Strategic planning application stage II referral


The proposal

Re-development comprising extension, alterations and demolition to provide a mixed use development of up to 12 storeys, comprising 148 residential units, 4,733 sq.m. of commercial space, together with new open space, landscaping, and parking.

The applicant

The applicant is Workspace plc and the architect is Karakusevic Carson Architects.

Strategic issues

The principle of a mixed use development that retains an employment function in the Deptford Creek /Greenwich Riverside Opportunity Area is supported. The architectural quality is high and the scheme would be acceptable in terms of strategic views. The affordable housing offer is appropriate, with the applicant having demonstrated that this is the maximum reasonable amount that can be provided. Further information has been provided in relation to outstanding points raised in relation to access and transport matters, and appropriate conditions and s106 obligations secured to ensure compliance with the London Plan.

The Council’s decision

In this instance Lewisham Council has resolved to grant permission.

Recommendation

That Lewisham Council be advised that the Mayor is content for it to determine the case itself, subject to any action that the Secretary of State may take, and does not therefore wish to direct refusal or direct that he is to be the local planning authority.

Context

1. On 7 January 2013 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. This was referred to the Mayor under the following Categories of the Schedule to the Order 2008:
1B (c) Development which comprises or includes the erection of a building outside Central London and with a total floorspace of more than 15,000 square metres

1C Development which comprises the erection of a building that is more than 30 metres high and is outside the City of London.

3E Development — (a)which does not accord with one or more provisions of the development plan in force in the area in which the application site is situated; and (b) comprises or includes the provision of more than 2,500 square metres of floorspace for a use falling within (vi) class B1 (business).

2 On 13 February 2013 the Mayor considered planning report PDU/2864/01, and subsequently advised Lewisham Council that the application was broadly acceptable but did not fully comply with the London Plan, with the reasons and remedies set out in paragraph 58 of the report.

3 A copy of the above-mentioned report is attached. The essentials of the case with regard to the proposal, the site, case history, strategic planning issues and relevant policies and guidance are as set out therein, unless otherwise stated in this report. On 2 May 2013 Lewisham Council decided that it was minded to grant planning permission and on 8 August 2013 it advised the Mayor of this decision. Under the provisions of Article 5 of the Town & Country Planning (Mayor of London) Order 2008 the Mayor may allow the draft decision to proceed unchanged, direct Council under Article 6 to refuse the application or issue a direction to Lewisham Council under Article 7 that he is to act as the Local Planning Authority for the purposes of determining the application and any connected application. The Mayor has until 21 August 2013 to notify the Council of his decision and to issue any direction.

4 The environmental information for the purposes of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 has been taken into account in the consideration of this case.

5 The decision on this case, and the reasons will be made available on the GLA’s website www.london.gov.uk.

Update

6 At the consultation stage, it was noted that the principle of redevelopment was acceptable in strategic planning terms, and the tall building as well as the architecture and design were supported. There were a number of points for which clarification or further information were required in order to demonstrate that the scheme was in full accordance with the London Plan. This related to the workspace, affordable housing, housing mix, inclusive design, and transport. Appropriately worded conditions were also requested in relation to residential amenity, inclusive design, sustainability and play space, which have been incorporated into the decision by the Council. Taking each of the outstanding issues raised at Stage 1, the following is noted:

Business space – land use principles

7 Given local concerns about the displacement of existing business and potential loss of affordable workspace, the Council has been working with the applicant to develop a series of mitigation measures, including surveys, relocation strategy, and Business Continuity Fund to support tenants with temporary or permanent relocation costs. There is also a commitment to support and relocate several of the charitable businesses within the buildings in particular, secured in the s106 agreement. These commitments are welcomed and ensure that concerns raised at the initial consultation stage about business retention and affordable workspace have been addressed.
Housing

At the initial consultation stage, it was noted that it still needed to be demonstrated that the maximum reasonable amount of affordable housing was being provided. The scheme proposes 14% affordable housing, made up entirely of affordable rent. The Council has commissioned an independent review, which confirms that when taken with other policy requirements and the regeneration benefits of the scheme, that the affordable housing provision is acceptable. The viability of the scheme is challenged by the extensive costs of refurbishing the retained buildings and the inclusion of the Business Continuity Strategy to mitigate the impact of the development on employment in the borough. The tenure has also been confirmed by the Council as appropriate in terms of delivering the maximum amount of affordable housing, and that the mix is appropriate for this site. The Council has also secured a review mechanism in the s106, noting the affordable housing level, ability to phase the development and that there may be an improvement in sales values in the future. On this basis, it has been satisfactorily demonstrated that the scheme is in accordance with London Plan policy 3.12.

Inclusive design

At the initial consultation stage, the inclusive design commitments of the applicant were noted. The applicant has indicated the location of the wheelchair accessible units, which are across the development in a range of unit types and tenure. The Council has secured a minimum provision of 15 wheelchair accessible units and a parking space for each within the s106, which is welcomed and ensures compliance with London Plan policies 3.8 and 7.2.

Transport

Following the Stage 1 report and consideration by the Council, outstanding points raised in relation to transport have been resolved and appropriately worded conditions and planning obligations secured. Of note is that the car parking at the development would be limited to 0.14 spaces per residential unit, with seven spaces for the commercial element. The draft s106 provides for an on-site car club space and a contribution towards a future controlled parking zone, subject to local consultation. The latter will prevent overspill parking on Creekside as new residents would be ineligible for permits. A travel plan and car parking management plan have been secured by condition. Furthermore, a minimum of 20% of the car parking spaces are required to be fitted with electric vehicle charging points. The car parking management plan should consider how this could be increased in the future, in terms of passive provision, to fully accord with London Plan policy. Each of the wheelchair units is now proposed to have a car parking space, which is welcomed.

In relation to cycling, the development would provide 210 cycle parking spaces (34 commercial and 176 residential), which exceeds the London Plan minimum standards and will be secured by condition.

The pedestrian environment in the immediate vicinity of the site will be improved as part of the development. In addition, £430,000 towards transport and public realm will be secured in the s106 agreement which would be used towards pedestrian and cycle improvements in the wider area including the A2 junction. A further obligation is the provision of a real-time public transport service information board within the development.

In combination, these measures address previous concerns about the contribution this development would make to over saturation of the A2 Deptford Church Street junction.

It is also noted that the Council has resolved to impose a number of conditions to minimise the impact of the development upon DLR operations and the adjacent viaduct. These are in line with TfL’s requests and are therefore welcomed. TfL (DLR) should be consulted when
the landscaping details are submitted for approval to enable confirmation that suitable treatment is proposed beneath and adjoining the viaduct. An approved service management strategy and a construction management plan (including how risks to cyclists and pedestrians will be minimised) are also required by way of condition.

15 In summary, the concerns raised at Stage 1 have been appropriately addressed and the application is acceptable in strategic transport terms.

**Response to consultation**

16 The application was advertised by site and press notices and consultation letters, which were sent to 729 neighbouring properties. An additional round of consultation was carried out following the receipt of additional information from the applicant.

17 A total of 55 objections have been received, together with a petition with 111 signatures.

18 The concerns raised by objectors are summarised as follows:

- Heritage/conservation: the existing buildings are of heritage value and should not be demolished; the scheme does not preserve industrial character.
- Height, massing, scale, design: the 12-storey building is out of keeping with the area, dwarfing Deptford Creek; the materials are out of keeping with its industrial character;
- Amenity: overshadowing; loss of daylight; loss of outlook; vermin, noise and dust pollution during construction;
- Density: the scheme represents overdevelopment of the site, and does not have regard to the surrounding area.
- Housing: the quality of the accommodation would be affected by surrounding uses, including the DLR; there are already too many flats in the area; not enough affordable housing or family housing proposed; the local infrastructure is not adequate to cater for the rising population; there is insufficient communal amenity space.
- Uses: the applicant has driven out local businesses; loss of employment and cultural uses; more units should be in Class B2 use; the units are too small; the scheme displaces existing artists and businesses to the detriment of Creekside’s character; there are no alternative affordable spaces to relocate to; the rents would no longer be affordable; there are already a number of empty offices in the area;
- Environmental: the scheme would harm the ecology of Deptford Creek including pollution from demolition and construction; the scheme should secure open access to Creek; the drainage systems in the area are inadequate; insufficient mitigation is proposed; the landscaping proposals are insufficient; ecological landscaping is crucial in terms of mitigation;
- Highways and Transport: the Creek should be used to transport materials; construction vehicles would cause congestion; applicant should fund improvements to paths and roads; pedestrian movement would be constrained; congestion of canal towpath; overcrowding of tube station; servicing and demolition traffic; insufficient parking for a scheme of this scale;
- Other issues raised include poor consultation by the applicant, incorrect quotes in the Environmental Statement.

19 A number of amenity groups have objected to the scheme, including the Friends of Deptford Creek, Greenwich Conservation Group, and Creekside Education Trust, which adjoins the site. These comments are included in the summarised list above.

20 Matters relating to impact upon local amenities and residential amenity of surrounding residents are not in this instance strategic planning matters and have been assessed by the Council in the committee report with appropriately worded conditions and planning obligations secured. In
relation to the objections raised by local residents in relation to the principle of the use, affordable housing, tall buildings and urban design, ecology, and transport issues, these matters have been dealt with in this and the previous report.

21 Other statutory consultees responded as follows:

**Thames Water:** Notes safeguarding direction in relation to Thames Tideway Tunnel Project; seeks appropriately worded conditions required in relation to piling, drainage, water infrastructure and groundwater extraction, which have been secured by the Council.

**English Heritage (Archaeology):** No objection raised – it is unlikely that any archaeological fieldwork is required prior determination but the Council has secured conditions requiring any necessary investigations prior to works commencing.

**English Heritage:** The building proposed for demolition is not considered to make a positive contribution to the conservation area, and the proposed design approach is appropriate. There are some areas where concerns have been raised, in relation to LVMF views and the relationship of the new residential block to Building C, but considers that the scheme should be determined in accordance with national and local policy guidance and on the basis of specialist conservation advice.

**London Wildlife Trust:** Notes the landscaping proposals, including green walls and brown roofs, but seeks a review of the type of planting proposed for the Creek edge and wildflower area.

**Port of London Authority:** No objections to the scheme subject to a management regime being secured in relation to the proposed ecological fenders on the existing steel sheet piles, which would need a River Works Licence. The Council has secured conditions regarding management and maintenance of the scheme’s landscaping proposals.

**Greenwich Council:** Has raised concerns about the height of the development upon views from Blackheath Point. This point is assessed in the Stage 1 report and the impact was not considered to be harmful.

**Article 7: Direction that the Mayor is to be the local planning authority**

22 Under Article 7 of the Order the Mayor could take over this application provided the policy tests set out in that Article are met. In this instance the Council has resolved to grant permission with conditions and a planning obligation, which satisfactorily addresses the matters raised at stage I, therefore there is no sound planning reason for the Mayor to take over this application.

**Legal considerations**

23 Under the arrangements set out in Article 5 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor has the power under Article 6 to direct the local planning authority to refuse permission for a planning application referred to him under Article 4 of the Order. He also has the power to issue a direction under Article 7 that he is to act as the local planning authority for the purpose of determining the application and any connected application. The Mayor may also leave the decision to the local authority. In directing refusal the Mayor must have regard to the matters set out in Article 6(2) of the Order, including the principal purposes of the Greater London Authority, the effect on health and sustainable development, national policies and international obligations, regional planning guidance, and the use of the River Thames. The Mayor may direct refusal if he considers that to grant permission would be contrary to good strategic planning in Greater London. If he decides to direct refusal, the Mayor must set out his reasons, and the local planning authority must issue these with the refusal notice. If the Mayor decides to
direct that he is to be the local planning authority, he must have regard to the matters set out in Article 7(3) and set out his reasons in the direction.

Financial considerations

24 Should the Mayor direct refusal, he would be the principal party at any subsequent appeal hearing or public inquiry. Government guidance in Circular 03/2009 ('Costs Awards in Appeals and Other Planning Proceedings') emphasises that parties usually pay their own expenses arising from an appeal.

25 Following an inquiry caused by a direction to refuse, costs may be awarded against the Mayor if he has either directed refusal unreasonably; handled a referral from a planning authority unreasonably; or behaved unreasonably during the appeal. A major factor in deciding whether the Mayor has acted unreasonably will be the extent to which he has taken account of established planning policy.

26 Should the Mayor take over the application he would be responsible for holding a representation hearing and negotiating any planning obligation. He would also be responsible for determining any reserved matters applications (unless he directs the council to do so) and determining any approval of details (unless the council agrees to do so).

Conclusion

27 Having regard to the details of the application, the matters set out in Lewisham Council’s committee report, draft section 106 agreement, and its draft decision notice, this scheme is acceptable in strategic planning terms, delivering regeneration, jobs and homes in the Deptford Creek/Greenwich Riverside Opportunity Area without harm to strategic views. Further information has been provided, which together with conditions (and planning obligations) imposed by Lewisham Council, address the outstanding issues that were raised at Stage 1. On this basis, the proposed development is acceptable in strategic planning terms.

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Strategic planning application stage 1 referral (new powers)


The proposal

Re-development comprising extension, alterations and demolition to provide a mixed use development of up to 12 storeys, comprising 148 residential units, 4,733 sq.m. of commercial space, together with new open space, landscaping, and parking.

The applicant

The applicant is *Workspace plc*, the architect is *Karakusevic Carson Architects*.

Strategic issues

The principle of a **mixed use** development that retains an employment function is acceptable. The scheme includes **affordable housing**, which is still the subject of discussion and negotiation to ensure the maximum reasonable amount would be delivered. Other strategic issues such as **inclusive design**, **climate change mitigation** and **adaptation** and **residential quality** are in line with the London Plan, subject to appropriate conditions and s106 obligations. There are outstanding **transport** matters that require resolution, as detailed below.

Recommendation

That Lewisham Council be advised that the application is broadly acceptable but does not fully comply with the London Plan, for the reasons set out in paragraph 58 of this report.

Context

1. On 7 January 2013 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 15 February 2013 to provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor’s use in deciding what decision to make.

2. The application is referable under the following categories of the Schedule to the Order 2008:
1B (c) Development which comprises or includes the erection of a building outside Central London and with a total floorspace of more than 15,000 square metres

1C Development which comprises the erection of a building that is more than 30 metres high and is outside the City of London.

3E Development — (a) which does not accord with one or more provisions of the development plan in force in the area in which the application site is situated; and (b) comprises or includes the provision of more than 2,500 square metres of floorspace for a use falling within (vi) class B1 (business).

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 has been taken into account in the consideration of this case.

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

Site description

6 The site, known as Faircharm Estate, is a 0.97 hectare site containing three large inter-connected factory buildings operated by Workspace and containing approximately 12,000 sq.m. of floor space for light industrial and business uses.

7 It is located on the western side of Creekside in the north of the borough of Lewisham. To the north is an ecology centre, with the railway line between Greenwich and Deptford beyond that. Deptford Creek runs alongside the site to the east and south east, and directly to the south is Harold Wharf, which is used as art space. The surrounding area is mixed in character, including local authority estates, commercial and industrial uses.

8 The site is located within the Strategic View Corridor of St Paul’s Cathedral from Blackheath Point. It is designated as a Local Employment Location within the Core Strategy, Flood Zone 3A, and also an Archaeological Priority Area. The Creek itself is designated as a Site of Importance for Nature Conservation (SINC). The buildings also fall within the recently designated Deptford Creekside Conservation Area.

9 The nearest part of the Transport for London Road Network (TLRN) is the A2 Deptford Broadway. The nearest part of the Strategic Road Network (SRN) is the A200 Creek Road. Both these roads are just under 500 metres from the site. They are linked by Deptford Church Street, off which is Creekside, which is directly adjacent to the site as is and the only access road for the site. Both these roads are part of the borough highway network.

10 Creekside forms part of National Cycle Network route 21, however the road is a poor environment for cyclists and pedestrians. Footways are narrow, there are many pot holes and on-street parking and servicing associated with the adjacent industrial and residential units can be obstructive. Creekside is also heavily used as a short cut between the A2 and A200.

11 A number of bus routes pass within walking distance of the site, as is Deptford National Rail station and the separate Deptford Bridge DLR station. The site records a public transport
accessibility level (PTAL) of 4, on a scale of 1 to 6, where 6 is the highest, so access to public transport can be considered to be ‘good’.

Details of the proposal

12 The application proposes remodelling, repair, restoration and conversion of two existing buildings fronting the site to contain commercial uses. At the rear, demolition of the existing buildings is proposed, with redevelopment comprising four new buildings ranging in height from six to 12 storeys to provide commercial and residential floor space.

13 In total, 148 residential units are proposed, together with 4,734 sq.m. (GIA) of mixed commercial (Use Class B1) floor space. Car parking at surface level is proposed, for 28 cars, together with cycle parking, and associated public realm and landscaping.

Case history

14 Pre-application officer-level discussions have taken place regarding the scheme, where the principles of the scheme, including a tall building were accepted, subject to clarification on a number of points, including impact upon views, affordable housing, detailed design, public realm, access, transport and climate change.

Strategic planning issues and relevant policies and guidance

15 The relevant issues and corresponding policies are as follows:

- **Principle of development**  
  London Plan;

- **Housing – affordable housing**  
  London Plan; Housing SPG; Housing Strategy; draft Revised Housing Strategy; Providing for Children and Young People’s Play and Informal Recreation SPG

- **Density**  
  London Plan; Housing SPG

- **Tall buildings/strategic views**  
  London Plan, LVMF SPG (2012)

- **Urban design**  
  London Plan;

- **Access**  
  London Plan; Accessible London: achieving an inclusive environment SPG; Planning and Access for Disabled People: a good practice guide (ODPM)

- **Sustainable development**  
  London Plan; Sustainable Design and Construction SPG; Mayor’s Climate Change Adaptation Strategy; Mayor’s Climate Change Mitigation and Energy Strategy; Mayor’s Water Strategy

- **Transport and parking**  
  London Plan; revised Early Minor Alteration to the London Plan; the Mayor’s Transport Strategy

- **Crossrail/CIL**  
  London Plan; Mayoral Community Infrastructure Levy; Crossrail SPG

16 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is the 2010 Hackney Core Strategy, the 1995 Unitary Development Plan and the 2011 London Plan.

17 The following are also relevant material considerations:


- Lewisham Development Policies and Site Allocations DPD (preferred options)
Principle of development

18 The site, which falls within the Deptford Creek/Greenwich Riverside Opportunity Area, is in light industrial and business use at present, operated by the applicant, Workspace. The London Plan seeks to develop the Opportunity Area for a range of uses, with a cultural quarter, small scale leisure and tourism, business workspaces and additional housing, identifying the potential for up to 4,000 jobs and 5,000 homes. The proposal is in accordance with this strategic policy direction. It is noted that the site is designated as a ‘Local Employment Location’ in the Council’s Core Strategy and as such, in accordance with policy 4.4 of the London Plan there is an assumption that the continuing use of the site for industrial and business uses should be the first priority. The Core Strategy notes that this is a vibrant employment site in a well established light industrial area of the borough and highlights that the area is emerging as a significant cluster for creative businesses, with Faircharm Estate as a dominant presence.

19 The applicant is a provider of affordable, managed business accommodation for small and medium enterprises (SME’s) in London. The existing site contains approximately 12,700 sq.m. of floor space, accommodating approximately 139 full time equivalent jobs in a range of creative industries, other business and charitable organisation. The applicant notes that rent levels are low but service charges are relatively high, reflecting the poor quality of the existing building fabric and the high cost of ongoing maintenance. This combination of low rents, low occupancy and high maintenance costs has meant that insufficient revenue has been generated to sustain the site in its current form. The scheme proposes a reduction in commercial floor space overall, by approximately 8,000 sq.m., but proposes to make more efficient use of the space and provide a series of flexible start up studio, gallery, and business floor space, with over 200 additional jobs being created.

20 In seeking to address the Council’s policy requirement that the site remain in employment use, the applicant has analysed a range of scenarios throughout the pre-application process to demonstrate that the retention of solely employment floor space is not sustainable or viable. In accordance with the London Plan, it is acknowledged that a mixed use development is a means of bringing forward jobs and growth, and new homes. In this instance, the reduction in floor space is substantial, and whilst it is acknowledged that the scheme makes more efficient use of the space and nearly triples the number of jobs on site, it will be important to ensure that mechanisms are in place to secure the type of businesses that will achieve these employment numbers and affordability levels, with flexibility to ensure that a range of businesses of different types and sizes, including small and medium sized enterprises can be accommodated. Evidence of how existing occupiers of the development would be accommodated, and how Workspace will encourage them to remain and relocate following redevelopment.

21 It will also be important for appropriately worded conditions to be imposed, which would protect the amenities of future residents without undermining or restricting the operation of the commercial uses.

Housing

22 The scheme proposes 148 new homes, which would contribute to Lewisham’s annual housing target of 1,105 homes. The proposed mix is as follows:
### Affordable housing

23 As noted above, the scheme proposes 14% affordable housing. In order to accord with the Council’s policy and London Plan requirements to demonstrate that the maximum reasonable amount of affordable housing is being delivered, the applicant has submitted a viability assessment to the Council to support its assertions that an appropriate affordable housing offer is being made. It is acknowledged that discussions regarding the affordable housing offer are ongoing and further analysis, including an independent appraisal of the toolkit, is required in order to satisfy policy requirements. The findings of the Council’s independent surveyor, together with a draft of the section 106 legal agreement will need to be provided to the GLA prior to the Stage 2 referral. This review will need to analyse in detail the costs and values that have been inputted to the toolkit and verify the assumptions that have been made in relation to rent levels.

24 In terms of tenure, the scheme would deliver wholly affordable rent, which will need to be discussed further to understand whether this meets local housing needs.

25 As noted in the London Plan, there are also circumstances where boroughs should consider whether it is appropriate to put in place provisions for re-appraising the viability of schemes, and maximise affordable housing provision, taking into account the possibility of increased sales values in the future. Such an approach might be appropriate for this scheme, given the level of affordable housing and length of time that may pass from initial toolkit appraisal to actual build out.

### Housing mix

26 The development is heavily skewed towards one and two bed units, with only one 3-bed unit provided in the affordable housing element. This does not comply with Lewisham’s emerging policy or the thrust of London Plan policy. Whilst it is acknowledged that this a high density mixed use development, with limited amenity space, further discussion (including confirmation from the Council’s housing team) will be appropriate in order to be clear as to what extent the mix reflects local needs and the Council’s housing requirements. Subject to the views of the Council, the applicant should explore the potential to increase the proportion of larger family sized units, particularly in the affordable element.

### Residential quality

27 Generally the residential quality of the development is very good. The applicant has provided floor plans showing that flats would meet and exceed the space standards set out in table 3.3 of the London Plan. Units are dual aspect where possible and have access to balconies or terraces. There are no solely north facing units, and there are large windows and storage provided for dwellings. Maisonettes with front doors at street level are provided where possible and there are no more than six units per floor.

### Children’s play space

<table>
<thead>
<tr>
<th>Unit Type</th>
<th>Private</th>
<th>Affordable rent</th>
<th>Total</th>
</tr>
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<tbody>
<tr>
<td>1-bed</td>
<td>55 (43%)</td>
<td>7 (33%)</td>
<td>62</td>
</tr>
<tr>
<td>2-bed</td>
<td>56 (44%)</td>
<td>13 (62%)</td>
<td>69</td>
</tr>
<tr>
<td>3-bed</td>
<td>16 (13%)</td>
<td>1 (5%)</td>
<td>17</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td>127</td>
<td><strong>21</strong></td>
<td><strong>148</strong></td>
</tr>
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</table>

**Affordable housing**

<table>
<thead>
<tr>
<th></th>
<th>14%</th>
<th></th>
<th>86%</th>
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<tbody>
<tr>
<td><strong>Total</strong></td>
<td><strong>148</strong></td>
<td><strong>100%</strong></td>
<td><strong>14</strong></td>
<td><strong>100%</strong></td>
</tr>
</tbody>
</table>
Based on the Mayor’s playspace SPG, 28 children are predicted to live in the development of which 17 would be under the age of 5. This gives rise to a total child playspace requirement of 280 sq.m. of which 170 sq.m. should be on-site and designed for under 5s. The scheme proposes 1,140 sq.m. of dedicated open space on site, of which 200 sq.m. is play space for children. The details of this play space should be secured by way of condition.

Density

The applicant has calculated the density to be 539 habitable rooms per hectare, using the methodology set out in the Housing SPG for mixed use developments. With a PTAL level of 4 and being within an urban area, the scheme falls within the density range set out in the London Plan and is acceptable.

Strategic views / tall buildings / urban design

The development is within the Blackheath Point to St Paul’s Cathedral strategic viewing corridor, as set out in the London View Management Framework (LVMF) SPG. The management plan for this view, which is detailed within the LVMF, suggests that St Paul’s Cathedral, as the focus of attention in this view, is its most important feature. However it also identifies St Paul’s Deptford as a local legibility feature. Both are Grade-I listed, meaning that strategic views are an important part of their setting.

The applicant has prepared a detailed townscape and visual impact assessment that considers local and strategic views. This study shows that the visual impact on the wider area, including listed buildings and nearby conservation areas, would not be significant. The impact on the longer distance viewing corridors from Blackheath Point (LVMF View 6) and Blythe Hill Fields (a Lewisham UDP Designated View) have also been evaluated and demonstrates that views of St Paul’s and St Paul’s Deptford would be maintained, and not unduly impacted upon.

This scheme has been the subject of extensive pre-application discussions, during which the scheme has evolved significantly following the designation of the Deptford Creekside Conservation Area (which includes Faircharm Estate), in May 2012. The applicant subsequently reconsidered their proposal in the light of this designation and submitted this current scheme which retains and remodels two of the three existing buildings (Buildings B and C) for new commercial uses, and entails the demolition of one building (Building A) to facilitate construction of four new blocks of flats (one of 12 storeys and two of six and seven storeys).

The retention of the 1950s buildings fronting Creekside and their sensitive remodelling and imaginative refurbishment for new B1 commercial uses is welcomed. This will greatly assist in the preservation of the intrinsic mid 20th century industrial character and townscape of this part of the Conservation Area viewed from Creekside. The retention of these buildings also greatly mitigates the height of the proposed 12 storey tower from the vantage point of this thoroughfare and from the public realm within the Crossfields Estate – they act as an effective foil to the taller building.

The height of the tallest block of flats, at 12 storeys (Building 04), does represent a very substantial increase in scale compared with the existing three storey Building B. The massing, articulation and rhythm of inset balconies and the richly textured facing brickwork should create a new landmark on the Creek, which respects and reinforces its industrial character.

The proposal creates a sequence of clearly legible spaces and views between the buildings to be retained and the new-build elements which it is considered will work well, respecting the urban grain of the historic district with its established network of courtyards and alleys, and enhancing its character.
The palette of materials of the new buildings has been well considered – the brick elevations (with colour-matched mortar and good articulation afforded by the differing brick tones and reveals), galvanised steel elements and the granite sets of the yards and paths complements the Creekside warehouse vernacular and thus enhance the character of the conservation area. The simple fair-faced concrete slab and balustrade railings of the projecting balconies are very much in keeping with the robust waterside architectural idiom.

The landscape and public realm strategy considers the existing ecology of the area and the approach to creating public spaces, yards and gardens, is in harmony with and responding to the established ‘creekscape’. The detailed hard and soft landscaping proposals should enhance the site representing a significant improvement on the harsh car parking and servicing areas that currently detract from the setting of the Creek. The orientation of the new buildings with their staggered building lines, varying heights, mixed uses and generous open landscaped areas along the creek-edge should also enhance its character.

The roofscape of the medium-rise new-build blocks also echoes the jumble of different roof-forms of this industrial area, comprising asymmetrical top storeys with irregular set-backs and contrasting metal-clad materials as exist elsewhere in the conservation area.

Inclusive design

The application is accompanied by access statements which cover the principles of inclusive design, access across the site, pedestrian routes, and drop off points. The level of detail provided is welcomed and all of the external gradients and access routes into the site for pedestrians are acceptable. Noting the varying levels across the site and within the existing buildings, there are stepped routes across the site at present. The scheme has been designed to provide level access into the buildings, and lifts are provided to all floors (with the exception of mezzanine levels). The exception is the refurbished Building A, where the main entrance requires an internal lift to be provided. This is accepted, noting the 1.6 metre level change.

The applicant has set out how each of the 16 points for Lifetime Homes will be met and has confirmed that 15 (10%) of units would be provided as wheelchair adaptable, spread across a range of unit sizes. Typical flat layouts are shown, with details of how relevant standards would be met. Details should be provided confirming the location of these units, and that they cover both private and affordable housing and are not clustered together. Ideally some would be fitted out as accessible from the outset. These commitments should be secured by way of condition.

In terms of parking provision, the scheme proposes three disabled parking bays out of a total of 28, which falls short of the expected one space per wheelchair accessible flat. As such, the parking management plan should include 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.

Climate change mitigation

The applicant has followed the energy hierarchy and is proposing to reduce carbon emissions by 27%, thus exceeding London Plan targets. Savings of 2% will be achieved from energy efficiency measures with 21% savings from a combined heat and power plant, which will provide the lead source of heat for the site wide energy network. The applicant is also proposing to install 200 sq.m. of solar photovoltaic panels on the roof of the building, providing a further 6% savings.
The applicant has also provided a commitment to ensuring that the development is designed to allow future connection to a district heating network should one become available. This together with a commitment to connect all apartments and non-domestic buildings to a single site wide energy network should be secured by condition or planning obligation.

**Climate change adaptation**

The applicant has submitted a sustainability report, which includes relevant BRE and Code for Sustainable Homes and pre-assessments. The applicant states that it is intended that all homes be designed to meet Code for Sustainable Homes Level 4 and BREEAM ‘very good’ for the retail space. The applicant’s statement sets out a number of techniques proposed to reduce energy consumption and cut carbon emissions, with high insulation, energy efficient glazing, and heat recovery, making use of orientation for solar gain and shading. Low energy lighting, energy efficient appliances, low water use sanitary-ware and fittings are proposed.

Noting the location within Flood Risk Zone 3A, a sustainable urban drainage system is proposed. Of particular note is that green roofs and rain water harvesting are proposed to address surface water management. The drainage strategy involves the majority of surface water discharge to the Creek, in agreement with Thames Water. The applicant’s commitments should be secured by way of condition.

In light of the location adjacent to the River Thames, policies 7.26 and 7.27, which relate to the Blue Ribbon Network, are also of relevance. Consideration should be given to using water based transport for freight if feasible, particularly during demolition and construction phases. Appropriately worded conditions should be secured.

**Transport**

**Highway Impact**

TfL modelling of the A2 Deptford Bridge/Deptford Broadway/Deptford Church Street junction showed above 100% saturation on some arms with already permitted development flows. Therefore any additional impact from this development will add to the oversaturation i.e. increase queue lengths. As such it is vital that, despite the low car parking provision (25 spaces) and low predicted traffic generation from the site, the mode share for walking, cycling and public transport is maximised.

Thus it is expected that section 106 funding would be secured in this respect, for example improving the currently poor pedestrian and cycle environment on Creekside, contributing to planned improvements at the A2 Deptford Bridge/Deptford Broadway/Deptford Church Street junction as part of TfL’s ‘Better Junctions’ programme, and contributing towards information provision and signage to and at the DLR station at Deptford Bridge. Cycle Superhighway 4 is also planned to run along Creek Road, funded through the TfL Business Plan, so it may be appropriate to seek contributions towards improving cycle links/signage to this route. A robust travel plan seeking to minimise peak hour traffic should also be secured, and likewise a delivery and servicing plan and a construction logistics plan.

The transport assessment (TA) shows that in future years, queue lengths on Creekside at its junctions with Creek Road and Deptford Church Street become significant as traffic increases due to local developments. It is unlikely that signalisation of the Creek Road/Creekside junction would be supported at a strategic level due to the impact on traffic flow on Creek Road (part of the SRN). Therefore it is suggested that options to ‘calm’ Creekside to discourage through traffic are considered, with developer funding sought if appropriate. This will also benefit pedestrians and cyclists.
Public transport impact

50 Due to the variety of services in the area and the relatively small number of trips produced, it is unlikely that the development will have an impact on public transport capacity.

51 One concern however, is the proximity of the development proposals to the DLR. Although the 5m protection zone is respected, TfL is seeking conditions to ensure that detailed design and construction methodology are agreed with, and approved by, DLR prior to commencement. This is in order to ensure that the proposals do not compromise the safe and effective operation of the DLR network. The development should also incorporate appropriate mitigation against noise, vibration and visual impacts on residents and occupiers arising from DLR operations.

Walking and Cycling

52 As highlighted above, the main access road, Creekside, is a relatively poor quality environment, particularly at the south end – the main route to the DLR station. As such, it is expected that the developer will contribute funds to improvements where possible, noting that major improvements such as footway widening may only be possible following redevelopment of adjacent sites.

Car Parking

53 The development has a relatively low (less than 0.2 spaces per dwelling) car parking provision and this is strongly supported.

54 Provision of blue badge and cycle parking and electric vehicle (EV) charging points for both the commercial and residential units should conform with London Plan standards. Details should be secured by way of condition.

Local planning authority’s position

55 The Council is presently reviewing the scheme and has sought further information on some aspects of the scheme. It is due to report to Committee in April 2013.

Legal considerations

56 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

57 There are no financial considerations at this stage.

Conclusion
The application broadly complies with the London Plan, however, further information and/or confirmation, as detailed below is required to comply fully.

- **Principle of use**: A mixed use development within the Deptford Creek/Greenwich Riverside Opportunity Area is acceptable in principle, and whilst a reduction in commercial floor space is proposed, there would be a projected increase in employment numbers. Details of the proposed business space should be secured in the section 106 agreement.

- **Housing**: The viability assessment should be independently assessed and its findings shared with the GLA. The acceptability of the housing mix, particularly the number of three-bed affordable units should be confirmed by the Council. Details of the fit out of the children’s play area needs to be provided and secured. The density is acceptable and the high standard of housing quality is welcomed.

- **Tall buildings, views and urban design**: The scheme is of high architectural quality, and the scheme respects the heritage designations, and would not adversely impact upon strategic views.

- **Inclusive design**: The inclusive design provisions are welcomed. The 100% Lifetime Homes and 10% wheelchair accessible flats should be secured by condition. Confirmation regarding the location of the wheelchair accessible flats should be provided and a parking management plan secured.

- **Climate change**: The proposed 25% carbon dioxide savings are welcomed. Potential future connection to a heat network, together with commitment to a single site wide energy strategy should be secured. The sustainability measures are in accordance with the Mayor’s standards and should be secured by condition.

- **Transport**: The scheme is acceptable in principle but the poor quality of the pedestrian and cycle environment needs resolving, together with protection of DLR assets and operations. Prior to Stage 2, the developer and/or Council should therefore clarify how these issues are intended to be addressed.

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