**Strategic planning application stage 1 referral**


**The proposal**

Comprehensive redevelopment to provide two buildings of 16 and 30-storeys to accommodate a residential-led mixed use scheme of 242 units, with 899 sq.m. of commercial uses at ground floor, and a new public square.

**The applicant**

The applicant is **Threadneedle Pensions Ltd.**, and the architect is **JTP**.

**Strategic issues summary**

**Principle of development:** The proposed residential-led mixed use redevelopment of this Opportunity Area site is supported and the scheme has significant potential to support regeneration and place making objectives for Lewisham town centre (paragraphs 14 to 17).

**Housing:** The applicant originally proposed 4% affordable housing; this has been increased to 20% through a robust viability review process led jointly by GLA and Council officers. Whilst a 20% affordable housing offer would typically be wholly unacceptable for a standalone high-density residential development, noting the exceptional transport safeguarding requirements and futureproofing costs unique to this site; and, the baseline viability position, the offer is an acceptable minimum in this case; subject to appropriate upward review mechanisms. Notwithstanding this GLA officers seek further discussion with Lewisham Council and the applicant to test a range of alternative tenure scenarios in order to establish whether a higher percentage provision of affordable housing could be delivered (paragraphs 18 to 27).

**Urban design:** The architectural approach to this high density town centre scheme is supported (paragraphs 28 to 33).

**Air quality and noise:** Suitable mitigation of localised air quality and noise issues must be secured as part of any planning permission (paragraphs 37 to 39).

**Transport:** The applicant must address issues with respect to: Bakerloo Line extension, transport impact, car and cycle parking, construction logistics, servicing, Agent of Change, DLR infrastructure, travel planning and highway works (paragraphs 40 to 53).

**Recommendation**

That Lewisham Council be advised that the application does not comply with the London Plan and draft London Plan for the reasons set out in paragraph 57 of this report.
Context

On 18 August 2017 the Mayor of London received documents from Lewisham Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008 the Mayor must provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor’s use in deciding what decision to make.

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

- 1A 1. “Development which comprises or includes the provision of more than 150 houses, flats, or houses and flats”; and,
- 1C 1.(c) “Development which comprises or includes the erection of a building of… more than 30 metres high and is outside the City of London”.

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

4 The environmental information for the purposes of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011, as amended, 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

The site is located in the heart of Lewisham town centre, within the Lewisham, Catford and New Cross Opportunity Area. The site is 0.26 hectares in area and is located within 100 metres of Lewisham DLR station (to the west). The plot itself is occupied by a large format retail unit and surface car parking/servicing areas, and is bound by railway embankment to the east; Loampit Vale (A20) to the south (a red route forming part of the Transport for London Road Network); Thurston Road to the west; and, Thurston Road bus stand to the north. The bus stand site has been identified as the preferred location of a new Lewisham Station as part of the proposed Bakerloo Line Extension project. In addition, this site is subject to safeguarding requirements associated with future Bakerloo Line underground tunnels which are planned to travel beneath this site.

The immediate context to the site is undergoing a process of significant growth and change, with various high density mixed use schemes delivered, under construction and in the planning pipeline. Such schemes include Lewisham Gateway, nearing completion, to the south (GLA reference: PDU/2051/02 - 788 units 20% affordable, leisure centre and 1,671 sq.m. commercial space up to 24-storeys) and Lewisham Retail Park, live planning application, to the west (GLA reference: D&P/3775/02 - 536 units 20% affordable and 4,343 sq.m. commercial space, up to 24-storeys).

The site benefits from excellent access to public transport, with Lewisham DLR station providing frequent services to Bank, Canary Wharf and Stratford. The site is also less than 200 metres from Lewisham Network Rail station - which provides frequent connections to the City from Bromley, Bexley and Kent. Furthermore, 21 bus routes operate within a 500 metre radius of the site, serving destinations in central, south-east and north-east London. Overall, the site
registers a public transport accessibility level of six(b) on a scale of zero to six(b), where six(b) denotes the most accessible locations in the capital.

**Details of the proposal**

9  Comprehensive redevelopment to provide two buildings of 16 and 30-storeys to accommodate a residential-led mixed use scheme of 242 units with 899 sq.m. of commercial uses at ground floor and a new public space. The proposed commercial space has been designed flexibly to allow for the potential to convert a ground floor retail unit into a new entrance for Lewisham Station.

**Case history**

10  Joint GLA and Lewisham Council pre-application meetings were held to discuss this scheme on 15 October 2015 and 7 March 2017. In summary, the most recent advice issued by GLA officers stated that the proposed housing-led mixed use redevelopment of this town centre site is strongly supported in strategic planning terms, and the design evolution of the scheme since the initial meeting is welcome. In particular, it was noted that the scheme presents potential to deliver a valuable new public space for Lewisham town centre. The applicant was, nevertheless, advised to ensure that the future planning submission addresses issues raised with respect to: housing and affordable housing; urban design; sustainable development; and, transport.

11  In parallel with pre-application discussions on this scheme, GLA and TfL officers have been working with Lewisham Council and Network Rail on a feasibility study for Lewisham station and transport interchange (the “Lewisham Interchange Study”). Whilst currently unpublished (and therefore of limited weight in planning terms), the study is intended to explore the feasibility of introducing a new interchange between the Bakerloo Line extension, DLR and National Rail services at Lewisham, and to develop a range of enhancement options intended to address existing capacity issues. Essentially the study seeks to establish the core requirements necessary to deliver an interchange, as well as various strategic design principles for how the interchange and associated public realm could help to support wider neighbourhood connections more generally.

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

12  For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is the 2011 Lewisham Core Strategy; 2014 Lewisham Town Centre Local Plan; 2014 Lewisham Development Management Local Plan; 2015 Lewisham Policies Map; and the 2016 London Plan (Consolidated with Alterations since 2011).

13  The following are relevant material considerations:

- The National Planning Policy Framework and National Planning Practice Guidance;
- Lewisham Planning Obligations SPD 2015;
- Draft Lewisham Local Plan 2015 (Regulation 18 consultation stage); and,
- Draft London Plan (consultation draft December 2017).

- Opportunity Area  
  London Plan;
- Housing  
  London Plan; Housing SPG; Affordable Housing and Viability SPG; Housing Strategy; Shaping Neighbourhoods: Play and Informal Recreation SPG; Shaping Neighbourhoods: Character and Context SPG;
- Affordable housing: London Plan; Affordable Housing and Viability SPG; Housing SPG; Housing Strategy;
- Density: London Plan; Housing SPG;
- Urban design: London Plan; Shaping Neighbourhoods: Character and Context SPG; Housing SPG; Shaping Neighbourhoods: Play and Informal Recreation SPG;
- Inclusive access: London Plan; Accessible London: achieving an inclusive environment 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; Mayor’s Ambient Noise Strategy;
- Air quality: London Plan;
- Ambient noise: London Plan;
- Transport and parking: London Plan; the draft Mayor’s Transport Strategy;
- Crossrail: London Plan; and, Mayoral Community Infrastructure Levy.

**Principle of development**

14 London Plan Policy 2.13 and Policy SD1 of the draft London Plan identify the Lewisham, Catford and New Cross Opportunity Area as having capacity to support between 8,000 and 13,500 new homes and 4,000 to 6,000 jobs, and acknowledge that strategically important regeneration is already well underway in central Lewisham. Lewisham itself is recognised by London Plan Policy 2.15 as a ‘major’ town centre with high growth potential. Policy SD6 of the draft London Plan maintains this classification, but also acknowledges the potential of this centre to achieve ‘metropolitan’ status over the new plan period.

15 The Lewisham Town Centre Local Plan is the local policy vehicle for shaping the continued growth of this area and specifically identifies this site (330 metres from the ‘core shopping area’ of the town centre) as suitable for mixed use development. The associated site allocation generally seeks to support town centre vitality and viability through the introduction of a greater mix of ground floor uses (including cafes, bars and other evening economy uses) which have potential to support additional secondary shopping frontage for the town centre.

16 Having regard to the policy context set out above, and the consideration of the proposed mix of uses below, the residential-led mixed use redevelopment of this Opportunity Area site is strongly supported in strategic planning terms.

**Mix of uses**

17 In terms of non-residential uses, the scheme proposes a shift from big box retail to a finer grain commercial offer (totalling 899 sq.m.). This allows flexibility to accommodate a broader mix of small retail and cafe type uses, as well as futureproofed provision for a new entrance to Lewisham station (refer to paragraph 30). Whilst it is acknowledged that this would result in a modest net reduction in retail space at this particular site (~188 sq.m.), officers are satisfied that this would not undermine the vitality or strategic function of the town centre. Moreover, GLA officers are of the view that the proposed offer of the scheme (which includes a valuable new public space and potential to deliver a new Bakerloo Line extension ticket hall and station entrance) has significant potential to support a broad range of regeneration and place making objectives for Lewisham town centre in line with the Local Plan. Accordingly, the proposed mix of uses is supported in strategic planning terms.
Housing

The London Plan allocates the London Borough of Lewisham a target to supply a minimum of 1,385 new homes a year and the draft London Plan sets out an increased target of 2,117 new homes a year. The Borough’s key growth areas are crucial to delivering this growth, and the Lewisham Town Centre Local Plan identifies this area as having potential to accommodate 3,400 new homes by 2021. Having regard to this policy context the proposed provision of 242 new homes (11% of the draft London Plan annual housing target for the London Borough of Lewisham) is strongly supported in accordance with London Plan Policy 3.3 and Policy H1 of the draft London Plan. Table 1 below sets out the proposed residential schedule for the development.

<table>
<thead>
<tr>
<th>Unit type</th>
<th>London Affordable Rent</th>
<th>Intermediate</th>
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<td>15</td>
</tr>
<tr>
<td>Total</td>
<td>24</td>
<td>25</td>
<td>193</td>
<td>242</td>
</tr>
</tbody>
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Table 1: Proposed residential schedule.

Affordable housing and scheme viability

London Plan Policy 3.12 seeks the maximum reasonable amount of affordable housing and the Mayor’s Affordable Housing and Viability SPG establishes a minimum pan-London threshold level of 35% affordable housing (before subsidy) as part of the Mayor’s strategic target of 50% affordable housing to be delivered through the planning system. This approach is carried forward by policies H5 and H6 of the draft London Plan.

The application was submitted with an affordable housing offer of 4%. Following rigorous independent review of the applicant’s submitted viability assessment it was identified that the scheme is subject to £3.7 million of exceptional costs. These exceptional costs include: the need for complex foundation works to safeguard delivery of new London Underground tunnels for the Bakerloo Line Extension, as well as the futureproofed provision of a new station entrance. The exceptional costs have been independently verified as presenting a genuine constraint on overall scheme viability, equivalent in financial terms to an affordable housing contribution of 10%. Notwithstanding this, through joint scrutiny by the GLA and the Council, various adjustments have been made to the applicant’s viability appraisal with respect to: benchmark land value, build costs, proposed residential values, ground rents and professional fees. Further to this, the maximum level of affordable housing has been independently verified as 14%.

However, acknowledging the Mayor’s priority to increase the delivery of affordable housing through the planning system; the place-changing regenerative nature of this scheme and its potential to gain value over time; and, the levels of affordable housing recently secured in other strategic schemes nearby (discussed in paragraph 7), GLA officers worked with Lewisham Council and the applicant in order to secure a commitment to an enhanced growth-based offer of 20% affordable housing.

The proposed tenure split is 50% London Affordable Rent and 50% intermediate (London Affordable Rent levels are set out within Table 2 below, intermediate products will have eligibility capped at incomes of £90,000 per year). The tenure split accords with the parameters of Policy H7 of the draft London Plan and the Mayor’s Affordable Housing and Viability SPG on the basis that it secures at least 30% low cost rent and at least 30% intermediate. Further to this GLA officers seek further discussion with Lewisham Council and the applicant to sensitivity test a
range of alternative tenure scenarios for the remaining 40%; in order to explore whether, having regard to the Local Plan and findings of the independent viability review, a higher percentage provision of affordable housing could be delivered in this case.

<table>
<thead>
<tr>
<th>London Affordable Rent</th>
</tr>
</thead>
<tbody>
<tr>
<td>One-bedroom</td>
</tr>
<tr>
<td>Two-bedroom</td>
</tr>
<tr>
<td>Three-bedroom</td>
</tr>
</tbody>
</table>

Table 2: Proposed London Affordable Rent affordability levels.

Affordable housing and scheme viability – conclusion

Whilst, in the context of the policy position set out in paragraph 19 above, a 20% affordable housing offer would typically be considered to be wholly unacceptable for a standalone high-density residential scheme, in this case, noting the exceptional transport safeguarding and futureproofing costs; and, having regard to the conclusions of the robust viability review, GLA officers are satisfied that the offer is an acceptable minimum for this scheme subject to the viability review mechanisms discussed below being secured. Notwithstanding this, as discussed in paragraph 22, GLA officers seek further discussion with Lewisham Council and the applicant to test a range of alternative tenure scenarios in order to establish whether a higher percentage provision of affordable housing could be delivered in this case. Moreover, in the interests of transparency, the Council should note that draft London Plan Policy H6 and the Mayor’s Affordable Housing and Viability SPG strongly encourage local planning authorities (LPAs) to publish any submitted financial viability assessment, and any associated independent viability review. The Mayor’s SPG makes clear that, where this information is not published by an LPA, the Mayor reserves the right to publish it himself.

Viability review mechanisms

In recognition that the 20% level of affordable housing is an absolute minimum, and in accordance with the ‘Viability Tested Route’ prescribed by Policy H6 of the draft London Plan and the Mayor’s Affordable Housing and Viability SPG, the Section 106 agreement must include an early viability review mechanism (to be triggered if an agreed level of progress on implementation has not been made within two years of any planning permission) and a late review mechanism (following occupation of 75% of units). The former is principally intended to incentivise swift housing delivery, and the latter is designed to upwardly reappraise the maximum level of affordable housing based on actual costs and values.

Residential standards, play space and density

All dwellings will meet or exceed the minimum space standards established by London Plan Policy 3.5 (Table 3.3) and Policy D4 of the draft London Plan. The proposed residential layouts are well resolved, with a high proportion of dual aspect units, and dwellings aligned to avoid direct overlooking between blocks. The scheme also responds positively to the other residential design quality benchmarks of the Housing SPG and includes the required 10% provision of wheelchair accessible/adaptable units. This is supported and accordance with Building Regulations standards M4(2) and M4(3) should be secured by planning condition in line with London Plan Policy 3.8 and Policy D5 of the draft London Plan.

With respect to children’s play space, the scheme includes a designated play area of 367 sq.m., which is intended to provide doorstep play for children under five. Whilst this would exceed play requirements of young children at the site, this provision represents a marginal 30 sq.m. shortfall against the overall requirements of the Play and Informal Recreation SPG, when
assessed across all age groups. The applicant has nevertheless demonstrated that the recreational needs of older children within the development can be met by various local open spaces in the general vicinity of the site. This approach is acceptable; however, the Council is encouraged to seek an open space contribution where appropriate to mitigate any intensified use of local spaces.

27 In general, noting the characteristics of the location and context (highly accessible town centre and Opportunity Area), this site lends itself well to a high quality, high density mixed use development. London Plan Policy 3.4 and Policy D6 of the draft London Plan seek to optimise housing density, with the draft London Plan placing greater emphasis on a design-led approach to density assessments. This includes a requirement for an independent design review of proposed development which exceeds various prescribed thresholds. In this case the scheme is 2,643 habitable rooms per hectare / 992 units per hectare. This exceeds the range within London Plan Policy 3.4 and the threshold within Policy D6 of the draft London Plan, and would therefore trigger the design review process. In this case the scheme has been subject to a locally-led design review by Lewisham Council’s Design Review Panel, as well as third party architectural peer review. Recommendations from these processes of design review have practically informed an iterative process of scheme evolution as part of various GLA and Lewisham Council pre-application meetings. Accordingly, noting the positive evolution of the scheme in response to the above-mentioned design review process, and the broad support for the design and residential quality (as discussed in this report) the proposed density is acceptable.

**Urban design**

28 The proposed development is laid out in an ‘L’-shaped footprint, creating a new south-facing public square fronting Loampit Vale. The scheme would be perceived as two blocks (A and B), ranging in height up to 30-storeys for block A, and 16-storeys for block B.

**Layout**

29 As discussed in paragraph 11, GLA and TfL officers have been working with Lewisham Council and Network Rail on the Lewisham Interchange Study. This study is intended to establish the core requirements necessary to deliver an enhanced Lewisham interchange, as well as various strategic design principles for how the interchange and associated public realm could help to support wider neighbourhood connections more generally. This development proposal is acknowledged as part of the evidence base for this work, but the study suggests a potential alternative design response for this site, including provision of a linkage to Lewisham station via a bridge over the Network Rail embankment. It is noted that this alternative option would require a different developmental layout form that proposed within this submitted application, and may also impact on the quantum of development that could be delivered at this site. The response of the scheme to the Lewisham Interchange Study is considered further below.

30 The proposed arrangement of active ground floor frontage onto the new public square and neighbouring public realm is supported. A large ground floor commercial unit (linking blocks A and B and fronting the new public square) has been provided in order to offer the potential to provide a new entrance to Lewisham station. This unit would operate a retail function until this space is required by TfL. The applicant has demonstrated that this provision could support a range of connectivity options (including access to National Rail, DLR and Bakerloo Line extension) in response to the broad objectives of the Lewisham Interchange Study. This proposed futureproofing is strongly supported, and the location of a new station entrance in this area would significantly enhance the legibility of Lewisham transport interchange for passengers arriving from the west. Whilst it is acknowledged that the proposed development represents an alternative layout to that preferred by the Lewisham Interchange Study, having regard to the
futureproofed potential for station connectivity, and the advice of TfL, GLA officers support the design and are satisfied that it would not undermine the core objectives for the enhancement of the Lewisham transport interchange.

**Scale, massing and architecture**

31 The simple massing arrangement is supported, and would provide two distinct blocks that would frame the new square as well as the potential future station entrance. Having regard to the Opportunity Area and town centre context, and having considered the submitted visualisations and local views assessment, the proposed scale and stepped roofline profile of the scheme is supported in line with London Plan Policy 7.7 and Policy D8 of the draft London Plan.

32 The applicant is proposing a strong, simple, grid framework pattern for elevations - grouping sets of storeys together in order to provide vertical emphasis to both blocks. This is supported, and in conjunction with contrasting tones of brickwork, the approach would ensure that whilst the two blocks display a similar architectural theme, they would appear as a distinct pair of buildings. The proposed architectural approach is supported in line with London Plan Policy 7.6 and Policy D1 of the draft London Plan.

33 In accordance with Policy D11 of the draft London Plan, the Council should secure an informative prescribing the submission of a fire statement, produced by a third party suitable qualified assessor, in consultation with the London Fire Brigade.

**Inclusive access**

34 The applicant has set out its approach to access and inclusion within the design and access statement. GLA officers support the commitment to ensure equal and convenient access to the building, and note that the layout of floorplates and their relationship with the proposed public realm ensure that this would be achieved. The building entrances are legible and uncluttered and the internal floorplans are spacious and well laid out. It is acknowledged that the provision of on-site Blue Badge car parking is constrained by basement feasibility challenges in the context of the Bakerloo Line extension and the desire to provide a new public square at grade. Nevertheless, in line with pre-application discussions GLA officers support the applicant’s proposal to provide a total of eight on-street accessible parking bays on Thurston Road. The application accords with London Plan Policy 7.2 and Policy D3 of the draft London Plan.

**Sustainable development**

**Energy strategy**

35 In accordance with the principles of London Plan Policy 5.2 and Policy SI2 of the draft London Plan the applicant has submitted an energy statement, setting out how the development proposes to reduce carbon dioxide emissions. In summary the proposed strategy comprises: energy efficiency measures (including a range of passive design features and demand reduction measures); a single energy centre and site-wide heat network capable of wider district connection; and, renewable technologies comprising photovoltaic panels. The approach proposed would achieve a 39% carbon dioxide reduction for the residential component of the scheme and a 35% reduction for the non-residential component. The principles of the energy strategy are supported. Once all opportunities for securing further feasible on-site savings have been exhausted, a carbon offset contribution must be secured to mitigate any residual shortfall against the zero carbon target for residential floorspace.
Climate change mitigation

36 The scheme includes various areas of soft landscaping and planting as part of communal amenity terraces and public realm proposals. This will help to support urban greening and the sustainable drainage characteristics of the site. These measures, in conjunction with a rainwater attenuation tanks, would ensure that the scheme would be limited to three times the greenfield runoff rate. This is supported in line with London Plan policies 5.10 and 5.13 and policies G5 and SI13 of the draft London Plan, and the Council should secure the details of these climate change adaptation measures by way of planning condition.

Air quality and ambient noise

37 London Plan Policy 7.14 and Policy SI1 in the draft London Plan seek to improve air quality in the capital and to incorporate design solutions to protect development in vulnerable locations. Moreover, these policies seek to ensure that new development is ‘air quality neutral’ in terms of its impact on the environment. London Plan Policy 7.15 and Policy D13 in the draft London Plan seek to improve the acoustic environment and avoid significant adverse noise impacts on health and quality of life.

38 The applicant has submitted an environmental statement which assesses the baseline conditions at the site with respect to air quality and ambient noise, and considers the effect of the proposed development (including its construction phase). It is noted that there are various potential sources of noise and air quality impacts in the vicinity, including the highway, TfL bus stand, DLR and National Rail operations.

39 The findings of the assessment demonstrate that the scheme would be air quality neutral. Furthermore, with the inclusion of proposed mitigation measures for both the construction and operational phases, the scheme would ensure an acceptable environment with respect to issues of noise and air quality. The mitigation proposed for dwellings in sensitive parts of the site comprises mechanical ventilation which ensures that adequate fresh air is drawn into properties (reducing the need to open windows). A range of glazing specifications have also been selected to respond to the noise conditions across the site. Lewisham Council will ensure that this mitigation (as well as the measures to control potential noise and air quality impacts associated with the construction phase) is appropriately secured by way of planning condition/planning obligation as appropriate.

Transport

Lewisham Interchange Study

40 As discussed in paragraph 11, TfL and the GLA have been working in partnership with Lewisham Council and Network Rail on a range of enhancement options for the transport interchange at Lewisham in order to address existing capacity issues and respond to the opportunities presented by the Bakerloo Line extension, in line with the draft Mayor’s Transport Strategy and Policy T3 of the draft London Plan. Whilst, as discussed in paragraphs 26 to 30 above, it is accepted that this scheme does not entirely reflect the preferred design approach for this site within the Lewisham Interchange Study, it is critical that the redevelopment of this site would not compromise the ability to deliver the Bakerloo Line extension and the necessary improvements to the Lewisham interchange. Associated considerations in this regard are set out within the various sections that follow.
Bakerloo Line extension (BLE)

41 The London Plan and draft London Plan identify southern extension of the Bakerloo line as a key strategic infrastructure intervention for the capital, and this has been under serious investigation since 2014. Consultation on a preferred route and station locations including a new station on the site of the Thurston Road Bus Stand was undertaken in Spring 2017 with the results of this consultation made public in July 2017. Further to this Thurston Road Bus Stand (immediately to the north of the site) has been identified as the preferred location of a new Lewisham Bakerloo Line Station. Should the Bakerloo Line extension project proceed, and the necessary funding is secured, construction could start in 2023 with services running by around 2028/29.

42 As discussed in paragraph 6 above, this site is subject to safeguarding requirements associated with future Bakerloo Line underground tunnels which are planned to travel beneath this site. Therefore, as part of the application a structural feasibility report has been prepared in order to demonstrate that the development could be constructed without compromising the ability to deliver the BLE beneath the site. Having considered the report, TfL is satisfied that its conclusions are reasonable and that, with the necessary safeguarding works secured, the development could be constructed in a way that would not compromise BLE delivery. Nevertheless, further technical work and detailed ground investigations are required to demonstrate that the applicant’s proposed foundation piling solution can accommodate the necessary alignment of BLE tunnels. These investigative studies must be secured by way of planning condition in line with London Plan Policy 6.2 and Policy T3 of the draft London Plan, with details agreed prior to the commencement of construction works on-site.

43 As discussed in paragraph 30, the development also proposes to provide passive provision for a new BLE station ticket hall. The dimensions of this space would accommodate the projected two-way capacity for passenger flows arising from operation of the BLE, and this proposed facility will be duly considered for operational use by TfL should the BLE project proceed.

Transport impact

44 The transport assessment predicts that the proposed development would result in an additional 148 two-way person trips being generated during the morning peak and 107 during the afternoon peak. The transport assessment also predicts that the majority of trips to/from the site will be made by public transport. No impacts on the capacity of local bus services are anticipated from the development; however, a review of the current and planned capacity of the DLR network indicates that the Lewisham branch between Bank and Stratford is now operating over capacity, meaning that is some instances users are unable to board trains during the morning peak. Additional demand generated from this development (in conjunction with other schemes in the planning pipeline along the DLR Lewisham Branch) would place further strain on the DLR network and extend capacity constraints further south along the network during the morning peak. To address the capacity issues on the DLR network the purchase of additional rollingstock is required. Accordingly a Section 106 financial contribution of £80,000 towards DLR capacity enhancements as proportionate mitigation must be secured in line with London Plan policies 6.2 and 6.3 and policies T3 and T4 of the draft London Plan.
**Car and cycle parking**

45 The scheme is proposed to be car-free (including Blue Badge spaces). Considering the excellent PTAL rating and close proximity to step-free public transport options and proposed loading/drop-off bay on Thurston Road this approach is supported. Nevertheless, to secure the car-free nature of the scheme in line with London Plan Policy 6.13 and Policy T6 of the draft London Plan, future residents should be excluded from obtaining parking permits within the surrounding controlled parking zones by appropriate legal obligations.

46 A total of 428 cycle parking spaces are proposed across four separate cycle stores, and within the new public square fronting Loampit Vale. The overall approach to cycle parking is supported. This quantity of cycle parking spaces meets London Plan standards and should be secured by way of planning condition in line with London Plan Policy 6.9 and Policy T5 of the draft London Plan.

**Construction logistics**

47 A preliminary construction management plan (CMP) detailing construction logistics has been submitted with the application. The initial proposals seem reasonable but final construction logistics arrangements must ensure that the capacity of the Thurston Road/Loampit Vale junction would be maintained and that bus journey times operating from the Thurston Road bus stand would not be adversely impacted. Once a contractor has been appointed and more detail is known on the precise nature of construction activities TfL expects a detailed CMP to be submitted to the Council for approval in consultation with TfL in line with London Plan Policy 6.14 and Policy T7 of the draft London Plan.

**Servicing**

48 All deliveries and servicing is proposed to be undertaken via two new loading bays located on Thurston Road. In view of the site constraints, this represents an acceptable design response. The delivery and servicing plan (DSP) submitted with the application should be secured by way of planning condition in line with London Plan Policy 6.14 and Policy T7 of the draft London Plan.

**Introduction of sensitive receptors / Agent of Change**

49 As discussed in paragraphs 37 to 39 above, it has been demonstrated that, subject to appropriately secured mitigation, the scheme could successfully manage potential air quality and noise issues in order to deliver a high quality residential environment. However, it is acknowledged that the windows of residential dwellings must be closed for the proposed mitigation to operate at maximum effectiveness. Noting that future occupiers have the option to open windows if they choose to do so, TfL has concerns that its 24-hour operations at the Thurston Road Bus Stand may potentially be vulnerable to amenity objections from future residents of the scheme. Accordingly, TfL seeks a requirement that all windows fronting the bus stand site should be non-openable, with balconies fully enclosed.

50 Draft London Plan Policy D12 places the responsibility for mitigating impacts from existing noise-generating activities or uses on the proposed new noise-sensitive uses. In line with this approach GLA officers are working jointly with TfL, the applicant and Lewisham Council to explore options to safeguard 24-hour operations at the Bus Stand, whilst not unduly constraining the opportunity for residents to naturally ventilate dwellings. An update will be provided at the Mayor’s decision making stage.
**DLR infrastructure**

51 Due to the proximity of the application site to DLR infrastructure there is the potential for construction works and the development itself to adversely impact on DLR operations if not appropriately designed and managed. To address DLR operational concerns a number of construction and radio communication safeguards are sought, with detailed planning conditions to be agreed with the Council and applicant to ensure accordance with London Plan Policy 6.3 and Policy T3 of the draft London Plan.

**Travel planning**

52 The framework travel plan submitted with the application identifies ambitious targets to increase active travel mode shares. In light of the existing capacity issues on the DLR network, and at Lewisham station itself, this approach is supported. The travel plan should be secured, monitored and enforced via the Section 106 agreement in accordance with London Plan Policy 6.3 and Policy T4 of the draft London Plan.

**Highway works**

53 In order to deliver the development the applicant will be required to enter into a Section 278 agreement for highway works proposed along the A20, Loampit Vale. The highway works will also be required to cover the replacement of the existing bus stop on Loampit Vale, which would need to be repositioned in order to align with the development and widened footway. Additional highway licences will also be required for the proposed balconies which would overhang the highway boundaries of the A20, Loampit Vale.

**Local planning authority’s position**

54 Lewisham Council supports the scheme in principle, and is expected to formally consider the application at a planning committee meeting in January/February 2018.

**Legal considerations**

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

**Financial considerations**

56 There are no financial considerations at this stage.
Conclusion

London Plan and draft London Plan policies on Opportunity Areas; mix of uses; housing; urban design; inclusive access; sustainable development; air quality and noise; and transport are relevant to this application. Whilst the application is acceptable in land use terms, it does not fully comply with the London Plan and draft London Plan, as set out below:

- **Principle of development**: The proposed residential-led mixed use redevelopment of this Opportunity Area site is supported in line with London Plan policies 2.13, 2.15 and 3.3, and policies SD1, SD6 and H1 of the draft London Plan, and the proposed mix of uses has significant potential to support regeneration and place making objectives for Lewisham town centre and is supported in strategic planning terms.

- **Housing**: The applicant originally proposed 4% affordable housing; this has been increased to 20% through a robust viability review process led jointly by GLA and Council officers. Whilst a 20% affordable housing offer would typically be wholly unacceptable for a standalone high-density residential development, noting the exceptional transport safeguarding requirements and futureproofing costs unique to this site; and, the baseline viability position, the offer is an acceptable minimum in this case; subject to appropriate upward review mechanisms. Notwithstanding this GLA officers seek further discussion with Lewisham Council and the applicant to test a range of alternative tenure scenarios in order to establish whether a higher percentage provision of affordable housing could be delivered in line with London Plan Policy 3.12, Policy H6 of the draft London Plan and the Mayor’s Affordable Housing and Viability SPG.

- **Urban design**: The proposed design of this high density town centre scheme is supported in line with London Plan policies 3.5, 7.1, 7.6 and 7.7 and policies D1, D4, and D8 of the draft London Plan.

- **Inclusive access**: The proposed approach to access and inclusion is supported in accordance with London Plan Policy 7.2 and Policy D3 of the draft London Plan.

- **Sustainable development**: Following clarifications on the energy strategy the Council must secure the associated energy and climate change adaptation measures by way of planning condition in accordance with London Plan polices 5.2, 5.10 and 5.13 and policies G5, SI2 and SI13 of the draft London Plan.

- **Air quality and noise**: Suitable mitigation has been identified to address localised air quality and noise issues. The Council must secure these measures by way of planning condition in accordance with London Plan polices 7.14 and 7.15, and policies SI1 and D13 of the draft London Plan.

- **Transport**: The applicant must address issues with respect to: Bakerloo Line extension, transport impact, car and cycle parking, construction logistics, servicing, Agent of Change, DLR infrastructure, travel planning and highway works in line with London Plan policies 6.3, 6.9, 6.10, 6.13 and 6.14 and policies D12, T3, T4, T5, T6 and T7.

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