

Convoys Wharf, Deptford, SE10

2 February 2011

in the London Borough of Lewisham

planning application no. DC/02/52533

Strategic planning application stage 1 referral 2000 Order

Town & Country Planning Act 1990 (as amended); Greater London Authority Act 1999; Town & Country Planning (Mayor of London) Order 2000

The proposal

Amendments to outline planning application dating from 2002.

The development consists of **Residential** development – up to 3514 units (337 980 sq.m), **Freight Wharf** - 32 200 sq.m, **Leisure/hotel** uses – up to 30 600 sq.m, **Employment** space – up to 19 100 sq.m (including up to 3 energy centres or connection to SELCHP), **Cultural/community** uses - up to 14 400 sq.m, **Retail** – up to 6400 sq.m, **Restaurant/bars** – up to 4520 sq.m, **Riverbus** facility, up to 2318 **parking spaces**

The amendments include revised development parcels, revised development parameters, an increase in wharf and hotel area and the removal of the boatyard element of the proposal.

The applicant

The applicants are **Convoys Investments S.A.R.L. and News International Ltd**

Strategic issues

The majority of the site is currently designated as a **safeguarded wharf**. The principle of release of some of this land for residential-led **mixed use** redevelopment of this site is acceptable, given that use of the full safeguarded wharf site would bring unacceptable impacts on the existing residential areas. The application is seeking permission for a range of **development parameters**, including those for three **tall buildings**, which given that this is an outline application, make it challenging to secure high **architectural quality**. The proposed **density** of the development would be high and the potential **quantum of development** would generate high levels of **additional trips** for which the **transport impacts** have not yet been suitably resolved. The detailed breakdown of the **mix of housing** on the site, including the proportion of **affordable units** is at present only indicative. There are outstanding issues to be resolved regarding **energy**, in particular the connection to SELCHP. The impact of the proposed **retail** element, particularly on Deptford town centre has not been satisfactorily addressed or justified. There is a lack of detail in relation to **inclusive design principles**.

Recommendation

That Lewisham Council be advised that the application does not comply with the London Plan, for the reasons set out in paragraph 152 of this report; but that the possible remedies set out in paragraph 154 of this report could address these deficiencies.

Context

1 On 23 December 2010 the Mayor of London received documents from Lewisham Council notifying him of amendments to a planning application of potential strategic importance to develop the above site for the above uses. This report sets out information for the Mayor's use in deciding what decision to make.

2 The application is referable under Categories 1A, 1B, 1C, 2C, 3B, 3E, 3F, 4 of the Schedule to the Order 2000:

1A Development which comprises or includes the provision of more than 500 houses, flats, or houses and flats.

1B Development (other than development which only comprises the provision of houses, flat, or houses and flat, which comprises or includes the erection of a building or buildings outside Central London and with a total floorspace of more than 15,000sq.m.

1C Development which comprises or includes the erection of a building in respect of which one or more of the following conditions is met (a) the building is more than 25 metres high and is adjacent to the River Thames.

2C Development to provide – (i) a passenger pier on the River Thames.

3B Development which occupies more than 4 hectares of land which is used for a use within Class B1 (Business), B2 (general industrial) or B8 (storage or distribution) of the Use Classes Order, and which is likely to prejudice the use of that land for any such use.

3E Development which does not accord with one or more provisions of the development plan in force in the area in which the application site is situated and – comprises or includes the provision of more than 2,500sq.m of floorspace for a use falling within any of the following classes in the Use Classes Order – (i) class A1 (retail), (ix) class D1 (non-residential institutions), (x) class D2 (assembly and leisure).

3F Development for a use, other than residential use, which includes the provision of more than 200 car parking spaces in connection with that use.

4 Development in respect of which the local planning authority is required to consult the Mayor by virtue of a direction given by the Secretary of State under article 10(3) of the GDPO. Convoys Wharf is a safeguarded wharf identified by direction of the Secretary of State.

3 If Lewisham Council resolves to grant permission, it is required to refer it back to the Mayor for his decision as to whether to direct refusal 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.

Site description

6 Convoys Wharf is a 16.6ha site fronting the River Thames within the London Borough of Lewisham. It makes up around half of Lewisham's Thames riverfront and is located to the north of Deptford Town Centre. The site is in the Deptford Creek/Greenwich Riverside opportunity area. It is bounded to the north by the River Thames, to the east by the historic Shipwrights Palace (Grade 2 Listed and in residential use), to the south-east, south, south west and north west by predominantly 1960s municipal built residential development over approximately 2 – 10 stories, consisting of the Sayes Court and Pepys Estates. The site is roughly rectangular in shape with irregular boundaries. The site has extensive archaeological deposits and contains a large grade II Listed Building (Olympia Warehouse), which is roughly central to the site and a grade II listed entrance gate and perimeter wall (part of). The site also contained a Scheduled Ancient Monument.

7 The safeguarded wharf makes up 9.13ha of the site along the Thames frontage. There is a low level of storage type uses on site at the moment which are not thought to utilise the river for transport.

8 Vehicular access to the site would be via Grove Street (B206), Prince Street and New King Street, the latter two of which are residential roads. The site is located 200m from the A200 Evelyn Street, which forms part of the Strategic Road Network (SRN). The closest bus stops to the site are on Evelyn Street (A200), serving routes 47/N47, 188, 199 and N1. The nearest station is Deptford National Rail Station which is approximately 500m from the southern boundary of the site and carries services to/from north Kent and London Bridge/Cannon Street stations).

9 The site has a low public transport accessibility level (PTAL) of 2-3 on a scale of 1 to 6, where 6 is most accessible.

Details of the proposal

10 The details of the proposal are broad at present as it is an outline planning application seeking to establish the following:

- Nine Parameter Plans, which will guide reserved matters applications for development within each of the development parcels: these parameter plans are:

000A	Site Location Plan
001A	Development Parcels
002A	Transport Infrastructure
003A	Proposed finished site levels
004A	Maximum building heights
005A	Minimum building heights
006A	Car parking zones
007A	Existing Buildings and spaces
008A	Phasing Plan

- One of the Parameter Plans (001A) identifies six Development Parcels, including the reduction of the safeguarded wharf area
- Detailed permission for two main access points and primary routes within the site
- Detailed permission for the siting (subject to a limit of 8m deviation) and massing of the three tall towers

11 An indicative masterplan has been provided, but is not for assessment at this stage. The proposed residential-led mixed use development comprises:

- Residential development – up to 3514 units (337 980 sq.m)
- Freight Wharf - 32 200 sq.m
- Leisure/hotel uses – up to 30 600 sq.m
- Employment space – up to 19 100 sq.m (including a connection to SELCHP or up to 3 energy centres)
- Cultural/community uses - up to 14 400 sq.m
- Retail – up to 6400 sq.m
- Restaurant/bars – up to 4520 sq.m
- Riverbus facility
- up to 2318 parking spaces

12 The two main access routes consist of a north–south route which is broadly a continuation of Deptford High Street and an east–west route from the junction of Grove Street/Leeway to the centre of the site. The two routes meet adjacent to the Listed Olympia Warehouse close to the centre of the site. There are expected to be other secondary routes and a range of pedestrian and cycle routes to come forward at the detailed stages.

13 The development is generally likely to be taller than its surroundings, ranging from 6-16 storeys. However, the proposal includes provision for three significantly taller buildings of up to 148m (46 storeys), 124m (38 storeys) and 106m (32 storeys).

The indicative layout is shown overleaf in figure 1– note this is not subject to the current application but is merely indicative:



Figure 1: indicative site layout

Case history

14 The original planning application was submitted in 2002. With referrals to the Mayor in 2003 and 2005. In 2005, officers highlighted that the appraisal of the safeguarded wharf had not been undertaken in compliance with the London Plan. In the intervening period the applicants have investigated the wharf in further detail and the site is understood to have changed ownership. During this period the applicants have had a number of discussions with GLA officers, in particular with regard to the wharf aspects and more broadly with TfL and Lewisham Council officers.

Strategic planning issues and relevant policies and guidance

15 The relevant issues and corresponding policies are as follows:

- Mix of uses *London Plan*
- Urban design *London Plan; PPS1*
- Tall buildings/views *London Plan; RPG3A, Revised View Management Framework SPG*
- Access *London Plan; PPS1; Accessible London: achieving an inclusive environment SPG; Planning and Access for Disabled People: a good practice guide (ODPM)*

- 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*
- Transport *London Plan; the Mayor's Transport Strategy; PPG13;*
- Parking *London Plan; the Mayor's Transport Strategy; PPG13*
- Climate change *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*

- Blue ribbon network *London Plan; Mayor's draft Water Strategy; PPS25, RPG3B, London Plan Implementation Report: Safeguarded Wharves on the River Thames*

16 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is the Lewisham Unitary Development Plan 2004 and the London Plan (Consolidated with Alterations since 2004).

17 The following are also relevant material considerations:

- The draft replacement London Plan, published in October 2009 for consultation.
- The Draft Lewisham Core Strategy (examination in public expected early 2011)

Principle of development and mix of uses

18 The majority of the site is designated as a safeguarded wharf. As such the development is contrary to existing London Plan and local development plan designations. However, the operation of a large wharf in close proximity to the existing residential uses that surround the site

is likely to have an unacceptable impact, therefore the principle of a reduction in wharf size is accepted. The detail of the appropriate size of wharf has been examined by the applicants and is covered in paragraphs 21-30 below.

19 The site is within the Deptford Creek/Greenwich Riverside Opportunity Area. The Mayor recognises that the site represents a major opportunity for regeneration in the North Lewisham/Deptford area, alongside a range of smaller sites in the vicinity. As such the comprehensive redevelopment of the site, subject to a satisfactory conclusion of the wharf issues, is supported by the London Plan.

20 The proposals, at their maximum, represent a large scale development with three tall towers included. The application is for outline permission and whilst each development parcel has scale parameters, these are in many cases wide. If developed at the fullest extent of these scale thresholds, buildings within the development could be bulky and lack permeability. Therefore such proposals may well be unacceptable see paragraphs 32-48 below.

Safeguarded Wharf

21 9.13ha of the site is designated as a safeguarded wharf. As a wharf, the site has good navigational characteristics, being adjacent to a deep river berth and having jetty structures into the river. It is also the closest safeguarded wharf to the eastern side of central London, meaning that it provides opportunities for relatively short onward journeys to many locations. The wharf's generally rectangular shape is also useful in terms of flexibility of operation. These characteristics mean that the wharf is potentially attractive to a wide range of cargo types.

22 However, the wharf is also surrounded by residential development, mostly in the form of municipal housing blocks of 4-6 stories. The roads into and from the Strategic Road Network are of a generally residential character. These two factors mean that it is unlikely that the wharf could be used to its full extent and that a reduction in wharf area is justified.

23 The applicants have submitted a Marine Terminal Assessment, undertaken by URS consultants in 2008-9. URS invited both the GLA and Port of London Authority to comment on the scope of the work and to observe interviews with potential wharf operators. Following this GLA officers are content that the process was open to all appropriate operators to express an interest and the assessment was undertaken in an appropriate way which considered all relevant potential cargoes and the relevant attributes and restrictions associated with operating a wharf within the safeguarded wharf area at Convoys Wharf.

24 As outlined above the navigational and locational attributes of the site are generally attractive to a wide range of cargoes. The main restrictive characteristic is that the site is surrounded by existing residential development. This poses a restriction in terms of the noise, dust, air pollution and traffic generated from any wharf operation. Again the GLA officers are content that these restrictions have been fairly assessed in the Marine Terminal Assessment.

25 The Marine Terminal Assessment concludes that a maximum area of 2.3ha of wharf could be made operational within the appropriate environmental restrictions. This would also require a high standard of screening and insulation for the proposed residential development on the remainder of the Convoys Wharf site as this would be generally closer to the operational wharf than the existing residential premises. There was no particular expression of preference for the location of the 2.3ha within the existing 9.13ha safeguarded area. The more easterly, downstream end of the wharf benefits from existing jetty infrastructure, whilst the more westerly, upstream end benefits from being closer to Grove Street (B206) and reduced need for any HGV movements on the smaller roads.

26 GLA officers expressed a view that the remaining portion of wharf should be increased slightly above this minimum threshold, by 0.5ha to 2.8ha to allow for future flexibility of the wharf, for example that more extensive areas may be used in relatively quiet uses, e.g. for barge to barge transfers. There was no specific evidence to support this suggestion but officers felt it was a prudent suggestion given the limited availability of wharf land in inner London and the extremely low probability of any new wharf land coming forward.

27 The proposals submitted include a wharf as Development Parcel F. This equates to 2.3ha of land plus a new jetty structure of 0.3ha. Whilst this is below the 2.8ha indicated by GLA officers, it is broadly acceptable in size terms as the land areas meets the minimum level specified in the Marine Terminal Assessment. The provision of the jetty should be secured by planning condition or S106 agreement. The quantum of development indicates a floor area of up to 32 200 sq.m. This suggests that there will be a range of floorspace above ground level. This is acceptable, although experience suggests that the majority of the above ground space is likely to be ancillary office type floorspace rather than operational cargo handling. Parcel F is located along the north western (upstream) boundary of the site. The location of the wharf area is acceptable.

28 Parameter 008A of the proposals set out that the wharf will be delivered in the third (ie final) phase of the development. The delivery of the wharf in phase three is unacceptable. The lead land use designation for the majority of this site, over 9ha, is as a wharf. The site has been out of wharf use for around 10 years and the Marine Terminal Assessment has demonstrated a clear demand for the site as a wharf.

29 Furthermore, it is good practice that prospective new occupiers of the surrounding development should be aware of the wharf, rather than have a wharf operation start up as or after all the other accommodation is occupied. The applicants have indicated that the wharf area or part of it would be used as a construction compound. It is acknowledged that if goods are being delivered or demolition spoil is being removed by water, then this is an appropriate use of a safeguarded wharf. However, the remaining wharf area is considered large enough to accommodate at least one permanent wharf operator whilst part of the site is being used as a construction compound. In line with London Plan Policy 4C.8, the Mayor would expect bulk construction and demolition material movements to be undertaken by water transport for this site.

30 The wharf's shape is somewhat irregular. The proposal creates a relatively narrow river frontage with larger areas some distance inland and some potentially awkward corners and pinch points. The GLA is not convinced that the whole of the wharf could be used effectively and is concerned that the shape lends itself to being further reduced by approximately half to the riverward portion only.

31 The Port of London Authority have advised that the proposed river jetty is not acceptable as it would give a shallow water depth at some tidal stages. This would limit the use of the wharf. The jetty will either need to be extended further into the river, which in turn will cause navigational concerns and potential conflict with the proposed passenger pier, or the location of the wharf may have to be re-examined. In either case the construction of the jetty is understood to require permission from the Crown Estate. These issues will need to be resolved.

Regeneration/Employment

32 As a major site within the Deptford Creek/Greenwich Riverside Opportunity Area, the principle of comprehensive redevelopment, subject to the satisfactory resolution of the wharf issues, is acceptable. The London Plan sets out that the Opportunity Area should deliver 4000 jobs and 8000 homes up to 2026. This scheme would help to deliver those targets.

33 It is not clear what level of permanent employment would be generated by the proposals. However it is clear that the construction activities would generate a high level of employment. The applicants should ensure that appropriate training and employment opportunities are provided to attract out of work Londoners from surrounding areas to benefits from these opportunities.

Urban Design/Quantum of development

34 Good design is central to all objectives of the London Plan and is specifically promoted by the policies contained in Chapter 4B. London Plan Policy 4B.1 sets out a series of overarching design principles for development in London. Other design policies in Chapter 4B and elsewhere in the London Plan include specific design requirements relating to tall and large-scale buildings, built heritage, views, and the Blue Ribbon Network amongst other matters. Chapter 7 of the draft replacement London Plan sets out design related policies.

Layout and form of buildings

35 The proposals are at outline stage and the level of design information submitted for consent at this stage is limited to the following parameters:

- 001A Development Parcels
- 003A Proposed finished site levels
- 004A Maximum building heights
- 005A Minimum building heights
- 006A Car parking zones

36 Given the outline stage of the application, building designs and detailed layouts are not available to assess. The Development Parcels are an improvement on previous proposals as the proposed parcels contain more unified development types which generally link to a 3 phase delivery. However, as set out below, further work is required on the split of these parcels.

37 The proposed finished site levels are relatively well understood as the site is generally flat and widespread existence of archaeological remains means that there will be only limited excavation and no major underground structures. This is acceptable, given the archaeology, however, this in turn means that car parking is mainly in covered buildings at ground floor level which in turn generate a podium level for most of the development. Successful design of street frontages, integration of accessible public realm and entrances to buildings then becomes significantly more challenging. At this outline stage, the applicants have submitted limited information to suggest how successful, or otherwise these design challenges will be addressed and whilst some indications are shown in the Design Statement (CW4), these are generally loose and fail to address the links to street level. This needs to be provided in the Parameter Plans by identifying typical layouts for the blocks. This would enable an assessment to be made as to the degree the outline would be able to meet the Mayor's residential design standards.

38 Maximum and minimum building heights are established by Parameter Plans 004A and 005A. In many cases there are wide ranges between these minimum and maximum criteria, generally between 6-16 storeys. In general this is likely to be acceptable. However the maximum heights are unlikely to be acceptable if widely applied and/or are proposed in some particular locations, such as Development Parcels B and D, which border existing residential development. These two Parcels have maximum heights of 44.5m (approximately 12 storeys). If the maximum height thresholds were to be proposed up to or close to the boundary, the detailed development would be unlikely to be acceptable, particularly close to more sensitive receptors such as Sayes Court Gardens and smaller scale residential properties in Barnes Terrace and Watergate Street.

Section 4.2 of the Design Framework (CW4) indicates that a zone closer to the existing residential properties would have smaller scale massing. In general this is welcomed but is felt not to be tight enough for the outline application.

39 The Development Specification document (CW5) also contains Appendix 4 setting out maximum and minimum lengths and widths for buildings within each Development Parcel. The maximum length and width of buildings in Parcels A, B, C and D are 150m and 80m respectively. It is unlikely that many buildings around these maximums would be acceptable given the limited permeability that would then be achieved. Drawings in the Design Statement indicate approaches that may be appropriate and reduce the bulk of buildings, but as with previous comments, the overall parameters are not tight enough for such a large development.

40 Ideally the applicant would have submitted a masterplan as part of the outline application – the submitted masterplan is stated as being indicative only. The Mayor does not consider it appropriate to grant planning permission at an outline stage for parameters which, if proposed in their full extent, at the detailed scale would be unlikely to be acceptable.

41 Therefore the scale parameters and/or development parcels need to be more precise in terms of the building masses and scales to provide for a scheme which would generally be acceptable in all forms. It is not expected that this task will be overly burdensome as it seems clear that the applicants have a reasonably well developed masterplan which has been submitted for illustrative purposes only.

42 Therefore the scale parameters regarding development parcels need to be amended such that the parameters are within tighter constraints which would be generally acceptable across all of the development parcels and development parcels especially parcels B and D need to be split such that particular height parameters can be tailored more precisely to building location and setting.

43 The nature of the concerns in relation to the building scale parameters and design quality generate a broader concern that the maximum level of development being applied for may not be achievable in an acceptable way.

44 The Development Parcels are designed to provide a continuation of Deptford High Street/New King Street from Evelyn Street to the Thames. This is welcomed although from site visits the success of this from Deptford High Street is somewhat questionable as New King Street is slightly off-set. This will form one of the main access points into the development and it also passes the Listed Olympia Warehouse, which will be the only retained building on site.

45 The second main access to the site meets the continuation of New King Street at the Olympia building from the edge of the site are Grove Street. This provides a clear main route through the development and a clear focus on the Olympia Warehouse as a public space. This principle is welcomed. These two routes will not form a through vehicular route but will form a bus corridor. This is welcomed as it provides public transport access to the heart of the site, with limited deviation for the buses and does not create a parallel route to Evelyn Street for other traffic. Notwithstanding that the main principles of the access strategy are supported, there is insufficient detail in relation to the access and servicing arrangements for such a large scale development. In particular it is not likely to be acceptable that the second main access for the development will not be provided until Phase 2 of the development.

46 Some of the development will be adjacent to an operational wharf. These units will require particularly careful design to ensure that there are no unacceptable conflicts. However, informal discussions with the applicants have indicated that some of these units may be single aspect and overlooking the wharf. Such a proposal at a detailed application stage is unlikely to be acceptable.

Section 4.4.14 of the Design Framework gives an indication that some of the relevant considerations to reducing these conflicts will be considered.

47 The proposed wharf is adjacent to an existing park. As proposed this would be flanked by a blank perimeter wall, similar to the existing situation. Whilst the difficulty of accommodating a wharf is acknowledged, the proposed blank wall is considered to be poor and the applicant should re-consider options.

Strategic Views and Tall Buildings

48 Development parcel E contains three tall towers for predominantly residential uses. The proposed maximum heights are: Tower A 146mAOD (approx 46 storeys), Tower D 124mAOD (approx 38 storeys) and Tower I 106mAOD (approx 32 storeys) – the finished ground level will be close to 5m AOD so the effective height will be approximately 5m less than the figures above.

49 The north western corner of the site is within the view management corridor 5A.2 from Greenwich Park to St Pauls Cathedral, as set out in the Mayor's London View Management Framework SPG. The three tall buildings would be just outside the viewing corridor. If suitably designed the blocks could be considered to be generally acceptable from a Strategic Views perspective, but the lack of detailed design makes this difficult to secure at the present stage.

50 From a more detailed viewpoint, the blocks will be within an area that is close to the Listed Olympia Warehouse building and close to the River Thames. The massing of the three buildings is fixed, all three have lengths of 38m and widths of 28m. This does not give any indication of the finer level of architectural design that is required to ensure that the buildings have slender and elegant profiles. The applicants must re-consider the level of detail submitted as the Mayor does not consider it would be appropriate to grant outline consent on the basis of the information provided.

51 In summary there is little to give assurance that proposals would be well designed and consistent with the design policies of the London Plan including London Plan policies 4B.1, 4B.10 and 4B.11 and considerable grounds for concern that there would be a significant gap between the aims of these policies and proposals at a detailed application stage.

Heritage and Archaeology

52 Deptford in general and this site in particular have been the location of a long history of maritime heritage. The site includes many areas of known archaeology and in-filled docks and basins and a Scheduled Ancient Monument. There is also the grade II listed building – the Olympia Warehouse and the grade II listed entrance gate and part of the perimeter wall. Adjoining the site to the south east is the listed Shipwrights Palace. The archaeology places restrictions on the building format and thus necessitates the use of extensive podium levels, that may prove to be a design challenge.

53 With this wealth of historic maritime connections, some of them relating to the Royal Family and great explorers such as Drake and Raleigh, the site has great opportunity for the creation of a distinctive place/series of places. This should be brought out in a meaningful way at the detailed stages of any planning permission.

Inclusive design

54 London Plan policy 4B.5 and draft replacement London Plan policy 7.2 require all future development to meet the highest standards of accessibility and inclusion, and requires design and

access statements submitted with planning applications to explain how the principles of inclusive design, including the specific needs of disabled people, have been integrated into the proposed development and how inclusion will be managed and maintained.

55 At this outline stage it is not possible to determine the extent to which these principles will be adhered to as the information has not been provided. This outline application should be accompanied by a Design and Access Statement which sets out a commitment to meeting inclusive design principles and what mechanisms will be used to achieve this at detailed design stage. Subsequent design and access statements submitted with each reserved matters application should be required to meet the inclusive design principles and commitments set out in this outline application and include an assessment of whether the proposal achieves the highest standards of accessibility and inclusion. Given that re-profiling works are to be carried out this is an opportunity to ensure that the levels and gradients across the site enable easy and convenient access for disabled people.

56 London Plan policy 3A.5 (Policy 3.8 of the draft replacement London Plan) requires all new housing to be built to Lifetime Homes standards and ten per cent to be wheelchair accessible or easily adaptable for residents who are wheelchair users. Further clarification is required to establish that the proposal meets the Lifetime Home standards as updated and revised by Habinteg Housing Association in July 2010 (see www.lifetimehomes.org.uk) as these are the standards that should be applied. This will need to be addressed prior to any Stage 2 planning referral by the submission of typical flat layouts.

57 The provision of accessible hotel bedrooms is required by Policy 4.5 of the draft replacement London Plan. The policy supports an increase in the quality and quantity of fully wheelchair accessible visitor accommodation and asks for at least 10% of new hotel bedrooms to be wheelchair accessible. The applicant should clarify the number of wheelchair accessible hotel bedrooms to be provided.

Blue ribbon network and flood risk

Blue ribbon network

58 The policies contained within chapter 4C of the London Plan are relevant given this site's riverside location. The policies seek to capitalise on the water and ensure that it is used. The designation of the majority of the site as a safeguarded wharf is a key issue addressed above. The proposals also indicate that they will provide a Thames Path along the frontage to the Thames and a River Bus Facility within Development Parcel E. There have been previous proposals to include a Cruise Liner Terminal and a Boat Yard facility at this site.

59 The Thames Path provision is indicated on Parameter Plan 002A as being along the river frontage and diverting landwards around the Shipwright's Palace at the south eastern end of the site. The principle of this is supported, and whilst a river front location is preferred, it would be acceptable if there was a limited diversion to allow for the operational needs of the wharf. The applicants should liaise with the owners of the Shipwrights Palace to ensure that the route integrates with any proposals for more open access to that building. The indication in the Design Framework (CW4) that the Thames Path will be at least 9m wide is welcomed, as is the indication that there will be public access onto the existing jetty areas.

60 The River Bus facility is indicated to be located on a jetty near the centre of the site's river frontage. This is acceptable in principle but detailed discussions will need to be undertaken with Thames Clippers and TfL River Services to determine how this pier would fit into a wider service pattern. A service that just provides a cross river option is likely to be of limited benefit given that

similar journeys can be made by DLR. Detailed design of the pier structure will need to consider how passengers, particularly disabled passengers, access vessels at all stages of the tide. Consideration will also be required to ensure that the operation of the river bus services does not impinge on the ability to operate the wharf. Consideration will also have to be given to navigation to/from the pier, given the comments in relation to the freight jetty in paragraph 31.

61 London Plan paragraph 4.164 requires that other water related land uses are required to be considered for any land which is released from wharf safeguarding. The proposals would result in the release of just over 6ha of currently safeguarded wharf land (subject to satisfactory resolution of wharf related issues identified above in this report). Whilst Convoys Wharf has been considered as a potential site for a cruise liner terminal, this does not feature in the proposals. Given the relatively advanced status of a planning application at Enderby Wharf in Greenwich, the Mayor does not consider a cruise liner facility at this site a priority at present.

62 London does require additional boat yard facilities for the inspection, maintenance and repair of an increasing fleet of vessels using the Thames. Convoys Wharf has previously contained proposals for a facility. However, the previous proposals were of limited value given that they could only cater for a limited size of vessel. Boat yard facilities are essentially industrial in nature and require a reasonable land area. In addition there are new facilities nearing completion at Bay Wharf in Greenwich which should provide such a facility. Therefore the provision of a boatyard is not considered a priority for this site.

63 Given the provisions being made on the site, the Mayor considers that, subject to the satisfactory resolution of the wharf issues, there is no requirement for additional river uses over and above the Thames Path and passenger pier.

64 Policy 4C.3 (DRLP Policy 7.28) seeks to protect and enhance the biodiversity value of the blue ribbon network. Given the outline stage of the current proposals, there is no detail in relation to this at present, although the Sustainability Statement (CW9) states that the "river will be significantly improved", it is unclear what this means. This should be investigated at detailed planning application stage for development Parcels A, C and F and advice from the Environment Agency should be sought.

65 Given the site's location adjacent to the Thames, the river should be used for the transportation of bulk building materials, demolition waste and excavated material in line with London Plan policy 4C.8 (DRLP Policy 7.26), this should be secured by planning condition. It is understood that this is the intention of the applicants and that such facilities would be located on Parcel F, namely the remaining safeguarded wharf. Such uses can be considered as appropriate for the wharf, providing they utilise the water for the majority of transport, but should not preclude the use of parcel F for a permanent wharf operation.

Flood risk

66 The site is located within flood zone 3a and benefits from the protection of the River Thames flood defences. A Flood Risk Assessment has been prepared by Mott Macdonald with an addendum by Buro Happold.

67 The development proposals show that the flood defence walls are at 5.7mAOD, which is above the EA's statutory 5.23mAOD, however there are a reported 5 openings in the wall to allow for the use of the site for cargo loading purposes. It is unclear what happens to these openings in the development and whether any new openings will be required as part of the retained wharf in the north eastern portion of the site.

68 A breach analysis has been undertaken that identifies that some of the highways at south west corner of the site would be inundated by a breach but that the development parcels would be free of flooding. Unlike many similar developments, the proposals do not include any basement parking areas, which present particular risks under flood conditions.

69 The Flood Risk Assessment states that approximately 60% of the surface water from the development will be kept separate from foul/combined drains and directed into the Thames via new outfalls. This is welcomed and is in line with the sustainable drainage hierarchy in London Plan policy 4A.14 (DRLP 5.13), opportunities to increase this to a greater proportion of the site should be taken if available.

Housing

70 London Plan policy 3A.1 seeks to increase London's supply of housing and sets a London-wide target of 30,500 additional homes per year between 2007/8 and 2016/17. Table 3A.1 sets borough housing targets, of which Lewisham is 975 additional homes per year between 2007/8 and 2016/17. Draft replacement London Plan policy 3.3 seeks provision of at least an annual average of 33,400 additional homes across London up to 2015/16. Table 3.1 sets annual average housing provision monitoring targets for London boroughs, of which Lewisham is 1105 units.

71 The proposals indicate that the development is seeking to deliver up to 3514 units. This would clearly be a major contribution to the number of homes required within Lewisham. The actual number of units to be delivered will be finalised at a more detailed stage. Given the concerns expressed in relation to urban design, wharf space and transport elsewhere in this report it is possible that the maximum level of housing will not be achieved on the site and that a lower figure may be more realistic. However, this is still likely to be a substantial number of units and will be a valuable addition to the housing offer in Lewisham and south east London more generally.

Affordable housing

72 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.

73 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.

74 Policy 3.13 of the draft replacement London Plan sets out the approach to negotiating affordable housing on site, and states that *"The maximum reasonable amount of affordable housing should be sought when negotiating on individual private residential and mixed use schemes"* taking account of a range of factors including local and regional requirements, the need to encourage rather than restrain development, and viability.

75 Also relevant is London Plan policy 6A.4 *Priorities in planning obligations*, which states that affordable housing and public transport improvements should generally be given the highest importance with priority also given to tackling climate change, learning and skills and health facilities. Draft replacement London Plan policy 8.2 *Planning obligations* states that affordable housing; supporting the funding of Crossrail where this is appropriate; and other public transport improvements should be given the highest importance.

76 At this outline stage, the applicant has indicated that the level of affordable housing may be 25% by habitable rooms. The Mayor will need to see further evidence to justify this level of affordable housing and given the scale of the development and likely phasing, a review mechanism is would be required if that level were to be accepted at present. Details of the proposed tenure split and any discussions with the Homes & Communities Agency about future grant funding should be provided.

Mix of units

77 London Plan policy 3A.5 requires new development to offer a range of housing choices in terms of the mix of housing sizes and types, taking into account the housing requirements of different groups. In support of this policy, the London Plan Housing supplementary planning guidance seeks to secure family accommodation within residential schemes, particularly within the social rented sector, and sets strategic guidance for councils in assessing their local needs. Policy 3.12 of the draft replacement London Plan states that within affordable housing provision, priority should be accorded to family housing. Also relevant is policy 1.1C of the London Housing Strategy, which sets a target for 42% of social rented homes to have three or more bedrooms.

78 Given the outline stage of this application the applicants have not submitted a mix of unit sizes. This will need careful consideration at the more detailed application stages in order that an appropriate mix is achieved.

Housing density

79 London Plan Policy 3A.3 outlines the need for development proposals to achieve the highest possible intensity of use compatible with local context, the design principles of the compact city, and with public transport accessibility. Table 3A.2 of the London Plan provides guidelines on density in support of policy 3A.3. Draft replacement London Plan Policy 3.4 states that density should be optimised within the relevant density range shown in Table 3.2.

80 The site has a public transport accessibility level of 2-3, (which may rise with the diversion of bus routes) and is in an urban setting. The currently proposed maximum is for 3514 units across the 16.6ha site. For the purpose of assessment against the density matrix and London Plan policy 3A.3, and taking account of the mixed use nature of the development, the applicant should specify scheme density based on net residential site area (i.e. excluding non-residential floorspace) using the 'Greenwich' method.

81 The density will be above the London Plan Density matrix, as even on a total site area (ie including the non-residential elements of the Development Parcels), the density is approximately 210unit/ha, where the range suggested by the London Plan for an Urban location with a PTAL of 2-3 is 70-170units/ha. For such a development to be acceptable, it must be of exceptional design quality and in particular have regard to the Mayor's Housing Design Standards. The development does have access to nearby existing open spaces and has a considerable frontage to the River Thames, these will mitigate the impacts of the density to a certain extent.

Housing Design

82 Policy 3.5 of the draft replacement plan introduces a new policy on the quality and design of housing developments. Part A of the draft policy states that housing developments should be of the highest quality internally, externally and in relation to the wider environment. Part C of the draft policy states that new dwellings should meet the dwelling space standards set out in Table 3.3, have adequately sized rooms and convenient and efficient room layouts. Part E of the draft policy states that the Mayor will provide guidance on implementation of this policy including on housing design for all tenures. The reasoned justification provides further guidance and explanation. In particular paragraph 3.31 states that other aspects of housing design are also important to improving the attractiveness of new homes as well as being central to the Mayor's wider objectives to improve the quality of life of Londoner's environment. To address these aspects the Mayor will produce a new draft Housing SPG on the implementation of Policy 3.5 for all housing tenures, drawing on his design guide for affordable housing. Paragraph 3.33 highlights what the proposed SPG would cover, in terms of requirements for individual dwellings.

83 Given the proposed high density and the concerns about design, the applicants need to provide further information to demonstrate that the proposed development could comply with the Housing Design Guide at the maximum parameters. The applicants should provide typical flat layouts for the blocks in order to demonstrate how the issues raised in paragraphs 70-82 would be addressed. Such information has been provided in similar outline schemes for example at Woolwich Arsenal and Brent Cross/Cricklewood. Without this it is difficult to set a benchmark for residential quality to be secured the detailed stage.

Open Space and Children's play space

84 The site currently contains no open space and is not accessible to the public. The proposals intend to create a range of both public and private open spaces, although no details are available given this outline stage in the planning process. A particular challenge for the detailed stage will be the successful integration of those open spaces given that many of them will be at a podium level above car parking zones.

85 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."* This is supported by Policy 3.6 of the draft replacement London Plan.

86 Given the outline stage of the proposals there is little detail as to what will be proposed, although the Sustainability Statements suggests that public space will be provided throughout the development, and there is existing provision in close proximity to the site. The amount of provision will need to be revisited in accordance with the final number of dwellings, unit mix and affordable housing provision, as unit size and tenure will affect child yield and the corresponding play space requirement. However, the applicant should be able to provide an indication of the approach to a play strategy that is likely to be proposed over the site.

Transport

87 The amended proposals were the subject of pre-application discussions with TfL, as well as detailed initial comments issued to the applicant on 17 August 2010, prior to Lewisham's validation of the application. A very limited response has been received since, however it is disappointing as it does not address much. TfL therefore remains seriously concerned that there is still a lot of work to be done, particularly with regard to the proposed changes on Evelyn Street, before the scheme can be supported in transport terms. TfL's initial comments are

considered still valid and are therefore reflected in the following paragraphs. Given the scale of the future transport mitigation measures likely to be secured as part of this development, TfL would also welcome further discussions with the applicant and Lewisham Council to consider the benefits and advantages for TfL to be a co-signatory to the future s106 agreement, as agreed for the previous application.

88 The site is directly adjacent to the river Thames to the north of Deptford town centre. The nearest Transport for London Road Network (TLRN) is the A2 New Cross Road / Deptford Bridge located approximately 750m away whilst the nearest part of the Strategic Road Network (SRN) is the A200 Evelyn Street close to the southern boundary of the site. The site is also located between Surrey Quays and Deptford stations which offer interchange opportunities with buses, London Underground (LUL) and national rail services. Bus routes 199, 188 and 47 also serve the site with bus stops located on the A200. As a result, it is estimated that the site records a low public transport accessibility level (PTAL) of 2 to 3, out of a range of 1-6 where 6 is considered excellent.

89 As further identified in Lewisham's recent cumulative impact study for the area, the site's low accessibility to public transport services is a key concern. The requirement to the sustainable delivery of such development subsequently 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 interchange with other public transport modes to minimise trip generation by private vehicles.

Car Parking & Access

90 Despite TfL's advice, the suggested level of 0.57 spaces per residential unit and the additional 323 spaces for non-residential uses still remain. It can only be reiterated that such a level is excessive, and is higher than neighbouring developments which promote much lower ratios (i.e. Deptford Wharves - 0.3 spaces per unit, Marine Wharf - 0.43 spaces per unit) and raises serious concerns given the existing network conditions and its operation in terms of capacity. In accordance with London Plan policy 3C.23 '*parking strategy*', TfL would therefore reiterate its request for reducing the proposed provision to minimise additional congestion on the adjacent highway network. Whilst this view is shared by both Greenwich and Lewisham boroughs, this is particularly an issue as the local highway network is already operating significantly above capacity throughout the whole day. As well as car parking provision being consistent with neighbouring developments, the applicant also needs to be aware that traffic impact of the proposals will be particularly scrutinised at implementation stage by TfL through notifications under the Traffic Management Act, as further detailed below.

91 Approximately 18% of the residential and 5% of the non-residential parking provision will be dedicated to blue badges, with electric vehicle charging points installed, and up to 35 spaces reserved for car club use, which is welcomed as outlined in policy 6.13 '*Parking*' of the Mayor's draft replacement London Plan.

92 As with other neighbouring developments in the area, TfL considers it crucial that the introduction of a Controlled Parking Zone (CPZ) should be provided for the site before occupation. TfL would reiterate that if not secured, the amount of potential overspill parking on surrounding streets is likely to be unacceptable, which will subsequently have the effect of both increasing car mode share and the development respective traffic impact, as well as impacting on bus journey times and road safety. As secured as part of the previous application, a s106 contribution towards CPZ implementation and control and management of car parking for the site is therefore expected.

93 A number of changes to the highway network in the vicinity of the site are proposed in order to facilitate access the site. Given TfL 's current concerns over the installation of new signals on both the TLRN and SRN, it is requested that consideration be given by the applicant whether the proposed signals meet TfL's criteria. As previously advised at pre-application stage, a full justification demonstrating the need of these new signals needs now to be submitted as part of the planning process.

94 Despite being an outline application, TfL remains concerned over the design of the junctions. Whilst TfL welcomes the provision of Advanced Stop Lines (ASL) to all junctions, the width of nearside lanes remains an issue as they do not appear to provide sufficient space to accommodate cyclists. As mentioned previously, this is particularly relevant given the high number of collisions involving cyclists along Evelyn Street and the role of the A200 in delivering the Route 4 of the future Cycle Superhighway.

95 For the Evelyn Street/New King Street junction, clarification whether left turn from Creek Road into Deptford High Street are to be banned should be provided as the layout presented does not seem to allow for such movement. TfL would query the route the traffic will need to take to go west of the site, if right turns from New King Street are to be banned and also whether the proposed central crossing is appropriate as it would appear to potentially often be blocked by traffic waiting to turn right into Deptford High Street. Given the length of the facility proposed, it is also likely that its introduction would require the inter-green to be increased.

96 The Stage 1 Safety audit is supported as is the developer's commitment to submit more information on the linking of the Evelyn Street junctions. The issues raised as part of this study will however need to be addressed as part of future proposals.

Trip Generation and Mode Split

97 In light of TfL's pre-application advice letter dated 7 July, TfL considers the assessment, as currently presented, to be unsatisfactory. This needs to be revised, particularly by reconsidering the chosen TRAVL sites. Although residential modal share methodology has been revised taking TfL's previous comments into account, which is welcomed, concerns remain about the 10% boat mode share assumption which is considered high. Further information on how boat services and capacity for the site is still therefore expected to justify this.

98 Given the applicant's remaining uncertainties related to the proposed quantum of B1 and B8 uses on site, TfL supports the worst case scenario presented for the trip generation of the employment element, which assumes B1 use only and whilst not ideal, the assessment is nevertheless accepted by TfL. The 10% modal share assigned to boat is however similarly questioned and should be altered to be more realistic.

99 As previously stated at pre-application stage, TfL accepts the trip generation for the hotel element, likewise for the community element subject to no car parking being made available for this specific use. However, it does appear that the general non-residential car parking could be used by visitors to the Olympia building and as such, justification for suggesting a zero car mode share is required.

100 TfL's previous concerns related to retail uses should also be addressed by way of a condition restricting the size of a single food store to 800sqm with no other retail unit to be larger than 300sqm. This should therefore be confirmed by the applicant for TfL to accept the retail assessment presented and be secured by condition.

101 Given the uncertainties related to the wharf final occupier, the first principle approach presented and treating this specific use as B8 storage use is accepted, subject to more thorough assessment being undertaken at detailed design stage and similarly secured by condition.

102 Finally the assumption of a 10% reduction in trip rates related to link trips still requires further justification as it is considered to be an overestimate given the large amount of residential development on site.

Walking and Cycling

103 A ratio of one cycle space per residential unit is proposed on site. However, the draft replacement London Plan requires higher numbers of facilities for larger residential units, and the provision should therefore be reviewed to reflect this. An additional 357 public cycle parking spaces within the public realm for non-residential uses are also proposed. How this provision has been reached and allocated between land uses however remain unclear and should be clarified. It is also important that a balance of off street, secure spaces for employees within the site (including shower and changing facilities) is provided, along with public cycle parking for visitors within the public realm. This will ensure compliance with London Plan policy 3C.22 *'improving conditions for cycling'* and draft revised London Plan policy 6.9 *'cycling'*.

104 As stated above, there is a concern over the introduction of narrow lanes on Evelyn Street. The A200 already has a cyclist collision rate well above the average for the borough, and designs for junctions will need to take this into account. As secured for the previous application, a s106 contribution would be expected towards the cycle network to comply with London Plan policy 3C.21 *'Improving conditions for walking'*.

105 Despite the analysis provided in the report, concern remains over the proposed 1.8m footways on New King Street. This is considered insufficient for the key pedestrian route into and out of the site, particularly as it will also need to accommodate people walking towards Deptford rail station or bus stops on Evelyn Street. In order to capture pedestrian issues outside pure crowding and include qualitative aspects, TfL would therefore recommend that an analysis of the proposed route be carried out using TfL's new Pedestrian Comfort Guidance.

106 The proposals to extend the Thames Path through the site are welcomed. However, the proposals must ensure that good quality signage is introduced to maintain the quality of this Strategic Walk Route (SWR).

107 The provision of a pedestrian (PERS) audit is also welcomed, as are the proposals to improve areas identified as deficient in the assessment. However, TfL considers it equally important to consider whether areas can be improved to avoid the risk for these areas to degrade further without suitable maintenance.

108 Given the size of the site and the likely catchment area resulting from the leisure and cultural facilities proposed, TfL recommended that the Legible London wayfinding system is incorporated into the site. Although this has now been agreed by the applicant, which is welcomed, confirmation that this signage will direct to all TfL stations around the development, including Cutty Sark and those beyond the boundary of the area based format, should still be provided.

Highways Impact

109 To better understand the methodology adopted for traffic distribution, a diagram only showing development traffic flows should be provided. Confirmation that redistribution of

traffic, as a result of the Watergate Street closure, has been considered is also requested. If from the above, further work on traffic distribution is deemed necessary, TfL would encourage the applicant to consider the scope for using the Rotherhithe multi-model developed by Southwark Council for the Canada Water area.

110 Whilst the impact of the of the development and related junction proposals will need to be fully assessed using TfL's TRANSYT model, which has now been made available to the applicant, the combination of LINSIG, ARCADY and PICADY models submitted in the interim raise serious concerns. The assessment reveals that in the morning peak, Evelyn Street junctions with New King Street / Deptford High Street, Grove Street and Dragoon Street / Blackhorse Road will all operate over capacity as a result of the development proposals. This is unacceptable for TfL and signals implementation under such circumstances will not be allowed particularly on the SRN.

111 Any costs related to highway works will need to borne by the applicant and be dealt through a s278 agreement with the relevant highway authorities.

Public Transport

112 Whilst the consideration given to the use of buses to access DLR and LUL/Overground services is welcomed, as required by TfL at pre-application, clarification is still required on the methodology used to assess this. By cross referencing the figures presented for the morning peak, those seem much lower and also inconsistent with what has been accepted for other sites in the area. This should therefore be revised.

113 Although discussions are on-going in relation to the ferry boat services and the development impact on river services, additional information on how this will be managed would be useful and particularly confirmation that the proposed service will be able to accommodate the proposed demand, and avoid trips being redistributed onto other modes, should be provided. As secured as part of the previous application, s106 contribution towards the provision of the pier and river services would be expected by TfL from the application in compliance with London Plan policy 3C.2 '*Matching Development to Transport Capacity*'. River Boat services should correspond to the provision of passenger services to/from the development as specified within a River Boat Service Strategy to be developed for the site, to Canary Wharf pier or other destinations, and which is still to be agreed. The contribution would be expected to be provided upon early occupation.

114 Following completion of a TfL's bus stops audit, it has been identified that from the bus stops that are likely to be used by bus passengers travelling to or from the site, four may require works. In order to encourage the use of buses to and from the site, and to promote inclusive accessibility to all users of the proposed development, TfL considers that these bus stops should be upgraded. A total capped contribution of £40,000 is therefore requested towards these works, including raising kerb heights and introducing bus stop clearways. This should be secured via s106 and will ensure consistency with London Plan Policy 3C.20 '*Improving conditions for buses*'.

115 Given the scale and location of the proposals, the applicant will be required to deliver enhanced bus services in conjunction with the site's redevelopment, as acknowledged by the applicant. However, the bus capacity assessment that has been carried out is considered misleading. Whilst it concentrates mainly on the Deptford – New Cross corridor, consideration should also be given to bus passengers travelling to or from the development and coming from or going to destinations that are more distant from the site. The assessment uses 2006 data, which are considered to be old, and assess a 3 hour peak period rather than the peak hour that

is normally used to assess bus capacity. This should therefore be addressed. Initial assessment suggested that the number of trips anticipated for the development is likely to warrant either the re-routing of an existing route or the creation of a new route penetrating the site, as well as enhancements to services along Evelyn Street. As a conservative estimate, an additional 10 vehicles are likely to be required to provide the extra frequency. At a cost of £220,000 per bus per year, this equates to a minimum cost of £2.2 million per annum for three years. As such, a £6.6m total contribution, to be secured within the S106, would be expected to be funded by the developer to accommodate the additional bus passengers generated by the development in line with London Plan Policy 3C.2 '*Matching Development to Transport Capacity*' and draft replacement London Plan Policy 6.2 '*Providing Public Transport Capacity and Safeguarding Land for Transport*'.

116 It is also noted that the access arrangements for the development will result in one way working for buses through the site (in from Prince Street and out via New King Street irrespective of the direction of the bus). This is not considered as ideal for bus operations and needs to be considered as part of any proposals to route buses through the site.

117 It is unclear from the report whether improvements relating to Thameslink are or are not included in the Railplan modelling. For passenger demand, it is assumed that 40% of demand in the three-hour morning peak period is concentrated into the peak hour. TfL would recommend that a figure of 54% is more commonly used across the network. It is however accepted that the additional capacity provided from the Deptford Station redevelopment and increase in available capacity given from the modelling forecasts of passengers diverting away from South Eastern services to Crossrail, is sufficient to meet the demand created by the development at Convoys Wharf on its own. However as stated above, the findings of Lewisham's cumulative impact study confirm that capacity enhancements will be required on the rail network to cope with the cumulative demand of north Lewisham redevelopment sites and further discussion related to a s106 pooling regime for National Rail, LUL and DLR networks and at the relevant stations would be welcomed.

Servicing and Construction

118 As detailed at pre-application stage, the following documents should be provided in support of a full application and be secured by conditions: i) A Construction Logistics Plan (CLP) which identifies efficiency and sustainability measures to be undertaken while developments are being built, and ii) a Delivery and Servicing Plan (DSP) which identifies efficiency and sustainability measures to be undertaken once developments are operational.

119 Due to the site's proximity to the Thames, river transport should also be used for the movement of construction material into and out of the development. Comments elsewhere in this report indicate that it is not acceptable to leave the permanent occupation of the wharf until the final phase of the development and the use of part of the wharf for construction compound should enable a wharf operator to commence in phase 1.

120 It is noted that the trip generation of the wharf will be assessed with reference to anticipated occupiers of the facility. This should also include the number of river trips generated and vehicle routings associated with the wharf. Although at this stage the occupier and type of business is still unknown, TfL would however expect the development of the wharf to be brought forward as an early part of the development phase may have benefits associated with construction of the development and result in fewer road trips. This should be secured by condition.

121 The wharf is safeguarded and has future potential for aggregate handling. Due to the nature of tides, associated working of the wharf may be necessary during night time and outside of normal working hours of operation. Mitigation may be necessary, but any adjacent development would need to be mindful of policy 4A.31 of the London Plan, which states *'safeguard wharves with an existing or future potential for aggregates handling and ensure adjacent development is designed accordingly to minimise the potential for conflicts of use and disturbance.'*

122 Finally, whilst the provision of swept path analysis for some of the proposed new junctions is welcomed, it is not exhaustive. It is believed that the wharf and potentially also other uses such as the Olympia Building will need to be serviced by articulated Heavy Good Vehicles. Swept paths of a 16.5m artic should therefore be provided for its route through the site, to include both the Evelyn Street / Prince Street and Evelyn Street / New King Street junctions to demonstrate that this is possible.

Travel planning

123 In line with London Plan Policy 3C.2, the applicant has provided a framework Travel Plan. As advised at pre-application stage, the travel plan has passed its ATTrBuTE evaluation and is a well written document. The plan proposes strong measures, and details how the development will be phased which is welcomed. Despite the travel plan achieving its aims, the inclusion of estimated number of people on site both residents, employees and visitors is desirable. Interim targets need to be identified for the site wide travel plan, as well as the individual land uses as they come on line. Whilst the travel plan is expected to be secured by condition or s106, the amount of time and budget allocated to the Travel Plan Co-ordinator and the measures would be a welcome addition to what is considered as a well thought out framework.

Climate change

124 The London Plan climate change policies as set out in chapter 4A collectively require developments to make the fullest contribution to the mitigation of and adaptation to climate change and to minimise carbon dioxide emissions (Policy 4A.1). Chapter 5 of the draft replacement London Plan also requires developments to make the fullest contribution to minimising carbon dioxide emissions.

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

BE LEAN - Energy efficiency standards

126 A range of passive design features and demand reduction measures are proposed to reduce the carbon emissions of the proposed development. Both air permeability and heat loss parameters will be improved beyond the minimum backstop values required by building regulations. Other features include the use of thermal mass, mechanical ventilation with heat recovery and energy efficient lighting.

127 Based on the information provided, the proposed development does not appear to achieve any carbon savings from energy efficiency alone compared to a 2010 Building Regulations compliant development. Therefore the applicant should commit to the development exceeding 2010 Building Regulations compliance through energy efficiency alone.

BE CLEAN - District heating

128 The applicant is currently investigating the opportunity to link the proposed development to the offsite waste to energy plant at SELCHP and has stated that this is the preferred option. This is welcomed and the applicant should continue to prioritise connection to SELCHP and should provide evidence of recent correspondence to demonstrate their commitment as well as provide a summary of progress. An indication of potential timescales for adoption, if viable, should also be provided. The use of SELCHP would represent a significant benefit of the scheme. In discussions with SELCHP operators Veolia, the GLA is aware that Veolia is keen to facilitate this development and to connect to further developments in the north Lewisham area. The Mayor is prepared to assist with any negotiations required in order to increase the likelihood of this option being available from the first phase of the development.

129 Should the timescale for connection to SELCHP prove incompatible, the applicant has provided a commitment to ensuring the site is designed to connect to SELCHP at a later date or connection to other future networks should they come forward.

130 The applicant should confirm that all buildings/uses will be connected into a single site-wide communal heating network.

131 Three indicative energy centres are proposed as a fallback option, should the SELCHP connection not materialise. The applicant should aim to minimise the number of energy centres serving the site. Further information on any constraints to having a single energy centre serving the entire site should be provided.

Combined Heat and Power

132 In the event the SELCHP connection proves unviable, it is proposed that 2,175 kWe of gas fired CHP capacity will serve the development supplemented by gas fired boilers. The CHP has been sized to provide 100% of the base heat load. The applicant should optimise the CHP sizing to provide a proportion of the development's space heating requirement as well as domestic hot water.

133 The applicant should provide estimates of the carbon savings from CHP, expressed in tonnes per annum relative to a 2010 Building Regulations compliant development.

Cooling

134 A range of passive measures are also proposed to minimise cooling. This includes high performance e-glazing to minimise solar gains and the use of external solar shading and overhangs to minimise overheating.

135 The applicant has assumed 15% of the total residential units have a provision for comfort cooling. The applicant should provide further details on which units will require active cooling and should include further details on how this will be provided.

BE GREEN - Renewable energy technologies

136 The applicant identifies potential to allocate 3,200sq.m (13% of the available roof area) for PV. This would provide an annual power output of 240,000kWh. An indicative roof drawing showing potential locations has been provided.

137 A reduction in regulated CO₂ emissions of 136 tonnes per annum (approximately 2%) would be achieved through this third element of the energy hierarchy. However, this will only be

pursued if the development proceeds with its gas fired CHP systems rather than connecting to SELCHP.

138 **Summary**

139 In the event that the onsite CHP is pursued, the estimated regulated carbon emissions of the development will be circa 6000 tonnes of CO₂ per year after the cumulative effect of energy efficiency measures, CHP and renewable energy has been taken into account.

140 The applicant should provide revised estimates of carbon savings after considering further opportunities for energy efficiency and renewable energy and relate these to a 2010 Building regulations compliant development, for both supply scenarios. It is likely that a number of planning conditions/s106 agreements will be required to secure the necessary assurances.

Climate change adaptation

141 London Plan policy 4A.9 seeks to ensure future developments are able to adapt to climate change. At this outline stage the proposals include areas of green roof, passive cooling features to avoid overheating and the diversion of approximately 60% of rainwater away from the combined sewer. Overall the development is acceptable in relation to London Plan climate change adaptation policies.

Retail, Leisure, Culture and Tourism

142 Since the previous 2002 scheme planning policies on town centre developments have changed. The most significant changes include the replacement of PPS6 by PPS4 and the adoption of the 2008 London Plan (consolidated with alterations since 2004). The key change in PPS4 is the introduction of a wider impact test, requiring local authorities to assess the impact of proposed locations for development on existing centres. Proposed development locations in edge of centre or out of centre locations should not have “an unacceptable impact on centres within the catchment of the potential development”.

143 In the light of the PPS4 definitions, the application site is considered as an out of centre location. The proposal is comprised of a number of town centre uses, including retail, restaurant and cafes, hotel and serviced apartments. The scale of the Convoys Wharf development is equivalent to a local centre. Taking account of the scale of the development, the sequential test (Policy EC15) and the impact assessment (Policy EC16) are required for this planning application. These tests are also supported by Policy 3D.2, paragraph 3.271 and paragraph 3.273 of the London Plan (2008)¹.

144 In terms of the sequential site assessment, the application fails to disaggregate the elements of the proposed town centre uses, considering whether any of the units proposed could be accommodated on more centrally located sites. When determining no other sequentially preferable sites are appropriate, the retail assessment fails to demonstrate why such sites are not practical alternatives in term of their availability, suitability and viability. It also failed to recognise Surrey Quays/Canada Water as a District centre in the London Town Centre Network excluding it from the sequential test. The application fails to meet the policy tests set out in PPS4 EC15 and the London Plan Policy 3D.2 and paragraph 3.271.

145 In terms of the scale of comparison retailing, the Convoys Wharf development is not simply to meet the needs of local residents and employees, but also visitors from outside the local Deptford catchment area. As such it would have adverse impact on the adjacent town centres,

¹ The London Plan consolidated with alterations since 2004.

especially critical for centres in need of regeneration like Deptford town centre. The application fails to clarify why the trade diversion and retail impact on Deptford Town Centre is the least among other centres such as Surrey Quays/Canada Water. Further clarification is therefore needed to reassure the GLA that there will be no significant adverse impacts arising from the proposed development in accordance with PPS4 EC15.

146 With regard to the London Plan (Consolidated with alterations since 2004), there is a lack of reference to Policy 3D.4 and Policy 3D.7 regarding culture, leisure and tourism developments. Such policies entail a proactive planning approach to managing the night-time economy and pressures on high volume visitor areas and their environments.

147 Apart from the comparison retail component, the provision of leisure, culture, hotels and serviced apartments would appear acceptable in general terms in line with Policy 5D.2 and paragraph 5.111 of the London Plan (2008).

Noise and air quality

148 The issue of noise and air quality in relation to the wharf land use will need to be addressed at the detailed stage, particularly in relation to the design of residential units close to the wharf site. Noise and air quality impacts on the existing residential development have been significant factors in determining the appropriate scale of the wharf and these will also need careful consideration at the more detailed level, a strategy of how to minimise these impacts to acceptable levels would be useful.

Local planning authority's position

149 As yet unknown.

Legal considerations

150 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. 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

151 There are no financial considerations at this stage.

Conclusion

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

- **Mix of uses:** the proposed mix of uses does not accord with London Plan policy but could be permitted if the issues regarding the remaining safeguarded wharf are resolved.
- **Safeguarded Wharf:** the proposal to reduce the wharf to an area of 2.3ha on land plus a 0.3ha jetty is acceptable in principle but must be provided as part of phase one of the

development and the applicant must demonstrate that the whole of the remaining wharf area is viable including the proposed jetty structure.

- **Urban design/Density/Quantum of development:** the outline stage of the application presents a number of serious difficulties in assessing the acceptability of the proposals. The scale parameters for the development parcels are set too wide to give assurance that the detailed applications are likely to be acceptable. Whilst aspects of the indicative layout give some cause for optimism, equally there are grounds for a concern that the overall quantum of development cannot be acceptably accommodated on the site. This concern is reinforced by the overall densities that would be required to reach the upper level of development quantum. The design approach to development parcels that are on podium levels above car parking will be challenging. The access and servicing proposals are insufficient and there are concerns about the access onto Grove Street not coming forward until phase 2 of the development.
- **Inclusive Design:** Insufficient information is currently available to ensure that more detailed applications will meet the London Plan requirements.
- **Tall buildings/Strategic views:** the views assessment demonstrates that the tall building area outside View management corridor 5A.2, however, the lack of detail and scale parameters in relation to the three tall buildings gives concern regarding their final quality and makes it impossible to fully assess their impact, including that on the nearby view corridor and the setting of Listed Buildings/structures and the adjacent Conservation Area.
- **Climate change /Energy:** the intention to connect to SELCHP is welcomed and in line with London Plan policy and particularly relevant to this site, in order to be acceptable however further information is sought.
- **Blue ribbon network:** despite a lack of other water uses for the proposed released safeguarded wharf area, the proposals are considered to be broadly in line with the London Plan.
- **Flood Risk** The flood risk assessment demonstrates general compliance with London Plan policy 4A.12 and 4A.14.
- **Housing:** Although the proposals will make a sizeable and valuable addition to housing provision in south east London, in the absence of an affordable housing offer or viability assessment, the application does not comply with London Plan policy 3A.10. Further information is required in order to ensure compliance with London Plan policy 3A.3 and the Housing Design Guide given the likely densities proposed.
- **Open space/Children's play space:** there is an absence of any detail although the indication in the illustrative diagram would suggest that the proposal can make a valuable contribution to public space in this part of London.
- **Transport:** the transport aspects of the scheme do not currently comply with the full range of London Plan transport policies and in some aspects fall seriously short of what may be acceptable.
- **Retail impact:** the application does not fully address the likely impact and does not undertake the relevant tests satisfactorily.

- **Noise/Air Quality:** the detailed stage will need a strategy to deal with potential impact, particularly in relation to the wharf.

153 On balance, the application does not comply with the London Plan.

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

- **Safeguarded Wharf:** the phasing parameter should include a working wharf, other than the site's own construction compound as part of phase one of the development and the applicants should demonstrate the long term viable of the wharf areas furthest from the river by selecting a wharf operator to work with and by resolving how the jetty would function.
- **Urban design/Density/Quantum of development:** the scale parameters for development parcels B and D should be revised and/or development parcels B and D should be split to establish more acceptable scale thresholds adjacent to surrounding existing development. A quantified masterplan should be prepared to enable an assessment of the impact of the maximum quantity of development and determine if it is likely to be acceptable. Typical flat layouts should be set out for the development blocks and these should indicate how density and design quality are to be addressed. Further details on access and servicing arrangements are required and the inclusion of the second main access route in phase 2 should be re-considered.
- **Tall buildings/Strategic views:** more detailed designs and/or tighter parameters should be established for the three tall buildings and illustrations showing the effect on the View Management corridor should be submitted including indications of the likely design quality of the detailed proposals.
- **Inclusive Design:** further information is required as set out in paragraphs 54-57.
- **Climate change /Energy:** Further information is required in relation to exceeding 2010 Building Regulations, cooling, roof area for photovoltaic and carbon savings.
- **Housing:** The applicants should commit to an initial level of affordable housing, tenure mix and review mechanism.
- **Transport:** considerable further work is required to address the numerous TfL concerns listed in paragraphs 82-118
- **Retail impact:** further work is required to justify the level and impact of retail development on the site.
- **Noise/Air Quality:** an indication of how these issues will be managed is required.

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