Strategic planning application stage 1 referral


The proposal

Redevelopment of Dulwich Hamlet Football Club to include demolition of existing buildings and the erection of a new stadium, including playing pitch, clubhouse and stand, 155 residential dwellings in a series of buildings of up to 6 storeys, associated car parking and cycle parking, a multi-use game area (MUGA), enhancements to existing open space at Green Dale Fields and creation of a new public linear park.

The applicant

The applicant is Greendale Property Company Ltd and the agent is Bilfinger GVA. The architect is Farrells.

Strategic issues summary

**Principle of development:** This is a stadium-led redevelopment. The principle of the development of the new pitch on Metropolitan Open Land accords with London Plan policy. However, further information is required to justify the loss of protected open space on the rest of the site. Appropriate mechanisms should be secured to ensure the future stability of the Club and the community benefits of the scheme. (paras 18 to 38)

**Housing:** It is proposed that 16% of affordable housing is delivered on site. This is considered low. The Council’s independent financial viability report should be shared with GLA officers to determine if the application provides the maximum reasonable amount of affordable housing, taking into account the costs of reproviding the stadium. (paras 41 to 43)

Recommendation

That Southwark Council be advised that while the application is generally acceptable in strategic planning terms, the application does not comply with the London Plan for the reasons set out in paragraph 100 of this report; but that the possible remedies set out in the same paragraph could address these deficiencies.
Context

1 On 13 May 2016 the Mayor of London received documents from Southwark 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 23 June 2016 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. This report sets out information for the Mayor’s use in deciding what decision to make.

2 The application is referable under Categories 1A and 3D 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 3D: 1. Development—
(a) on land allocated as Green Belt or Metropolitan Open Land in the development plan, in proposals for such a plan, or in proposals for the alteration or replacement of such a plan; and
(b) which would involve the construction of a building with a floorspace of more than 1,000 square metres or a material change in the use of such a building.

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

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

Site description

5 The 4.7 hectare application site is located in East Dulwich on Abbotswood Road. It adjoins a Sainsbury’s supermarket (and car park) located north of the site, which itself is immediately south of Dog Kennel Hill Woods. The site is bounded to the east by a car park currently used as a hand car wash and by St Francis Park, an area of open space, to the south by residential properties of various types, and to the west by Green Dales Playing Fields.

6 The application site comprises the Dulwich Hamlet Football Club (DHFC) stadium (including car park) and Green Dale Artificial Pitch and Green Dale Playing Fields. The playing fields are designated areas of ‘Metropolitan Open Land’, whilst the pitch of Dulwich Hamlet Football Club is designated as ‘Other Open Space’ by the local planning authority. It is not accessible to the public and is only used by the football club. The DHFC stadium consists of a grassed pitch, a 3,000 person capacity stand and a club house. Part of the club house is used as a gym with other facilities, including function rooms available for public hire. There are also squash courts east of the club house, although these are not in use. Green Dale Playing Fields contains astroturf pitches in poor condition and overgrown tennis courts that were available for use by the community. St Francis Park, also considered as ‘Other Open Space’ is maintained by the Sainsbury’s supermarket and provides play space. It is also used as a pedestrian route from Dog Kennel Hill to the supermarket and the Football Club site.

7 In terms of transport, the A2216 Dog Kennel Hill is located 150 metres away via Edgar Kail Way and forms part of the Strategic Road Network (SRN). The nearest part of the Transport for London Road Network (TLRN) is the A202 Camberwell Church Street, 1.4 kilometres away.
East Dulwich station is located a 350 metres walk (330 metres when St Francis Park is open) from the closest part of the site. It has National Rail services between London Bridge, West Croydon and Beckenham Junction. The P13 bus service stops within the adjacent Sainsbury’s car park, and a further four services have stops on Dog Kennel Hill about 200 and 300 metres walk from the nearest part of the site. As St Francis Park is not open 24 hours, walking routes through the park cannot be relied upon for the Public Transport Access Level (PTAL) calculation, accordingly the site records a PTAL of 3.

View of the site looking north

**Details of the proposal**

8 Full planning permission is sought for the demolition of the existing buildings and the erection of a new stadium, including playing pitch, clubhouse and stand, 155 residential dwellings in a series of buildings of up to 6 storeys, associated car parking and cycle parking, multi-use game area (MUGA), enhancements to existing open space at Green Dale Fields, and creation of a new public linear park.

9 The development proposals include the relocation and redevelopment of the Dulwich Hamlet Football Club (DHFC) stadium to the west of the existing facilities. The new Third Generation (3G) all-weather artificial playing pitch will be largely located on the site of the Green Dale Artificial Pitch, which is designated as Metropolitan Open Land (MOL), and the main built infrastructure that consists of the 4,000 person capacity stand, clubhouse and gym will be built outside MOL on the western end of the existing stadium site to ensure minimal impact on the openness of the MOL.

10 The 155 residential units in the form of three 4-6 storey residential blocks with two 3 storey townhouses will be built on the site of the existing DHFC stadium, together with a linear park providing open space and servicing and a green link between St Francis Park and Green Dale Playing Fields. The new multi-use game area (MUGA) will be provided on the site of the current DHFC pitch, whilst Green Dale Playing Fields will undergo a number of improvements to enhance biodiversity and provide play equipment.

11 The application responds to the need to regenerate the currently under-functioning football facilities to provide new facilities for DHFC and the community. An application to register the DHFC as a community asset was made in August 2013 by the Dulwich Hamlet Supporters Trust but was unsuccessful due to the Club being in financial administration at the time.
12 It is anticipated that the new stadium and associated facilities will be constructed first. The existing stadium will then be demolished to make way for the proposed residential development.

![Existing and proposed site](image)

**Case history**

13 Of relevance to this scheme is application reference TP/2134-B granted in October 1990, which involved the redevelopment of the Kings College Sports Ground to provide a retail store, coffee shop, public open space and the construction of a new football stadium to replace the existing. The retail store referred to here is the Sainsbury’s store that is still in existence north of the site and the football stadium is the existing Dulwich Hamlet Football Club which was reprovided, as part of a planning agreement associated with the Sainsbury’s scheme. This redevelopment was intended to secure the football club’s long term future.

14 The proposal was discussed at pre-application stage with GLA officers on 15 January and 1 December 2015. GLA officers were generally supportive of the applicant’s proposals to reprovide the Dulwich Hamlet Football Club in more suitable facilities, and with greater community use and an improved access to an enhanced Green Dale Fields. However, the applicant was advised to continue to work closely with the Council to resolve issues relating to the loss of local open space and to secure the community benefits resulting from the scheme. Further information on the affordable housing offer and clarifications on design were also requested.

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

15 The relevant issues and corresponding policies are as follows:

- MOL  
  - London Plan;
- Playing Fields  
  - London Plan
- Social infrastructure  
  - London Plan; Social Infrastructure SPG
- Housing/Affordable housing  
  - London Plan; Housing SPG; Housing Strategy; Shaping Neighbourhoods: Providing for Children and Young People’s Play and Informal Recreation SPG
- Mix of uses  
  - London Plan
- Urban design  
  - London Plan; Character and Context SPG
• Access  London Plan; Accessible London SPG;
• Sustainable development  London Plan; Sustainable Design and Construction SPG; Mayor’s Climate Change Adaptation Strategy; Mayor’s Climate Change Mitigation and Energy Strategy; Mayor’s Water Strategy;
• Transport  London Plan; the Mayor’s Transport Strategy;
• Parking  London Plan; the Mayor’s Transport Strategy; Land for Industry and Transport SPG.


17 The following are also relevant material considerations:

- New Southwark Plan, Preferred option stage (2015)
- Southwark Development Viability SPD (2016)
- Southwark Open Space Strategy (2013)

Principle of development – development on Metropolitan Open Land (MOL) and protected open spaces

18 London Plan Policy 3.19 supports developments that increase or enhance the provision of sports and recreation facilities and states that where sports facility developments are proposed on existing open space, they will need to be considered carefully in light of policies on Green Belt and Protecting Open Space, as well as the borough’s own assessment of needs and opportunities for both sport facilities and for green multifunctional open space.

19 As mentioned in paragraph 6, the development proposals involve the erection of a new football pitch on Green Dale Fields which is designated as ‘Metropolitan Open Land’ in Southwark Council’s Adopted Policies Map. It also comprises the construction of ancillary facilities to the stadium and a residential development on the land currently occupied by Dulwich Hamlet stadium that is designated as ‘Other Open Space’ or ‘Outdoors Sports Facilities – private’ in Southwark’s Local Plan and Open Space Strategy.
Green space and planning status

Impact of development on Metropolitan Open Land (MOL)

20 London Plan Policy 7.17 gives Metropolitan Open Land the same level of protection as the Green Belt, which the National Planning Policy Framework (NPPF) protects from development through a strong policy presumption against inappropriate development. Paragraph 87 of the NPPF advises that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.

21 Paragraph 89 of the NPPF identifies the exceptions to inappropriate development in the Green Belt to include:

- provision of appropriate facilities for outdoor sport, outdoor recreation and for cemeteries, as long as it preserves the openness of the Green Belt and does not conflict with the purposes of including land within it;

22 It is accepted as the applicant maintains that the proposed reused of part of the MOL for the provision of a new pitch for outdoor sport and outdoor recreation would represent an exception to inappropriate development in line with the NPPF, as long as it preserves the openness of the MOL and does not conflict with the purposes of including land within it.

23 The applicant advises in its submission that the relocation of the football pitch and its realignment towards the development site would result in a gain of 980 sq.m of MOL, mitigating some of the loss of Greendale Playing Fields to the north and east of the pitch. It also advises that the new football pitch has been designed to preserve the openness of the MOL through the realignment of the pitch; the positioning of the main stand and clubhouse outside the MOL; and the provision of fewer and lower floodlighting than the existing provision to make the development less intrusive on the MOL. The visualisations provided by the applicant in its submission show that the new football pitch would maintain the open character of the MOL.

24 Based on the above, the principle of the development on MOL is accepted. However, the proposal should also meet national and London policy which requires the applicant to justify
the loss of open space and demonstrate the needs for the alternative sports and recreation provision as detailed below.

**Impact of development on protected open space**

25 Paragraph 74 of the NPPF states that existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:

- the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or
- the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.

26 London Plan Policy 7.18 states that the loss of protected open spaces must be resisted unless equivalent or better quality provision is made within the local catchment area. It also states that replacement of one type of open space with another is unacceptable unless an up-to-date needs assessment shows that this would be appropriate.

27 As mentioned in paragraph 19, the application site includes an area of protected open space currently occupied by the Dulwich Hamlet Football Club stadium. It is currently proposed that this area is replaced with enabling residential development and the new stadium’s ancillary facilities. The applicant has set out the following cases to justify the loss of open space:

- Financial difficulties of the Club and need for new facilities

28 The football club is in severe financial need and requires a radical restructuring in order to ensure long term financial stability. The Club is unable to support the level of ancillary facilities currently provided at the site, in particular the gym, squash courts and entertainment spaces. The new artificial pitch would ease the Club’s current financial situation as it has low management costs. It can also be used in all weather conditions. Furthermore, in order to enable progression to the National League, DHFC must provide a stadium that can accommodate at least 4,000 spectators, as well two coach parking bays for team use.

29 With regard to the future running of the Club, it is intended that the Club and stadium pitch and multi-use games area will be constructed and transferred from private ownership to permanent management and ownership through either a Community Benefits Society and/or via Southwark Council. The letting of the pitch will generate revenue and ensure on-going maintenance. The Football Club will receive free use of the facility and be able to generate income through gate receipts and bar takings on match days. The applicant has advised that the level of provision developed for the Club will be sufficient to support its continued growth and enable promotion into a higher division.

- Quantitative loss of open space mitigated by better provision

30 The application would result in an overall loss of local open space that would be mitigated via the provision of enhanced open space either on the same site or adjacent to the current provision. This enhanced provision is in the form of the new DHFC pitch, a MUGA, a publically accessible linear park and improvements to Green Dale Playing Fields, including landscaping and biodiversity enhancements. All provide greater access and community benefits than at present. The current facilities are generally in a poor state of repair.

31 The applicant advises that the proposal would result in a net reduction in ‘green’ area through the redevelopment of the stadium from 37,100 sq.m. currently across the site (including Green Dale Playing Fields) to 28,980 sq.m.
The applicant has carried out an assessment of local open space provision based on the Council’s open space strategy, which indicates that the value of the open space on the application site is low in terms of accessibility, and that there is sufficient alternative open space and outdoor sports facilities available in the proximity of the site.

- Delivery of homes to enable the redevelopment of the stadium

The residential development, to be positioned on the current DHFC pitch, will enable the redevelopment of the DHFC stadium, together with the provision of the MUGA, linear park and Green Dale improvements.

The application will result in the delivery of 155 residential homes that are needed by the Council. The applicant’s position is that the proposed location for the residential element of the scheme is suitable because it comprises partly previously developed land, and the loss of open space is offset by a significant improvement to the quality of open space re-provided.

**GLA officers’ assessment of the applicant’s case:**

As mentioned in paragraph 18 above London Plan Policy 3.19 supports developments that increase or enhance the provision of sports and recreation facilities. The policy also encourages the multi-use of public facilities for sport and recreational activity.

Whilst GLA officers support a solution that allows the re-provision of Dulwich Hamlet Football Club in more suitable facilities, GLA officers would want to be satisfied that the final arrangements in terms of ownership and management of the Club and facilities in the event of a transfer would be robustly secured through appropriate mechanisms to ensure the future financial stability of the Club, particularly as the previous Sainsbury’s related development failed to secure this outcome. The community benefits of the scheme should also be secured by the Council through a S106 planning agreement.

With regard to the loss of protected open space, as advised at pre-application stage, the applicant should provide a clear breakdown of the amounts and types of open space that are to be lost as a result of the overall development and confirm the loss of public open space. Whilst an exercise has been carried out by the applicant to assess the quality and quantity of local open space provision, GLA officers are not in a position to comment on this detailed assessment and the Council should confirm that it is satisfied with the applicant’s assessment and the re-provision of local open space in accordance with local and London Plan policy. The Council should also provide clarification on the future designation of the new linear park.

London Plan Policy 3.3 provides explicit strategic support for the provision of housing within London. The London Plan sets a target for Southwark Council to deliver a minimum annual housing target of 2,736 homes in the Plan period 2015-2025. The provision of homes will therefore contribute to the London Plan’s strategic objectives.

**Summary**

The principle of the development of the new pitch on MOL is accepted. However, further information should be provided by the applicant to justify the loss of the protected open space on the rest of the application site. The Council should also confirm it is satisfied with the re-provision of local open space in accordance with its own assessment of needs. Appropriate mechanisms should be secured to ensure the financial stability of the Club and the community benefits of the scheme.
Housing and affordable housing

40 The application proposes a total of 155 new dwellings, of which 25 units are affordable. The proposed housing schedule is summarised in table 1 below:

<table>
<thead>
<tr>
<th>Unit type</th>
<th>Market Housing</th>
<th>Affordable housing</th>
<th>No of units no</th>
<th>Total Mix (%)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Studio</td>
<td>7</td>
<td>0</td>
<td>7</td>
<td>5</td>
</tr>
<tr>
<td>1 bed</td>
<td>45</td>
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<td>56</td>
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<td>2 bed</td>
<td>39</td>
<td>7</td>
<td>46</td>
<td>30</td>
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<tr>
<td>3 bed</td>
<td>36</td>
<td>7</td>
<td>43</td>
<td>28</td>
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<td>3</td>
<td>0</td>
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<td>2</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>130</strong></td>
<td><strong>25</strong></td>
<td><strong>155</strong></td>
<td><strong>100%</strong></td>
</tr>
</tbody>
</table>

Table 1: Proposed accommodation schedule

Affordable housing

41 London Plan Policies 3.11 and 3.12 require the maximum reasonable amount of affordable housing to be delivered in all residential developments above ten units, taking into account; the need to encourage rather than restrain development; the housing needs in particular locations; mixed and balanced communities, and; the specific circumstances of individual sites. London Plan Policy 3.11 also suggests that 60% of new housing should be for social/affordable renting and 40% for intermediate housing products. Southwark Council’s preferred tenure split is 70% affordable/social rented and 30% intermediate and its housing policy requires that at least 35% of all new housing is delivered as affordable housing in Urban and Suburban Density Zones.

42 The application includes 25 affordable housing units to be delivered on site, which equate to 16% of affordable housing by unit across the scheme. The affordable housing provision is split between 70% affordable/social rented and 30% intermediate. This is in line with Southwark’s preferred tenure split.

43 The applicant has submitted a financial viability report in support of its proposals which is being independently assessed by the Council. It is therefore not possible at this stage to comment on the applicant’s affordable housing offer and determine whether the application provides the maximum reasonable amount of affordable housing in accordance with London Plan Policy 3.12 and the Council’s affordable housing policy. At this point, the offer appears very low, given the current uses of the site and values in the area. It is understood that the cost of the stadium (approximately £5m) has been included in the appraisal but that there is no income apportioned to it as the facility will be gifted to a specialist charitable leisure operator such as GLL or to Southwark Council, and it is accepted that this does impact upon viability. The applicant has asserted that if it did not have to meet the costs of reproviding the stadium, it could have achieved 35% of affordable housing. This needs to be verified. The results of the independent report will need to be shared with GLA officers before the application is referred back to the Mayor at Stage 2. The Council should also confirm that any affordable offer, tenures and rent levels meet local housing needs. Subject to the findings of the Council’s independent review, consideration should also be given to a contingent obligation or review mechanism given the nature of the scheme, costs, potential for phasing and long build out time.
Housing Choice

44 London Plan Policy 3.8, together with the Mayor’s Housing SPG, and the Housing Strategy, seek to promote housing choice and a balanced mix of unit sizes in new developments. London Plan Policy 3.11 establishes that strategic priority be afforded to the provision of affordable family homes. Southwark Core Strategy Policy 7 requires that developments in this location deliver at least 60% of 2 or more bedroom units and at least of 30 % of 3, 4 and 5 bedroom dwellings. The number of studio flats must not exceed 5% of the total number of dwelling units within a development.

45 As set out in table 1, the proposed residential units would comprise studios, one, two, three and four bedroom dwellings in apartment blocks or townhouses. Whilst the provision of family homes (30% of total units) is welcomed and complies with local policy, as the London Plan gives priority to affordable family homes, the applicant should seek to maximise the provision of family sized affordable homes in line with policy. The Council should also confirm that the proposed mix meets local housing needs.

46 The application has advised in its submitted documents that homes will be designed to Lifetime Homes standards and that 16 wheelchair accessible units, equivalent to 10%, will be delivered on site. In order to comply with London Plan Policy 3.8, a condition should be set by the Council to ensure that 90% of new housing will meet Building Regulation requirements M4(2) ‘accessible and adaptable dwellings’ and 10% of homes will meet Building Regulation requirement M4(3) ‘wheelchair user dwellings’.

Density

47 London Plan Policy 3.4 requires development to optimise housing output for different locations taking into account local context and character, design principles set out in London Plan Chapter 7 and public transport capacity. Table 3.2 provides the density matrix in support of this policy. Based on the characteristics of the location set out in the site description section of this report, the site can be regarded as having an ‘urban’ setting with PTAL rating of 3. For this setting, the matrix suggests a residential density in the region of 200-450 habitable rooms per hectare and 45-170 units per hectare. Southwark Council in its core strategy expects a density of 200 to 350 habitable rooms per hectare on the site.

48 Based on the calculation outlined in the Mayor’s Housing SPG, the proposed development generates a density of 352 habitable rooms per hectare, which is within the suggested density range for a site in this location. The proposed density is therefore acceptable.

Children’s play space

49 London Plan Policy 3.6 seeks to ensure that development proposals include suitable provision for play and recreation. The Mayor’s ‘Shaping Neighbourhoods: Play and Recreation’ SPG requires proposals that include housing to provide 10 sq.m. of playspace per child, with dedicated play space for children under the age of 5 on site as a priority.

50 The applicant has advised that based on the residential units proposed, the required amount of play space is 383.4 sq.m but that 475 sq.m. of dedicated play space will be delivered across the development.

51 The provision of doorstep play for children under 5 (175 sq.m.) in the residential courtyards is welcomed, so is the dedicated play provision for the 5 to 11 years old (300 sq.m.) in
the linear park. It is accepted that given the proximity of Green Dale Fields and the proposed MUGA, no dedicated provision for children over 12 is required on site. The use of creative natural play elements is also supported. Detailed plans of the proposed play spaces should be secured by condition by the Council.

**Urban design**

52 Good design is central to the objectives of the London Plan and is specifically promoted by the policies contained within chapter seven which address both general design principles and specific design issues. The design approach taken by the applicant has been discussed extensively at pre-planning application stage and the applicant has worked to address the majority of design issues raised at that stage. As a result the scheme demonstrates high standard of place-making, residential quality and architecture.

53 As dealt with in the principle of development section of this report, the main built infrastructure have been sensitively positioned to ensure that the development is as unobtrusive on the landscape as is possible, whilst also safeguarding key views across the site. The main stand and clubhouse are built outside of MOL on the site of the existing stadium and the proposed stadium is positioned in the lower lying segment of the site to mitigate impact on the MOL. This is welcomed.

54 The layout of blocks has been developed to provide a clear distinction between public and private realm, with podium car parking accessed towards the north eastern corner of the site. This allows the proposed green link/linear park, south of the site, which is itself a very positive element of the scheme, to be prioritised for pedestrians and residential amenity. The inclusion of front door access to all ground floor units and townhouses between the finger blocks at the park front age are also recognised as bringing positive benefits to the scheme in terms of optimising activity and passive surveillance onto the public realm and providing future residents with a sense of ownership.

55 As advised at pre-application stage, the applicant has provided further information on the shared space strategy for the access road towards the football club, north of the linear park and has clarified that the shared surface street will be a controlled entrance for pedestrian and cyclist use to limit vehicular movement. It will also form the main arrivals sequence for football fans on match days. The delineation of vehicle movements from pedestrian routes is welcomed and ensures it is safe and inclusive access for all. The ‘football club community square’ and proposed surface materials will provide a unified space for residents and the users of the community facilities when not in use for parking on match days. This is welcomed, however, the applicant should take note of the comments raised by Transport for London in the transport section of this report on the space allocated for coaches. A plan should be provided to clarify the routes that will be taken by coaches on match days and the space coaches will have to turn around.

56 The finger block typology of residential blocks is supported and the architect has worked to provide efficient depths of floorplates, with units orientated to provide potential for good levels of daylight/sunlight penetration as confirmed by the ADF studies submitted by the applicant. The applicant has also confirmed that all units will be designed to achieve a minimum of 2,600mm floor to ceiling heights.

57 The applicant has advised that the residential units will be predominantly dual aspects, which is welcomed. The proposed units’ depth, orientation, shading and ventilation will also ensure that the single aspect units due do not overheat. Communal corridors will also be naturally lit and ventilated from the courtyards.
58 The applicant has confirmed that all units will meet or exceed the Mayor’s minimum space standards and the private amenity space requirements with private balcony, terrace or private gardens provided for every unit. Two courtyards and a large communal terrace are also accessible by all residents. This is in line with the Mayor’s design standards.

59 The form and massing strategy is broadly supported, raising no specific strategic issues and it is noted that the massing has been reconfigured to separate the finger blocks into distinctive massing elements and that the breaks between the apartment blocks and townhouses allow views through to the residential courtyards. This is a welcome design approach and will help to provide architectural articulation and avoid continuous walls of development. Overall the design of the housing has been well considered and is of a high standard.

**Inclusive Access**

60 The aim of London Plan Policy 7.2 is to ensure that proposals achieve the highest standards of accessibility and inclusion. 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.

61 The applicant has provided a very detailed accessibility statement which is commended. The document demonstrates that all facilities, including the football pitch, the spectator accommodation, the club house, the MUGA facility have been designed with inclusive access in mind in line with London Plan Policy 7.2.

62 The applicant has also demonstrated that the residential units would meet the Lifetime Homes requirements. Whilst it is recognised that the Lifetime Homes requirements are more onerous than the latest Building Regulations requirements with regards to accessibility, to ensure compliance with London Plan Policy 3.8, a condition should be secured by the Council to ensure that the proposals meet the M4(3) ‘wheelchair user dwellings’ and M4(2) ‘accessible and adaptable dwellings’ requirements. The applicant has identified the location of the wheelchair units on plan and has advised that the 10% of homes that would be wheelchair user dwellings would be spread proportionally across the unit and tenure mix. This is welcomed and will give disabled and older people similar choices to non-disabled people. The plans should be secured by condition. The accessibility statement notes that of the 62 residential parking bays, 16 parking bays are designed as wheelchair accessible bays. This is also welcomed, although as set out in the transport section of this report, provision for high vehicles and visitors that are Blue Badge holders should be clarified.

63 The applicant should ensure that the proposed linear park incorporates the highest standards of accessible and inclusive design at detailed design stage. Seating through the scheme and in particular in the linear park should incorporate back rests and arm rests to ensure that as many people as possible can use the space.

**Climate change mitigation**

**Energy efficiency standards**

64 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 high efficacy lighting. The applicant is not proposing cooling
on any of the dwellings. The applicant should provide evidence of how Policy 5.9 has been addressed to avoid overheating and minimise cooling demand.

65 A domestic overheating checklist is included in the GLA’s energy guidance which should be completed and used to identify potential overheating risk and passive responses early in the design process.

66 The applicant should set out the reduction in regulated CO2 emissions in tonnes per annum and percentage terms that will be achieved through this first part of the energy hierarchy.

District heating

67 The applicant has carried out an investigation and there are no existing or planned district heating networks within the vicinity of the proposed development. The applicant should provide a commitment to ensuring that the development is designed to allow future connection to a district heating network should one become available.

68 The applicant is proposing to install a site heat network. However, the applicant should confirm that all apartments and non-domestic building uses will be connected to the site heat network. A drawing showing the route of the heat network linking all buildings on the site should be provided.

69 The applicant should confirm that the site heat network will be supplied from a single energy centre. Information on the floor area and location of the energy centre should be provided.

Combined Heat and Power

70 The applicant is proposing to install a 110 kWe gas fired CHP unit as the lead heat source for the site heat network. The CHP is sized to provide the domestic hot water load, as well as a proportion of the space heating. The applicant should provide a sales strategy for the electricity generated by the CHP.

71 The applicant should set out the reduction in regulated CO2 emissions in tonnes per annum and percentage terms that will be achieved through this second part of the energy hierarchy.

Renewable energy technologies

72 The applicant has investigated the feasibility of a range of renewable energy technologies but is not proposing to install any renewable energy technology for the development.

Summary

73 The applicant should provide information on the residual CO2 emissions after each stage of the energy hierarchy and the CO2 emission reductions at each stage of the energy hierarchy as set out in ‘Energy Planning Greater London Authority guidance on preparing energy assessments (March 2016)’ published on the GLA website. It should also provide an overall value for the reduction in tonnes of CO2 per year (and percentage terms) in regulated emissions compared to a 2013 Building Regulations compliant development that is expected so that it can be
determined if the carbon dioxide savings exceed the target set within Policy 5.2 of the London Plan.

**Climate change adaptation**

74 London Plan Policy 5.12 seeks to prevent flood risks and Policy 5.13 raises the importance of utilising sustainable urban drainage systems.

75 A Flood Risk Assessment (FRA) has been completed by WSP Parsons Brinkerhoff. The FRA confirms that the site is located within flood zone 1 with some relatively minor areas of surface water flood risk. Therefore, the proposed development is acceptable in terms of London Plan Policy 5.12.

76 Although the site itself has limited surface water flood risk, areas close to the site, including to the immediate south are at significant surface water risk, and surface water from this site will contribute to that risk, therefore the application of London Plan Policy 5.13 will be an important consideration for these development proposals.

77 The FRA states that the development will be designed to reduce surface water run-off from the site up to the 1 in 100 year storm by at least 50%. The FRA goes on to state that this requirement will be met without the inclusion of the extensive green roofs into the calculations, and that therefore the actual reduction will be in excess of 50%.

78 Given the nature and location of the proposals this approach is considered to be the minimum acceptable approach to London Plan Policy 5.13. The detailed drainage design should be agreed with the Council and secured via an appropriate planning condition. The detailed design should also consider the use of the Method 2 attenuation tank design recommended by Susdrain (Susdrain Factsheet “Designing attenuation storage for redeveloped sites” by Anthony McCloy).

**Transport**

**Site Access**

79 Vehicle, pedestrian and cycle access to the residential part of the development will be via Abbotswood Road, with a route for pedestrians and cyclists also provided within the new linear park along the southern boundary of the site. This link would replace an existing one connecting a pedestrian cycle only through route via St Francis Road and the Greendale, part of the London Cycle Network. In addition pedestrians can walk between the site and Dog Kennel Hill via St Francis Park when it is open.

80 A separate access road to the stadium also off Abbotswood Road will be provided. Its use will be limited to essential users, football club coaches and pick up/drop off for mobility impaired spectators. This is welcomed, and a management plan for this road should be secured by condition.

**Car and Cycle Parking**

81 At present, there is a football club car park adjacent to the ground with 46 spaces. In the proposed development, this will be replaced by four blue badge spaces shared between the stadium, gym and all weather pitches. This is welcomed by TfL in order to encourage the use of walking, cycling and public transport to attend matches and use the other sports facilities.
The applicant is willing to provide an appropriate contribution towards a consultation exercise should the Council wish to evaluate the potential implementation of a Controlled Parking Zone (CPZ) on the surrounding roads, which is welcomed by TfL. A contribution should also be secured towards its implementation in the event this is required.

For the 155 residential units, 62 car parking spaces will be provided, a ratio of 0.4 spaces per unit. This seems to strike an appropriate balance between preventing significant parking overspill on surrounding roads and encouraging the use of sustainable modes of transport. Whilst disabled parking provision accords with London Plan standards the applicant should also clarify provision for high vehicles and visitors who are Blue Badge holders given all spaces are within a covered and gated car park.

The development proposes electric vehicle charging points (EVCP) in accordance with current London Plan (2015) requirements.

The transport assessment states that 316 cycle parking spaces will be provided, of which 278 will be for the residential units and 38 for the community facility and MUGA. Whilst this provision meets in numerical terms London Plan standards, no details have been provided to confirm the capacity for residents’ bikes. Furthermore this provision would all be in bike stores off the car park and thus are not a convenient location; the location of the four short stay residential spaces should also be confirmed.

The short term cycle parking provision for the stadium is considered to be acceptable, being in line with provision at other recent London football stadia. All short term cycle parking for the stadium, leisure use and residential visitors will be provided within a communal facility convenient for those going to the MUGA and stadium but not the residential part of the scheme. These issues should be addressed prior to Stage 2.

Although two coach bays are proposed, the location of the bays has not been identified on plan and it is not clear whether there is sufficient space for the coaches to turn around on site.

**Trip Generation**

Information as to why only a limited attendance at matches has been assessed rather than the full capacity of the stadium has not been provided. Transport assessments should provide a worst case assessment of the potential impact in order to provide a robust analysis and the assessment that has undertaken does not do this. Despite previous spectator attendances being recorded as approximately 30% of the total capacity, there is no reason why this will not increase in the future. TfL require a further assessment of a capacity event at the stadium in order to appropriately review the submission and currently TfL cannot form a view of the impact of the development due to insufficient evidence provided.

TfL disagrees with the applicant and the Council regarding the use of LTDS data for determining the modal split of proposed developments. The transport consultant is already aware of TfL’s reasons for not accepting the use of this data. LTDS is used for larger, broad-brush approximating and is not appropriate for determining the mode split at a sub-borough level by time of day, due to the small sample size. LTDS is most useful when looking at travel behaviour at a greater geographical level, rather than at specific sites. The use of borough-wide mode shares from LTDS means the outcomes are not specifically relevant to this development. There have been other recent applications where LTDS has been used give modal share figures and in these instances TfL has considered them inappropriate due to the reasons given above.
TfL request that the applicant reviews the methodology for determining the residential modal split.

**Walking and Cycling**

90 Although a PERS audit has not been carried out, the scheme would appear to address the main existing issue for pedestrians in proposing a new footway to fill the existing gap along Abbotswood Road on the western boundary of the site, which is welcomed. The stadium access road, with vehicle access on non-match days controlled by ‘rising bollards’ will be part of the replacement pedestrian and cycle link between Abbotswood Road and Green Dale. The application scheme completes this link with a 3 metre wide shared pedestrian cycle surface to the existing route between the playing fields which are to remain. The replacement of this route is welcomed by TfL.

91 The applicant has agreed to contribute to improved wayfinding in the local area through provision of Legible London signage; an appropriate sum should therefore be secured in the section 106 agreement. It is considered that a contribution towards improvements to Green Dale as a means of better integrating the development into the surrounding area and encouraging walking and cycling would also be justified and should be similarly secured.

**Travel Plans**

92 Both a stadium management plan and a framework travel plan (FTP) have been submitted with the application and should be secured by condition on any consent. The former should cover management of the car parking but is otherwise considered acceptable.

93 The FTP only directly covers the stadium, despite the proposed residential development being of a scale where a strategic level FTP is normally appropriate. A condition should be imposed on any consent requiring travel plans for each element of the development together with a section 106 obligation to secure the implementation, management and monitoring of them. TfL note the applicant’s willingness to revisit the targets in the FTP, which are currently unambitious.

**Construction**

94 A construction logistics plan should also be secured by condition on any planning approval. In particular, this will need to ensure that construction traffic is managed appropriately without impacting on existing residents and club supporters together with vehicles including buses going to the adjoining Sainsbury’s as well as minimising the transport impact of the construction phase.

**Planning Obligations**

95 In accordance with London Plan policy 8.3 the Mayor commenced CIL charging for developments on 1st April 2012. Within Southwark the charge is £35 per square metre.

**Local planning authority’s position**

96 Council officers are still reviewing all of the submitted documents and assessing consultation responses. The Council has been involved in extensive pre-application discussions with the applicant and at this early stage, officers have concerns with regard to the design, height, bulk and massing of the residential blocks. The level of proposed affordable housing is also being carefully assessed as is the future stability and maintenance of the football
club. Furthermore, there remains concerns with regard to the impact on the MOL and the loss of open space.

Legal considerations

97 Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged, or direct the Council under Article 6 of the Order to refuse the application, or issue a direction under Article 7 of the Order that he is to act as the local planning authority for the purpose of determining the application and any connected application.

98 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

99 There are no financial considerations at this stage.

Conclusion

100 London Plan policies on the principle of development, MOL and protected open space, housing, urban design and inclusive design, climate change and transport are relevant to this application. Whilst the application is generally supported in principle, however there remains some outstanding strategic planning concerns. Further discussion is therefore required regarding the following issues:

- **Principle of development:** The principle of the development of the new pitch on MOL is accepted. However, further information should be provided by the applicant to justify the loss of the protected open space. The Council should also confirm it is satisfied with the reprovision of local open space in accordance with its own assessment of needs. Appropriate mechanisms should be secured to ensure the financial stability of the Club and the community benefits of the scheme.

- **Housing and affordable housing:** It is not possible at this stage to determine whether the proposal provides the maximum reasonable amount of affordable housing in accordance with London Plan Policy 3.12 but the offer appears very low. The Council’s independent assessment of the viability appraisal should be shared with GLA officers prior to the application being referred back to the Mayor. The Council should also confirm that the proposed tenure mix and rent levels meet an identified need in the borough. The provision of family sized affordable homes should be maximised. A condition should secure the M4(2) and M4(3) requirements.

- **Urban Design:** The design approach and form and massing strategy is broadly supported. The scheme demonstrated a high standard of place making, residential quality and architecture.
• **Climate change:** Further information (detailed in the body of the report) is required before the proposals can be considered acceptable and the carbon dioxide savings verified. This should be submitted for assessment prior to the application being referred back to the Mayor. The approach to flood risk management is acceptable and in line with London Plan Policy 5.12. The approach to sustainable drainage is in line with London Plan Policy 5.13 subject to the details of the drainage regime being agreed via a planning condition.

• **Transport:** Further information (outlined in the body of this report) regarding transport matters are required for assessment prior to the application being referred back to the Mayor.

For further information, contact GLA Planning Unit (Development & Projects Team):

**Stewart Murray, Assistant Director – Planning**
020 7983 4271 email stewart.murray@london.gov.uk

**Colin Wilson, Senior Manager – Development & Projects**
020 7983 4783 email colin.wilson@london.gov.uk

**Justin Carr, Strategic Planning Manager (Development Decisions)**
020 7983 4895 email justin.carr@london.gov.uk

**Hermine Sanson, Senior Strategic Planner**
020 7983 4290 email hermine.sanson@london.gov.uk