While the assessment appears to be sound, the Council will seek confirmation of the assessment's robustness from the Environment Agency, which is a statutory consultee.

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

139 GLA officers understand that the Council is broadly supportive of the scheme in terms of its regeneration and housing delivery benefits, having spent several years working in partnership with the applicant to deliver a viable scheme.

## Legal considerations

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

## Financial considerations

141 There are no financial considerations at this stage.

## Conclusion

142 London Plan policies on regeneration and mix of uses, transport and parking, employment, housing, affordable housing, density, tall buildings and views, urban design, access, climate change, biodiversity, ambient noise, and the River Thames and flooding are relevant to this application. The application complies with some of these policies but not with others, for the following reasons:

- **Regeneration / mix of uses:** Commitment to a relocation strategy for existing commercial tenants to be displaced as a result of the proposal.
- **Transport and parking:** The proposal does not comply with the London Plan, specifically regarding issues of parking, trip generation and traffic impact, bus provision, taxi and coach areas, cycling and walking, and travel planning. The main concern is the level of accessibility relative to the scale of development proposed. However the committal to the provision of Surrey Canal Road station is welcomed.
- **Employment:** Although the level of employment generating floorspace is reasonable, dedicated employment floorspace is less than the borough's requirements. However the proposed provision is reasonable.
- **Housing:** Family housing delivery would be about 15% of residential accommodation. Additional opportunities for family housing should be sought. Play space provision is acceptable.
- **Affordable housing:** The provision of 25% affordable housing is low, and viability would need to be reviewed. A facility to review affordable housing provision at each phase of development should be incorporated within the proposal to maximise affordable housing provision in light of potentially changing economic circumstances.
- **Density:** The proposal is not in accordance with the London Plan, as residential density significantly exceeds the plan's guidance levels.
- **Tall buildings / views:** There would be no detrimental strategic impact.
- **Urban design:** The proposal would provide a dense scheme with significant scale, in outline form. However the applicant has committed to a high standard of design, with measures in place to ensure that this is capable of being delivered. The scheme is

acceptable in principle, with the exception of the incorporation of north-facing, single-aspect residential dwellings.

- **Access:** The scheme is generally acceptable in its consideration of access matters, although further information and commitment to issues such as wheelchair housing, Lifetime Neighbourhoods and step-free station access would be welcomed.
- **Climate change:** The applicant has broadly followed the energy hierarchy. Sufficient information has been provided to understand the proposals as a whole, but although proposals are broadly acceptable, further information is required. Other sustainability measures are supported.
- **Biodiversity:** There would be no detrimental strategic impact.
- **Ambient noise:** There would be no detrimental strategic impact.
- **River Thames / flooding:** The proposal complies with the London Plan.

143 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:

- **Regeneration / mix of uses:** Commitment to a relocation strategy for existing employment tenants. Commitment to the delivery of the sports facilities at specific development milestones should be included within the section 106 statement.
- **Transport and parking:** A car parking management plan should be secured, as well as CPZ controls and consideration of the potential for shared spaces between the polyclinic and multi-faith centre. There must be a firm commitment to the amount of development needed to trigger the construction/operation of Surrey Canal Road station, with revision of the mode share to consider interim bus requirements. Further traffic assessment study is required, particularly with regard to Ilderton Road / Old Kent Road associated junctions. Bus demand forecasting is unrealistic and requires revision. The applicant should provide confirmation that it will be possible to run a double decker bus through the site. Additional bus stop infrastructure will require further study and committal by the applicant. A coach management strategy is required, and detail of proposed taxi areas should be submitted. Information regarding the overcoming of level differences between the site and Surrey Canal Road should be provided. A commitment to Legible London signage is requested. Further information on proposed cycle parking levels and local improvement strategies is required. A draft travel plan, delivery and servicing plan, and construction and logistics management plan should be submitted for consideration.
- **Employment:** The Mayor will expect relocation assistance for existing tenants that would be required to move as a result of the development.
- **Housing:** The GLA should be provided with an independent assessment of scheme's viability. The provision of studio units requires additional justification.
- **Affordable housing:** The GLA should be provided with an independent assessment of scheme's viability. Additionally the Council should consider reassessment of provision at each phase.
- **Density:** Calculation of a net density figure based on the net site area of each phase. A density of the scale proposed requires an extremely high quality of design.

- **Urban design:** The Council should consider a condition limiting the number of multi-faith centre events catering to larger numbers of people, or to avoid clashing with match day events. Although the applicant's submission notes that Metropolitan Police have been consulted regarding the site layout and uses, the Mayor will consider the consultation response and the response of the community regarding safety fears and implications should the application be referred back to him. The currently proposed level of single-aspect, north-facing dwellings is unacceptable.
- **Access:** The applicant should consider the inclusion of a commitment to access facilities and Lifetime Neighbourhoods within the development specification. Further information should be included regarding the delivery of wheelchair accessible homes, and access to surrounding facilities (including step-free access to all adjacent railway stations).
- **Climate change:** Further energy information is required, including confirm that all buildings/uses will be connected into a single site-wide communal heating network, further information on the possible footprint of the energy centre, the regulated carbon savings that second part of the energy hierarchy would achieve, and confirmation that SELCHP would be adequate for the waste needs of the development.

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