St. Dunstan’s Jubilee Sports Ground, Catford Road
in the London Borough of Lewisham
planning application no. DC/16/096086

<table>
<thead>
<tr>
<th>Strategic planning application stage 1 referral</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>The proposal</th>
</tr>
</thead>
<tbody>
<tr>
<td>Part change of use of St. Dunstan’s Jubilee Sports Ground into a day nursery.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>The applicant</th>
</tr>
</thead>
<tbody>
<tr>
<td>The applicant is St. Dunstan’s Education Foundation and the architect is PLB.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Strategic issues summary</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Land use principle:</strong> The application is for <strong>change of use</strong> only, with minor arrangements to the elevations and external works to create outside space for use by the nursery. Given there would not be any change in the size and height of the built environment, the material harm of the proposed nursery on the openness of the MOL and the playing fields is negligible, and <strong>raises no strategic concern</strong>. The provision of a nursery is <strong>supported</strong> in accordance with London Plan policy 3.18 particularly in the context of the significant quantum of housing development being brought forward in Catford. The proposal is therefore <strong>acceptable</strong>. (Paragraphs 15–20).</td>
</tr>
</tbody>
</table>

| Transport: | Tfl will work with the Council and the applicant to resolve the transport issues identified. |

<table>
<thead>
<tr>
<th>Recommendation</th>
</tr>
</thead>
<tbody>
<tr>
<td>That Lewisham Council be advised that the application complies with the London Plan, for the reasons set out in paragraph 32 of this report and does not need to be referred back to the Mayor.</td>
</tr>
</tbody>
</table>
Context

1 On 25 May 2016 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 5 July 2016 to provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. 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:

Category 3D – “Development – (a) on land allocated as Green Belt or Metropolitan Open Land in the development plan, in proposals for such a plan, or in proposals for the alteration or replacement of such a plan; and (b) which would involve the construction of a building with a floor space of more than 1,000 square metres or a material change in the use of such building.”

Category 3C – “Development which is likely to prejudice the use as a playing field of more than 2 hectares of land which —(a) is used as a playing field at the time the relevant application for planning permission is made; or (b) has at any time in the five years before the making of the application been used as a playing field.”

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 or allow the Council to determine it itself, unless otherwise advised. In this instance, the Mayor does not need to be consulted again on this application.

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

Site description

5 The Jubilee Sports Ground is within an area of Metropolitan Open Land and Culverley Green Conservation Area. It fronts the southern side of the South Circular Road (A205) at Catford Bridge and extends to approximately 8 hectares in size. The sports ground is bounded by the A205 south circular Road to the north, the main Catford Bridge railway line to the west, a part-section of Fordmill Road and a former Environment Agency depot to the south and for broadly half of its length on its eastern side, the large rear gardens of the residential properties fronting Canadian Avenue. The northern part of the site has historically been identified as an opportunity for a possible realignment of the South Circular as part of a wider town centre regeneration initiative (‘Civic Quarter and South Circular’), which was being pursued in the now withdrawn Catford Town Centre Area Action Plan.

6 The Sports Ground Pavilion was formerly the Private Bank Sports Ground, and beyond the main playing field area and large two-storey pavilion positioned on the northwest boundary (to which this application specifically relates), the site also contains a five-a-side football centre comprising 14 all-weather and floodlit courts originally operated by Power League, but now run by Catford Soccer. The soccer centre is situated directly to the south of the main pavilion (to which this application relates) and a large car park area (containing 100 spaces), which is served off a single vehicular means of access afforded off Canadian Avenue to the east and at a point just south of its junction with the South Circular Road.
7 The Pavilion forms the centre-piece of the sports ground and is arranged over 2-storeys with the ground floor containing the principal changing and welfare facilities alongside a main bar, kitchen and former gym, and the upper floor accommodating three meeting rooms, a fitness studio and an external terrace. It has an overall GIA of 1,524sqm.

8 The site lies less than 300 metres from the A205 South Circular (Catford Road) which forms part of the Transport for London Road Network. Catford railway station is on the Catford loop line and is served by Thameslink services operating between West Hampstead Thameslink / London Blackfriars and Sevenoaks. There are two trains per hour in each direction during the day with additional services at peak times. The nearest bus stops to the proposed development are located on Canadian Avenue, Catford Road and Bromley Road in which over 8 buses serve the site in the peak hours. As a result, the site has a high public transport accessibility level (PTAL) of 5/6, based on a scale of 1a to 6b, where 1a is lowest and 6b is highest.

Details of the proposal

9 The applicant is seeking full planning permission for part-change of use of St. Dunstan’s Jubilee Ground pavilion into a Class D1 day nursery for up to 40 children. The conversion includes extending over ground and first floors with minor alterations to the south pavilion elevation to form additional door openings and windows and associated external works on land directly to the south of the pavilion, in the former gym space.

10 The proposal also includes use of existing car park to provide 6 staff parking spaces and 18 short-stay parent drop-off/pick-up spaces; formation of pedestrian path from existing Canadian Avenue entrance to proposed nursery entrance; and reopening of pedestrian link connection below Catford Road Bridge to north side Catford Road.

Case history

11 There is no planning history relevant to the current application.

Strategic planning issues and relevant policies and guidance

12 The relevant issues and corresponding policies are as follows:

- Education London Plan; Social Infrastructure SPG;
- Metropolitan Open Land London Plan;
- Playing fields London Plan;
- Transport London Plan; the Mayor’s Transport Strategy;

13 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plans in force for the area are the 2011 Lewisham Core Strategy Development Plan Document, the 2014 Development Management Local Plan and the 2013 Site Allocations Local Plan, and the 2016 London Plan (Consolidated with Alterations since 2011).

Land use principle: change of use and provision of educational facilities on MOL

15 In relation to the provision of educational facilities, policy 3.18 ‘Education facilities’ of the London Plan states that ‘The Mayor will support provision of early years, primary and secondary school and further education facilities adequate to meet the demands of a growing and changing population and to enable greater educational choice, particularly in parts of London with poor educational performance. …Development proposals which enhance education provision will be supported, including new build, expansion of existing facilities or change of use to educational purposes.’ The Mayor’s Social Infrastructure SPG (2015) provides guidance on planning for social infrastructure provision at the strategic level starting with the GLA’s own demographic projections and the ways in which these can be used to understand need for health, education and sports facilities.

Change of use

16 The nursery would be accommodated in the former gym space on the south wing of the pavilion (242sqm GIA) and at first floor level (225sqm GIA). It would be enclosed by a low-level (1.2m high) timber picket fence with proposed planting areas on the east, south and west boundaries. The nursery school would be accommodated in an area of the pavilion that was formerly used as a private gym with some community access/membership. The limited numbers of gym members have been transferred to a replacement gym facility at St. Dunstan’s College, and so there would be no loss of community benefit though the redevelopment of the gym element, and it raises no strategic concerns.

17 The provision of a nursery is supported in accordance with London Plan policy 3.18.

Provision of educational facilities on Metropolitan Open Land

18 The London Plan (policy 7.17) gives the MOL the same level of protection as in the Green Belt, and the National Planning Policy Framework (paragraph 89) sets out that only development associated with agriculture, forestry, outdoor sport and recreation, limited infilling and redevelopment of existing sites is appropriate in the Green Belt. All other forms of development are, by definition, ‘inappropriate’. In order for ‘inappropriate’ development to be acceptable in the MOL, very special circumstances must apply.

19 Furthermore, bullet point 6 of the above paragraph in relation to previously developed land states that ‘limited infilling or the partial or complete redevelopment of previously developed sites (brownfield land), whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development’ may be an acceptable development on the Green Belt.

20 The application is for change of use only, with minor arrangements to the elevations and external works to create outside space for use by the nursery. Given there would not be any change in the size and height of the built environment, the material harm of the proposed nursery on the openness of the MOL and the playing fields is negligible, and raises no strategic concern. The provision of a nursery is supported in accordance with London Plan policy 3.18 particularly in the context of the significant quantum of housing development being brought forward in Catford.
**Transport**

21 The proposed development is broadly acceptable in strategic transport terms, however further measures should be taken in terms of the proposed footway, car parking and cycle parking and additional information should be provided on trip generation and the access control. TfL will work with the Council and the applicant to ensure the issues identified are addressed prior to the Council’s determination of the application.

**Pedestrian access route, footways and subway**

22 The proposal to provide a new footway along the southern boundary of the vehicular access road from the entrance to the site is supported. However, the width of this new footway is not stated. It is recommended that the footway should be provided with a minimum width of 2 metres. This would allow two pushchairs to pass each other without causing an obstruction. Furthermore, the alignment and route of the footway along the eastern frontage of the building needs to be carefully considered and it should be set out how this footway ties into the existing footways in the site and links to the artificial sports pitches and the car park to the south. It is assumed that the access gates on Canadian Avenue will also be amended to provide level access to the proposed footway.

23 The proposal to reopen the subways beneath Catford Road in order to provide a new level access point to Catford station is supported. However, the supporting documentation is lacking in any detail regarding the process for approval of this, and how this will tie into the newly proposed footway on site. There is also a lack of detail on how pedestrians proposing to use this subway will access it from the northern side of Catford Road or from the site itself. Further details are also requested regarding the access controls to be employed. TfL would request that this is not just a gate with key fob entry (as per the existing stair access to the site). CCTV and intercom controls should be provided to enable easy access from this point and encourage its use for all people wishing to use it. The proposals for both the footway and the new subway should provide high quality pedestrian environments and emphasise the quality of the pedestrian space in line with London Plan policy 6.10.

**Car parking**

24 As part of the development proposal, a large number of parent/carer drop-off and pick-up spaces are proposed. The evidence base for the 18 spaces is a single hands-up survey of the nursery children, rather anything from local or strategic policies. Considering the significant congestion experienced on the roads surrounding the site and the high PTAL of 5/6, this is a considerable overprovision of parking spaces. The applicant should set out a more robust justification for the required spaces. It is noted that currently there are 94 parking spaces, which is exceptionally large number compared to the size of the site; therefore the applicant should consider reducing the overall number of spaces. For the proposed staff parking provision, a similar robust justification needs to be provided. In line with London Plan policy 6.13, new developments should prevent excessive car parking provision that can undermine cycling, walking and public transport use.

**Trip generation**

25 The number of car parking spaces proposed on site has informed the trip generation. There is very minimal analysis of the potential impact of the provision of the new nursery upon the operation of the surrounding network. In the morning and evening peaks there is congestion experienced along Canadian Avenue and there has been no assessment of the impact of an additional 42 vehicle movements at this location. The lack of robust assessment provided by the applicant means that TfL cannot accept the findings in the transport assessment which states that the development does not have significant impact upon the operation of the local road network. The applicant should provide detailed information, or consider reducing the overall parking on site (as discussed above) to
minimise the impact on the surrounding highway network which already experiences significant congestion, in line with London Plan policy 6.3.

**Cycle parking**

26 The transport statement states that a total of 7 cycle parking spaces will be provided. A minimum of 2 cycle spaces should be provided for staff, whilst a further 5 spaces should be provided for students with a single additional space for visitors equalling 8 spaces in total. These spaces should be safe, secure and covered. Appropriate facilities should also be provided within the nursery for staff wishing to cycle and therefore showers, lockers and a changing room should be provided. This is in line with London Plan policy 6.9.

27 It is noted that there is currently no cycle parking provided on site for any of the other sports uses. In order to encourage active travel to the site for all uses the applicant should increase the proposed cycle parking provision to the benefit of all users. Based on the short-stay requirements for a D1 Nursery with a total floor area of c.1,200sqm, 12 cycling parking spaces should be provided.

28 The transport statement also states that there are a number of children who will, or would preferably want to, travel to nursery via scooter. In order to encourage use of active modes such as walking and scooter travel, the applicant should consider the provision of safe, covered and secure scooter parking within the site.

**Local planning authority’s position**

29 Lewisham Council planning officers have yet to confirm their position.

**Legal considerations**

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

**Financial considerations**

31 There are no financial considerations at this stage.

**Conclusion**

32 London Plan policies on provision of education facilities, Metropolitan Open Land and transport are the key strategic issues relevant to this planning application. In general, the application complies with these policies, for the following reason:

- **Principle of land use: change of use and provision of educational facilities on MOL:** The application is for change of use only, with minor arrangements to the elevations and external works to create outside space for use by the nursery. Given there would not be any change in the size and height of the built environment, the material harm of the proposed nursery on the openness of the MOL and the playing fields is negligible, and raises no strategic concern. The provision of a nursery is supported in
accordance with London Plan policy 3.18 particularly in the context of the significant quantum of housing development being brought forward in Catford. Therefore, the proposal is acceptable.

- **Transport:** Whilst the transport arrangement is broadly supported and does not raise strategic planning issues, TfL requests that further measures are required in terms of the proposed footway, car parking and cycle parking and additional information should be provided on trip generation and the access control. TfL will work with the Council and the applicant to resolve the above identified issues.

33 The Mayor does not need to be consulted again on this planning application.