

## Loampit Vale

in the London Borough of Lewisham

planning application no. DC/08/69295

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

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

### The proposal

Full application for eight buildings ranging from 5 to 23 storeys in height, featuring 819 residential units (including 232 affordable), a leisure centre, commercial floorspace including space for creative uses, an energy centre, facilities and accommodation for the London City Mission, 893 cycle and 201 car parking spaces and public and private amenity space. The Leisure centre will include two swimming pools, fitness suites, outdoor climbing wall, crèche, spa facilities and indoor/outdoor café.

### The applicant

The applicant is **Barratt Homes (East London)**, and the architects are **LA Architects** for the leisure centre and **Assael Architects** for the residential and commercial aspect of the proposal.

### Strategic issues

The principle of the mixed uses on site including **commercial, leisure, residential and community facilities** is welcomed. The **density**, development on **MOL**, and commitment to **inclusive design** and **sustainable design** and construction are broadly acceptable. Further justification for the **mix of housing** on site, and the level of **affordable housing** must be provided. **The design, massing and external appearance** of the taller elements is not considered to be high quality design of a standard appropriate to a tall building. Internal layouts are inappropriately sized and oriented and will not provide a high quality residential accommodation across all tenures. Further detailed information is required relating to **climate change, inclusive design** and **transportation**.

### Recommendation

That Lewisham Council be advised that the application does not comply with the London Plan, for the reasons set out in paragraph 126 of this report; but that the possible remedies set out in paragraph 128 of this report could address these deficiencies.

### Context

1 On 7 October 2008 the Mayor of London received documents from Lewisham Council notifying him of a planning application of potential strategic importance to develop the above site

for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008 the Mayor has until 17 November 2008 to provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.

2 The application is referable under Categories 1A, 1B and 1C of the Schedule of the Order 2008:

- *1A: Development which comprises the provision of more than 150 houses, flats or houses and flats*
- *1B: Development which comprises or includes the erection of a building or buildings in Central London (other than the City of London) and with a total floorspace of more than 20,000 square metres, and*
- *1C: Development which comprises or includes the erection of a building more than 30 metres high and is outside the City of London.*

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

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

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

## **Site description**

6 The site is 1.7 hectares and occupies a prominent position on the western end of the defined Lewisham town centre along the A20 Loampit Vale, which forms part of the Transport for London Road Network. Loampit Vale runs along the long northern boundary of the rectangular site, with Cornmill Park and the Lewisham Bridge Primary School along the long southern boundary. The eastern and western ends of the site are bounded by raised railway embankments and arches. The site is bisected into two blocks by Elmira Street.

7 The site is within the Lewisham Town Centre AAP boundaries, and a small part of the site is identified as Metropolitan Open Land. The Waterlink Way, a local Green Chain, also runs through the site. The site is crossed by a dedicated pedestrian and cycle route. The main shopping areas within Lewisham are to the east of the site.

8 The site is currently occupied by vacant housing which was formerly part of the Sundermead estate, and a small church occupied by the London City Mission. To the south of the site is a primary school which is being redeveloped as part of the 'Buildings Schools for the Future' programme.

9 The site is adjacent to the Lewisham DLR station, and Lewisham railway station is also located within an acceptable walking distance from the site. The railway station is part of the National Stations Improvement Programme and is in Phase 2 of the 'Access for All' scheme, which aims to ensure a step free station in the near future. The site is also located near Lewisham bus station, and served by numerous bus stops in the vicinity. The site is therefore very well served by

public transport and records an excellent public transport accessibility level (PTAL) of 6b. This PTAL should be further improved by the implementation by 2009 of the DLR 3-car upgrade project for the Lewisham branch.

## Details of the proposal



View towards the west, Submitted by Barratt East Homes

10 The proposal is for a mixed use scheme to provide a leisure centre, 819 residential units, commercial space including space allocated to creative industries, an energy centre, and new facilities for the London City Mission church, including a hall, ancillary space, meeting rooms and residential accommodation.



Elevation to Loampit Vale, Submitted by Barratt East Homes

11 The proposal comprises two large urban blocks and two stand-alone buildings to the western end of the site. The two urban blocks feature base buildings with active frontages to all four sides; car parking is provided within the base buildings hidden behind the active frontages. These base buildings support a series of residential towers of varying heights aligned perpendicularly to Loampit Vale and featuring a stepped profile. Communal amenity spaces are provided on the roof of the base buildings between the towers.



deliver the leisure centre. External consultants prepared the Loampit Vale Residential and Leisure Design Brief to inform the client brief for the tender, which set out specific requirements for the leisure centre as well as levels of affordable housing (35%), housing mix, and other land uses. The brief does not have planning status itself, although its main principles and objectives have been incorporated into the draft Lewisham Town Centre AAP.

19 The site lies to the west of the Lewisham Gateway, for which outline planning permission for 100,000 square metres of commercial/office/retail space, 800 residential units, education, health and leisure facilities was granted in 2007, however the section 106 agreement has not yet been signed. To the north of the site on the opposite side of Loampit Vale, planning permission was granted in 2007 (also still subject to section 106 agreement) for a 2-17 storey mixed-use scheme on Thurston Road incorporating 406 residential units.

20 GLA officers have had several pre-application meetings with the applicant, and the application was the subject of GLA pre-application advice notes dated 14 February and 6 June 2008.

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

21 The relevant issues and corresponding policies are as follows:

- Regeneration and mix of uses *London Plan; PPS1; the Mayor's Economic Development Strategy*
- Density and housing *London Plan; PPS3; Housing SPG; Providing for Children and Young People's Play and Informal Recreation SPG*
- Green Belt and MOL *London Plan; PPG2, PPG17, East London green grid network SPG*
- Urban design/tall buildings *London Plan; PPS1*
- Access *London Plan; PPS1; Accessible London: achieving an inclusive environment SPG; Wheelchair Accessible Housing BPG; Planning and Access for Disabled People: a good practice guide (ODPM)*
- Air quality *London Plan; the Mayor's Air Quality Strategy; The Control of dust and emissions from construction and demolition BPG; PPS23*
- Climate change *London Plan; PPS, PPS Planning and Climate Change Supplement to PPS1; PPS3; PPG13; PPS22; the Mayor's Energy Strategy; Sustainable Design and Construction SPG*

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

23 The following are also relevant material considerations:

- The Lewisham Core Strategy (Preferred Options Stage).
- The Lewisham Development Control Policies Development Plan Document (Preferred Options Stage).
- The Lewisham Town Centre Area Action Plan (Preferred Options Stage).

## **Regeneration and mix of uses**

24 The principle of the mix uses on site is welcomed and is consistent with the London Plan and draft AAP for the town centre in its provision of a mixture of uses including commercial, leisure, residential and community facilities. The proposal incorporates the redevelopment of a brownfield site in a highly accessible, town centre location which is part of the Lewisham-Catford-New Cross opportunity area. The mix of uses proposed and intensity of use reflects London Plan policies 2A.5, 5D.1, and 5D.2, which seek to ensure that town centres in South East London accommodate increased demand for retail, leisure, community and business services, and that new housing provision is complemented by social and other infrastructure.

25 The provision of a leisure centre with extensive facilities and the re-provision of the London City Mission in particular reflect London Plan policy 3A.18, which seeks the protection and enhancement of social infrastructure and community facilities within easy reach by walking and public transport.

## **Density, housing and affordable housing**

26 This site sits within the Lewisham, Catford and New Cross opportunity area identified in the London Plan as being able to accommodate over 6,000 new homes to 2026. The draft AAP for Lewisham Town Centre (currently at 'preferred options' consultation stage and adopted as non-statutory interim policy by Members) sets a minimum housing target of 4,100 units for the town centre, of which 1,450 should be provided in Loampit Vale.

27 The residential provision is 819 units, with a range of unit types ranging from studio flats to 4-bedroom townhouses. The level of development is broadly in accordance with the draft Lewisham Town Centre AAP. The site at Thurston Road has consent for 406 units, and this proposal would bring the total consented in the area to 1,225 units. The AAP does not set a maximum level of housing for the area, however if the sites to the north of Loampit Vale were to be redeveloped to a similar density as proposed on this site, the total delivery of housing in this area could be close to double that projected in the draft AAP. The numbers in the draft AAP might therefore require revision to accurately reflect the quantum of development anticipated in the area proposed and consented.

28 The proposed net density is 482 dwellings per hectare, or approximately 1,280 habitable rooms per hectare. This level is slightly greater than the higher end of the density range appropriate to this site in the London Plan density matrix. The high density is justified by the accessibility and central location of the site, the provision of community facilities within the scheme, and the high quality of public space, amenity space and for the residential units.

### Affordable Housing

29 The affordable housing mix proposed is set out in the table below:

	Total		Market/Private		Affordable		Social Rented		Intermediate	
	units	hr	units	hr	units	hr	units	hr	units	Hr
<b>Studio</b>	<b>51</b>	51	<b>51</b>	51	<b>0</b>	0	<b>0</b>	0	<b>0</b>	0
<b>1 bedroom</b>	<b>294</b>	588	<b>240</b>	480	<b>54</b>	108	<b>31</b>	62	<b>23</b>	46
<b>2 bedroom</b>	<b>386</b>	1158	<b>295</b>	885	<b>91</b>	273	<b>30</b>	90	<b>61</b>	183
<b>3 bedroom</b>	<b>77</b>	313	<b>1</b>	4	<b>76</b>	309	<b>76</b>	309	<b>0</b>	0
<b>4 bedroom</b>	<b>11</b>	66	<b>0</b>	0	<b>11</b>	66	<b>11</b>	66	<b>0</b>	0
total	<b>819</b>	2176	<b>587</b>	1420	<b>232</b>	756	<b>148</b>	527	<b>84</b>	229
% total			72%	65%	28%	35%	18%	24%	10%	11%
% affordable							64%	70%	36%	30%

Figure 1: Affordable housing mix

30 The proposal achieves 35% affordable housing on a habitable room basis, with 70% of the affordable housing being for social rent and 30% for intermediate tenures, again in terms of habitable rooms. The affordable housing will be provided in partnership with London and Quadrant Housing Group, who have confirmed a contribution to the affordable housing component of the scheme, assuming Housing Corporation grant funding.

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

32 The Council's development brief incorporated a 35% target of affordable housing (by floor area) based on an analysis of local needs and a reflection of the Council's Strategic Housing requirements. Lewisham Council does not have an overall borough target of affordable housing in its UDP, nor does it include a site-wide target within policy, however a target of 35% is set within the supporting text to the policy. In their draft Core Strategy (preferred options) the Council has not explicitly set a borough-wide affordable housing target, as required by London Plan Policy 3A.9, but has an implied target that is significantly lower than the strategic target of 50%. This was raised as a matter of general conformity in the Mayor's consultation response to the Preferred Options consultation in August 2007.

33 London Plan policy 3A.10 is supported by paragraph 3.52, which urges borough councils to take account of economic viability when estimating the appropriate amount of affordable provision. As the proposal does not meet the strategic target of 50% affordable housing, a viability assessment/development appraisal toolkit has been submitted. Within this assessment, several assumptions have been made which require further clarification or revision from the applicant before full justification for the proposed level of affordable housing is considered acceptable.

34 The applicant has assumed a much higher developer's return to reflect current market conditions, the nature of enhanced risk associated with a project of this size and scale, and in line with current developer and lender requirements. The council should consider the use of an

overage agreement in the section 106 to ensure that, when built out, any additional return (e.g. due to market recovery) could be recouped by the council to compensate for the lower levels of affordable housing provided.

35 The applicant has also included the cost of providing the energy centre and as one of the section 106 obligations. This has been raised as a concern with the applicant, as this should not be considered an additional cost to the developer but should be an integral element of the project cost, given that providing district heating has been a policy requirement which has been in place for several years. The applicant has been asked to revisit the viability assessment to ensure the maximum reasonable amount of affordable housing has been proposed in order to ensure compliance with London Plan policies.

#### Housing mix

36 The proposed housing mix is set out in the table below.

Unit size	Number of units	% of total	Number of habitable rooms	% of total	Target % (Housing SPG)
<b>Studio</b>	51	6%	51	2%	
<b>1 bedroom</b>	294	36%	588	27%	32%
<b>2 bedroom</b>	386	47%	1158	53%	
<b>3 bedroom</b>	77	9%	313	14%	
<i>2, 3 bedroom</i>	463	57%	1471	68%	38%
<b>4 bedroom</b>	11	1%	66	3%	30%
<b>total</b>	<b>819</b>		<b>2176</b>		

Figure 2: Overall housing mix

37 With regards to the target mix of housing set out in the Housing SPG, the proposed mix includes a high proportion of 2 and 3 bedroom units (57% in terms of units, vs. 38% target) and a very low proportion of 4 bedroom or larger units (1% of units vs. 30% target in the SPG), as well as a proportion of studios, which are not normally encouraged.

38 The applicant states that this mix corresponds to the council’s strategic housing requirements arising from analysis of local needs. The reduced number of larger units also reflects the density and location of the site. The current proposal is a high-density development, and its location on the busy road between two railway viaducts does provide less opportunity to accommodate larger family units with sufficient amenity space. The proposals for Thurston Road and Lewisham Gateway reflect this position, as neither incorporates any 4-bedroom units. In this context, the proposal to accommodate only eleven 4-bedroom units can be seen as acceptable. However, discussions are needed with the applicant and the Council to confirm whether the proposal adequately responds to need

39 The proposal is broadly compliant with London Plan policy 3A.5, but discussions are needed with the applicant and the Council to determine if the proposal adequately responds to need in terms of mix.

40 The Council’s development brief also required 35% of the affordable housing (rent and shared ownership) to be family sized units (3 bed or larger), with 10% of those family units to be 4 bedrooms or more. Reflecting the development brief, the proposal features 38% affordable family sized units, of which 12% are 4 bedrooms or more. In terms of floorspace, 50% of the affordable floorspace is taken by family size units, of which 20% is for 4 bedrooms or more.



41 This mix represents a lower level of affordable family sized housing than the strategic targets in the Housing SPG, but was based on an analysis of local needs and a reflection of the Council’s Strategic Housing requirements. Discussions are needed with the applicant and the Council to determine if the proposal adequately responds to need and represents a mix that corresponds to strategic needs.

#### Children’s play space

42 Policy 3D .13 of the London Plan sets out that “the Mayor will and the boroughs should ensure developments that include housing make provision for play and informal recreation, based on the expected child population generated by the scheme and an assessment of future needs.” Using the methodology within the Mayor’s supplementary planning guidance ‘Providing for Children and Young People’s Play and Informal Recreation’ (2008) it is anticipated that there will be approximately 293 children within the development, however the applicant has assumed a lower child yield than calculated by GLA officers. Clarification on this point should be provided.

<b>Age Group</b>	<b>Number of children</b>	<b>Sq m needed</b>
0-4	103	1033
5-10	113	1128
11-15	77	769
<b>Total</b>	<b>293</b>	<b>2931</b>

Figure 3: Estimated child yield (GLA officer calculations)

43 The guidance sets a benchmark standard of 10 sq.m. of useable child playspace to be provided per child, with under-5 child playspace provided on-site. Using the figure calculated by GLA officers, the development should make provision for 1,033 sq.m. of playspace on site for young children. This development currently proposes 790 square metres of dedicated playspace on site, divided between the two podium buildings into a 210 square metre space and a 580 square metre space. Both spaces could be enlarged as they sit within larger areas of amenity space (1,300 and 1,150 square metres respectively).

44 The SPG advises that playspace for under-5s should be within 100 metres of the residential unit. It appears that the proposal incorporates the larger play space on a podium block which houses fewer large units, and will therefore be home to fewer children. The applicant has been asked to provide detailed information per block to ensure that the playspace provided is adequately distributed to reflect the projected child residency levels per block.

45 For older children, the applicant will rely on the public plazas provided within the scheme as well as a 1,400 square metre play area contained within the existing Cornmill Gardens directly south of the site. All of these options are within 100 metres walking distance from the development, and represent an acceptable amount of amenity space, and are in addition to the leisure centre proposed, which will provide valuable amenity for children and adults.

46 The proposal is broadly compliant with London Plan policy 3D.13, however further detail should be provided to ensure that the provision of under-5s play space corresponds to the child yield of each building.

### **Green Belt and Metropolitan Open Land**

47 London Plan policy 3D.10 requires the Mayor and the boroughs to maintain the protection of Metropolitan Open Land (MOL) from inappropriate development. There is currently 2,753 square metres of designated MOL within the application site, running along the Loampit Vale boundary to the east of Elmira Street and along the eastern end of the site. This space connects to a longer stretch of MOL that extends south along the Ravensbourne River.

48 The proposal infringes on a portion of the MOL on site resulting in a loss of 897 square metres of MOL. This is a relatively small strip of land along the northern boundary of the site, which is dominated by road traffic. The land does not exhibit the characteristics set out in London Plan policy 3D.10 required for designation as MOL, as it is not clearly distinguishable from the built-up area given its size and location, does not include any open-air facilities for leisure or contain any features or landscapes of interest. The proposal is therefore acceptable

49 The Council has anticipated the possibility that the boundary of the MOL in this location might require alteration in conjunction with regeneration proposals by incorporating a policy in the draft Lewisham Town Centre AAP that the Council will consider the re-provision of and alteration to the boundary of MOL, where the regenerative benefits arising will make a significant positive contribution to the quality of the MOL. Having regard to this proposed policy, the applicant has proposed to compensate for the loss of the MOL with the provision of open space additional to that already on site.

50 The proposed redevelopment will also provide for a net increase of 1,019 square metres or approximately 31% of open space over the existing site; of this, 897 square metres can be allocated to the re-provision of MOL, resulting in a net gain on site of 122 square metres of publicly accessible open space. It is unclear whether the Council has agreed to designate some of the newly provided open space MOL in the forthcoming LDF and clarification will be sought on this matter.

51 The eastern boundary of the site adjoins the South East London Green Chain, a component of the East London Green Grid network, and this proposal improves the condition and context of the Chain, enhancing the access and setting of the Ravensbourne River and Waterlink Way.

52 The proposals will result in superior quality public open space than currently on site. On the basis of the above, the proposal is compliant with London Plan policies 3D.9 and 3D.10

## **Urban design**

53 Good design is central to all objectives of the London Plan and is specifically promoted by the policies contained within Chapter 4B which address both general design principles and specific design issues. London Plan Policy 4B.1 sets out a series of overarching design principles for development in London. In addition to Chapter 4B, London Plan policies relating to density (3A.3) and sustainable design and construction (4A.3) are also relevant. Design policies in the London Plan include specific design requirements relating to maximising the potential of sites, the quality of new housing provision, tall and large-scale buildings, built heritage and views.

54 The applicant has engaged in pre-application discussions relating to the design with GLA officers as well as with CABE, the Council's own design review panel, and Council officers.

55 The site was subject of an urban design and planning brief by Allies and Morrison and Urban Practitioners that has informed the draft AAP. The current proposal is the result of a critical re-evaluation of some of the principles of the brief but not of the overall vision, and is seen as a positive improvement over the brief. The proposal takes a different approach to massing to improve the definition of public and private spaces, the penetration of light to Loampit Vale and the quality of the residential accommodation, whilst maintaining a strong visual link with the Lewisham Gateway site, a community focus with the leisure facility, a mix of uses with high density residential development above, active frontage to Loampit Vale, and a massing which creates a transition in scale towards Lewisham Gateway.

56 The proposal acknowledges and responds to the changing context of the site, particularly the change in scale to the north and east that will soon be realised due to recently permitted developments including the Lewisham Gateway and Thurston Road. To the south the school will

be redeveloped into a single-entry primary and secondary school, and a new park and mid-rise housing have recently been completed. To the west of the site and over the railway viaduct remains a low-rise residential neighbourhood of terraced houses.

57 The proposal features two 'base' buildings of approximately 5 storeys with two tall buildings above each base ranging in height from 10 to 23 storeys. In addition, the site features two stand-alone tall buildings of 10 and 15 storeys. This range of heights and forms allows for a variety of residential typologies, shared and private amenity spaces, and also breaks down the mass of the proposals to allow light to penetrate to Loampit Vale whilst also allowing for a progression of buildings along Loampit Vale towards the Gateway site. The tallest building (23 storeys) sits on the north edge of the newly completed Cornmill Park and near the entrance to the leisure centre, providing a marker for these community facilities and also creating a counterpoint to the landmark buildings on the Lewisham Gateway site.

#### Site Layout

58 The site layout enhances the existing north-south pedestrian links whilst adding another key connection on the western half of the site, providing a route through from the school to the south to Loampit Vale. East-west connections are improved by wider pavements along Loampit Vale and the introduction of a landscaped/home zone along Vian Street.

59 Careful consideration has been given to ensuring most frontages are active and entrances are legible across the site, however several areas may benefit from further consideration. The proposal appears to incorporate gated servicing access between the curtilage of buildings A and B and the western site boundary along railway viaducts, but the nature of the space between the site boundary and the viaduct is unclear, and raises concern relating to safety and security. Furthermore, the ground floor of building B housing the energy centre currently features inactive frontages to the western plaza, with the main residential entrance tucked around the corner in the passageway by the viaduct. The residential entrance should be much more prominent, such as on the corner of the building, which would allow for improved legibility and wayfinding as well as a degree of animation for the western plaza.

#### Open Space/Public Realm

60 This proposal builds on the open space implemented as part of the completed Sundermead Estate redevelopment. The proposal maintains and extends the recently completed paving works to create a substantial public open space at the front of the Leisure centre with additional trees, seating and lighting. Outdoor café seating from the leisure centre overlooks the park, however wind tunnel testing suggests that these areas may not be suitable for sitting. The applicant must clarify what additional mitigation will be proposed to ensure that the micro-climactic conditions are suitable for the proposed uses.

61 The scheme incorporates landscaping improvements to the pavement along Loampit Vale, creating a much wider thoroughfare to accommodate cyclists and pedestrians. Elmira Street will be designed as a shared surface route. The southern boundary extending from Cornmill Gardens will be landscaped and closed to traffic, retaining the existing mature Lime trees, whilst Vian Street on the west of Elmira Street will be partially closed to vehicles. A small public plaza is proposed between the westernmost towers and the podium block, providing a pedestrian connection from Loampit Vale to Vian Street and amenity space for the ground floor creative uses surrounding the plaza.

62 The western boundary of the site runs along railway viaducts and a strip of land identified as a green corridor in the UDP, notes as an 'area of wild natural landscaping which should be respected and enhanced.' The plans submitted do not illustrate how the proposal will enhance the

green corridor; the applicant must demonstrate that sufficient consideration has been given to meeting this requirement.

63 The proposal incorporates shared and private amenity space on roof terraces and private balconies, which is welcomed, including two communal garden spaces above the base buildings for residents of the towers above. The podium courtyard between the eastern towers features a series of cascading terraces with stepped access from one to the next. The design and access statement does not provide sufficiently clear illustration that this space is accessible to all. The applicant has been asked to provide more detailed information that illustrates how step free access to these spaces will be provided that does not require a substantial detour for the users.

#### Tall buildings, views, scale and mass

64 The lower base buildings reference the mid and low-rise development of the new Sundermead Estate to the south as well as to the residential neighbourhoods beyond the western railway viaduct, whilst the towers reflect the intensification of use and development anticipated by the Opportunity Area designation and the consented Lewisham Gateway and Thurston Road schemes. The leisure centre is accommodated in one of the base buildings with no development above it, to distinguish the centre and from other uses on site to create a human scale to the building.

65 The applicant has submitted information to demonstrate how the design has incorporated many of the principles set out in the CABE/English Heritage guidance on tall buildings, particularly emphasising that the site is highly accessible, that the proposal will enhance existing links, incorporate a significant community facility as well as a series of public spaces across the development. The proposal will have no effect on the context of any World Heritage Sites or other historic assets or on strategic views.

66 Despite these positive aspects of the proposal, the detailed design, height and disposition of the tall buildings is not entirely convincing, particularly in longer range views where the silhouettes of individual blocks become difficult to distinguish and the development can be perceived as a single, amorphous mass. The tower elements are very bulky, being over 60 metres long and stepping up in height between 14 and 23 storeys. This stepped approach precludes each tower from having a strong, clear and distinguishable presence.

67 Concerns raised at pre-application relating to overshadowing of the towers on the shared amenity spaces have been borne out by the submitted daylight studies and the wind studies also suggest that the microclimate at podium level may require more substantial mitigation to allow the spaces to be suitable for outdoor recreation. In particular, the two easternmost blocks, F and G, create a high level of overshadowing on the amenity space at podium level, as do buildings B and C to a lesser extent on the western plaza.

68 The applicant is encouraged to reconsider the approach to the taller elements.

#### Architectural Expression

69 The detailed design and architectural expression of a scheme of this scale is fundamental to its success, and it is disappointing that the architecture of the taller buildings does not reflect the exemplary standard that is required of tall building proposals. The architect has sought to distinguish different parts of the development with a fairly anonymous palette of details and materials; these are extremely repetitive when extended over an expanse of building such as a 20-storey façade. The architect has attempted to signify the different roles of the various parts of each building by applying different materials and detailing in a somewhat systematic manner across the 7 buildings on site. This results in a slightly schizophrenic building design when looking at an individual building, whilst at the same time failing to provide each building with its own distinct identity. The design of the tallest tower is promising, as is some of the balcony detail in some

areas, but further development and attention to detail is required to ensure that the proposal does not become a development which largely lacks in character and sophistication.

70 A separate architectural firm has undertaken the design of the leisure centre. To highlight the presence of the centre, the proposal incorporates brightly coloured façade treatment, a five-storey high fully glazed entrance area and a public plaza in front of the entrance, as well as conical rooflights that will be visible from the nearby park. The frontage to Loampit Vale features a large window into the pool along which provides visual connection into the leisure centre. The façade treatment to Cornmill Park incorporates frosted vertical louvres for solar shading and creates a calmer backdrop to the park.

71 The proposal incorporates a cultural strategy in the form of artwork on the elevations of the leisure and energy centres and the accommodation of 'cultural industries' in the scheme. The architects for the residential component have sought to extend the colourful theme from the leisure centre through the ground floor elevations in an attempt to create a link between the leisure centre and the rest of the scheme, however this is not entirely convincing. It is also unfortunate that the towers identified as the 'landmarks' do not share some of the bold and energetic characteristics of the leisure centre.

#### Internal Layouts

72 The proposal provides for a variety of housing typologies and internal layouts. Most of the residents access their homes by a communal entrance into a lobby and reception. Given the size of the towers and the number of homes accessed from the central point, it is disappointing that the reception areas are not larger. On upper floors, the layouts are relatively efficient and acceptable, with limited corridor lengths and low number of flats served off of double lift cores. Still, many flats are single aspect, and whilst none are north-facing the predominance of single-aspect flats remains a concern with regards to residential quality.

73 Flats are generally sized to exceed minimum space standards, however the applicant should review some of the flat layouts for the larger units to ensure kitchen and living spaces are sufficiently large to accommodate the needs of larger families. The flat layouts in block B in particular are of concern, as the balconies provided for the 3 bedroom units are very small and many bedroom windows for larger units face the railway. This block has been identified as socially rented affordable housing, however this should not result in poor quality homes as this does not accord with the aspiration to deliver tenure-blind residential units. The applicant should revisit the plans to ensure all units are designed to be tenure-blind.

#### Conclusion

74 The principle of the proposal in design terms is welcomed, however the design of the taller elements remains unconvincing and requires further development to ensure it represents high quality design of a standard appropriate to a tall building, and internal layouts require further consideration to ensure they are appropriately sized and oriented to ensure a high quality residential accommodation across all tenures. Consequently, the proposal does not currently comply with London Plan policies 4B.1 and 4B.10.

### **Access and inclusive design**

75 London Plan policy 4B.5 expects proposals to aim for the highest standards of accessibility and inclusion (not just the minimum) and that the design process has from the outset considered how everyone, including disabled and deaf people, older people, children and young people, will be able to use the places and spaces that are proposed. A detailed access statement has been submitted, and demonstrates that the proposal has incorporated the principles of inclusive design, including level entrances throughout. Many of the provisions in the access statement suggest that

the proposal will meet part M requirements, however to fully comply with London Plan policy, the applicant should demonstrate or commit to exceeding part M requirements.

76 The design of the landscaping and the public realm is crucial to how inclusive the development is to many people. Pedestrian routes to each building have been designed to ensure full and easy access for all users, however it is unclear whether the landscaping features have taken account of the principles of inclusive landscape design. The shared surface areas in particular should be safe and convenient for disabled pedestrians including visually impaired people, and further information should be provided to illustrate how pedestrians will be segregated from traffic and turning vehicles. The design of the terraced podium garden is of particular concern, as it does not appear to be accessible to wheelchair users. Further detail should be provided on this point. The applicant has suggested that further discussions on detailed design shall take place with the council's access officer and local access groups, which is welcomed and encouraged at this stage, and should be required by condition.

77 London Plan policy 3A.5 requires all housing to be built to 'Lifetime Homes' standard, and 10% of all new housing to be wheelchair accessible or easily adaptable for wheelchair users. The proposals suggest that all units will be designed to Lifetime Homes standard, which is welcomed, and that 10% of the homes will be built to full wheelchair standard or be easily adapted. The proposal does not identify which units will be built to this standard, but the applicant has provided sample layout plans to illustrate that at least one of each type of unit will be built to the standard.

78 In the context of a low level of overall car parking, the applicant has provided for 5% of the residential spaces to be allocated for blue badge car parking, with a further 5% easily convertible if necessary. This does not reflect best practice standards which require one space per wheelchair unit, and given the currently unknown level of demand for blue badge parking, a condition should be included on the permission to ensure that the parking management plan includes a mechanism to ensure that the supply and demand of the blue badge bays are regularly monitored and provision reviewed, to ensure that provision equates to the demand from disabled residents and visitors and that the bays are effectively enforced. Furthermore, the proposed location of some of the blue badge spaces should be reconsidered to ensure they minimise travel distances to lifts.

79 The design of the leisure centre has been undertaken incorporating the principles of inclusive design from first principles. The designer has engaged with the Council's access group and Disability Advisory Consultant, and the proposed design is considered to be exemplar in its approach to inclusive design. All facilities have level access, toilets, changing facilities and the teaching pool have been designed especially for accessible needs, and arrangements for groups with special needs have been catered for as well. The teaching pool can be closed to ensure that there can be complete privacy, and the spectator seating provides for several wheelchair spaces with unimpeded views. The applicant intends to continue engaging with the local disabled user group to deliver a highly accessible facility.

80 The proposal is broadly compliant with London Plan policy 3A.5, however further information must be submitted to demonstrate that all amenity space is designed to be fully inclusive for all in order to be compliant with policy 4B.5.

## **Climate change mitigation**

81 The London Plan requires developments to make the fullest contribution to the mitigation of, and adaptation to climate change, and to minimise carbon dioxide emissions (Policy 4A.1).

82 Policies 4A.2 to 4A.8 of the London Plan focus on how to mitigate climate change, and the carbon dioxide reduction targets that are necessary across London to achieve this.

83 London Plan policies 4A.4 and 4A.7 require the submission of an energy demand assessment along with the adoption of sustainable design and construction, a demonstration of how heating and cooling systems have been selected in accordance with the Mayor's hierarchy, and how the development will minimise carbon dioxide emissions, maximise energy efficiencies, prioritise decentralised energy supply, and incorporate renewable energy technologies, with a target of 20% carbon reductions from on-site renewable energy.

84 The development has been designed to provide a reduction in carbon emissions of approximately 47% using energy efficient design, a combined heat and power system, a biomass boiler and photo voltaic cells. The applicant is engaging with GLA officers to address some of the concerns below.

#### Energy efficiency (be lean) – policies 4A.3 and 4A.4

85 A baseline energy assessment has been provided, however the applicant has been asked to confirm that the appropriate modelling was used and to clarify the methodology used.

86 Energy efficient design measures have been proposed that reduce emissions by 18% for the residential buildings, but more information has been requested to allow officers to determine the reduction for the leisure centre.

#### Decentralised energy and combined heat and power (be clean) - policies 4A.5 and 4A.6

87 In terms of District Heating there are currently no suitable site wide district-heating networks to which this scheme could connect, however the applicant has stated that the scheme will be future proofed to allow for future connection, and it will be designed to connect to any local community-heating scheme as it comes on-line. This includes providing a connection for the school redevelopment, however further information detailing this arrangement has been requested.

88 The scheme features a single, communal heating network using CHP units delivering both hot water and space heating requirements to all elements of the development fed from a single energy centre. The applicant has been asked to provide further information relating to the space requirements for the heat generation plant, the dual CHP strategy, and the phasing of the development.

89 Very little information is provided regarding the cooling strategy for the proposal, and the applicant has been asked to provide further information regarding the cooling strategy for the dwellings and the scheme in general.

#### Renewable energy (be green) - policy 4A.7

90 A combination of photovoltaic panels and a biomass boiler are proposed to provide the renewable energy contribution reducing emissions by a claimed further 13% (12% from biomass and 1% with PV).

91 The applicant has been asked to provide further information to demonstrate the compatibility of the two of the heating technologies proposed with one another (CHP and biomass boilers). Further detail has been requested relating to cooling options using renewable energy. To address questions relating to Air Quality, further information has been requested relating to the biomass boiler to ensure it is one of the lowest emitting models available on the Government's Exempt Appliance list at the time of installation.

## Overall

92 Overall, sufficient information has been provided to understand the proposals, although further details are required in particular areas. The applicant has broadly followed the energy hierarchy set out in Policy 4.A1. Whilst the proposals are acceptable in broad terms, further information and a revised energy strategy should be provided to ensure the application complies with London Plan policies 4A.3, 4A.4, 4A.6 and 4A.7.

## **Climate change adaptation**

93 The London Plan promotes five principles in policy 4A.9 to promote and support the most effective adaptation to climate change. Developments are required to be adaptable to the climate they will face over their lifetime and address the five principles set out in policy 4A.9 of the London Plan. These are to minimise overheating and contribution to heat island effects, minimise solar gain in summer, contribute to flood risk reductions, including applying sustainable drainage principles, minimising water use and protecting and enhancing green infrastructure. Specific policies cover overheating, living roofs and walls and water.

94 London Plan policy 4B.10 expects all large-scale buildings to illustrate exemplary standards of sustainable construction and resource management. The scheme is committed to achieving Code for Sustainable Homes rating of level 4 for all residences (achieving more than a 44% improvement on energy efficiency over 2006 building regulations), and a BREEAM Very Good rating for the leisure centre. Furthermore, the proposal aspires to achieve a Code for Sustainable Homes rating of 6 (zero carbon) for the townhouses in block D.

## Water Resources

95 Policy 4A.14 seeks to ensure that surface water run-off associated with a proposed development is managed as close to its source as possible, and sets out a hierarchy of preferred measures to achieve this. Policy 4A.16 seeks to ensure that new development has proper regard to the impact of those proposals on water demand and existing capacity by minimising the use of treated water and maximising rainwater-harvesting opportunities. The policy seeks to maximise rainwater-harvesting opportunities and promotes the use of grey water recycling and dual potable systems.

96 The development will minimise potable water use through demand reduction measures, metering, rainwater harvesting and greywater recycling techniques. In the residential portion, combined measures will result in water consumption of less than 90 litres per person per day, close to the Mayor's preferred standard.

97 The use of a sustainable urban drainage system is not a practical option for this site due to space constraints and potentially detrimental effect on National Rail. However, the proposal does incorporate multiple green roofs and underground storage tanks as the two main strategies to attenuate stormwater runoff, to the level of the Mayor's essential standard.

98 Policy 4A.11 expects living roofs and walls to be incorporated where feasible. The proposal incorporates a variety of living roofs including biodiverse/brown roofs on higher rooftops, landscaped recreational roofs on some levels, and a green roof on the leisure centre that is not publicly accessible. A planning condition should be used to secure the provision of, and details of, the living roofs.

99 In the context of the above, the proposal complies with London Plan policies relating to sustainable design and construction and climate change adaptation.

## **Air Quality**



100 As the development is proposed in an Air Quality Management Area, the applicant should contact the Council's air quality team to ensure compliance with their Air Quality Action Plan and local controls. The development should comply with the requirements of the *London BPG (Best Practice Guidance): the control of dust and emissions from construction and demolition*, as a minimum.

## **Transport for London's Comments**

101 Transport for London has engaged with the applicant at pre-application stage and requested additional information as part of the final Transport Assessment report (TA) in several areas. The final TA, has addressed some of TfL's concerns and requests for further information from the pre-application stage, however TfL has advised the applicant that the report needs more consideration, particularly in relation to leisure car parking provision, drop off/pick-up proposal, site access layout, as well as more clarification on modal split, distribution and modelling.

### Parking

102 The low level of car parking provision proposed on site for the residential element (0.17 spaces per unit), the car club, the dedicated parking facilities for disabled persons and the production of a Car Parking Management Plan to be secured by condition are all welcomed. A condition restricting the future occupiers from eligibility from residents parking permits should also be secured. As previously stated at pre-application stage and following review of the car parking accumulation results presented in the transport assessment report, the 64 spaces suggested for the leisure use is considered to be an overprovision. This level of car parking should be reduced in line with the London Plan standards.

### Site Access & Pick-up / Drop Off Proposals

103 Whilst TfL supports the widening of Vian Street to facilitate vehicular access to the site, the enforcement of the left turn only arrangement on the exit of Elvira Street is questioned. This banned movement, already often violated, will be further exacerbated by the increase in vehicles generated by the site and as such, TfL would recommend the applicant to consider the introduction of a median strip to enforce this.

104 Details of how the proposed coach drop off bay on the existing bus lay-by (on the southern side of Loampit Vale) will be enforced and managed should be provided. The proposed occasional use of the existing loading bay on Elmira Street is not considered acceptable by TfL due to the potential risk of traffic queuing back onto the TLRN to enter Elmira Street. Details of the number of coaches expected to access the development when gala events take place should be provided and subsequent consideration should be given to providing an area dedicated to coaches within the curtilage of the site. Ideally, such a facility should be provided to the south of the site to be shared with the proposed new school needs.

### Trip Generation & Impact Assessment

105 TfL has agreed 'in principle' at pre-application stage that the proposed use of the Lewisham Gateway trip rates would be acceptable. Subject to sensitivity testing a similar agreement was reached in relation to distribution and modal share, however it is considered that the use of the Gateway's modal split figures for the leisure uses on site is inappropriate due to the high level of car parking provision. The use of surveyed figures from the Ladywell site is therefore recommended for this exercise. Additionally, clarification of the distribution assumptions presented in the report should be provided.

106 The modelling of the Loampit Vale / Elmira Street junction is based on the assumption that right turners on Loampit Vale do not block ahead traffic. This is not considered to represent a robust approach and TfL would therefore request that the modelling of this particular junction be

reviewed to address this. Given the already congested nature of the highway network in the area, TfL also requests that the assessment of other junctions be provided, as previously discussed at pre-application stage.

#### Servicing & Construction Impact

107 The proposed servicing arrangements are acceptable, however confirmation should be provided that servicing will not take place or impede on the TLRN. Additionally, TfL recommends that a delivery and servicing plan (DSP) be produced to cover the development. This could help identify the optimum use of the loading facilities by trip reduction measures including safe drop off/concierge facilities, and establish appropriate servicing off-peak time restrictions including a booking system. Consideration for ensuring that deliveries are not disrupted or cause disruption when community events occur should also be further looked at as part of this plan.

108 TfL welcomes the construction logistics plan (CLP) to be secured by condition and would further suggest that consideration of the use of nearby rail freight facility at Hither Green for the delivery of construction materials be looked at as part of this plan.

#### Public Transport Impact

109 TfL is pleased to see that following pre-application discussions, the scheme has been designed to allow Loampit Vale to be widened in line with the Council's development plan for the town centre. Whilst this is strongly supported, confirmation that the safeguarding of this adequate strip of land on the northern edge of the site will be provided at no cost to TfL should be provided and secured as part of the section 106 agreement.

110 Whilst it is accepted that the proposed development will be accommodated on the existing public transport capacity network, TfL requests that accessibility improvements be provided. The applicant will need to ensure that all bus stop facilities, including potentially relocated and existing ones which are not being upgraded as part of the Thurston Road or Gateway developments, be brought to TfL's standards. Additionally, given the importance of the DLR as a transport mode within the vicinity, TfL would request that a £20,000 contribution be secured towards the provision of DAISY screens and other real time information.

#### Pedestrian & Cycle Linkages

111 TfL welcomes the proposed pedestrian and cycle improvements suggested as part of the design to link the site to public transport amenities and the town centre. The applicant should ensure that all existing and future crossing points adhere to BV165 standards and are preferably straight across facilities as suggested in TfL Streetscape guidance. Additionally, TfL would expect that linkages to both national and local cycle networks be investigated and integrated into the development particularly at access points. Confirmation that Waterlink Way will not be affected by the development is also required.

112 The level of residential cycle parking provision is supported. For the leisure and commercial elements, a total of 74 additional visitor cycle parking spaces are proposed; to confirm the acceptability of the cycle parking provision for the non-residential uses, TfL requests clarification of the expected number of staff and visitors for those particular uses.

#### Travel Plan

113 The Travel Plan, to be secured by condition, is supported by TfL. According to TfL's guidance, a full workplace travel plan will however need to be submitted for the retail and possibly leisure uses, for which additional information related to measures, management and monitoring sections will be required.

## London Development Agency's Comments

114 In accordance with the London Plan and the Economic Development Strategy, the London Development Agency (LDA) seeks to deliver healthy, sustainable, high quality communities and urban environments.

115 Located within the Lewisham/Catford/New Cross Opportunity Area and Lewisham Town Centre, the site presents an opportunity for intensification and regeneration. In accordance with London Plan policies 3A.18 (Protection & Enhancement of Social Infrastructure & Community Facilities) and 3A.26 (Community Strategies) the LDA recommend that the Council establish whether existing facilities can accommodate the expected increase in population as a result of this proposal. It is important that the new housing provision is complemented by adequate social and other infrastructure that is integrated into the broader life of Lewisham and the surrounding area, in line with London Plan policy 5D.1 (Strategic Priorities for South East London).

116 In line with London Plan policies 3B.8 (Creative Industries) and 3B.1 (Developing London's Economy) the LDA supports the proposal to provide floor space for creative industries. The creative industries are a core part of London's economy, and the development of clusters of creative industries should be encouraged. In order to ensure that these work spaces are protected and affordable to new and emerging businesses, the applicant should be encouraged to commit to the capping of rental fees, short leases, and ring-fencing to ensure that only creative industries can occupy the space.

117 The replacement of the London City Mission is supported as it is an important community facility that should be protected and enhanced. However, to ensure continued provision, the Council should look to relocate the City Mission to a suitable location whilst the demolition and construction works are carried out.

118 The LDA welcomes the proposal to build a leisure centre as provision of community facilities such as leisure centres are key to enabling communities to function. The LDA is particularly supportive of the crèche element of the proposal, given that the affordability and availability of childcare can be a major barrier to employment for single parent households and those that are unemployed or returning to work.

119 The Council should impose appropriate planning conditions to require the provision of childcare facilities to be linked with the phasing of the development, i.e. childcare facilities should be built and equipped before the first occupation of the development by other uses. Planning conditions should also ensure that the affordability of childcare spaces is secured for local employees. Such conditions should be included in a section 106 agreement between the developer and the local authority.

120 With regards to employment and training opportunities, the LDA encourages the Council to obtain a suitable Employment and Training Strategy from the applicant. On a scheme of this scale, the LDA recommends that the applicant provide construction training on-site, or commit to making a financial contribution towards the cost of construction training. In addition the applicant should consider initiatives to allow for the recruitment of apprentices from local schools and the recruitment of new employees from among school leavers, older people and those that have been out of work for a long time. These types of initiatives and commitments will ensure that the proposal meets the objectives of London Plan policy 3B.11 (Improving Employment Opportunities for Londoners).

121 In addition to initiatives that target local people, the applicant should also ensure that local businesses, particularly small and medium sized enterprises, benefit from the proposal. For

example, during the construction phase small and medium sized enterprises should be encouraged to apply for work on site as contractors or goods suppliers.

122 Once the development is complete, the Council should ensure that local people are given the opportunity to apply for jobs within the A1, A2 and B1 buildings. Local leaflet drops, advertisements and recruitment campaigns are encouraged.

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

123 Unknown at this time.

## **Legal considerations**

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

## **Financial considerations**

125 There are no financial considerations at this stage.

## **Conclusion**

126 London Plan policies on regeneration, mix of uses, density, housing, affordable housing, Green Belt, MOL, urban design, tall buildings, access, transport and climate change(are relevant to this application. The application complies with some of these policies but not with others, for the following reasons:

- Housing: There is currently insufficient information to determine whether the proposal represents the maximum reasonable amount of affordable housing or a mix that corresponds to strategic needs and as such the proposal currently does not comply with London Plan policies 3A.5, 3A.9 or 3A.10. Further detail should be provided to ensure that the provision of under-5s play space corresponds to the child yield of each building to comply with 3D.13.
- Urban design and tall buildings: The design, massing and external appearance of the taller elements is not considered to be high quality design of a standard appropriate to a tall building. Internal layouts are inappropriately sized and oriented and will not provide a high quality residential accommodation across all tenures. Consequently, the proposal does not currently comply with London Plan policies 4B.1 and 4B.10.
- Access and inclusive design: Amenity space does not appear to be designed to be fully inclusive for all and therefore is not currently compliant with London Plan policy 4B.5.
- Climate change: insufficient information has been submitted with regards to the energy demand assessment modelling, cooling demand and technologies, and compatibility of

technologies proposed, and therefore the proposal is not yet compliant with London Plan policies 4A.3, 4A.4, 4A.6 and 4A.7.

- Transport: concerns remain relating to the proposed level of car parking, the strategy for accommodating coaches for the leisure centre, the transportation modelling submitted. The applicant has not submitted a delivery and servicing plan, and has provided insufficient information relating to cycling provision. The proposal is therefore not compliant with London Plan policies 3C.2, 3C.23, 3C.25.

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

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

- Housing: submission of further information or revision of the affordable housing offer to ensure that the proposal represents the maximum reasonable amount of affordable housing and mix that corresponds to strategic needs. Further detail should be provided to ensure that the provision of under-5s play space corresponds to the child yield of each building.
- Urban design: The design of the taller elements requires further development to ensure it represents high quality design of a standard appropriate to a tall building, and internal layouts require further consideration to ensure they are appropriately sized and oriented to ensure a high quality residential accommodation across all tenures.
- Access and inclusive design: further information must be submitted to demonstrate that all amenity space is designed to be fully inclusive for all.
- Climate Change: further information in regards to the energy demand assessment modelling, cooling demand and technologies, and compatibility of technologies proposed.
- Transport: A reduction in car parking in line with the London Plan standards, the submission of further information and alternate strategy for accommodating coaches, further modelling of junctions around the site, submission of a delivery and servicing plan and a workplace travel plan, and more information regarding the Waterlink Way and cycling provision for non-residential uses.

---

for further information, contact Planning Decisions Unit:

**Giles Dolphin, Head of Planning Decisions**

020 7983 4271 email giles.dolphin@london.gov.uk

**Justin Carr, Strategic Planning Manager (Development Decisions)**

020 7983 4895 email justin.carr@london.gov.uk

**Alexandra Reitman, Case Officer**

020 7983 4804 email alexandra.reitman@london.gov.uk

---