Public Document Pack

STRATEGIC PLANNING COMMITTEE

Date of Meeting:	**THURSDAY, 15 SEPTEMBER 2011** TIME **7.30 PM**
PLACE:	**ROOMS 1 & 2, CIVIC SUITE, LEWISHAM TOWN HALL, CATFORD, SE6 4RU**

Members of the Committee are summoned to attend this meeting:

Membership
Councillors:

Paschoud (Chair)
Till (Vice-Chair)
Amrani
Bell
Clutten
Curran
De Ryk
Fitzsimmons
Alan Hall
Maslin

The public are welcome to attend our committee meetings, however, occasionally committees may have to consider some business in private. Copies of reports can be made available in additional formats on request.

Barry Quirk
Chief Executive
Lewisham Town Hall
London SE6 4RU
Date: 6 September 2011

For further information please contact:
Sean Farnan Committee Co-ordinator
5th Floor Laurence House
Catford Road SE6 4RU

Telephone No: Sean Farnan
Email: 020 8314 9786

	Order Of Business		
Item No	**Title of Report**	**Ward**	**Page No.**
1.	Declarations of Interests		1 - 2
2.	Minute Page		3 - 4
3.	Deptford Wharves Oxestalls Road SE8	Evelyn	5 - 132

This page is intentionally left blank

Committee	STRATEGIC PLANNING COMMITTEE	
Report Title	DECLARATIONS OF INTERESTS	
Class	PART 1	Date 15 SEPTEMBER 2011

Declaration of interests

Members are asked to declare any personal interest they have in any item on the agenda.

Personal interests

There are two types of personal interest :-
(a) an interest which you must enter in the Register of Members' Interests*
(b) an interest where the wellbeing or financial position of you, (or a "relevant person") is likely to be affected by a matter more than it would affect the majority of in habitants of the ward or electoral division affected by the decision.

*Full details of registerable interests appear on the Council's website.

("Relevant" person includes you, a member of your family, a close associate, and their employer, a firm in which they are a partner, a company where they are a director, any body in which they have securities with a nominal value of £25,000 and (i) any body of which they are a member, or in a position of general control or management to which they were appointed or nominated by the Council, and (ii) any body exercising functions of a public nature, or directed to charitable purposes or one of whose principal purpose includes the influence of public opinion or policy, including any trade union or political party) where they hold a position of general management or control

If you have a personal interest you must declare the nature and extent of it before the matter is discussed or as soon as it becomes apparent, except in limited circumstances. Even if the interest is in the Register of Interests, you must declare it in meetings where matters relating to it are under discussion, unless an exemption applies.

Exemptions to the need to declare personal interest to the meeting

You do not need to declare a personal interest where it arises solely from membership of, or position of control or management on:

(a) any other body to which your were appointed or nominated by the Council
(b) any other body exercising functions of a public nature.

In these exceptional cases, <u>unless your interest is also prejudicial</u>, you only need to declare your interest if and when you speak on the matter .

Sensitive information

If the entry of a personal interest in the Register of Interests would lead to the disclosure of information whose availability for inspection creates or is likely to create a serious risk of violence to you or a person living with you, the interest need not be

entered in the Register of Interests, provided the Monitoring Officer accepts that the information is sensitive. Where this is the case, if such an interest arises at a meeting, it must be declared but you need not disclose the sensitive information.

Prejudicial interests

Your personal interest will also be prejudicial if all of the following conditions are met:

(a) it does not fall into an exempt category (see below)
(b) the matter affects either your financial interests or relates to regulatory matters - the determining of any consent, approval, licence, permission or registration
(c) a member of the public who knows the relevant facts would reasonably think your personal interest so significant that it is likely to prejudice your judgement of the public interest.

Categories exempt from being prejudicial interest

(a) Housing – holding a tenancy or lease with the Council unless the matter relates to your particular tenancy or lease; (subject to arrears exception)
(b) School meals, school transport and travelling expenses; if you are a parent or guardian of a child in full time education, or a school governor unless the matter relates particularly to the school your child attends or of which you are a governor;
(c) Statutory sick pay; if you are in receipt
(d) Allowances, payment or indemnity for members
(e) Ceremonial honours for members
(f) Setting Council Tax or precept (subject to arrears exception)

Effect of having a prejudicial interest

If your personal interest is also prejudicial, you must not speak on the matter. Subject to the exception below, you must leave the room when it is being discussed and not seek to influence the decision improperly in any way.

Exception

The exception to this general rule applies to allow a member to act as a community advocate notwithstanding the existence of a prejudicial interest. It only applies where members of the public also have a right to attend to make representation, give evidence or answer questions about the matter. Where this is the case, the member with a prejudicial interest may also attend the meeting for that purpose. However the member must still declare the prejudicial interest, and must leave the room once they have finished making representations, or when the meeting decides they have finished, if that is earlier. The member cannot vote on the matter, nor remain in the public gallery to observe the vote.

Prejudicial interests and overview and scrutiny

In addition, members also have a prejudicial interest in any matter before an Overview and Scrutiny body where the business relates to a decision by the Executive or by a committee or sub committee of the Council if at the time the decision was made the member was on the Executive/Council committee or sub-committee and was present when the decision was taken. In short, members are not allowed to scrutinise decisions to which they were party.

Committee	STRATEGIC PLANNING COMMITTEE	
Report Title		
Ward		
Contributors		
Class	PART 1	Date 15 SEPTEMBER 2011

MINUTES

To approve the minutes of the meeting of the Strategic Planning Committee held on 21 July 2011.

This page is intentionally left blank

Committee	STRATEGIC PLANNING COMMITTEE	
Report Title	DEPTFORD WHARVES, LAND BOUNDED BY OXESTALLS ROAD, GROVE STREET, DRAGOON ROAD AND EVELYN STREET SE8, BUT EXCLUDING SCOTT HOUSE, 185-195 GROVE STREET (FORMERLY KNOWN AS DIPLOMA WORKS)	
Ward	Evelyn	
Contributors	Chris Brodie	
Class	PART 1	Date: 15 SEPTEMBER 2011

Reg. Nos. DC/09/73189

Application dated 29.01.10, revised 27.05.10 with supplementary information 27.07.11

Applicant CMA Planning and Savills on behalf of City and Provincial Properties plc

Proposal

Outline planning application for the whole site comprising:

- The demolition of existing buildings on the site, excluding former Public House on Grove Street.
- The phased redevelopment of the site to provide a maximum of 1,029,670m2 (gross external floor area) comprising up to 905 residential units (853,218m²) and 17,645m2 non-residential floorspace comprising A1 Shops, A2 Financial & Professional Services, A3 Restaurants & Cafés, A4 Drinking Establishments, A5 Hot Food Takeaways, B1 Businesses, D1 Non-Residential Institutions and D2 Assembly & Leisure uses.
- Erection of buildings ranging in height from 4 to 18 storeys.
- An energy centre.
- Open space.
- New vehicular access into the site and parking (up to 1,127 cycle and 370 vehicle spaces) and associated works.

Detailed planning application for Phases 1 & 2 only (covering the southern ⅔ of the site)

- Redevelopment of land fronting Evelyn Street, Dragoon Road and Grove Street for 591 residential units and 9,424 m2 of non residential floorspace (comprising A1 Shops, A2 Financial & Professional Services, A3 Restaurants & Cafés, A4 Drinking Establishments, A5 Hot Food Takeaways, B1 Businesses, D1 Non-Residential Institutions and D2 Assembly & Leisure uses) in buildings ranging from 4 to 18 storeys in height.
- An energy centre.
- Car and cycle parking.
- New access into the site and associated highway infrastructure.
- Public realm works, landscaping and amenity / open space including water feature.

Amendments and Further Information (27/05/10)

- The amendments received comprised alterations to the: external appearance and internal layout/floor plans of buildings, landscaping, and the provision of wheelchair car parking. Private amenity space provision increased.
- Scope of the outline planning application amended to reserve landscaping for future determination.
- Environmental Statement amended and updated with the submission of further information.

Supplementary Report (27/07/11)

- Delivery Strategy
- Affordable housing provision reduced from 35% to 20%

Applicant's Plans and other documents submitted with the application

Design and Access Statement (December 2009); Design and Access Statement Supplementary Material (May 2010); Landscape Design and Access Statement (December 2009); Planning Statement (December 2009); Sustainability Statement (December 2009); Transport Assessment (December 2009); Residential Travel Plan (May 2010); Framework Workplace Travel Plan (June 2010); Statement of

Community Involvement (December 2009); Environmental Statement Vol 1 – Main Report (December 2009), Vol. 2 – Figures (December 2009), Vol. 3 – Appendices (December 2009), Vol. 4 – Application Drawings Revision A (May 2010); Environmental Statement: Further Information (May 2010); Delivery Strategy (July 2011); Supplementary information contained in letter from Savills (27 July 2011);

Plan nos: 945_DWGPL_1-000A; 945_DWGPL_1-001A; 945_DWGPL_1-002A; 945_DWGPL_1-003A; 945_DWGPL_1-004A; 945_DWGPL_1-005A; 945_DWGPL_1-006A; 945_DWGPL_1-007A; 945_DWGPL_1-008A; 945_DWGPL_1-009A; 945_DWGPL_1-010A; 945_DWGPL_1-101A; 945_DWGPL_1-102A; 945_DWGPL_1-103A; 945_DWGPL_1-104A; 945_DWGPL_1-105A; 945_DWGPL_1-106A; 945_DWGPL_1-107A; 945_DWGPL_1-108A; 945_DWGPL_2-000A; 945_DWGPL_2-001A; 945_DWGPL_2-002A; 945_DWGPL_2-003A; 945_DWGPL_2-004A; 945_DWGPL_2-005A; 945_DWGPL_2-006A; 945_DWGPL_2-007A; 945_DWGPL_2-008A; 945_DWGPL_2-009A; 945_DWGPL_2-010A; 945_DWGPL_2-011A; 945_DWGPL_2-012A; 945_DWGPL_2-013A; 945_DWGPL_2-014A; 945_DWGPL_2-015A; 945_DWGPL_2-016A; 945_DWGPL_2-017A; 945_DWGPL_2-018A; 945_DWGPL_2-101A; 945_DWGPL_2-102A; 945_DWGPL_2-103A; 945_DWGPL_2-104A; 945_DWGPL_2-105A; 945_DWGPL_2-106A; 945_DWGPL_2-107A; 945_DWGPL_2-108A; 945_DWGPL_3-000A; 945_DWGPL_3-001A; 945_DWGPL_3-002A; 945_DWGPL_3-003A; 945_DWGPL_3-004A; 945_DWGPL_3-005A; 945_DWGPL_3-006A; 945_DWGPL_3-007A; 945_DWGPL_3-008A; 945_DWGPL_3-009A; 945_DWGPL_3-010A; 945_DWGPL_3-101A; 945_DWGPL_3-102A; 945_DWGPL_3-103A; 945_DWGPL_3-104A; 945_DWGPL_3-105A; 945_DWGPL_3-106A; 945_DWGPL_3-107A; 945_DWGPL_3-108A; 945_DWGPL_4-000A; 945_DWGPL_4-001A; 945_DWGPL_4-002A; 945_DWGPL_4-003A; 945_DWGPL_4-004A; 945_DWGPL_4-005A; 945_DWGPL_4-006A; 945_DWGPL_4-007A; 945_DWGPL_4-008A; 945_DWGPL_4-101A; 945_DWGPL_4-102A; 945_DWGPL_4-103A; 945_DWGPL_4-104A; 945_DWGPL_5-000A; 945_DWGPL_5-001A; 945_DWGPL_5-002A; 945_DWGPL_5-003A; 945_DWGPL_5-004A; 945_DWGPL_5-005A; 945_DWGPL_5-006A; 945_DWGPL_5-101A; 945_DWGPL_5-102A; 945_DWGPL_5-103A; 945_DWGPL_5-104A; 945_DWGPL_5-105A; 945_DWGPL_5-106A; 945_DWGPL_5-107A; 945_DWGPL_5-108A; 945_DWGPL_6-000A; 945_DWGPL_6-001; 945_DWGPL_7-000A; 945_DWGPL_7-001; 945_DWGPL_8-000A; 945_DWGPL_8-001; 945_DWGPL_x-000A; 945_DWGPL_x-001A; 945_DWGPL_x-002A; 945_DWGPL_x-003A; 945_DWGPL_x-101A; 945_DWGPL_x-102A; 945_DWGPL_x-103A; 945_DWGPL_x-104A; 945_DWGPL_x-201A; 945_DWGPL_x-202A; 945_DWGPL_x-203A; 945_DWGPL_x-204A; 945_DWGPL_x-300; 945_DWGPL_x-301; 945_DWGPL_x-302; 945_DWGPL_x-303; 945_DWGPL_x-304; 945_DWGPL_x-305

<u>Background Papers</u>

(1) Case File – DE/153/U/TP
(2) Adopted Unitary Development Plan (July 2004) saved policies
(3) Core Strategy (June 2011)
(4) The London Plan (July 2011)
(6) PPS 1: Delivering Sustainable Development (2005)

(7) Planning and Climate Change – Supplement to PPS 1 (2007)
(8) PPS 3: Housing (2011)
(9) PPS 4: Planning for Sustainable Economic Growth (2009)
(10) PPS 5: Planning for the Historic Environment (2010)
(11) PPG 8: Telecommunications (2001)
(12) PPS 9: Biodiversity and Geological Conservation (2005)
(13) PPS 10: Planning for Sustainable Waste Management (2011)
(14) PPG 13: Transport (2001 update 2011)
(15) PPG 17: Planning for Open Space, Sport and Recreation (2002)
(16) PPS 22: Renewable Energy (2004) and Companion Guide (2004)
(18) PPS 23: Planning and Pollution Control (2004)
(19) PPG 24: Planning and Noise (1994)
(20) PPS 25: Development and Flood Risk (2010)
(21) Draft National Planning Policy Framework (2011)
(22) Delivering Affordable Housing – Good Practice and Guidance (2006)
(23) The Code for Sustainable Homes – Setting the Standard in Sustainability for New Homes (2008)
(24) Planning and Access for Disabled People – A Good Practice Guide (2003)
(25) Circular 11/1995 – The Use of Conditions in Planning Permissions
(26) Circular 02/1999 – Environmental Impact Assessment
(27) Circular 05/2005 – Planning Obligations
(28) Mayor of London's Transport Strategy (2010)
(29) Mayor of London's Housing Strategy (2010)
(30) Mayor of London's Air Quality Strategy – Cleaning London's Air (2002) and second draft Air Quality Strategy (2010)
(31) Mayor of London's Biodiversity Strategy (2002)
(32) Mayor of London's Energy Strategy (2004) and draft Climate Change Mitigation and Energy Strategy (2010)
(33) Mayor of London's draft Water Strategy (2009)
(34) Mayor of London's Housing SPG (2005) and draft revised interim Housing SPG (2009)
(35) Mayor of London's Sustainable Design and Construction SPG (2006)
(36) Mayor of London's London View Management Framework Revised SPG (2010)
(37) Mayor of London's Accessible London SPG (2004)
(38) Mayor of London's Providing for Children and Young People's Play and Informal Recreation SPG (2008)
(39) Mayor of London's Planning for Equality and Diversity in London SPG (2007)
(40) Mayor of London's Economic Development Strategy for London (2010)
(41) Mayor of London's Industrial Capacity SPG (2008)
(42) Living Roofs and Walls – Technical Report Supporting London Plan Policy (2008)
(43) Mayor of London's The Control of Dust and Emissions from Construction and Demolition BPG (2006)
(44) Mayor of London's Wheelchair Accessible Housing BPG (2007)
(45) Mayor of London's Health Issues in Planning BPG (2007)
(46) London Housing Design Guide Interim Edition (2010)
(47) LB Lewisham Residential Development Standards SPD (2006)
(48) Lewisham Housing Market Assessment 2007-8 (2009)
(49) Lewisham Leisure and Open Space Study Final Report (2010)
(450 By Design – Urban Design in the Planning System: Towards Better Practice (2000)
(51) Urban Design Compendium (2000, 2007)

(52) South East London Housing Partnership's Wheelchair Homes Design Guidelines (2009)
(53) Homes and Communities Agency's Investment and Planning Obligations – Responding to the Downturn Good Practice Note (2009)
(54) Local meeting notes (18 May 2010)

Zoning (Site Specific Designations)	London Plan 2011 – Deptford Creek / Greenwich Riverside Opportunity Area Core Strategy 2011 – Mixed Use Employment Location, Strategic Site Allocation 4
EIA Screening	The proposed development is EIA development for the purposes of the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 1999.

CONTENTS

1.	**INTRODUCTION**
1.1	Background
1.2	Current Position
2.	**APPLICATION SITE AND SURROUNDINGS**
2.1	Site Description
2.2	The Surrounding Area
2.3	Relevant Planning History
3.	**CURRENT PLANNING APPLICATION**
3.1	Introduction
3.2	Application Documents
3.3	General Layout and Uses
3.4	Residential Accommodation
3.5	Non-Residential Uses
3.6	Open Space, Playspace and Landscaping
3.7	Parking and Movement
3.8	Servicing and Refuse
3.9	Highway Works
3.10	Implementation and Phasing
4	**Environmental Impact Assessment (EIA)**
4.1	Introduction
4.2	Restriction on grant of planning permission for EIA development
4.3	Environmental Statement (ES) Documents
5.	**CONSULTATION**
5.1	Introduction
5.2	Consultation Process
5.3	Consultation Responses
5.4	Local Meeting

5.5	Consultation Responses August 2011
6.	**PLANNING POLICIES AND GUIDANCE**
6.1	Introduction
6.2	Planning Policy Guidance and Planning Policy Statements
6.3	London Plan
6.4	Lewisham Core Strategy
7.	**PLANNING CONSIDERATIONS**
7.1	Introduction
7.2	Principle of Mixed-Use Development – Oxestalls Road Strategic Site
7.3	Land Use: Employment
7.4	Land Use: Housing
7.5	Land Use: Retail
7.6	Urban Design
7.7	Transport
7.8	Sustainability
8.	**ENVIRONMENTAL IMPACT ASSESSMENT**
8.1	Introduction
8.2	Construction and Implementation
8.3	Air Quality
8.4	Archaeology
8.5	Daylight and Sunlight
8.6	Drainage and Flood Risk
8.7	Ecology
8.8	Ground Conditions, Hydrogeology and Contamination
8.9	Noise
8.10	Microclimate
8.11	Socio Economic
8.12	Townscape and Visual Assessment
8.13	Transportation
8.14	Waste
8.15	Cumulative and Residual Effects
9.	**FINANCIAL VIABILITY AND DELIVERY**
9.1	Introduction
9.2	Financial Viability
9.3	Deliverability
10	**CONSIDERATION OF OBJECTIONS**
10.1	Introduction
10.2	Consideration of Objections
11.	**LEGAL AGREEMENTS**
11.1	Introduction
11.2	Planning Obligations (Section 106 Agreement)
12.	**CONCLUSIONS AND RECOMMENDATIONS**
12.1	Introduction
12.2	Recommendations
12.3	Summary of Reasons for Grant of Planning Permission
12.4	Conditions
APPENDICES	
1	Site Layout - Proposed

2	Map Showing Consultation Letter Distribution Area
3	Notes of Local Meeting

1. INTRODUCTION

1.1 Background

1.1.1 In January 2010 the Council received a hybrid planning application (outline and part detailed) submitted by City and Provincial PLC for the comprehensive redevelopment of land bounded by Oxestalls Road, Grove Street, Dragoon Road and Evelyn Street North Deptford, but excluding Scott House, 185 Grove Street (formerly known as Diploma Works). This is a major mixed use proposal providing up to 905 new homes together with retail, business, non-residential institution, assembly and leisure uses. The application has been the subject of extensive consultation with local residents and businesses, statutory consultees, elected Members, CABE and the Council's Design Panel. It has also been the subject of a Stage 1 Report by the GLA.

1.1.2 In July 2010 the Strategic Planning Committee received a report from the Head of Planning setting out progress in the consideration of the planning application at that time. The report described the scope and content of the application, considered the proposals in the light of relevant planning policy and guidance, representations received and other material considerations and identified those issues where further technical assessment by the Council was ongoing. The report also drew to the attention of the Committee to the potential scope of legal agreements and sought endorsement of the mechanisms by which outstanding should be resolved and of the negotiating stance of the Head of Planning with the applicant.

1.1.3 Councillor Paschoud (Chair) outlined a number of issues which the Committee would particularly wish to see addressed when the application was reported back to Strategic Planning Committee, namely a transparent approach to the viability of the scheme, its delivery and S106 Agreement, how the phased development of the scheme will be undertaken and the developed and undeveloped phases would be managed as it is brought forward. Following presentations the committee resolved that the contents of the report and representations received to date be noted and:

i) Noted the issues raised by the Head of Planning and agreed to further discussions and assessment on the issues raised in 12.2.2 of the report
ii) Noted the potential scope of legal agreements and agreed to the Head of Planning continuing discussions with the applicant
iii) Requested the Head of Planning to report to the Strategic Planning Committee on the resolution of outstanding matters and any changes to the proposed development as a consequence of those discussions that would materially affect the determination of the planning application.

1.2 Current Position

1.2.1 The July 2010 report identified a number of issues where further technical assessment was required and/or mechanisms needed to be identified to ensure the development is implemented as submitted and does not give rise to adverse impacts. These were:

i) assessment of the cumulative impact of the proposed development with other sites including the impact on public transport services and highway capacity
ii) mechanisms to control the mix of non-residential uses
iii) mechanisms to ensure the comprehensive redevelopment of the site
iv) details of the proposed planning obligations and other legal agreements

1.2.2 Following the July 2010 meeting there have been further discussions with the applicant regarding these matters and a Delivery Strategy and associated (confidential) Financial Appraisal were submitted in July 2011. This report considers the proposals in the light of this additional information, relevant planning policy and guidance, representations received and other material considerations, and makes recommendations on the determination of the application.

2. APPLICATION SITE AND SURROUNDINGS

2.1 Site Description

2.1.1 The site is bounded by Oxestalls Road to the north (an elevated road bridge, built in the late 60's to cross the (former) Grand Surrey Canal); Grove Street to the east with Pepys Park beyond; Dragoon Road to the south which is closed at its junction with Evelyn Street; and Evelyn Street (A200) to the west which forms part of the Borough Principal Road Network.

2.1.2 The site covers an area of approximately 4.54ha and existing buildings in range of commercial uses amount to around 17,000m2. Current employment on the site is estimated by the applicant at about 160 jobs.

2.1.3 Historically the application site has included a mix of residential and commercial uses however other than a single residential property on Evelyn Street it is now occupied by commercial activities including a petrol filling station, scrap yard, car wash, car auction, open storage and public house (now closed). A three storey brick building (Diploma Works) is located at junction of Oxestalls Road and Grove Street although this building does not form part of the application site.

2.1.4 The north-eastern part of the site (with frontage to Oxestalls Road and Grove Street and wrapping round the Diploma Works site) comprises a metal clad building along the northern boundary, together with extensive areas of hardstanding used as a scrap metal merchants. To the south of this on Grove Street is the former public house comprising a 19th century three storey brick building. The remainder of the frontage onto Grove Street, Dragoon Road and the southern part of the site on Evelyn Street comprises a number of industrial and storage/retail warehouse buildings and open uses used for commercial storage, retail, car breakers, vehicle repairs, car wash and car auction.

2.1.5 The north western corner of the site (fronting Evelyn Street and Oxestalls Road) is occupied by a petrol filling station which includes a small retail outlet. To the east and south of this towards the centre of the site is a municipal services depot for waste collection vehicles.

2.1.6 Overall the site comprises a mix of predominately commercial and industrial buildings of no unified form or design, that have been developed independently and on an ad hoc basis over time. There are a few reminders of the former use of the site as a series of wharves along the route of the Grand Surrey Canal including brick boundary walls incorporating the name of the wharf, Blackhorse Bridge on Evelyn Street which retains its cast iron structure and brick abutments and the pub on Grove Street. However the canal itself was filled in the 1970's and is not evident on the site, and the process of redevelopment of individual plots on the site has obscured and obliterated much of its history.

2.1.7 The site is generally flat although Evelyn Street and Oxestalls Road rise above the level of the site where bridges cross the route of the former canal. The Oxestalls Road/Evelyn Street junction is signal controlled and there are a number of vehicular accesses into the site on each frontage.

2.1.8 The applicant (City & Provincial Properties plc) owns the freehold of approximately two thirds of the application site. There are though four freehold interests within the application site which currently fall outside the applicant's ownership. These comprise the scrap metal yard, petrol filling station and a single house on Evelyn Street and a strip of land along Oxestalls Road owned by the Council.

2.2 The Surrounding Area

2.2.1 To the north and east of the site is the Pepys Estate comprising a number of blocks of flats including Eddystone Tower on the northern side of Oxestalls Road. Deptford Park Primary School also lies to the north, fronting onto Oxestalls Road and Evelyn Street. Four five-storey blocks forming part of the Trinity Estate are located on the south side of Dragoon Road.

2.2.2 To the east is Pepys Park and to the west Victorian terraced housing and commercial buildings forming part of the Deptford Trading Estate. The wider area comprises a mix of residential and commercial and other uses (including small scale retail, schools and community buildings). Deptford Park is located to the west and accessed via Grinstead Road and Evelyn Street.

2.2.3 The site is served by the number 47, 188 and N47 buses along Evelyn Street and the 199 bus (and N1 night bus) along Evelyn Street and Oxestalls Road. The nearest bus stops to the application site are located on Oxestalls Road (adjacent to the site) and on Evelyn Street (just to the north of Oxestalls Road and south of Dragoon Road). The nearest London Overground station is Surrey Quays to the north providing rail services towards Dalston to the north and New Cross, Crystal Palace and West Croydon to the south, with Underground services further to the north at Canada Water on the Jubilee Line. The nearest mainline railway stations are some distance away at South Bermondsey and Deptford providing connections to south and central London and Kent. Commuter river bus services are available from Greenland Pier to the northeast of the application site, providing connections to central London to the west and Woolwich Arsenal to the east.

2.2.4 The majority of the site has a Public Transport Accessibility Level (PTAL) rating of 2, where 1 is poor and 6 is excellent. The nearest cycle route forming part of the Lewisham Cycle Network runs along the bank of the River Thames via Deptford Wharf and Deptford Strand to the east of the site. Evelyn Street has been identified as part of the London Mayor's Cycle Super Highway.

2.2.5 The nearest district centre within the Borough is Deptford High Street, some 1.6km away. The Surrey Quays Shopping Centre (to the northwest) in LB Southwark is closer, being approximately 1.3km distant.

2.3 Relevant Planning History

Application Site

2.3.1 The recent planning history of the site has, prior to the current application, been relatively minor applications involving change of use, extensions to buildings and advertisement consents.

Adjoining Sites

2.3.2 In recent years there have been a number of major planning applications in the local area, which reflect the regeneration that is beginning to commence in North Deptford.

2.3.3 In July 2001 planning permission was granted for the conversion of the Diploma Works building, a former industrial building which stands at the corner of Oxestalls Road and Grove Street (to the north east and directly adjoining the application site) to 19 live/work units together with minor alterations to the side elevation. This permission has been implemented and the building is occupied.

2.3.4 In 2002, an outline planning application was submitted by News International for redevelopment of its former paper importing site at Convoys Wharf which lies to the south east of the application site. The application proposed some 450,000m2 of floorspace which included approximately 3,500 new homes, 73,000m2 of employment space including a working wharf. In 2005 the Council's Strategic Planning Committee resolved to grant planning permission subject to a Section 106 agreement and referral to the Mayor of London. Amended proposals have recently been submitted. The revised application remains under assessment and is yet to be determined.

2.3.5 Planning applications have also been received for the other Core Strategy Strategic Sites in the area. Two separate, detailed planning applications have been received relating to the majority of the Plough Way Strategic Site located to the north (Marine Wharf West and Cannon Wharf) and the Council has resolved to grant planning permission for these developments subject to conditions and s.106 agreements. The application for Cannon Wharf has yet to be referred to the GLA for their Stage 2 report whilst a response on Marine Wharf West is due prior to the consideration of this report. An application has been received for the Surrey Canal Triangle site to the west and has yet to be reported to committee. In addition the Council has

resolved to grant planning permission for Neptune Works on Grinstead Road which although not a Strategic Site is identified in the Core Strategy as a Mixed Use Employment Location (Core Strategy Policy 4).

3. CURRENT PLANNING APPLICATION

3.1 Introduction

3.1.1 The application site is divided into 8 plots proposed for development in 3 phases. Phase 1 comprises Plots 1 and 2, Phase 2, Plots 3-5 and Phase 3, Plots 6-8. The application is a hybrid planning application, comprising an outline planning application for the whole site with details submitted for part of the site. Details of layout, scale, appearance, access and landscaping, have been submitted for approval for Plots 1 – 5 (Phases 1 and 2). Details of layout and access are submitted for Plots 6 – 8 (Phase 3), but scale appearance and landscaping for these plots are reserved matters to be submitted for approval at a later date. Details are as follows:

Outline planning application

- The demolition of existing buildings on the site, excluding former Public House on Grove Street
- Up to 905 residential units
- Up to 17,645m2 non-residential floorspace comprising A1 Shops, A2 Financial & Professional Services, A3 Restaurants & Cafés, A4 Drinking Establishments, A5 Hot Food Takeaways, B1 Businesses, D1 Non-Residential Institutions and D2 Assembly & Leisure uses
- An energy centre
- Buildings ranging in height from 4 to 18 storeys
- New access into the site and parking (up to 370 vehicle and 1,127 cycle and spaces) and associated works

Detailed planning application for Phases 1 & 2 (Plots 1-5) only (southern ⅔ of the site)

- Redevelopment of land fronting Evelyn Street, Dragoon Road and Grove Street for 592 residential units and 9,424 m2 of non residential floorspace (comprising A1 Shops, A2 Financial & Professional Services, A3 Restaurants & Cafés, A4 Drinking Establishments, A5 Hot Food Takeaways, B1 Businesses, D1 Non-Residential Institutions and D2 Assembly & Leisure) in buildings ranging from 4 to 18 storeys in height
- An energy centre
- Car and cycle parking
- New access into the site and associated highway infrastructure
- Public realm works
- Landscaping and amenity / open space including a water body

3.1.2 For those elements which remain in outline only, the application is also accompanied by the relevant information to be submitted with outline applications, as advised by DCLG Circular 01/06: Guidance on Changes to the Development Control System published in June 2006 including information on:

- Use – uses proposed for the development

- Amount of development – the amount of development proposed for each use
- Scale parameters – an indication of the upper limits for height, width and length of each building within the site boundary

3.1.3 The following information has also been provided within the planning drawings that relate to Plots 6 to 8 (Phase 3):

- Massing of buildings (including upper parameters for height, width and length)
- Type and quantum of different uses (indicative for each plot based on maximum quantum's for the Phase as a whole)
- Illustrative public realm/landscaping strategy
- Illustrative typical floor plans
- Precedent images of the type of architecture/materials anticipated for each plot/building as appropriate

Amendments

3.1.4 Following consultation and negotiations, amendments to the application were submitted in May 2010 comprising alterations to the external appearance of the buildings, their internal layout and floor plans, landscaping, the provision of wheelchair car parking, and private amenity space. The scope of the outline application was also amended with landscaping becoming a reserved matter. Amendments to the Environmental Statement which accompanied the application were also made (see Section 4 below).

3.1.5 In July 2011 the applicant submitted a Delivery Strategy setting out amongst other matters a mechanism to ensure the comprehensive development of the site. This was accompanied by an updated financial appraisal. The Delivery Strategy states that affordable housing on the site is now proposed at 20% (reduced from 35% in the original planning application), to be subject to a review mechanism in a proposed Section 106 Agreement so that if the finances improve, additional funds are to be applied towards affordable housing.

3.2 Application Documents

Design and Access Statement (including supplementary material)

3.2.1 This document sets out the design process leading to the proposed scheme including the site layout, urban design strategy, architectural approach, and landscape strategy and environmental considerations. The document outlines the physical, social, economic and policy context, the design brief, the design process including the conceptual design and consultations and then details the design response outlining the details of the present scheme. The current proposals are discussed in light of relevant policies and design guidance such as the CABE/English Heritage guidance on tall buildings.

3.2.2 The statement also sets out how access issues have been addressed throughout the scheme including access to the site and the various transport modes available, and the building environment looking at the accessibility of the main pedestrian routes for all users.

Planning Statement

3.2.3 The statement identifies what the applicant team consider to be the relevant planning history and national, regional and local planning policy context. It goes on to address the planning considerations and merits of the proposals against the identified planning policy context.

Sustainability Statement

3.2.4 The statement considers the various measures to reduce CO2 emissions using the Mayor's energy hierarchy – lean (energy efficiency), clean (CHP), green (renewables). The energy efficiency measures that have been applied beyond the requirements of a 2006 Building Regulations compliant design include natural ventilation, thermal insulation, enhanced air tightness, U values which exceed minimum building regulations, heat recovery and energy efficient lighting. It is estimated that these measures achieve a carbon emission reduction of 13% beyond the baseline emissions.

3.2.5 The proposed development includes a 500 kilowatt gas fired combined heat and power (CHP) plant with de-centralised absorption chillers providing cooling using the waste heat in summer. A key element of the energy strategy is the installation of a communal heating network to link all of the buildings across site. The waste heat from the CHP unit would be distributed around the site using the communal heating network. The proposed CHP plant is estimated to reduce carbon dioxide emissions by a further 24.9% over and above the reductions due to energy efficiency measures.

3.2.6 Passive design measures are proposed to provide cooling for the residential buildings. Openable windows and acoustic attenuated passive air paths will provide fresh air to the majority of units across the site, reducing the need for a mechanical ventilation plant. Mechanical ventilation to bedrooms and living rooms are limited to those which face onto busy roads and for which the acoustic criteria cannot be otherwise met. Thermal mass is proposed for reducing daytime temperature and solar shading and solar control glass to reduce peaks in solar gain.

3.2.7 A 500 kilowatt ground source heat pump is proposed to provide cooling for the commercial areas using dedicated boreholes or foundation piles to transfer heat into and out of the ground. Other on-site renewables proposed include photo voltaic panels and solar thermal hot water collectors on the roofs of some of the proposed buildings.

3.2.8 The applicant estimates that overall the CO2 emissions of the development will be reduced by 47.7% compared to a part L 2006 compliant scheme. Such a reduction exceeds the Code for Sustainable Homes level 4 target and the CO2 targets to achieve BREEAM 'very good'.

3.2.9 The application site is located approximately 700m east of the South East London Combined Heat and Power (SELCHP) plant which could potentially supply waste heat to the development. In addition it is possible that the pipe networks of a future regional district heating scheme could pass close by. Although the proposed development does not propose tapping into this potential source of heat location of the proposed energy centre would allow for connection to SELCHP in the future with minimum disruption.

Landscape Design and Access Statement

3.2.10 This statement outlines how the landscaping arrangement will create important links across the site providing increased permeability and connections to the surrounding areas in the form of north to south corridors and east to west linking spaces. The scheme involves the creation of a range of distinct public spaces, including a new square, community space and waterside landscape together with private residential courtyard gardens and spaces.

Statement of Community Involvement

3.2.11 The statement outlines the applicant's pre-application consultation process and engagement through talking to local people, key stakeholders and community groups.

3.2.12 This process has been wide-ranging using a number of techniques to understand what North Deptford is like today, uncovering history and hidden assets, and finding out how people would like to see the area in the future. The applicant has presented principles for the masterplan and held creative workshops to draw out their vision. In September 2009 outline designs were presented and debated; and in late October 2009 they held a final exhibition in which they worked through public responses and held a question and answer session.

Delivery Strategy

3.2.13 This document (submitted by the applicant in July 2011) sets out the applicant's approach to securing both the comprehensive development of the site and the mechanisms to support the delivery a policy compliant scheme as the development is built out.

3.3 General Layout and Uses

3.3.1 The proposal is arranged into eight plots, described in the application as 'wharves'.

Plot 1 (Bridge Wharf)

3.3.2 Located in the south western corner of the site fronting both Evelyn Street and Dragoon Road Plot 1 will provide 116 residential units comprising 52 one bedroom flats, 48 two bedroom flats and 16 three bedroom flats. Private balconies and/or enclosed winter gardens are provided to all residential units and a raised podium courtyard provides a communal amenity area shared by residents of this plot.

3.3.3 The lower and upper ground levels of the building would be for commercial use. This area has been identified by the applicant as replacement accommodation for an existing user on the site, the Ascott Cab Company, providing office, workshop, bodyshop and showroom accommodation. This employment space will be delivered in the earliest phase of the development. The space is described as being for B1 purposes.

3.3.4 The western end of the block rises to five storeys above Blackhorse Bridge with a taller block rising to ten storeys situated on its eastern side. The building will be constructed predominately of a textured off-white coloured

brick with the taller eastern element clad in nickel-silver anodized aluminium cladding panels. The ground floor of the building on its southern/western corner will comprise double height glazed show room space.

3.3.5 Also included in this plot is an energy centre which will serve the entire site. This facility, facing onto one of the key east-west pedestrian routes and at the end of the 'canal' route is in a deliberately prominent location with the detailed design of the ground floor elevation intended to promote the sustainability commitments inherent in the development.

3.3.6 Amendments have been made to the ground floor of this building to address concerns about level changes and pedestrian access to the residential entrances which have also been made more prominent throughout the scheme. The elevation of the energy centre has also been amended to make it more of a design feature.

Plot 2 (Dragoon Wharf)

3.3.7 Located in the south eastern corner of the site this plot includes 144 residential units comprising 43 one bedroom flats, 82 two bedroom flats, 7 three bedroom flats and 12 four bedroom flats and non-residential uses at ground and part first floor level. Private balconies are provided to all units. A raised podium courtyard and the roof of the health centre provides a communal amenity area shared by residents of this block.

3.3.8 The first two floors of the building provide 1,595m2 of space intended for occupation as a health centre and/or retail. The block sits above a basement area incorporating the ramp to a basement car park (that sits under another building plot) plus 21 cycle parking spaces for the employment space and visitors.

3.3.9 The block rises to four storeys along Dragoon Road, eight storeys on the inner west edge and an eighteen storey tall building fronting the corner of Grove Street and Dragoon Road opposite Pepys Park. The eighteen storey building will be opposite the north eastern corner of the Convoys Wharf site.

3.3.10 The podium and the smaller western building will be constructed from a textured red/brown coloured brick, and the taller eastern element clad in nickel-silver anodized aluminium cladding panels.

3.3.11 Amendments have been made to the ground floor layout to replace service areas with residential entrances and to provide a more active frontage along Dragoon Road and the western face of the building.

Plot 3 (Victoria Wharf)

3.3.12 Plot 3 fronts onto Grove Street/Pepys Park and has a return frontage onto the internal site access road. The plot will provide 92 residential units comprised of 29 one bedroom flats, 43 two bedroom flats and 14 three bedroom flats and 6 four bedroom flats. The plot comprises three new blocks plus the retained public house which will be refurbished. Ground floor retail units will be provided fronting onto Grove Street and form a continuous frontage along the main block. Uses ancillary to the public house are situated at the ground floor of the smaller adjacent block to the north, while the smaller block on the plot's southern boundary will be solely residential.

3.3.13 A linear building facing onto Grove Street is six storeys for most of its length rising to ten storeys at its southern end. Two six storey buildings are situated to the west at the southern and northern end of the main block. The arrangement of the blocks creates a west-facing courtyard garden for residents and private balconies are also provided to dwellings above ground floor level. Access to the residential units in the main block will be from inside the courtyard.

3.3.14 The Grove Street building and the smaller northern building will be constructed from a textured off-white coloured brick, while the smaller southern building will be constructed from a textured red / brown coloured brick.

Plot 4 (New Timber Wharf)

3.3.15 Plot 4 is located in the centre of the site with the proposed water body on its western side and an internal street on its eastern side. The plot accommodates 140 residential units comprising 51 one bedroom flats, 60 two bedroom flats, 25 three bedroom flats, and 4 four bedroom flats. Private balconies are provided to all residential units as a continuous perimeter of amenity space on the building's facades. Ground floor units open onto patios that are differentiated from public areas through articulated thresholds and changes in level.

3.3.16 The block is situated above a basement containing 249 car parking spaces (including 30 disabled) which serves the majority of the residential units in Plots 1-5. Access to the basement for residents is afforded via two circulation cores at either end of the building at ground level.

3.3.17 The building is a strong linear block and is characterised by a rectangular brick frame utilising a smooth red brick, while the balcony projections will be constructed from fair-faced concrete.

Plot 5 (Park Wharf)

3.3.18 Plot 5 provides 99 residential units, comprising 17 one bedroom flats, 61 two bedroom flats and 18 three bedroom flats and 3 four bedroom flats. This part of the scheme can be divided into two different block types. The first comprises a four storey row of stacked maisonettes running in parallel rows in the centre of the plot. The ground floor maisonettes have private garden amenity space. The second built element is a block fronting onto Evelyn Street to the west and the public route between this plot and Plot 1 to the south, the ground floor of which is to be retail with residential on the upper floors. Private balconies are provided to all units. Each maisonette has projecting balconies and the Evelyn Street facing block has recessed enclosable amenity spaces/winter gardens.

3.3.19 The block is predominantly five storeys with its top two floors setback and a sixth storey at either of its ends where the block meets the water body. A total of 10 car parking spaces are provided within this plot.

3.3.20 The Evelyn Street building will be constructed from semi-glazed blue engineering bricks with detailing to break up the facade. The four storey buildings to the east are divided into vertical 'town house' type blocks

through the utilisation of textured red/brown coloured bricks, textured off-white coloured bricks, and semi-glazed blue engineering bricks.

Plot 6 (Park Wharf, New Baltic Wharf, Crown Wharf)

3.3.21 Plot 6 in the site's north western corner comprises two blocks; one block is the continuation of plot 5 at the southern edge of the plot. The indicative mix comprises 81 one bedroom flats, 61 two bedroom flats, 18 three bedroom flats and 1 four bedroom unit. 1,401m2 of commercial space is accommodated across the two buildings.

3.3.22 The southern block is predominantly five storeys with its upper two storeys setback. Where the block overlooks the water body it is six storeys in height. A taller building (fifteen storeys) is proposed on the corner of Evelyn Street and Oxestalls Road marking an entry to the site and one of the main public routes across the site.

Plot 7 (Park Wharf, New Baltic Wharf, Crown Wharf)

3.3.23 Plot 7 comprises two buildings with elevations onto Oxestalls Road to the north, and the main area of public open space within the site to the south. The indicative mix comprises 28 one bedroom flats and 56 two bedroom flats plus 3,253m2 of B1 commercial space and 905m2 of retail at ground floor level. Between the two blocks is car parking and a service yard for the commercial uses. Along the eastern edge of the plot a 10 storey block frames a proposed route under Oxestalls Road bridge, with commercial space on the ground floor. Alongside this block stepped access is provided from the top of the Oxestalls Road bridge into the site.

Plot 8 (Park Wharf, New Baltic Wharf, Crown Wharf)

3.3.24 Plot 8 in the site's north eastern corner is comprised of three separate blocks. The indicative mix comprises 11 one bedroom flats, 28 two bedroom flats and 30 three bedroom flats. In addition, it will accommodate 668m2 of community use and 742m2 of leisure use.

3.3.25 A four storey block faces the north end of the water body with a part three/part six storey block facing onto Grove Street. An eight storey block faces onto Oxestalls Road which also includes ground floor undercroft car parking.

3.4 Residential Accommodation

3.4.1 The proposed development would provide a total of 905 residential units of which 189 are proposed to be affordable homes, representing 79% private sale and 21% affordable by unit (78% private sale and 22% affordable by habitable room). The tenure mix of the affordable is split between affordable rent (set at 60% of market rent) and intermediate (shared equity, other low cost homes for sale and intermediate rent) on a 30 : 70 basis. This gives a total of 61 affordable rent and 128 intermediate units. The affordable rent units are provided in Plots 1, 3 and 5 and Intermediate units in Plots 1, 3, 5, 7, and 8. The delivery of the affordable housing is not dependent on central government grant.

3.4.2 The detail of the proposed housing by unit size is summarised in the table below.

	Total	
Flats	Units	Habitable Rooms
1-bed/2 person	312	624
2-bed/3 person	148	444
2-bed/4 person	291	873
3-bed/5 person	117	468
3-bed/6 person	11	44
4-bed/6 person	14	70
4-bed/7 person	7	35
4-bed/8 person	5	25
Total	**905**	**2,583**

3.4.3 The affordable housing comprises:

	Affordable Rent		Intermediate	
Flats	Units	Habitable Rooms	Units	Habitable Rooms
1-bed/2 person	14	28	44	88
2-bed/3 person	0	0	9	27
2-bed/4 person	24	72	39	117
3-bed/5 person	13	52	36	144
3-bed/6 person	4	16	0	0
4-bed/6 person	0	0	0	0
4-bed/7 person	6	36	0	0
4-bed/8 person	0	0	0	0
Total	**61**	**198**	**128**	**376**

3.4.4 All units (affordable and private sale) have been designed to meet the space standards set out in London Plan Policy 3.5 and are designed to Lifetime Homes standard, and 10% will be wheelchair accessible or easily adaptable and designed to South East London Housing Partnership standards. The residential space will also be designed to achieve Code for Sustainable Homes Level 4.

3.5 Non-Residential Uses

3.5.1 The application includes a mix of non-residential space including B1 (business) A1, A2, A3, A4, A5 (retail, professional services, restaurant/café, pub and takeaway), D1 (non-residential institutions e.g. surgery, nursery, hall, church) and D2 (assembly and leisure e.g. cinema, gym). The non-residential space is distributed across the site, and all Plots (other than Plot 4) include an element of non-residential floorspace including a dedicated B1 building in Plot 7 as well as, potentially, other B1 space as part of mixed-use buildings in Plot 1, 2, 5 and 6. The applicant is seeking significant flexibility in the range of non-residential uses that could be provided on the site and this is discussed further in Section 7 of this report.

3.6 Open Space, Playspace and Landscaping

3.6.1 The application site boundary includes part of the route of the former Grand Surrey Canal which bisects the site roughly north-south. The application proposes that a water-body is provided on the site, approximately on the alignment of the former canal, and that a connection would be facilitated under the Oxestalls Road bridge to connect with the route of the former canal to the north. With other sites to the north this would allow a connection through to Plough Way. Areas of public open space are also provided as part of an east-west connection across the southern part of the site and also in the north western part of the site.

3.6.2 Raised private communal podium gardens are proposed within the courtyard blocks. These areas would feature hard and soft landscaping with ground level communal space proposed within Plots 3 and 5. A variety of smaller private amenity spaces are proposed comprising roof terraces and private balconies and terraces to flats within the development. Shared surfaces, street trees and limited on-street parking are proposed within the site.

3.6.3 Living roofs are proposed on a number of the buildings amounting to around 4,400m2 of roofspace.

3.7 Parking and Movement

3.7.1 370 car parking spaces are provided on site, 241 in the semi-basement car park under Plot 4 and 121 at grade. Of this total 269 spaces (i.e. 0.3 spaces per residential unit) are to be provided for the residential units, plus 65 non-residential spaces for commercial users across the site and 36 operational spaces for the B1 space in Plot 1. A total of 90 blue badge spaces are to be provided, 30 in the semi-basement car park and 60 at grade.

3.7.2 A total of 36 motorcycle parking spaces are proposed for the residential units. No dedicated spaces have been identified for the commercial space. Cycle parking spaces are proposed at a ratio of 1 per flat plus 1 per 12 flats for visitors giving a total of 980 spaces, to be provided in a combination of dedicated storage space close to flats. In addition 147 spaces will be provided for the commercial space to be located either within the individual buildings or within the public realm.

3.7.3 Vehicle access into the site would be from Oxestalls Road, Grove Street and Dragoon Road, with the existing access points from Evelyn Street being removed.

3.8 Servicing and Refuse

3.8.1 All deliveries for the development will take place at street level from any of the site access points on Oxestalls Road, Grove Street and Dragoon Road. In addition a servicing/parking bay is to be provided on Evelyn Street. Refuse collection for both the commercial and residential waste will take place from temporary storage holds at ground level within the development.

3.9 Highways Works

3.9.1 The application proposes the rationalisation of and amendments to site access points including minor alterations to the public highway, the provision of a signal-controlled (Toucan) pedestrian crossing of Evelyn Street (south of Grinstead Road) and works to the footpaths around the perimeter of the site.

3.10 Implementation and Phasing

3.10.1 Section 5.2 of the ES sets out a construction programme for the proposed development comprising 3 principal phases over an 8 year period with each main phase comprising a number of sub-phases ('Plots'):

Phase 1 = Plot 1 and Plot 2;
Phase 2 = Plot 3, Plot 4 and Plot 5; and
Phase 3 = Plot 6, Plot 7 and Plot 8.

3.10.2 Following pre-commencement design procurement (9 months duration), site preparation including demolition, remediation, site clearance would take place over a 20 month period with excavation and construction of the southern part of the water body (10 months) commencing approximately halfway through that process. The construction of Plot 1 buildings on the south-western corner of the site (30 months) would commence 6 months after site preparation works had started with Plot 2 on south-eastern corner (24 months) commencing approximately halfway through the construction of Plot 1. Subject to acquisition of those parts of the site not owned by the applicant, construction of Plots 3-5 in the central part of the site would commence shortly after the start on Plot 2 as the basement area on Plot 4 is accessed via Plot 2. Plots 3, 4 and 5 are estimated to take 24, 25 and 36 months duration respectively and would complete Phase 2 of the development. This would be followed by demolition, remediation and site preparation work on Plots 6 and 7 (9 months) and then Plot 8 (12 months). The northern section of the water body would then be constructed (14 months) followed by the construction of buildings on Plots 6-8 (40, 34, 28 months respectively). Taking the commencement of site preparation works as the start of the project (Q1) then the indicative skeleton programme shows the following build out of the scheme:

Phase	Phase	Start (qtr)	End (qtr)	Duration (months)
Site Prep. / Demolition / Remediation	1	1	7	20
Water body	1	4	7	10
Plot 1	1	3	12	30
Plot 2	1	9	16	24
Plot 3	2	14	21	24
Plot 4	2	14	22	25
Plot 5	2	10	21	36
Site Prep. / Demolition / Remediation	3 (part)	12	14	9
Water body	3	23	27	14

Plot 6	3	15	28	40
Plot 7	3	19	30	34
Site Prep. / Demolition / Remediation	3 (part)	21	24	12
Plot 8	3	23	32	28

3.10.3 As noted in para. 2.1.8 above the applicant does not have ownership and control of the entire application site and so, at the current time, is unable to deliver comprehensive development of the site until the remaining land interests are acquired or an agreement is reached with third parties. This matter is discussed in more detail in Section 9 below in terms of the delivery strategy for the scheme.

4. ENVIRONMENTAL IMPACT ASSESSMENT (EIA)

4.1 Introduction

4.1.1 As members will be aware, certain development proposals are required to be subject to environmental impact assessment before planning permission can be granted. The relevant regulations in relation to the application are the Town & Country Planning (Environmental Impact Assessment) (England & Wales) Regulations 1999 (as amended). The 1999 Regulations (so far as they relate to England) have been replaced, with effect from 24 August 2011) by the Town & Country Planning (Environmental Impact Assessment) (England) Regulations 2011, but the 1999 Regulations (as amended) expressly continue to apply to applications submitted prior to the coming into force of the 2011 Regulations. References in this report to "the EIA Regulations" are therefore references to the 1999 Regulations (as amended) which continue to apply to the application.

4.1.2 Capita Symonds, independent consultants, were appointed at an early stage to advise the Council on EIA issues arising from the scheme and to help officers scrutinise technical material prepared by the applicant.

4.1.3 The EIA Regulations identify certain development projects – Schedule 1 and Schedule 2 development - which must or may require Environmental Impact Assessment (EIA). Projects of a type listed in Schedule 1 must be subject to EIA before permission can be granted. Projects of a type listed in Schedule 2 will require EIA before permission is granted if any part of the development is in a sensitive area or the prescribed threshold/criteria is exceeded/met and in either case the proposed development is likely to have significant effects on the environment by virtue of factors such as its nature, size or location. The application scheme comprises an urban development project with a development area of more than 0.5 hectares. It therefore falls within paragraph 10 of Schedule 2 to the EIA Regulations.

4.1.4 Before the planning application was submitted, the applicant sought a screening opinion from the Council as to whether the application proposals would require EIA. Given, in particular, the location of the site, the mix of uses and scale of the proposed development and its potential for cumulative impacts with other developments, officers concluded, having regard to the statutory criteria and applicable guidance that the development would be

likely to have significant effects on the environment and so would require EIA. A Screening Opinion to this effect was issued by the Council in November 2009.

4.1.5 Where EIA is required, the EIA Regulations require submission of an Environmental Statement (ES) to assess the likely significant environmental effects of a proposed development. In dealing with the effects of the scheme, such a statement must identify the baseline situation, the nature of the impact both direct and indirect, whether it is temporary (demolition and construction) or permanent (operation) and measures to mitigate the likely adverse impacts in each case. It must also identify the residual effects after assumed mitigation as well as the cumulative effects of such a scheme in relation to other committed development in the area. Where alternatives have been considered it must set these out with reasons for selecting the proposed development site.

4.1.6 Prior to submission of the planning application, the applicant also requested a Scoping Opinion from the Council on the scope of issues and methodology that an EIA for the emerging proposals should cover. Following consultation with statutory consultees, the Council issued a Scoping Opinion in November 2009.

4.1.7 An ES was, accordingly, submitted with the application.

4.1.8 During the initial assessment of the application, the Council formed the view that certain aspects of the ES were deficient and indicated to the applicant its intention to serve a Regulation 19 request requiring the applicant to submit further information. In addition, (although not a Regulation matter) aspects of the ES required clarification/correction. Prior to service of any Regulation 19 request, however, the applicant submitted additional information covering the deficiencies in the ES and clarifying and correcting certain information. The additional information also covered amendments to the scheme which were submitted at the same time. The additional ES material included information on: the proposed development; air quality; archaeology; daylight and sunlight; drainage and flood risk; ecology; ground conditions, hydrology and contamination; noise; microclimate; socio economic; townscape and visual impact; waste; and revised application drawings. This information was submitted in May 2010 in the form of a revised ES (Revised ES). As the information encompassed 'other information' for the purpose of the EIA Regulations it was required to be subject to the same publicity/consultation requirements in Regulation 19. The information was therefore publicised and consulted upon in accordance with the requirements of Regulation 19. The amendments to the scheme (see 3.1.4 above) were also publicised and consulted upon at the same time.

4.1.9 As indicated above, the EIA process must take account of cumulative impacts to ensure that it assesses the likely significant cumulative impacts of application proposals with other schemes. Conventionally, cumulative impact is assessed on the basis of relevant "committed schemes" which means those that have planning permission. However, given significant current applications on other nearby Strategic Sites at Marine Wharf West (application ref: DC/10/73437), Cannon Wharf (application ref:

DC/08/68523), Surrey Canal Triangle (application ref: DC/11/76357), Grinstead Road (application ref: DC/10/75331), Convoys Wharf (application ref: DC/02/52533) and Creekside Village East (application ref: DC/06/63352) plus Paynes & Borthwick Wharves (committed scheme) Creekside Village West (committed scheme) and Greenwich Reach (committed scheme) in LB Greenwich, it was considered appropriate that these be included in the EIA assessment and the cumulative impacts have been addressed on this basis.

4.2 Restriction on grant of planning permission for EIA development

4.2.1 By virtue of Regulation 3 of the EIA Regulations, the Council cannot grant planning permission in respect of the application unless it has first taken the environmental information into consideration. The environmental information means the ES, any further or other information received, any representations made by any consultation bodies and any representations made by any other person about the environmental effects of the proposed development. The ES and other information received is considered in Section 8 below and responses to consultations and other representations are also considered elsewhere in this report.

4.3 Environmental Statement (ES) Documents

4.3.1 As the proposals comprise EIA development, the application is accompanied by an Environmental Statement (ES).

4.3.2 The ES comprises the following documents:

- Non Technical Summary
- Volume 1 – Main Report (setting out findings under the following headings):
- Volume 2 – Figures
- Volume 3 – Appendices
- Volume 4 – Application drawings
- Additional Environmental Information

4.3.3 Section 8 of this report reviews the ES, the assessment of environmental effects and proposed mitigation and these form an integral part of the Council's consideration of the proposed development.

Environmental Statement Non Technical Summary (NTS)

4.3.4 The NTS sets out a brief summary of the findings and content of the main ES. The document provides a description of the site and of the pre-amendment proposals. Following a brief summary of the process of scoping and preparing of the ES, the NTS sets out 12 main topic chapters under which the environmental effects of the proposed development are summarised.

4.3.5 The applicant has stated that whilst amendments to the proposed development (see 3.1.5 above) required certain limited consequential alterations to the original application material these largely flowed from amendments to the external appearance of the blocks within the proposed development and no any change to the description of development or the findings of the ES. In addition, the Revised ES does not contain any change

in the findings of the original ES .. Consequently the impacts identified in the December 2009 ES (and summarised within the Non Technical Summary) have not changed as a result of the revisions to the scheme, nor as a result of any other information or clarification/corrections received on the ES. to the applicant has not, therefore, revised the Non Technical Summary.

Environmental Statement Volume 1: Main Report

4.3.6 The Main Report sets out the findings of the environmental impact assessment under the following headings:

1. Introduction
2. Background to Environmental Impact Assessment
3. Site Location and Description
4. The Proposed Development
5. Construction and Implementation (Including Details of Demolition)
6. Air Quality
7. Archaeology
8. Daylight and Sunlight
9. Drainage and Flood Risk
10. Ecology
11. Ground Conditions, Hydrogeology and Contamination
12. Noise
13. Microclimate
14. Socio Economic
15. Townscape and Visual Assessment
16. Transportation
17. Waste

4.3.7 Cumulative effects of the proposed development with other committed schemes are assessed under each topic heading. As indicated above, the schemes identified were Cannon Wharf (part of Plough Way), Convoys Wharf, Greenwich Reach, Creekside Village, Paynes and Borthwick Wharves, Surrey Canal Triangle and Grinstead Road. The ES sets out under each topic whether it is appropriate to consider cumulative impacts on receptors and identifies those schemes that have been assessed.

Environmental Statement Volume 2: Figures, Volume 3: Technical Appendices

4.3.8 These appendices provide the detailed data, figures and other information referred to in the main ES report including Daylight and Sunlight Analysis, Car Parking Strategy, Geo-Environmental Site Assessment, Micro-climate Assessment and Noise survey results, and Townscape And Visual Assessment including Strategic Views.

Volume 4: Application Drawings and Revision A

4.3.9 Appendix 4 is a full set of the application drawings incorporating amended plans submitted May 2010.

Other Information (May 2010)

4.3.10 As set out in paragraph 4.1.7, since the application and the ES were submitted, ‘other information’ in the form of a Revised ES has been received from the applicant in respect of the ES.

5. CONSULTATION

5.1 Introduction

5.1.1 This section outlines the consultation arrangements and summarises the consultation responses. Comments made in response to the proposals are referred to, where appropriate, in Section 7 and 8 of this report and have been addressed by officers as an integral part of considering the merits of the proposals. In addition, Section 10 of this report responds to the key objections to the proposals and makes clear where and how these have been taken into account

5.2 Consultation Process

5.2.1 The application has been advertised as an EIA application and as a departure application (as it does not accord with certain aspects of adopted policy) in accordance with the relevant statutory publicity requirements. The other information received from the applicant in May 2010 in respect of the ES has also been publicised in accordance with the requirements of the EIA Regulations.

5.2.2 Further, following receipt of the Delivery Strategy in July 2011 the Council wrote to previous respondents to the application advising them of the additional information and inviting further comment in the light of this. In terms of the revision in the level of affordable housing from 35% to 20% the Council concluded that the associated information did not constitute 'other' information for the purposes of Regulation 19 of the EIA Regulations and that such information was not therefore subject to the publicity requirements in Regulation 19.

Local Residents and Businesses

5.2.3 A substantial mailing exercise was undertaken in relation to the application as originally submitted, with letters sent to all properties within Evelyn ward along with London Borough of Southwark residents on the Borough boundary (over 8,000 individual letters in total). Letters were hand delivered on 8 February 2010 giving people at least 28 days to comment on the revised proposals. Statutory notices were also displayed around the site and in the Newshopper newspaper on 10 February 2010. In early March a separate letter was also sent out to the same residents who were consulted in February informing them of the range of major proposals that are in the pipeline for North Deptford and the various ways in which they can keep informed and involved with the progress of these sites.

5.2.4 Following receipt of amendments to plans and documents and receipt of the Revised ES in May 2010 a re-consultation took place on 1 June 2010 with over 8,000 letters sent to the same local residents and occupiers who were consulted in February. The statutory and internal consultees were also consulted again, while a further statutory notice in the Newshopper was posted on 2 June 2010.

5.2.5 As noted in 5.2.2 above respondents to the original application were advised of the receipt of the Delivery Strategy in July 2011.

Local Societies, Groups and Organisations

5.2.6 The following local societies and groups were consulted:

- Pepys Community Forum
- Riverside Youth Centre
- Deptford Park Primary School
- Lewisham People Before Profit
- Deptford Park Residents Group
- Canada Water Consultative Forum

Statutory Agencies and Organisations

5.2.7 The following statutory agencies and organisations were consulted

- Government Office for London
- Greater London Authority
- Commission for Architecture and the Built Environment
- Environment Agency
- Natural England
- English Heritage
- English Heritage – Archaeology
- London Cycling Network
- Transport for London
- Lewisham Primary Care Trust
- London Wildlife Trust
- Met Police Crime Prevention Unit
- National Grid
- Thames Water
- Health and Safety Executive
- Fire Prevention Group
- London Buses
- London Wildlife Trust
- London Fire & Emergency Planning Authority
- London Borough of Southwark

5.3 Consultation Responses

Written Responses from Residents and Businesses

5.3.1 The consultation responses relate principally to the consultation undertaken in February and May 2010. References to policies are those applicable at that time including the London Plan (2008 consolidated with alterations since 2004) Adopted UDP (Saved policies) and the Draft Core Strategy (Preferred Options pre-submission version). Consultation responses since July 2010 are reported in Section 5.5 below.

5.3.2 Responses to consultation in February and May 2010 resulted in a total of 26 objection letters from local residents and occupiers, with 4 letters received in support. The address details are as follows: 74 Burghill Rd, Sydenham; Flat 6, 20 Deptford Wharf; 42 Foreshore, Deptford; Surrey Docks Ward Councillors in Southwark; 43 Scawen Road, Deptford; 4 Lapwing Tower, Taylor Close; Pepys Community Forum; 3 Clayton Drive, Deptford; 104 Millard Rd, Deptford; Shell Deptford Service Station; Veolia Environmental Services, New Baltic Wharf, Oxestalls Rd; Canada Water Consultative Forum; 49 Pendennis House, Rainsborough Ave; 14 Box Tree House; 2 Barfleur Lane; 96 Millard Rd, Deptford; 90 Millard Rd, Deptford;

106 Millard Rd, Deptford; 4 Clayton Drive; 103 Millard Rd, Deptford; Lewisham People Before Profit, 102 Endwell Rd, Brockley; 10 Eddystone Tower; 3 Plough Way, Surrey Quays; 56 Etta St, Deptford; 30 Acacia Close, Deptford; 251 Grove St, Deptford; 107 Millard Rd; Flat 61, Eddystone Tower, Oxestalls Rd; 118 Evelyn St; 124 Evelyn St.

5.3.3 The written objections raise the following issues, which are grouped in terms of the topic (numbers in brackets are the number of times each individual issue has been raised):

Traffic

- Increase in traffic congestion (15)
- Overcrowding of buses (6)
- Increase in parking congestion (5)
- Concern about traffic congestion in the adjoining Southwark Council road network (2)
- Negative impact on pedestrian safety (2)
- Too many car parking spaces proposed (1)
- The pavement should be widened on Evelyn St to the north and south of the Oxestalls Rd junction to enhance pedestrian safety (1)
- There could be an increase in traffic which would increase the risk of injuries to pedestrians and cyclists at the Oxestalls Rd / Evelyn St junction (1)
- A bicycle lane should be provided along this section of Evelyn St (1)

Scale, Massing and Design

- The 18 storey building is too tall and out of context with the local area (10)
- The high rise buildings are too tall and have a negative impact on the surroundings (10)
- Result in overshadowing and loss of sunlight and daylight to Pepys Park (2)
- Excessive density (1)
- The tall buildings along the development's perimeter will form a barrier and exclude the adjoining community (1)
- The design has not taken into account the naval / working class history of the area (1)

Social Infrastructure

- A new secondary school should be provided on the site (7)
- Opposed to a secondary school on the site, which would have the same negative impacts as the existing uses on site (1)
- The existing health facilities will not cope with the additional demand (5)
- The existing school facilities will not cope with the additional demand (5)
- No youth facilities provided (2)
- Lack of local police facility (1)

Residential Amenity

- Result in overshadowing, and loss of sunlight and daylight to residential properties (7)
- Has an overbearing impact on residential properties causing loss of amenity (4)
- Results in overlooking of adjoining residential properties and loss of privacy (3)
- Loss of views (3)

- Increase in light pollution (1)
- Development's construction will have a negative impact on amenity (1)
- Result in small overcrowded homes (1)

Air Quality

- Increase in air pollution (7)

Noise

- Increase in noise pollution (3)

Mix of Uses

- Too many bars and takeaways proposed resulting in anti-social behaviour, litter, noise, traffic and obesity (4)
- The take away, restaurant and bar uses will not benefit local people (1)
- Business uses should be provided that lead to real jobs (2)
- The large number of shops proposed will be unviable (1)

Cumulative Impact

- The cumulative impact of the development and the others planned in Deptford and Canada Water will have a negative impact on the area (2)
- The developer should provide money to upgrade adjoining social housing (1)

Landscaping

- Low quality landscaping (1)
- There are several bushes and trees within the site therefore a tree survey should have been provided (1)

Affordable Housing

- The housing should be democratically controlled, securely tenured social rented housing suitable for those who are currently on Council waiting lists (1)
- More affordable housing should be provided (1)
- The affordable housing is below the 50% target of the Council and the GLA (1)

Management

- Rubbish could get dumped in the canal (1)
- Junk could be stored on the proposed balconies (1)
- Adequate waste and recycling facilities should be provided (1)

Ecology

- The proposal will have a negative impact on the rare species and wildlife identified on the Convoys Wharf site and Pepys Park adjoining Convoys (1)

Employment

- Loss of local businesses on site (1)
- Loss of a high value petrol filling station serving the local community (1)
- The Veolia business within the application site is an important part of a vital public service provision for London that will be lost (1)
- The opportunity for Veolia to find a suitable alternative premises in the area will be difficult. It is important that they operate in the area owing to their use of SELCHP (1)
- Application is contrary to London Plan (2008 Consolidated with Alterations since 2004) policies 4A.22, 4A.24 and 3B.10, which safeguard existing waste facilities (1)

Contamination

- Flooding of the canal and its contamination from the soils on site (1)

Other

- The applicant didn't listen to residents during the pre-application process (1)
- Negative impact on the sense of well being and community in Deptford (1)

5.3.4 The letters of support raised the following key items:

- Provide much needed jobs (2)
- Result in the regeneration of a neglected brownfield site that is an eyesore (2)
- Provide much needed housing in an area suited and designated as a London growth area (2)
- Encourage less anti-social behaviour in a previously run down area (1)
- Bring sustainable development to the area (1)
- Will provide potential opportunities to the area (1)
- Will improve the area (1)
- An excellent proposal of redevelopment (1)

5.3.5 There was also support for aspects of the scheme from some individuals who objected to other elements including support for the redevelopment an unsightly block, the provision of much needed quality housing, the provision of a range of much needed retail and restaurant facilities, the creation of new jobs and enterprises, a welcome addition in the regeneration of Deptford, the removal of the Veolia waste depot, the provision of landscaping, green space and a canal.

5.3.6 Individual letters and e-mails are available to Members.

Statutory Agencies and Organisations

5.3.7 Environment Agency – the proposed development will only be acceptable if conditions, which relate to flood risk management and groundwater protection, are attached. An informative should be attached relating to the excavation of contaminated soil.

5.3.8 Mayor of London GLA Stage 1 Report (17th March 2010)) – the report, which incorporates comments from TfL notes that London Plan policies on land use, housing, urban design, strategic views, access, transport, blue ribbon (water bodies), energy and climate change are relevant to this application. The application complies with some of these policies but not with others, for the following reasons:

- Strategic Industrial Land: The site is still designated as Strategic Industrial Land (SIL) in the London Plan and the Council's adopted UDP. The proposed mix of uses are not acceptable on SIL land. However, the Council is preparing its detailed Core Strategy and evidence base which justifies the proposed release of this land from its current SIL designation for mixed use development. The proposed release of SIL on this site has been accepted by the GLA at officer level.
- Housing: The financial information justifying the proposed level of affordable housing has not recently been submitted to the GLA. There is a low provision of 3 bed units.
- Urban design: The overall design approach achieves a high quality, however, further work is required on a number of detailed design areas.

- Access: Further detail is required on the 10% wheelchair accessible units, the low level of blue badge car parking and detailed Lifetime Homes standards.
- Transport: There is a lack of information submitted as part of the application and as such TfL cannot comment in detail on the likely impact of the development on the transport network and the subsequent acceptability of the proposals. Additional information is therefore required, as detailed above, before TfL can support the application and confirm its compliance with the London Plan's transport policies.
- Energy and climate change: Further information is required on the modelling work, the ability to connect to SELCHP, the proposed CHP plant, the cooling measures and the renewable component is required and sustainable urban drainage measures.

5.3.9 The Stage 1 Report concludes that on balance, the application does not comply with the London Plan. It goes on to state that the following changes might remedy the above mentioned deficiencies, and could possibly lead to the application becoming compliant with the London Plan.

- Strategic Industrial Land: In principle, the proposed release of this site from its SIL land has been accepted by officers at the GLA, However, the Mayor has not yet issued his formal pre-submission comments on the general conformity of the Core Strategy and Site Specific Allocations. These comments were subsequently received in April 2010 and accepted the case for the release of specified sites including Oxestalls Road.
- Housing: Further discussion on the affordable housing offer and the low provision of 3 bed + accommodation is required.
- Urban design: Whilst the overall design approach is successful there are a number of detailed areas where further design work is required.
- Access: Further information is required on the provision of 10% wheelchair accessible units, how each of the units achieve Lifetime Homes standards and the level of blue badge car parking.
- Transport: Further information is required on a range of transport measures is required.
- Energy and climate change: Further information is required on the submitted energy strategy is required to ensure that the strategy is in line with the Mayor's energy hierarchy.

5.3.10 Natural England – no objection. However, it is recommended that the Council secure the proposed enhancements for the natural environment set out in the Environmental Statement through the use of a planning condition. The Council should also be satisfied that the proposals will facilitate better links to existing areas of green space as the development site is located within one of the GLA's areas of deficiency in access to nature.

5.3.11 Commission for Architecture and the Built Environment – the application is supported, it is considered that the project has vision and the potential to create an excellent development. The amendments to the application improve the design. However, there are a number of comments about the proposal that should be addressed as the design of the scheme progresses.

In terms of site layout and uses:

- The clarity of the routes leading from the canal should be a priority so that the need for signposting is avoided.
- The previous concern about an apparent confusion between the fronts and backs of the block between Evelyn Street and the canal (Plot 5) has been lessened by the amendments to the application that reinforce the inner elevation and street as a residential front rather than being the back of the Evelyn Street retail units.
- The applicant needs to be confident that the socio-economic demographic of the locality can support the viability of the range of retail, restaurant and other leisure uses proposed. A large proportion of the scheme relies on active frontages and any shortfall in the viability of these units will have significant implications for the success of the streets and spaces.

In terms of architecture:

- There is some reservation about some floor to ceiling glazing proposed and its deliverability.
- Ultimately the architectural quality will be dependant on the detailed design and the choice of appropriate materials. Conditions should be applied to ensure an appropriate level of control of the design details.

In terms of open space:

- The proposed landscape strategy is very strong but given the ambitious amount of public and shared private space proposed, achieving the aspirations for the neighbourhood suggested will be dependant on successful management and maintenance regimes.

In terms of sustainability:

- Achieving Code for Sustainable Homes Level 4 for tall buildings is challenging given the problems with wind exposure and restrictions on adaptability.

In terms of implementation and phasing:

- The phasing diagram should be supported by a robust implementation strategy including details on how flexibility has been built into the plan to account for economic changes during the build out. It should also set out how different partners from the public and private sector are expected to deliver the proposal.
- The implementation strategy should detail how the social infrastructure in the early phases will be funded and managed in the long term.

5.3.12 London Borough of Southwark – no objection. However the application does not consider the traffic impact on the Lower Road/Rotherhithe New Road/Rotherhithe Old Road gyratory on which there is considerable existing congestion. The development's transport impact should be tested on the Rotherhithe Multi Modal transport model. The developer should contribute to any mitigation measures required. 2 car club spaces are not considered sufficient, provision should be made for expansion to 10. The Pedestrian Environment Review System Audit of the public realm around the site identifies a deficiency in the footway of Lower Road and in general pedestrian signage. The development will generate additional pedestrian traffic to Surrey Quays Station, therefore funds should be secured to address these deficiencies. Would like to see improvements to bus service frequencies. Any grant of planning permission should be conditioned to

ensure that the retail units cannot be amalgamated, so as to reinforce the role of Canada Water town centre.

5.3.13 English Heritage – no comments on the application. Consider it should be determined in accordance with national and local policy guidance and on the basis of your specialist conservation advice.

5.3.14 English Heritage (Archaeology) – approval is recommended subject to a condition and informative.

5.3.15 Metropolitan Police Crime Prevention Unit – it is requested that the development provide appropriate police related facilities in consultation with the Met prior to the commencement of any development, secured by planning condition or S106 agreement. A development of this scale is likely to necessitate floorspace of approximately 150m2 to accommodate a neighbourhood policing facility. This should be fully DDA compliant and located at ground floor level, it will be required for a period of 25 years minimum. It is essential that the proposal complies with the security standards detailed in the Secured by Design Scheme.

5.3.16 London Fire and Emergency Planning Authority – no objection

5.3.17 Thames Water – no objection, subject to the attachment of conditions and informatives.

LB Lewisham Design Panel

5.3.18 The Panel has considered the scheme on several occasions. The most recent considerations were of the application proposals in January 2010, when it made the following comments.

5.3.19 The Panel gave significant attention to the importance of making the development hang together, especially in terms of its materiality. The Panel raised some concern regarding how this would be achieved during the delivery of the different buildings and public spaces within the outline and detailed planning application. The Panel was anxious that the presented scheme relied too much on precision and asked for 1:20 details as part of the conditions of the proposal. The importance of retaining the architect Hawkins Brown through the detailed design process was emphasised. The Panel stressed the importance of public spaces to add distinctiveness and focus as well as unity throughout the whole scheme. Each space needs to really feel as a recognisable entity/meeting point/moment. The Panel raised concerns regarding the design of balconies generally and how they should be designed in relation to the environment they faced, if they are not simply to become storage spaces. In particular size of and lack of privacy between balconies on Plot 3 Victoria Wharf was questioned. In this case privacy could be provided by a single screen on one side. The Panel liked the villa treatment of the family housing. In conclusion the Panel felt that the scheme had developed well since the last presentation at the pre-application stage. However, the time available to focus on elevation design was limited, so the case for the large materials palette compared to a simpler, unified approach was unresolved.

5.3.20 The Panel further considered the scheme in June 2010 after the Design Code was submitted. The Panel considered that the Code was a good document, offering considerable promise for later stages. The proposed brickwork is a good mix underpinned by a sound logic. However, it is important that the specification section refers to anodised aluminium cladding to ensure that it is not down graded to powder coated. There is some concern about the prominence of the cladding joints. The cladding pattern creates some very small panels on what are already thin members between the windows. The Panel were concerned that these are going to look insubstantial, these panels should relate better to the openings to avoid these small cladding panels. The design of the windows and doors to residential units is generally supported subject to clarification about cleaning regimes and child safety. The thought that has gone into the entrance designs is welcomed, however can graffiti be easily removed from the concrete? Good quality and sufficient lighting inside and out is very important. For private amenity space type B, the balcony screens for privacy are a good idea and should be incorporated. However, for private amenity space type D the panel questioned how the glass screens would be cleaned. If they are not likely to be cleaned regularly another material may be better. A unified approach to shop front design which respects the contextual architecture is welcomed, but there is concern whether a suitable leasehold agreement would prevent retailers from installing their own shopfronts at a later date.

5.4 Local Meeting

5.4.1 Due to the level of response received to the application, in line with the Council's Statement of Community Involvement a local meeting was held on 18 May 2010. All those who had made representations were invited to the meeting along with ward Councillors. The public meeting was attended by approximately 15 people. The main points to emerge being concerns about scale and building heights in particular and their impact, alternative proposals for the use of the site for a secondary school, concerns about the consultation process, a concern that there were too many flats and not enough jobs being created on the site, car trips generated by the site, the cumulative impact of this site with other major developments in the area including impacts on health and education facilities, and construction impacts. Notes of the meeting are set out in Appendix 3 to this report.

5.4.2 Two petitions were submitted by Lewisham People Before Profit on 9 March 2010 and 10 June 2010 that were signed by 86 and 140 signatories respectively. The petition stated that the petitioners objected to the application on the basis that this is one of the few sites in the area suitable for a new school. It alleges the application will cause pollution and lead to further poor air quality in breach of European Law, Evelyn Street already has poor traffic flow and the excessive extra parking places proposed will further increase traffic and road safety concerns to local residents. The height off the tower blocks will lead to loss of light and the overall development is too large for the site. The affordable housing ratio is below the 50% target. The take away, restaurant and bar uses will not have any benefit to local people as many shops are closed. The Council should ensure that the needs of local people, present and future, are reflected with any consents given. Business uses should lead to real jobs, such as a centre for new green

business, carpenters, and other trades. Green energy ideas should be at the forefront to deal with the future shortage of gas and electricity.

5.5 Consultation Responses August 2011

5.5.1 As referred to above, following receipt of the Delivery Strategy prepared by the applicant the Council wrote to all previous respondents to the application advising them of this information and inviting further comment. Consultees were given 21 days to respond. On expiry of this consultation period 4 responses had been received from occupiers of 43 Scawen Road, Flat 6, 20 Deptford Wharf, representatives acting on behalf of Shell UK and The Tenants Action Group, based in Bowditch. These cover the following issues:

Traffic

- Increase in traffic congestion
- Road improvements required
- Bus routes need to be improved

Residential Amenity

- The development would not provide good quality homes to meet the need for lifetime occupation

Mix of uses

- The scheme lacks uses that are needed locally

Affordable housing

- The reduction from 35% - 20% affordable housing is outrageous and the scheme should be refused
- There is not sufficient real housing provision to meet Lewisham's real housing need which is for more 3 and 4 bed homes in particular at a reasonable rent

Management

- There would be too much waste produced by the scheme

Employment

- The site should remain in employment use and once lost to housing, land is never replaced. In November 2010 a survey showed that the site provided between 757 – 857 jobs in primary and secondary employment
- The development would result in the loss of a petrol filling station

Other

- Decisions are made by the Council behind closed doors and are always approvals
- There will be too much development in the area
- No justification is given for the use of CPO powers

5.5.2 Any further responses received will be reported to Committee.

6. PLANNING POLICIES AND GUIDANCE

6.1 Introduction

6.1.1 In considering and determining applications for planning permission the local planning authority must "have regard to the provisions of the development plan, so far as material to the application, and to any other material considerations" (Section 70 (2) of the Town and Country Planning Act 1990). Section 38 (6) of the Planning and Compulsory Purchase Act (2004) makes

it clear that the determination of planning applications must be made in accordance with the development plan unless material considerations indicate otherwise. This approach is reflected in PPS 1, where, at paragraph 8 (and again at paragraphs 28 and 31), it is confirmed that, where the development plan contains relevant policies, applications for planning permission should be determined in line with the plan, unless material considerations indicate otherwise.

6.1.2 The 'development plan' for Lewisham comprises the London Plan (July 2011), the Core Strategy Development Plan Document (CSDPD) (adopted in June 2011) and those saved policies in the adopted Lewisham UDP (July 2004) that have not been replaced by the CSDPD.

6.2 Planning Policy Guidance and Planning Policy Statements

6.2.1 Planning Policy Guidance and Statements of relevance to the application are:

PPS 1: Delivering Sustainable Development (2005)
Planning and Climate Change – Supplement to PPS 1 (2007)
PPS 3: Housing (2011)
PPS 4: Planning for Sustainable Economic Growth (2009)
PPS 5: Planning for the Historic Environment (2010)
PPG 8: Telecommunications (2001)
PPS 9: Biodiversity and Geological Conservation (2005)
PPS 10: Planning for Sustainable Waste Management (2005)
PPG 13: Transport (2001 updated 2011)
PPG 14: Development on Unstable Land (1990)
PPG 17: Planning for Open Space, Sport and Recreation (2002)
PPS 22: Renewable Energy (2004)
Planning for Renewable Energy – A Companion Guide to PPS 22 (2004)
PPS 23: Planning and Pollution Control (2004)
PPG 24: Planning and Noise (1994)
PPS 25: Development and Flood Risk (2010)

<u>Other National Guidance</u>

6.2.2 The following national guidance is also considered relevant to the application:

- By Design – Urban Design in the Planning System: Towards Better Practice (2000)
- Urban Design Compendium (2000, 2007)
- Delivering Affordable Housing – Good Practice and Guidance (2006)
- The Code for Sustainable Homes – Setting the Standard in Sustainability for New Homes (2008)
- Planning and Access for Disabled People – A Good Practice Guide (2003)
- Circular 11/1995 – The Use of Conditions in Planning Permissions
- Circular 02/1999 – Environmental Impact Assessment
- Circular 05/2005 – Planning Obligations
- Homes and Communities Agency's Investment and Planning Obligations – Responding to the Downturn Good Practice Note (2009)

6.2.3 In July 2011 the Government issued a Draft National Planning Policy Framework that is intended to replace existing Planning Policy Guidance and Statements. Whilst this document is a material consideration it is considered that, given it is a consultation document at an early stage, limited to no weight should be given to it in the determination of this application.

6.3 London Plan

6.3.1 The London Plan 2011 has recently been adopted and replaces earlier versions of the document. The policies that are of particular relevance to the determination of this application are:

London's Places
2.13: Opportunity Areas and Intensification Areas
2.14: Areas for Regeneration
2.18: Green infrastructure: the network of open and natural spaces

London's People
3.1: Ensuring equal life chances for all
3.2: Addressing health inequalities
3.3: Increasing housing supply
3.4 Optimising housing potential
3.8 Housing choices
3.5 Quality and design of housing development
3.6: Children and young people's Play & Informal Recreation Strategies
3.8: Housing choice
3.9 Mixed and balanced communities
3.11 Affordable housing targets
3.12: Negotiating affordable housing in individual private residential and mixed-use schemes
3.14: Existing housing
3.16: Protection and enhancement of social infrastructure and community facilities
3.17: Health and social care Facilities
3.18: Education facilities
3.19: Sports facilities

London's Economy
4.1; Developing London's Economy
4.4: Managing industrial land and premises
4.5: London's visitor infrastructure
4.6: Support and enhance the provision for arts, culture and entertainment
4.7: Retail and town centre development
4.8: Supporting a successful and diverse retail sector
4.9: Small shops
4.12: Improving opportunities for all

London's Response to Climate Change
5.1: Climate change mitigation
5.2: Mitigating carbon dioxide emissions
5.3: Sustainable design and construction
5.4: Retrofitting
5.5: Decentralised energy networks

5.6: Decentralised energy in development proposals
5.7: Renewable energy
5.9: Overheating and cooling
5.10: Urban greening
5.11: Green roofs and development sites environs
5.12: Flood risk management
5.13: Sustainable drainage
5.14: Water quality and sewerage infrastructure
5.15: Water use and supplies
5.16: Waste self-sufficiency
5.17: Waste capacity
5.21: Contaminated land

Transport
6.1 Strategic Approach
6.2: Providing public transport capacity and safeguarding land for transport
6.3 Assessing transport capacity
6.4: Enhancing London's transport connectivity
6.7: Better streets and surface transport
6.9: Cycling
6.10: Walking
6.11: Smoothing traffic flow and tackling congestion
6.12: Road network capacity
6.13: Parking
6.14: Freight

London's Living Places and Spaces
7.1: Building London's neighbourhoods and communities
7.2: An inclusive environment
7.3: Designing out crime
7.4: Local character
7.5: Public realm
7.6: Architecture
7.7: Location and design of tall and large buildings
7.8: Heritage assets and archaeology
7.10: World Heritage Sites
7.11: London View Management Framework
7.13: Safety, security and resilience to emergency
7.14: Improving Air Quality
7.15: Reducing noise and enhancing soundscapes
7.18: Protecting local natural space and addressing local deficiency
7.19: Biodiversity and access to nature

Implementation, Monitoring and Review
8.1: Implementation
8.2: Planning Obligations
8.3: Community Infrastructure Levy

6.3.2 The Mayor of London has also published a number of strategies, Supplementary Planning Guidance (SPG) and Best Practice Guidance (BPG) notes in order to help implement London Plan policies. The following strategies, SPGs and BPGs are particularly relevant to this application:

- Transport Strategy (2010)
- Housing Strategy (2010)
- Air Quality Strategy – Cleaning London's Air (2002) and second draft Air Quality Strategy (2010)
- Biodiversity Strategy (2002)
- Energy Strategy (2004) and draft Climate Change Mitigation and Energy Strategy (2010)
- Draft Water Strategy (2009)
- Interim Housing SPG (2010)
- London View Management Framework Revised SPG (2010)
- Sustainable Design and Construction SPG (2006)
- Accessible London SPG (2004)
- Providing for Children and Young People's Play and Informal Recreation SPG (2008)
- Planning for Equality and Diversity in London SPG (2007)
- Mayor of London's Economic Development Strategy for London (2010)
- Mayor of London's Industrial Capacity SPG (2008)
- Living Roofs and Walls – Technical Report Supporting London Plan Policy (2008)
- The Control of Dust and Emissions from Construction and Demolition BPG (2006)
- Wheelchair Accessible Housing BPG (2007)
- Mayor of London's Health Issues in Planning BPG (2007)
- London Housing Design Guide Interim Edition (2010)

6.3.3 The South East London Housing Partnership's Wheelchair Homes Design Guidelines (August 2009) do not set out planning policy and are not referred to in the Council's Core Strategy or Residential Standards SPD, but they have been adopted by the Council as the housing standards for accessible housing.

6.4 Lewisham Core Strategy

6.4.1 The Core Strategy includes three different types of policies: Spatial Policies (1 to 6), Cross Cutting Policies (1 to 21), and Strategic Site Allocation Policies (1 to 6). Strategic Site Allocation 4 (SSA4) identifies Oxestalls Road and sets out specific requirements for mixed-use development of the site. This and other policies of relevance to this application are:

Spatial Policies
SP1 – Lewisham Spatial Strategy
SP2 – Regeneration and Growth Areas

Cross Cutting Policies
CS1 – Housing provision, mix and affordability
CS3 – Strategic Industrial Locations and Local Employment Locations
CS4 – Mixed Use Employment Locations
CS5 – Other employment locations
CS6 – Retail hierarchy and location of retail development
CS7 – Climate change and adapting to the effects
CS8 – Sustainable design and construction and energy efficiency

CS9 – Improving local air quality
CS10 – Managing and mitigating the risk of flooding
CS12 – Open space and environmental assets
CS13 – Addressing Lewisham's waste management requirements
CS14 – Sustainable movement and transport
CS15 – High quality design for Lewisham
CS16 – Conservation areas, heritage assets and the historic environment
CS17 – The protected vistas, the London panorama and local views, landmarks and panoramas
CS19 – Provision and maintenance of community and recreational facilities
CS20 Delivering educational achievements, healthcare provision and promoting healthy lifestyles
CS 21 – Planning obligations

Strategic Site Allocation Policies
SSA1 – Requirements for strategic site allocations
SSA4 – Oxestalls Road

6.4.2 In order to support the Core Strategy the Council is working closely with other local partners to prepare and implement an Infrastructure Delivery Plan (IDP), relating to physical, social and green infrastructure in Deptford and New Cross. The IDP is overseen by the Sustainable Development Partnership (one of the thematic partnerships that reports to the Local Strategic Partnership Board) and is being driven forward by Lewisham's Asset Management Board (comprising senior officers from the Council and local partners – including the Primary Care Trust and Hospital Trust).

6.4.3 In addition to the policies in the Core Strategy, also of relevance are those Saved policies in the Adopted Lewisham UDP (2004) that have not been replaced.

Other Relevant Local Guidance

6.4.4 In August 2006 the Council adopted the Residential Standards Supplementary Planning Document. This document sets out guidance and standards relating to design, sustainable development, renewable energy, flood risk, sustainable drainage, dwelling mix, density, layout, neighbour amenity, the amenities of the future occupants of developments, backland development, safety and security, refuse, affordable housing, self containment, noise and room positioning, room and dwelling sizes, storage, recycling facilities and bin storage, noise insulation, parking, cycle parking and storage, gardens and amenity space, landscaping, play space, Lifetime Homes and accessibility and materials.

6.4.5 Lewisham's Housing Market Assessment 2007-8 (2009) and the Lewisham Leisure and Open Space Study Final Report (2010) are also considered relevant to this application as they provide the evidence base for the Local Development Framework.

7. PLANNING CONSIDERATIONS

7.1 Introduction

7.1.1 The planning application for the comprehensive redevelopment of the Oxestalls Road site raises a number of issues against which the proposals have been assessed in terms of development plan policy and other material considerations. These can be summarised as follows:

- Principle of Mixed Use Development
- Land Use: Employment
- Land Use: Housing
- Land Use: Retail
- Urban Design
- Transport
- Sustainability
- Other Planning Considerations

7.1.2 Each of the topics is assessed below in relation to policies set out in the development plan and other material considerations together with the information set out in the ES (2009) and Revised ES (May 2010). The following discussion refers to the proposed development as amended by the drawings and documents (May 2010) and the Delivery Strategy (July 2011).

7.1.3 Environmental impacts and mitigation identified in the applicant's ES are assessed at Section 8 of this report. Financial viability and deliverability are considered in Section 9.

7.2 Principle of Mixed Use Development: Oxestalls Road Strategic Site

7.2.1 The Oxestalls Road site lies within the Deptford Creek/Greenwich Riverside Opportunity Area identified in Policy 2.13 of the London Plan 2011 where development proposals should seek to optimise residential and non-residential output and densities, provide necessary social and other infrastructure to sustain growth, and, where appropriate, contain a mix of uses. Policy 3.7 of the London Plan (Large residential developments) in respect of sites of over 5 hectares or capable of accommodating more than 500 dwellings states that proposals for large residential developments including complementary non-residential uses are encouraged in areas of high public transport accessibility and should be progressed through an appropriately plan-led process to co-ordinate, where necessary, provision of social, environmental and other infrastructure and to create neighbourhoods with a distinctive character, sense of local pride and civic identity.

7.2.2 Core Strategy (Spatial Policy 2) sets out a vision for the Borough up to 2026 and seeks to focus new development within the Regeneration and Growth areas of Deptford New Cross, Lewisham and Catford. The Deptford and New Cross area (Evelyn and New Cross wards and part of Telegraph Hill Ward, north of New Cross Road) is expected to accommodate up to 2,300 additional new homes by 2016 and a further additional 8,325 new homes by 2026, and an increase in population of around 24,600 together with significant amounts of new business and other employment generating floorspace over this period. Core Strategy Policy 4 sets out the objectives for Mixed Use Employment Locations which are existing industrial sites

identified for redevelopment for mixed-use purposes. The Core Strategy (para. 6.34) notes that collectively redevelopment of Mixed Use Employment Locations will provide major regeneration benefits by making the best use of available land, attracting further investment, by providing a sense of place, by addressing severance issues and by increasing connectivity by visual and physical links.

7.2.3 Within the Regeneration and Growth areas Strategic Site Allocation 1 identifies 'strategic sites' that are of such a scale and significance that individually and collectively they are considered central to the achievement of the Lewisham Spatial Strategy and will act as catalysts for regeneration. Four strategic sites have been identified in the Deptford and New Cross area: Convoys Wharf, Surrey Canal Triangle, Oxestalls Road and Plough Way (Marine Wharf and Cannon Wharf). Development is due to be focused on these sites plus other proposed Mixed Use Locations (Grinstead Road, Arklow Road and Kent and Sun Wharf) and other sites (including Creekside Village East, Giffin Street masterplan area, New Cross Station sites and the New Cross Gate NDC Centre).

7.2.4 Redevelopment of the strategic sites can deliver a comprehensive range of regeneration outcomes in the borough's most deprived areas focused on the provision of housing, jobs, accessibility improvements (public transport, pedestrian and cycle), public realm improvements and infrastructure provision (physical, social and green) that collectively can transform the physical environment and achieve place-making objectives. Strategic Site Allocation 4 relates specifically to the Oxestalls Road site and identifies it as a major regeneration opportunity, with comprehensive redevelopment providing for a mix of uses and improvements to the environmental quality of the site and the surrounding area, as well as improvements to accessibility, connectivity and legibility between Deptford Park, the Pepys estate, the River Thames and Convoys Wharf. The policy sets out both land use objectives and urban design principles to guide redevelopment of the site.

7.2.5 In view of the importance and complexity of the strategic sites, Core Strategy Policy 4 states that specific proposals will need to be progressed in the context of a site-wide masterplan to be submitted as part of a planning application. Details of the approach are set out in Strategic Site Allocation 1 (SSA1), the supporting text to which states that:

> "… to ensure a comprehensive approach to their development and enable local communities to help further shape the proposals, specific proposals will need to be progressed in the context of a site-wide masterplan. The masterplan will need to be prepared by the prospective applicant and will be based on an analysis of the site and its context and set out an overall development strategy that will form the basis of a planning application for the site."

7.2.6 The Core Strategy also states that the masterplan will need to include a delivery strategy that will identify how the development will be implemented and managed once occupied (including housing stock and publicly accessible space), any matters to be resolved such as land assembly and preparation, infrastructure requirements and delivery, development phasing and likely need for planning obligations (including financial contributions)

and/or conditions. It will also identify the likely need for public sector intervention, by which agency and when.

7.2.7 The masterplan for the site has been prepared in general accordance with the process set out in Policy SSA1, with a 'Framework Plan' prepared in 2007 which has been developed and refined in consultation with the Council, local residents and other organisations. This provides a coherent and comprehensive basis for development of the site and has been incorporated into the planning application submission. The hybrid nature of the application (outline for the entire site with details for Phase 1 and 2) is also in accordance with this policy. Subject to the development being able to mitigate on and off-site impacts either through works in kind or financial contributions the spatial strategy and site specific policies set out in the Core Strategy are therefore supportive of the principle of mixed use development of the site.

7.2.8 For the reasons set out elsewhere in this report officers consider that the analysis of the site and its context is based on an appropriate understanding of the issues, constraints and opportunities of this part of the borough and that the proposals provide a coherent basis within which the Oxestalls Road site can come forward. The masterplan for the site has been prepared without reference to land ownership boundaries and demonstrates that, with control of the entire site – the delivery of the site is considered in Section 9 below – the proposals could deliver a comprehensive development of the Oxestalls Road Strategic Site and would deliver the general and site specific objectives set out in the Core Strategy.

7.3 Land Use: Employment

Introduction

7.3.1 In assessing the characteristics, constraints and opportunities of the Oxestalls Road site paragraphs 8.27 and 8.28 of the Core Strategy note amongst other matters that the site is open and visible and occupied by a mix of more modern warehouses, older commercial and warehousing buildings, open sites and environmentally unfriendly uses, that the adjacent high density housing in the Pepys Estate is adversely affected by the car breaking and scrap metal recycling activities which blight the site's overall quality and that the current industrial and business uses do not reflect the importance of the site.

7.3.2 In this context the Core Strategy proposes that as a large cohesive site, redevelopment presents a major regeneration opportunity, with good access and critical mass potential. Accordingly redevelopment should provide for a mix of uses to improve the environmental quality of both the site and the surrounding area. In respect of future employment uses on the site the Core Strategy notes that:

- The site has sufficient scale to allow a distinct 'business quarter' that could be adjacent rather than integral to residential buildings as part of an intensive mixed use development.
- Opportunities should be taken to provide residential uses, quality business and light industrial uses providing higher density employment, and contribute towards public realm up-grade.

- The site offers a good opportunity for new employment space within a mix of uses that should be less focused on its current un-neighbourly uses.

Commercial Floorspace

7.3.3 The site is currently occupied by a number of businesses including the storage of goods, open parking of refuse vehicles, vehicle repair, car breaking/scrap yard and a petrol filling station. Current on-site employment is some 160 jobs (the ES estimates that if the existing floorspace on the site was more intensively used it might accommodate around 430 jobs). The uses are generally low density and some operations such as the scrap yard located on the north east corner of the site are a source of complaints by local residents.

7.3.4 Policy SSA4 in the Core Strategy requires a comprehensive approach to redevelopment that delivers, amongst other priorities, at least 20% of the built floorspace on the site for a mix of B1(c), B2, B8 business space as appropriate to the site and its wider context. The planning application proposes a mix of employment uses across the site about half of which is accommodated on Plots 1 and 7. In total this amounts to 16,393m2 (gross internal area) of floorspace on the site, comprising retail (A1-A5), business (B1a-B1c), non-residential institutions e.g. surgery, nursery, hall, church (D1), and assembly and leisure e.g. cinema, gym (D2) as follows:

Plot	Use Class	m2 (GIA)
1	B1	5,472
2	A1/A2/A3/A4/A5/B1	122
	A1/D1/D2	1595
3	A1/A2/A3/A4/A5	530
	A4	515
4		0
5	A1/A2/A3/A4/A5/B1	1190
6	A1/A2/A3/A4/A5	712
	A1/A2/A3/A4/A5/B1	227
	A1/D1/D2	462
7	A1/A2/A3/A4/A5	905
	B1	3253
8	D1	742
	D2/A3	668
	Total	16,393

7.3.5 This represents 17% of the total built floorspace being for non-residential purposes. In terms of B1 use, this would comprise at least 9% of the built floorspace, and up to 11% depending on the mix of uses within each Plot. Whilst the absence of B2 and B8 uses from the current proposals is considered appropriate given the potential impact of such uses on adjoining residential properties the B Class commercial floorspace proposed is significantly below that required by policy SSA4. In addition the application seeks significant flexibility in the final mix of non-residential uses on the site. Therefore although a proportion of the space would be provided solely for B1 purpose on Plot 1 and Plot 7 other space identified for B1 use might be used for other purposes. In the case of Plot 7 it is proposed that this would

include a dedicated B1 building which goes some way to meeting the policy objective of having independent rather than integrated business space on the site.

7.3.6 In support of the overall mix of uses on the site and the level of B1 floorspace in particular the applicant has submitted a confidential financial appraisal of the scheme. This demonstrates that given the costs and values of the development the non-residential floorspace provides a limited contribution to the gross development value of the scheme and not in proportion to its contribution to the overall floorspace. The consequence of this is that the provision of this space is cross-subsidised in part by the residential content of the development, and so increasing the commercial floorspace would have a negative impact on scheme viability. Given that the scheme is already a high density development increasing commercial space whilst maintaining the number of housing units is not considered appropriate on this site and the alternative of replacing residential with commercial space would have a disproportionate and further negative impact on viability. In the circumstances, and taken with the other aspects of the proposed development it is considered that the proposed amount of commercial floorspace is acceptable in this case.

7.3.7 In terms of jobs the site currently supports 162 full time jobs although the ES estimates that the existing floorspace could potentially support approximately 429 full time employment jobs (FTEs). The proposed 16,393m2 (GIA) of non-residential floorspace is estimated to support between 547 and 743 FTEs plus some 200 FTE jobs in construction activities (100 of which would be on site). Whilst the number of jobs on site will depend on the final mix of uses and levels of occupation the proposed development therefore has the potential to increase job opportunities as well as replace the existing 'bad neighbour' uses with activities that are more compatible with a mixed use residential area.

7.3.8 Given the importance of securing a mixed use development on the strategic sites and the relatively low level of commercial floorspace provision on this site compared to Policy SSA4 it is important that the non-residential space comes forward, including that on Plot 1 which is intended for use by an existing business on the site. To support the relocation of existing businesses and ensure that new and existing occupiers can afford space within the development it is appropriate that the commercial space across the site has service connections and other basic infrastructure provided as part of the construction process.

7.3.9 The provision of modern buildings offering new job opportunities and the potential to achieve higher levels of employment than currently exists is consistent with Core Strategy policies. To promote opportunities and uptake by local residents in both construction and operational jobs, measures to support local employment are considered appropriate and would be secured through planning obligations.

7.4 Land Use: Housing

Introduction

7.4.1 At national level, PPS 1 (paragraph 14 onwards) and PPS 3 recognise the need to develop socially inclusive communities, creating a suitable mix (both market and affordable) of housing. PPS 3 (paragraph 29 onwards) requires the Council to set a plan-wide target for affordable housing, and targets relating to the mix in terms of social and intermediate housing, size and type. In addition, PPS 3 requires the Council to set a threshold above which developments would be expected to achieve such targets and an approach for seeking developer contributions towards the provision of affordable housing.

7.4.2 The Core Strategy notes that the Lewisham Housing Market Assessment 2007-8 shows an overwhelming housing need within Lewisham and that a net 6,777 dwellings should be provided over the current 5-year period to meet current the identified need. Table 3.1 of the London Plan sets a target of 11,050 additional homes to be built in Lewisham in the 10 years from 2011-2026, with an annual monitoring target of 1,105 additional homes per year. As part of the overall need for housing in Lewisham the Housing Market Assessment shows that there is a pressing need for more affordable housing in the borough, which supports the overall Core Strategy target of 50% affordable housing on new developments.

7.4.3 Given that the application site is within reasonably close proximity to local services and access to the necessary social infrastructure it is considered suitable for affordable housing in accordance with Core Strategy Policy 1 and London Plan Policy 3.11 and 3.12. The Core Strategy also commits the Council to negotiating for an element of affordable housing to be provided in any major residential development, the starting point for negotiations being a contribution of 50% affordable housing on qualifying sites across the borough subject to a financial viability assessment. With regard to tenure mix, Core Strategy Policy 1 states that the affordable housing component is to be provided as 70% social rented and 30% intermediate housing although it also states that where a site falls within an area which has existing high concentrations of social rented housing, the Council will seek for any affordable housing contribution to be provided in a way which assists in securing a more balanced social mix. This may include a higher percentage of intermediate housing or other arrangements as considered appropriate.. In terms of unit size mix the Core Strategy expects the provision of family housing (3+ bedrooms) across all tenures as part of any new development with 10 or more dwellings and in the case of affordable housing, the Council will seek a mix of 42% as family dwellings (3+ bedrooms). The London Plan target is for 60% social rented and 40% intermediate.

Tenure Mix

7.4.4 As noted in 3.3 above, the proposed development would provide 905 residential units of which 189 are proposed to be affordable homes, representing 79% private sale and 21% affordable by unit (78% private sale and 22% affordable by habitable room). The tenure mix of the affordable is split between Affordable Rent and Intermediate on a 30 : 70 basis. This gives a total of 61 affordable rent and 128 intermediate units. It should be noted that at this stage no breakdown is provided for the split between

intermediate rent or sale and that the financial viability appraisal assumes there is no grant support for the affordable housing. . It is proposed that the split between intermediate rented and for sale be addressed through the Section 106 Agreement.

	Affordable Rent		Intermediate	
Flats	Units	Habitable Rooms	Units	Habitable Rooms
1-bed/2 person	14	28	44	88
2-bed/3 person	0	0	9	27
2-bed/4 person	24	72	39	117
3-bed/5 person	13	52	36	144
3-bed/6 person	4	16	0	0
4-bed/6 person	0	0	0	0
4-bed/7 person	6	36	0	0
4-bed/8 person	0	0	0	0
Total	**61**	**198**	**128**	**376**

7.4.5 The affordable rent units are provided in Plots 1, 3 and 5 and intermediate units in Plots 1, 3, 5, 7, and 8.

Phase	Plot	Affordable Rent	Intermediate	Private
1	1	24	28	64
1	2	0	0	144
2	3	11	15	66
2	4	0	0	140
2	5	26	27	47
3	6	0	0	160
3	7	0	30	54
3	8	0	28	41

7.4.6 Based on this mix the development would comprise 6.5% affordable rent and 14% Intermediate by unit, 7.5% and 14.5% respectively by habitable room. Based on unit numbers the combined affordable housing component would be 21% (22% by habitable room). When this is examined in terms of family-sized accommodation the scheme would provide 154 units in total (17% of units, 25% by habitable rooms) with 59 being affordable (7% of units and 10% by habitable rooms). Of the affordable family-sized units, 23 would be affordable rent and 36 intermediate (38% and 62% respectively of the affordable units).

7.4.7 These figures fall significantly short of the 50% affordable housing target in the Core Strategy. The applicant has submitted a confidential financial appraisal for the scheme which has enabled the Council, advised by specialist consultants, to assess the overall viability of the scheme and its ability, in financial terms, to meet policy in terms of affordable housing provision. Further consideration of financial viability is set out at Section 9 of this report however in summary the financial appraisal demonstrates that, when taken with other policy requirements such as the provision of employment space and other site specific objectives, the proposed development provides the maximum viable amount of affordable housing at this time. The GLA has noted in its Stage 1 response that the level of affordable is below target levels (and that the proposed tenure split does not

reflect London Plan policy). The financial viability report that underpins the scheme will be provided to the GLA when the application is referred back following determination by the Council.

7.4.8 Whilst the financial appraisal demonstrates that the provision of a larger percentage of affordable housing is not viable at this time, given the shortfall in affordable housing provision relative to the levels set out in planning policies it is appropriate that this is kept under review. To this end a mechanism is to be included in the s.106 agreement to secure funding for additional affordable housing should social housing grant be forthcoming or values increase to a level where this would be financially viable.

7.4.9 In terms of the affordable housing mix, the provision of 61 affordable rent units represents 38% of the affordable housing, compared with the 70 : 30 split set out in Core Strategy. However London Plan Policy 3.9 (Mixed and Balanced Communities) states that a more balanced mix of tenures should be sought in all parts of London, particularly in some neighbourhoods where social renting predominates and there are concentrations of deprivation. As noted above, Core Strategy Policy 1 states that where a site falls within an area which has existing high concentrations of social rented housing, the Council will seek for any affordable housing contribution to be provided in a way which assists in securing a more balanced social mix, and that this may include a higher percentage of intermediate housing or other arrangements as considered appropriate. There are high concentrations of social housing in the area around the site, in particular on the Pepys and Trinity Estates.

7.4.10 In this case a balance has been struck between the mix of uses on the site, affordable housing size and tenure mix and scheme viability. For the reasons set out above, and with the inclusion of a review mechanism, it is recommended that this tenure mix is accepted.

Unit Size

7.4.11 The application states that the 905 residential units would comprise:

	Total	
Flats	Units	Habitable Rooms
1-bed/2 person	312	624
2-bed/3 person	148	444
2-bed/4 person	291	873
3-bed/5 person	117	468
3-bed/6 person	11	44
4-bed/6 person	14	70
4-bed/7 person	7	35
4-bed/8 person	5	25
Total	**905**	**2,583**

7.4.12 The proposed size mix includes 154 units (17% of the units) as family-sized accommodation (3+ bedrooms) including 26 4 bedroom units. The applicant has justified this level of provision on the basis of financial viability and in the circumstances officers consider the proposed unit size mix is acceptable.

7.4.13 The London Plan Policy 3.5 and Table 3.3 sets out minimum space standards for new dwellings and all units (affordable and private) will meet or exceed these standards. Combined with the careful layout and planning of the units it is considered that the proposed development will provide a high quality of accommodation. Stacking of the units is also considered to be generally satisfactory.

Accessibility

7.4.14 Saved UDP Policy HSG 5 states that the Council will only permit new residential development which provides physical accessibility for all members of the community including people with disabilities. Where appropriate the Council will seek the provision of new homes designed, or capable of adaptation, to housing for long term needs. The supporting text later confirms that the Council will encourage developers to provide facilities that improve upon those statutorily required and that the Council will encourage the provision of units that are designed to the Joseph Rowntree Foundation's Lifetime Homes Standards.

7.4.15 Core Strategy Policy 1 and London Plan Policy 3.8 state that all new housing should be built to Lifetime Homes standards and that 10% of the new housing is designed to be wheelchair accessible or easily adaptable for residents who are wheelchair users. The applicant has confirmed that all residential units have been designed to Lifetime Homes standards. These standards will be secured by condition.

7.4.16 At least 90 units (10%) are proposed as wheelchair accessible/adaptable although no detailed breakdown has been provided in terms of units size or tenure. In the circumstances it is appropriate that these details are provided and agreed prior to commencement of the development and this will be secured through the s.106 agreement to ensure an appropriate number and mix of unit sizes that are distributed across the site.

Residential Amenity

7.4.17 Core Strategy Policy 15 seeks to ensure a high quality of development in Lewisham, including residential schemes and that densities should be those set out in the London Plan. Policy 3.4 in the London Plan 2011 seeks to ensure that development proposals achieve the maximum intensity of use compatible with local context, the design principles in Policy 4B.1 and with public transport capacity. Table 3.2 (Sustainable residential quality) identifies appropriate residential density ranges related to a site's setting (assessed in terms of its location, existing building form and massing) and public transport accessibility (PTAL). The Oxestalls Road site is considered to be in an 'urban' setting and has a PTAL rating of 2 giving an indicative density range of 45-170 dwellings per hectare / 200-450 habitable rooms per hectare (dependent on the unit size mix). The London Plan states that residential density figures should be based on net residential area, which includes internal roads and ancillary open spaces.

7.4.18 The application proposes 79,263m2 (GEA) of residential space providing up to 905 units. The site area is 4.54 hectares giving a residential density of 200 units per hectare although given the non-residential floorspace to be provided on the site the overall development density is higher.

7.4.19 At 200 units per hectare the proposed density is above the guidelines in the London Plan although the London Plan Interim Housing Supplementary Planning Guidance (April 2010) notes that where proposals are made for developments above the relevant density range they must be tested rigorously, balancing concerns for overall housing output against Policy 3A.3 [now Policy 3.4] of the London Plan and other policies which are relevant to exceptionally high density development. These include different aspects of 'liveability' related to proposed dwelling mix, design and quality, amenity provision and space, physical access to services, sustainable design and construction, car parking. In addition the wider context of the proposal taking account of its contribution to local 'place shaping' is relevant.

7.4.20 In this case five bus routes (including two night buses) pass the site and it is about a 10-15 minute walk to the East London Line at Surrey Quays. Consequently the PTAL rating of 2 is considered to under-represent the overall accessibility of the site although it is also appropriate to consider the capacity of existing services to accommodate the additional passengers that the site will generate. This is addressed below. Also of relevance is the proposed residential environment in terms of the layout of the site and of individual residential units, the internal space standards achieved in the residential accommodation and provision of private and communal amenity space, as well as on and off-site public open space. It is considered that the masterplanning of the site, layout of buildings, internal space planning and provision of open space mitigate the high density of the scheme and in the circumstances a high housing density on this site is, in principle acceptable subject to appropriate mitigation (in-kind or by way of financial contributions) to address off-site impacts on transport and social infrastructure.

7.4.21 Saved UDP policies HSG 4 and HSG 5 seek to improve and safeguard the character and amenities of residential areas in the borough and to ensure that new housing is of a high quality in terms of its design. The layout of the site means that the flats have a range of aspects with the majority being dual aspect and with no north facing single aspect units which is welcomed. The dual-aspect layout of a number of the residential units allows for natural cross-ventilation with the potential to reduce the need for mechanical ventilation. Given the orientation of the flats and proposed position of windows it is considered that habitable rooms within the proposed development would receive adequate levels of natural light.

7.4.22 In terms of outlook, windows serving habitable rooms would generally not be enclosed by adjacent development or other parts of the proposed development. Privacy within the proposed residential units would also be satisfactory due to the relationship between the blocks and the existing residential properties to the south. The positioning of balconies and screens have been used to avoid overlooking within the development. The relationship of the proposed housing to that adjacent is, on balance, considered acceptable.

7.4.23 The majority of the residential units would be provided with their own private outdoor amenity spaces in the form of balconies or roof terraces plus access to communal gardens shared amongst flats within a block. The majority of the proposed balconies would be accessed from the living spaces, with some units having the possibility of a second access from a bedroom. The

majority of flats in the taller building on Plot 2 will have either balconies or enclosed 'winter gardens' with openable louvres. Balconies would have a minimum depth of 1200mm, with some 1500mm or deeper. The 1200mm deep balconies would provide 3m2 of private amenity space with the deeper and wider units providing over 5m2.

7.4.24 Officers consider that the type, location and size of private and communal amenity space provided for the residential units is acceptable for a development of this nature and density.

7.5 Land Use: Retail

Introduction

7.5.1 The application proposes between 2,662m2 and 6,926m2 (GIA) of retail (A1-A5) space depending on the mix of other uses i.e. B1, D1 and D2 that would make up the approximately 17,000m2 of non-residential space on the site. Currently there is approximately 1,485m2 of warehouse retail space on the site plus a small retail outlet as part of the petrol filling station.

7.5.2 PPS4 requires applications for main town centre uses that are not in a centre and not in accordance with an up to date development plan be assessed against a number of criteria. Guidance on impact assessment accompanying PPS4 states that comprehensive assessments will only generally be needed if a scheme is over 2,500 square metres, although they can be required for developments of less than 2,500 square metres which are likely to have a significant impact on smaller town centres. The site is outside an existing town centre and there may be impacts on existing local centres, particularly when taken together with other sites including the Plough Way Strategic Site and Convoys Wharf.

7.5.3 Core Strategy Policy 6 sets out the retail hierarchy and location of retail development across the borough and policy Strategic Site Allocation 4 notes that development of the Oxestalls Road site will provide retail (A1, A2) uses to serve local needs where they do not adversely impact on existing town centres. London Plan Policy 4.7 states that boroughs should firmly resist inappropriate out of centre development and Saved UDP policy STC 2 sets out a sequential test applicable to substantial retail development (over 1,000m2), confirming that such development should be located in the first instance in major and district centres.

Retail Impact

7.5.4 The application is not supported by a Retail Impact Assessment although a 'Placemaking approach at the Wharves Deptford' is included as an appendix to the Planning Statement. Applying the methodology adopted in that report, it estimates that the 905 residential units could support approximately 1,300m2 of retail space plus an additional approximately 14,415m2 of 'hospitality' space 230m2 of 'leisure' and 7,300m2 of 'flexible' (retail, hospitality and community) space. Following 'recalibration' the report recommended a total of 16,393m2 of non-residential space of which 6,411m2 would be 'flexible, interchangeable space to accommodate retail (A1, A2), hospitality (A3, A4, A5), leisure (D2) and community (D1) uses.' Whilst the assessment is of interest as an approach to looking at what mix of uses are present in different parts of London, it is not a Retail Impact

Assessment and no clear evidence has been submitted to support the quantum of retail space being proposed.

7.5.5 Oxestalls Road site is in close proximity to Evelyn Street local parade and a smaller parade on Grove Street, with the nearest town centre at Deptford further to south east. Given the proximity of the Strategic Sites to each other it is also relevant to consider the potential cumulative impact of the proposed retail floorspace across these sites. In the case of Oxestalls Road, given the close proximity to Convoys Wharf it is important to ensure that the proposals together do not provide a level of retail floorspace which attracts shoppers as a destination in their own right and as such potentially harm Deptford Town Centre in particular. On this basis there is a concern that the maximum level of Class A1-A5 floorspace proposed at Oxestalls Road could, when considered cumulatively with Convoys Wharf (where up to 6,400m2 of A1, A2 and up to 4,520m2 of A3, A4 floorspace is proposed), harm nearby centres and promote a level of retail provision which exceeds that envisaged in the emerging Core Strategy. This reinforces the concerns regarding the amount of floorspace that the application is seeking.

7.5.6 In response, in their Delivery Strategy the applicant has indicated that, taking account of the existing retail space on the site, the amount of A1 retail space should be capped at 3,625m2 with any additional space to be justified by a Retail Impact Assessment. Whilst the need for a degree of flexibility in the use of the non-residential space is understood, it is considered that this reduced amount of retail could still harm existing centres.

7.5.7 The Council has therefore sought advice from specialist retail consultants Nathaniel Litchfield & Partners who have advised on borough-wide retail issues. Using a simple capacity analysis based on the number of additional residents and typical convenience expenditure per head, they estimate that the 905 residential units plus demand from businesses on the site might support a single foodstore store of up to 500m2 (gross internal area). They also consider that a further 200m2 of convenience retail space could be permitted. In terms of comparison retail they advise that in the absence of detailed analysis by the applicants and to meet the Council's policy objective of the retail provision serving local needs they advise that a maximum of 1,000m2 comparison floorspace could be allowed. This figure is consistent with the threshold used by the Council for 'substantial' retail developments in Saved UDP policy STC2 and would be in addition to the 500m2 (gross) local foodstore and 200m2 (gross) other local convenience floorspace. It is also recommended that any retail unit is not greater than 250m2 without the prior written approval of the Council. These limits would be imposed by condition.

7.5.8 In the light of this analysis and the information currently submitted with the application it is considered that the maximum potential level of (unspecified) retail use of 6,296m2 could adversely affect nearby centres, particularly when account is taken of the sites relatively close proximity to Deptford Town Centre. Accordingly it is recommended that floorspace limits are imposed and these are set out in the conditions in section 12.4 of this report.

7.6 Urban Design

Introduction

7.6.1 The overarching aim of PPS1 (Delivering Sustainable Communities) and the draft National Planning Policy Framework is the achievement of sustainable development, to be achieved by various means including the delivery of high quality development through good and inclusive design. PPS1 makes clear that design that is inappropriate in its context or which fails to take the opportunities available for improving the character and quality of an area should not be accepted. This is mirrored in Saved UDP Policy URB 3 (Urban Design) regarding the need for high quality design and Core Strategy Policy CS18 in respect of the location of tall buildings. London Plan policies of particular relevance are 7.1-7.17 (Place Shaping) in particular 7.4 (Local Character) and 7.6 (Architecture) and 7.7 (Location and Design of Tall and Large Buildings).

Site-wide Masterplan

7.6.2 The masterplan for the site has been developed through a process of consultation with Council officers and its Design Panel, with local residents and CABE and the layout as well as the design of individual buildings has been refined in the light of these discussions. The application is supported by a Design and Access Statement that provides a detailed and thorough analysis of the site and its local and wider context including its historical development, patterns of movement and access, land uses and social infrastructure, amenity and open space, existing built character and building heights. This analysis has informed the assessment of site constraints and opportunities and fed into a masterplan based on a number of strategic objectives and development principles as well as into the detailed design response which is supported by a Design Code.

7.6.3 As a hybrid application, Phases 1 and 2 (Plots 1-5) are submitted in detail with all matters to be determined whereas Phase 3 (Plots 6-8) are in outline where access and layout are to be determined, and scale, landscaping and appearance reserved for later submission. The masterplan for the site is comprehensive, including all the land identified in Core Strategy Policy SSA4 other than the converted Diploma Works building. This comprehensive approach allows for a coherent strategy for the site to be presented, and demonstrates how the site as a whole will integrate with the wider area. Given the existing uses on the site including a scrap yard, vehicle repairs, petrol filling station and open storage a masterplan that sets out a comprehensive strategy for the redevelopment of the site as a whole rather than in a piecemeal fashion that retains existing bad neighbour uses is considered critical in facilitating the delivery of land use, environmental and urban design objectives for the site and area set out in the Core Strategy.

7.6.4 The layout of the site comprises a number of distinct plots with a range of different building layouts, form, height and design. The buildings define a series of routes and spaces across the site, with the built form responding to the particular characteristics and opportunities that the site and its context offers. The inclusion of a linear water body in the centre of the site, mimicking the former Surrey Canal, links the open spaces and routes across the site and also functions as public amenity space and part of the sustainable urban drainage/flood risk alleviation strategy for the site. This is

a significant feature of the site and an important part of the masterplan, setting a strong framework for the site as a whole.

Streets and Routes

7.6.5 Core Strategy Policy 4 states that Mixed Use Employment Locations (including Strategic Sites) will, through comprehensive redevelopment, be required to provide improvements to the overall environmental quality of these locations by providing where appropriate the provision of new, or improvement of existing, walking and cycling routes to public transport services and local facilities. The introduction of new east-west and north-south routes connecting beyond the application site allow for significantly greater permeability and connections with the surrounding area than exist at the moment and will help integrate the site and its surroundings by addressing some of the existing barriers to movement in the area. The proposed layout of streets is a strong element of the scheme and the proposed north-south water body complements, and forms a component of, the North Lewisham Links programme being promoted by the Council.

7.6.6 The routes through the site are well defined by buildings that front them and routes through the site will be clear and legible. A significant proportion of the ground floor space within the site will be in some form of commercial/non-residential use with access to the blocks of flats generally located on the routes within the site although not exclusively so, so that most internal and external frontages are active. In the case of the building facing on to Pepys Park issues of flood risk mean that access to the flats above the commercial units is from within the site.

7.6.7 The appearance of the commercial space at ground floor level has not been detailed in the submitted drawings. These ground floor treatments can be dealt with at conditions stage. The submitted floor plans suggest that there will be scope for significant stretches of glazing at ground floor level, which would enable the uses within to animate the streets that they would line, and would improve natural surveillance of the street.

7.6.8 Overall, the experience of residents of and visitors to the developed site at street level is considered acceptable.

Height, Massing and Tall Buildings

7.6.9 Building heights vary across the site from 4 to 18 storeys (including ground floor) with taller buildings (up to 18 storeys) located as markers for the site at key locations in the south east and north west corners of the site. Given that the general scale of existing buildings on the site and surrounding is 3-5 storeys and with the open space of Pepys Park to the east) the proposed development will be highly visible and the taller elements will be particularly prominent on the skyline. This however needs to be seen in the context of existing taller buildings close to the site, in particular Eddystone Tower to the north and proposed buildings including those on Canary Wharf and Cannon Wharf and to a lesser extent Marine Wharf West. Whilst this change will have a significant townscape impact it will replace generally low grade buildings of limited or no architectural merit and needs to be considered in the context of the varied building heights and scales already existing in the area and planned as part of the redevelopment of other key sites.

7.6.10 The range of building heights and their disposition across the site creates a varied built form and which together with the range of architectural styles adopted creates a complex built environment. However it is considered that the massing and scale of buildings responds appropriately to their context and avoids a uniform building height across the site that is typical of some other developments locally. Given the 'island' nature of the site bounded as it is on all sides by roads, the buildings around the perimeter of the site generally respond appropriately and sensitively to their context. There are though locations where taller buildings are proposed and it is considered that these are both appropriately located as markers and there relationship both to buildings in the surrounding area and on buildings and spaces within the site are acceptable.

7.6.11 Whilst the site lies outside the strategic viewing corridors and lateral assessment areas for views from Greenwich Park and Blackheath Point, it is located between them and will be evident in the wider views from these locations along with the River Thames, the Convoys Wharf site, and Aragon Tower. Iceland Wharf and some of the blocks on the Pepys Estate. Beyond these, Tower Bridge, The Monument, and St Paul's Cathedral can be seen. The background of St Paul's Cathedral in the view is mostly unimpeded, with a silhouette of the dome clearly visible in the strategic view. At page 26 of the LVMF SPG, it is noted that the foreground and middle ground of London Panoramas must be given careful attention, as development within these areas can greatly affect the designated view. The Oxestalls Road site falls within the middle ground in this case, and whilst the two tall buildings by virtue of their height will be clearly visible it is considered that they would be read with other tall buildings in the vicinity and not appear overly intrusive or prominent to the detriment of the view.

7.6.12 The Core Strategy notes that, subject to meeting the criteria set out in CS18 (The location and design of tall buildings), Strategic Site allocations in Deptford and New Cross are, in principle, considered appropriate for the location of tall buildings to mark the scope and scale of regeneration that the policies in the Core Strategy will deliver. Core Strategy Policy 18 and London Plan policy 7.7 also note that tall buildings will need to be of the highest design quality.

7.6.13 The applicant's case for including two tall buildings on the site presented in the Design and Access Statement makes reference to the role of tall buildings as markers and points of recognition within the townscape. The detailed siting of the tall buildings is explained in terms of marking the corners of the site. Given that existing and proposed buildings in the immediate vicinity of the site are generally up to a maximum of 5 storeys (with some buildings significantly lower) the two tall buildings will be very prominent in local and longer distance views.

7.6.14 The ES includes an assessment of overshadowing of the site and adjoining properties caused by the proposed development, as well as an assessment of daylight and sunlight to adjoining properties using the BRE's guidance. The findings of the Vertical Sky Component (VSC) and Average Daylight Factor (ADF) tests are set out in Section 8 of the original ES and the Revised ES. The sunpath analysis shows that the tall buildings will cast a shadow at different times of the day over the site and beyond. On 21

March/September, the residential properties on the western side of Evelyn Street would not be overshadowed however the school to the north would be from before 10.00am until about 1.30pm and Pepys Park to the east increasingly from midday. The overshadowing is earlier/later and to a lesser/greater extent during summer/winter respectively. Given the orientation of the site and buildings, properties on the Trinity estate to the south will not be overshadowed.

7.6.15 Within the site, routes will be in shadow by the tall buildings (and mid-rise blocks) at different times of the day as will the communal gardens on the site. However no parts of the site are in permanent shadow. Whilst it is evident that the tall buildings (and some mid-rise blocks) will have a direct and noticeable effect on adjoining properties and spaces, these impacts will be transitory with the buildings to the north being over-shadowed in the earlier part of the day only, and to a limited extent during the summer months. Given this situation it is considered that the overshadowing impacts from the tall buildings will not give rise to an unacceptable impact on the amenity of adjoining residential properties or open space.

7.6.16 The principle and detailed design of the scheme as a whole and of the tall buildings in particular has been the subject of review by CABE and the Lewisham Design Panel and has undergone redesign by the applicant to refine the architectural treatment of the buildings in response to points raised. This has focussed on the design of the taller building in the south west corner of the site (that in the north west forms part of the outline application only) with the location of windows, lower floor treatment and materials being revised. The effect of these changes is that the building has a more logical overall appearance and ties in the changes to the materials with different elements of the building. Whilst the amended proposals have not been reassessed by CABE or Lewisham's Design Panel it is considered that the changes do not raise significantly new issues from the scheme they previously reviewed and that the amendments improve on their original form and detailed design. Whilst the tall buildings will inevitably be highly visible in the local and wider area given their height it is considered that their design is now acceptable.

Architecture, Materials and Elevational Detail

7.6.17 Core Strategy Policy 15 (High quality design for Lewisham) and Policy 7.6 (Architecture) in the London Plan (July 2011) set out the importance of high quality design. The design of the individual buildings varies across the site with a range of building heights, styles and materials. This has been described in Section 3.2 of this report. It is considered that the site is sufficiently large and the masterplan and building architecture robust that this approach is appropriate, creating distinctive character areas within the site. As noted above the massing of the buildings generally varies within each plot with a taller (18 storey) building in the south east corner of the site, clad in nickel-silver anodized aluminium panels. The ES includes a townscape and visual impact assessment of the development from a number of local and more distant viewpoints and given the general scale of existing buildings on the site and surrounding, the proposed development will be highly visible and prominent on the skyline. Whilst this change will have a significant townscape impact it will replace generally low grade buildings of limited or no architectural merit and needs to be considered in the context of

the varied building heights and scales already existing in the area and planned as part of the redevelopment of other key sites.

7.6.18 The site lies between two views in the London View Management Framework, Greenwich Park and Blackheath Point. Although the proposed development includes tall buildings the site lies outside the viewing corridors and lateral viewing areas. The site is peripheral in the view from Greenwich Park and whilst visible in the middle distance from Blackheath Point it forms part of a group of taller buildings and is seen against a backdrop of taller buildings beyond. The impact on these views is therefore considered marginal.

7.6.19 Section 6.7 of the Design and Access Statement describes the design, appearance and materials of the buildings on each of the plots setting out the rationale for the proposed approach. The document suggests that the scheme as a whole is expressed in "simple forms that make reference to something of the robustness of this ex-industrial site", that "the masterplan's massing and architectural expression are ordered for visual consistency and interest across the site" and that in terms of architecture and materials "this is executed in a palette of robust and selectively varied materials, reconciling a development of this size with an individual human scale." The palette of materials is limited but is used and ordered in a manner which provides contrasts, and responds to the different context and character across the site. Brick is the primary cladding material with metal cladding systems for the taller buildings. Softer materials, treatments and distinctive colours pick out particular elements of the buildings.

7.6.20 This variety of materials and their use across the site could lead to a somewhat disjointed feel and appearance but it is considered that this is successfully addressed by a each building having a distinct identity defined by a clear architectural style and consistent materials palette. Overall the architectural treatment is robust, setting a high standard which it is important is maintained through the detailed design and implementation post-planning permission.

Design and Crime

7.6.21 Core Strategy policy 15 (CS15) (High quality design for Lewisham) states that for all development the Council will ensure design acts to reduce crime and the fear of crime. The layout and design of the site means that routes and public open space within the site will be overlooked with retail uses and/or entrances to flats above located on them. The block facing onto the new water body would have direct access from the 'towpath' along its eastern edge and the flats would have balconies over looking this space.

7.6.22 The route between Plots 3 and 4 (running north-south through the site provides access to ground floor garage parking to Plot 4 and a communal garden to flats in buildings in Plot 3 which would be bounded by a fence. This route is the only vehicular route through the site (connecting Oxestalls Road with Dragoon Road and with access also onto Grove Street) and so will have a mix of activity along it whereas most other routes are predominately pedestrian only.

7.6.23 The communal gardens in Plots 1 and 2 are accessed only from within the buildings and so considered to be secure. The ground floor communal garden in Plot 3 is bounded by buildings to the north, south and east and by a fence along the internal access road to the west. This space also serves as an access route to the flats in the building facing onto Pepys Park and is considered to be well overlooked. The ground floor 'gardens' within Plot 5 are accessed from the individual buildings and will be overlooked by buildings. Parking is either at basement level (accessed via a gated entrance in Plot 2) or contained within the buildings at ground level (Plot 4), with limited on-street parking to the rear of buildings fronting Evelyn Street (Plot 5). Secure cycle parking is provided within the buildings with dedicated storage next to the flats. The proposed internal layout of the residential units is acceptable with corridors/cores serving no more than 8 flats.

7.6.24 On balance it is considered that the proposed layout and design raises no significant concerns in terms of crime and the fear of crime. In response to the application the Metropolitan Police Crime Prevention Unit identified the need for a neighbourhood policing facility of around 150m2 and this could be accommodated in part of the non-residential floorspace proposed on the site.

7.7 Transport

Introduction

7.7.1 This section of the report addresses issues relating to the impact of the development on different modes of transport, trip generation and the impact on the local highway network, proposed highways works, car and motorcycle parking, cycling and cycle parking, servicing and construction traffic. A Transport Assessment (TA) was submitted with the planning application and the ES includes a chapter on Transportation which draws on the findings of the TA. The scope of the TA was discussed and agreed with the Council and TA has been reviewed by independent consultants (Alan Baxter & Associates) appointed by the Council.

7.7.2 National guidance on transport matters is found in PPG 13 (Transport) and PPS 3 (Housing). London Plan Policy 6.1 (Integrating Transport and Development) directs high trip generating development to locations where there is both high levels of public transport accessibility and capacity and seeks to ensure that development is related to transport capacity and that measures are taken to shift to more sustainable modes of transport. Core Strategy policy CS14 (Sustainable Movement and Transport) states that there will be a managed and restrained approach to car parking provision to contribute to the objectives of traffic reduction while protecting the operational needs of major public facilities, essential economic development and the needs of people with disabilities. A network of high quality, connected and accessible walking and cycling routes across the borough will be maintained and improved including new connections throughout the Deptford New Cross area.

Site Access and Accessibility

7.7.3 Vehicular access to the site is currently via a number of locations along Evelyn Street as well as from Oxestalls Road, Grove Street and Dragoon Road. The application proposes the removal of all vehicular access from

Evelyn Street and the focussing of access onto Oxestalls Road (two points near its junction with Evelyn Street and Grove Street) and one off Grove Street and Dragoon Road. The access point onto Grove Street will create a new crossroad junction opposite Bowditch and it is proposed that this junction is not signalised but rather the design of it will promote movement by non-motorised modes. Whilst this approach is acceptable in principle, the details will need to be agreed with the Council and works undertaken as part of a s.278 agreement. The simplifying of the site access arrangements is welcomed and the location of the new access points considered acceptable. Servicing for the non-residential uses will generally be from within the site although loading bays are proposed on Evelyn Street to service the retail units on this frontage. This approach is supported and avoids service vehicles (other than refuse lorries) entering the residential 'courtyard' to the rear of the Evelyn Street buildings.

7.7.4 Routes for vehicles within the site are generally limited to the periphery or to enable essential access for servicing and indicated as shared surface 'homezones' in the Design and Access Statement. There is a single direct route through the site (north-south through the eastern part of the site) linking Oxestalls Road and Dragoon Road. The other route from Oxestalls Road is on the western side of the site and serves the dedicated B1 building on Plot 7 as well as the public square in the north-western part of the site and access to residential properties and parking to the south (Plot 5).

7.7.5 The application site currently has a PTAL rating of 2 ('Poor') even though five bus services (including two night services) pass the site on Evelyn Street, two of which also turn into Oxestalls Road and Grove Street (travelling away from the site). There are several bus stops directly adjacent to the site, some of which have shelters for passengers. The three daytime services provide connections to London Underground, DLR and mainline railway stations for onward journeys and there are day and night services to/from the West End. Given the number, frequency and proximity of bus services to the site the low PTAL rating is likely to be primarily a factor of the distance to Surrey Quays and Canada Water stations which are beyond the 12 minute walk time in the PTAL assessment process (approximately 14 minutes and 20 minutes respectively) and are therefore excluded from the calculation. Given this, the TA submitted with the application proposes an alternative methodology, Accession, which assesses the public transport network accessibility of a site in terms of catchment and journey times to key destinations that contain services and facilities such as employment and shopping. Using this methodology the TA concludes that the site is more accessible than its PTAL rating would suggest. In terms of ability to travel to areas of employment or to town centres for example, using public transport the West End can be reached in less than 30 minutes and the City and Canary Wharf can be reached in journey times of less than 30 minutes and 20 minutes respectively. This conclusion is accepted in principle and has been taken into account in the consideration of aspects of the scheme such as residential density.

7.7.6 There are currently no Controlled Parking Zones (CPZ's) in the immediate or wider North Deptford area and on-street parking is readily available on most adjacent streets.

Traffic Impact and Trip Generation

7.7.7 The TA estimates vehicle trips that the proposed development would generate for different modes (private car, taxi motorcycle, public transport (bus, tube, rail) cycling and walking) and assesses their impact on the existing network and services. Given that the site is currently in use this has been calculated on a net additional basis, i.e. taking into account existing parking and trip generation from the site. A survey in September 2009 of the entry and exit flows from each existing access point around the site found that the existing site (not including on street parking associated with the site operations) generated a total of 3,115 two-way vehicular movements (1815 'In' and 1300 'Out') over a 12 hour survey period (7am to 7pm). Of these movements the existing petrol filling station and associated shop generated a total of 1,928 two-way movements (966 "IN" and 962 "OUT"), accounting for 62% of total movements. The TA notes that the trips associated with the petrol filling station are likely to be made up largely of 'pass by' and 'diverted' trips and would therefore already be on and remain on the network regardless of whether the petrol filling station and associated shop were closed or relocated elsewhere. On this basis only 5% of the trips associated with these land uses are considered as trips being 'generated' by the site in its existing form. In addition it is proposed to retain the Ascott Cab Company on site and therefore these trips will also remain on site. It is also relevant to note that approximately 30% of vehicle trips were HGV's or medium goods vehicles serving the existing industrial uses on the site which would be removed on redevelopment.

7.7.8 Adjusting for the level of pass by traffic using the site, the TA estimates current trip generation in the peak hour periods. This is based on Passenger Car Units (PCUs) rather than absolute vehicle numbers.

	AM Peak 07:45 – 08:45			PM Peak 17:30 – 18:30		
PCUs	In	Out	2-Way	In	Out	2-Way
Petrol Filling Station	4	4	8	4	4	8
Other Uses	77	58	135	23	32	55
Total	81	62	143	27	36	63

7.7.9 These trips have been deducted from the forecast flows for the proposed development to establish net additional trips. The trip generation arising from the proposed development has been estimated using TRAVL data for a range of sites and uses, and informed by modal split data from the 2001 census. Journey purpose data has been obtained using the London Travel Demand Survey. Using this information the applicant estimates the following net additional week day peak hour trip generation:

	AM Peak 07:45 – 08:45			PM Peak 17:30 – 18:30		
PCUs	In	Out	2-Way	In	Out	2-Way
Residential	139	509	139	388	246	388
Business	267	3	267	3	125	3
Community	139	50	139	223	303	223
Hospitality	28	289	28	3	3	3
Leisure	4	4	4	6	6	10
Retail	88	69	88	314	305	314

7.7.10 The TA has also estimated net additional trips by mode.

	AM Peak 07:45 – 08:45		PM Peak 17:30 – 18:30	
(PCUs)	In	Out	In	Out
Underground	57	124	87	59
Train	51	65	48	32
Bus	97	134	135	105
Taxi	7	8	9	7
Car	-27	-9	34	26
Passenger in car	53	49	103	102
Motorcycle	10	5	4	7
Bicycle	13	15	15	11
On Foot	152	135	289	285
Other	4	3	2	3
Total	419	529	726	636

7.7.11 Given the existing uses on the site and type of vehicle (i.e. a relatively high percentage of heavy goods vehicles which have a higher PCU than cars) the assessment indicates a net reduction in car traffic following redevelopment. The TA then assesses the impact of these trips on the highway network during the weekday AM and PM peak hours (07.45 – 08.45 and 17.30 – 18.30). Development traffic has been distributed on the surrounding highway network in accordance with existing traffic flows and the TA has assumed that for the future year assessments there is zero growth in background traffic on the road network.

7.7.12 In terms of background traffic flows along Evelyn Street these are recorded using Annual Western Screen Line Traffic Counts and show overall trends in the volume of traffic using Evelyn Street. This includes a survey location adjacent to the site by Blackhorse Bridge. Between 1997 and 2010 total traffic flows between 7.00am and 7.00pm (using a three year moving average to 'smooth out' year-by-year fluctuations) decreased by 33%. Using the same method, survey counts for the AM and PM peaks at this location show a small (3%) reduction in the AM peak between 1997 and 2010 whereas for the PM peak the reduction over the same period was more significant at over 40%. Whilst the survey data shows both increases and decreases on a year-by-year basis, the overall picture is one of decline and on this basis zero growth is considered a reasonable basis for assessment between the base assessment year and projected completion year.

Highway Modelling

7.7.13 Using these assumptions the analysis shows that the percentage increase in traffic attributable to the scheme at most junctions would be below the 5% significance threshold for assessing impact. However two junctions – the signalised junction of Oxestalls Road / Evelyn Street and the priority junction of Grinstead Road / Evelyn Street – were modelled as part of a TRANSYT network. The application proposes that Dragoon Road remains closed although an option to re-open has also been considered. The modelling assesses highway impacts on a site only basis, and cumulatively with other committed schemes in the area.

7.7.14 Analysis of the junctions where development traffic joins the local road network shows that with development traffic added to existing flows and with Dragoon Road closed the junctions work within capacity during both the AM and the PM Peak time periods. The highest degree of saturation experienced during the AM Peak is on Evelyn Street (south bound) which reaches a degree of saturation of 52% and a corresponding queue of 9 PCUs. During the PM Peak the same approach arm experiences the highest degree of saturation reaching 70% and a queue of 14 PCUs.

7.7.15 When development traffic and committed schemes are combined and the impacts assessed with Dragoon Road re-opened, whilst the highway network continues to operate within capacity during the AM Peak (the highest degree of saturation is 84% with a corresponding queue of 7 PCUs) in the PM peak the Evelyn Street / Oxestalls Road junction exceeds its capacity with the Oxestalls Road approach arm operating at up to 127% (with a corresponding queue of 30 pcus). The TA notes that this assessment was undertaken using the 2002 trip generation figure for Convoys Wharf whereas more recent discussions between the Council and applicants for that site indicate both a reduction in parking provision and likely reduction in vehicle trips from that site. In the circumstances this outcome is considered a worst case scenario and with a combination of reduced trip generation from Convoys and the implementation of Travel Plan measures at both the Oxestalls Road and Convoys Wharf sites is one which is unlikely to occur.

7.7.16 Whilst this conclusion is broadly accepted, it is crucial that measures are introduced to encourage non-car modes on this and other sites in the area. The applicant proposes there is a site-wide Travel Plan and traffic/transport related contributions (including towards public transport service and infrastructure enhancements) and a Car Club for residents and businesses. These are considered appropriate and will be secured by condition and through the s.106 agreement.

Public Transport

7.7.17 The TA has assessed impacts on the various public transport modes assuming around 50% of public transport trips will be by bus with the other 50% being by rail/underground. This split is considered to be a reasonable basis on which to assess the impacts on public transport. Cumulative impact with other sites in the locality has also been assessed.

7.7.18 On this basis the TA estimates the following extra demand on national rail (at Deptford Station), London Overground (at Surrey Quays) and buses for the main mode of travel.

Additional Passengers	**AM Peak 07:45 – 08:45**			**PM Peak 17:30 – 18:30**		
	In	Out	2-way	In	Out	2-way
Overground	57	124	182	87	59	146
National Rail	51	65	115	48	32	80
Bus	97	134	231	135	105	240

7.7.19 The TA then examines service improvements and expansion being promoted by third parties (such as the East London Line and bus services

linked to the Convoys Wharf development), notes the benefits these will bring to the area and supports them. However it does not identify financial or other contributions to these projects from the Oxestalls Road site.

7.7.20 In this regard the Council has commissioned its own assessment of the individual and cumulative impact of development of the major sites in the Deptford and New Cross area on public transport. This shows that whilst London Overground and National Rail services will benefit from capacity improvements over the coming years and have sufficient capacity to meet forecast increases in demand, there is a significant impact on bus services within the area and a need for capacity enhancements. In terms of the Oxestalls Road site the Council's own analysis identifies a similar or slightly lower net additional demand for bus services although this is in the context of greater use of other modes such as the River Bus, thereby reducing demand for bus and rail services. Overall however the scale of impact on public transport services is broadly similar.

7.7.21 The Council's analysis also examines the demand by individual bus route (including new and/or diverted routes proposed by other sites) based on proximity to the site and also the likely timing of this demand based on the housing trajectory figures used in the Core Strategy. This concludes that existing Overground and National Rail will have capacity to accommodate the additional passengers generated by the development. However in the case of buses, individually the development sites in the area will increase demand and cumulatively will add significant numbers of additional passengers. Taking a strategic and coordinated approach to the provision of additional capacity then a contribution from the Oxestalls Road site to bus service enhancements is required and should be secured through the legal agreement. The applicant has included a financial contribution for this purpose as part of the s.106 package and this is considered an appropriate sum given the scale of impact arising from the site.

Car and motorcycle parking

7.7.22 Core Strategy policy CS14 states that the car parking standards contained within the London Plan will be used as a basis for assessment. These are set out in Table 6.2 of the London Plan. These are maximum car parking standards and the application proposes car parking for the residential units at a significantly lower ratio of 0.3 spaces per unit across the scheme as a whole.

7.7.23 This level of provision is welcomed however TfL have questioned whether this will be successful in reducing car use given the fact that currently there are no restrictions over on-street parking in the surrounding area. This is particularly relevant given the scale of development taking place in the Deptford and New Cross Area as a whole and the overall number of parking spaces proposed across the Strategic Sites. At the moment this part of the borough is not covered by a CPZ and given the scale of proposed development in the vicinity (Oxestalls Road, the Plough Way sites and Convoys Wharf all located to the east of Evelyn Street) it is appropriate that in due course consultation with local residents is undertaken on a CPZ in the area and the applicant has agreed to a financial contribution towards this exercise and its implementation. Should a CPZ be agreed then it is intended

that residents of the development would not be able to apply for on-street residents parking permits within the Zone.

7.7.24 In addition, to further reduce residents' need to own vehicles the applicant is proposing up to 8 spaces for Car Club vehicles on the site subject to operational requirements. This would be secured as part of the s.106 agreement and in line with other sites in the area should include free initial membership for occupiers (residents and businesses) of the development. The facility would also be available for use by the general public. The TA also proposes a parking management strategy for the site is prepared and adopted and Framework Travel Plans have been submitted as part of the TA (see 7.7.27 below). Whilst further work is required on both these documents it is considered that they provide an appropriate basis for supporting the use of non-car modes of transport and will be secured as part of the s.106 agreement.

7.7.25 The London Plan identifies a non-operational parking standard for B1 uses of 1 space per 600– 1000m2. This would allow for around 6-10 parking spaces for the B1 space, significantly below that proposed in the application. Accordingly consideration has been given to the operational needs of the proposed commercial floorspace as well as existing parking levels on the site. It is considered that the 38 operational spaces for the intended commercial occupier in Plot 1 is considered reasonable (subject to further evidence on operational requirements) and the 65 other spaces would serve a range of occupiers. When considered in terms of the impact of development traffic on the local road network it is considered that up to 101 non-residential parking spaces is acceptable although the detailed provision during phases of the development will need to be the subject of a parking management strategy to be secured through the s.106 agreement. Overall, and combined with the implementation of a site-wide Travel Plan that will work towards reducing use of the private car by businesses on the site (as well as mechanisms to control the use of these spaces by residential occupiers), the level of provision is considered acceptable.

Pedestrians and Cyclists

7.7.26 There is currently no public access to the site for pedestrians or cyclists. The application proposes the opening up of the site allowing pedestrians and cyclists to enter the site from all frontages and cross the site via generously proportioned and largely traffic-free routes. The creation of east-west routes linking Deptford Park and Pepys Park is complemented by north south routes including the creation of a pedestrian route alongside a new linear water body along part of the route of the former canal on the site. This has the potential to link under Oxestalls Road bridge to connect with land to the north which is Council owned and form part of a longer network along the route of the former canal from Plough Way to Blackhorse Bridge on Evelyn Street. This new pedestrian route is welcomed and implements part of the Council's wider strategy for the area set out in the North Lewisham Links Strategy and being developed as part of a coordinated design response along the route of the former canal. The connection to the north and laying out of this area will necessarily involve the Council as land owner and the proposed Heads of Terms for the s.106 includes a financial contribution to meet the cost of these works.

Servicing

7.7.27 Routes for vehicles within the site allow for servicing and emergency vehicle access plus access to the parking areas within the site although the detailed design of routes seeks to prioritise pedestrian and cyclists. The applicant has provided vehicle tracking and swept path analysis for emergency and refuse vehicles which demonstrates that there is sufficient space for vehicles to turn and leave the site in a forward gear. The development does not include specific provision for taxis or drop/off pick up although it is considered that this could be accommodated on the internal street layout. It is considered that the site servicing provision is acceptable.

Travel Plan

7.7.28 Draft Residential and Work Place Travel Plans have been submitted with the application and whilst they set out an overall strategy and potential measures to promote sustainable modes of transport by both businesses and residents on the site they do not include specific targets in terms of modal shift. The documents propose the appointment of a Work Place Travel Plan Coordinator responsible for overseeing the management, development, implementation, monitoring and review of the Travel Plan. It is proposed that the monitoring and management of the Travel Plan would be funded by occupiers on the site. No specific details are provided however.

7.7.29 Whilst it is considered that these principles and proposals form an appropriate basis for a Travel Plan for the site, there is currently a lack of detail in terms of specific measures, clear targets in terms of modal shift and clarity about start up funding. Accordingly it is recommended that the preparation, submission and implementation of a full Travel Plan is secured as part of the s.106 agreement.

7.8 Sustainability

Introduction

7.8.1 London Plan policy 5.2 requires developments to make the fullest contribution to the mitigation of and adaptation to climate change and meeting CO2 emission targets through a combination of using less energy (be lean) the efficient supply of energy (be clean) and using renewable energy sources (be green). Policy 5.3 seeks to ensure that ensure developments meet the highest standards of sustainable design and construction. This approach is reflected in Core Strategy Policy 8 (CS8) (Sustainable design and construction and energy efficiency) which states that the Council will explore opportunities to improve the energy standards and other sustainability aspects involved in new developments and that it will expect all new development to reduce CO2 emissions through a combination of measures including maximising the opportunity of supplying energy efficiently by prioritising decentralised energy generation for any existing or new developments and meet at least 20% of the total energy demand through on-site renewable energy. In the case of strategic sites, the Core Strategy states (Strategic Site Allocation 1) that sites will need to make provision for decentralised energy networks and/or the use of SELCHP where appropriate. Further, Core Strategy Policy 8 states that all new residential development (including mixed use) will be required to achieve a minimum of Level 4 standards in the Code for Sustainable Homes from 1 April 2011 and Level 6 from 1 April 2016, or any future national equivalent.

Energy Demand, CO2 Emissions and Renewables

7.8.2 The planning application is supported by a Sustainability Statement which sets out how sustainable design and construction measures have been integrated into the design response to the site (particularly in relation to energy, daylight, ventilation and water) rather than as 'add-on' mitigation measures and how they contribute to meeting policy. These include achieving Code for Sustainable Homes Level 4 for the residential units and BREEAM 'Very Good' for the non-residential space. The assessment calculates that CO2 emissions from regulated energy use of the development will be reduced by 47.7% compared to a part L 2006 compliant scheme. In terms of the energy hierarchy this comprises a 13% reduction from the baseline emissions through energy efficiency measures, 25% from gas-fired CHP, and approximately 10% from renewables comprising a combination of ground source heat pumps and photovoltaics. When assessed in terms of regulated and unregulated energy use there is an overall reduction of 30% compared to a part L 2006 compliant scheme with renewables contributing a 6% reduction.

7.8.3 The applicant has demonstrated that they have considered a number of alternative ways of meeting London Plan policy requirements, for example using different renewable energy sources to achieve a higher reduction in CO2. From this exercise they have selected ground source heat pumps and photovoltaics although it is noted that this will not achieve the 20% renewable target set out in the Core Strategy. As part of the energy strategy for the site the applicant has considered how the site could be linked in to a decentralised energy network such as SELCHP should that become available. Although the pipe work and infrastructure to connect sites to SELCHP is not yet in place the proposed development of the Oxestalls Road site would allow for the possibility of a future connection to SELCHP subject to this being technically and financially viable and compatible with the construction programme. In the circumstances whilst it is accepted that a commitment to connect to SELCHP being made prior to the determination of this application is not feasible, future-proofing of a connection should this become available is appropriate and will be secured by condition.

7.8.4 London Plan policy 5.11 expects major developments to incorporate living roofs and walls where feasible. The application includes 4,428m2 of living roofs across the site as part of the sustainable urban drainage strategy for the site as well as to increase biodiversity. Subject to detailed design and specification this is welcome and implementation of the living roofs (to a specification agreed by the Council) will be secured by condition.

7.8.5 Officers have considered the range of measures to reduce CO2 emissions from the proposed development and the estimates of the savings that will be achieved including the use of on-site renewables. The commitment to achieving CfSH Level 4 and BREEAM Very Good is also noted. Whilst the use of renewables falls below the levels specified in the Core Strategy officers consider that on balance the proposals are acceptable and subject to relevant controls to secure their implementation as an integral part of the development are to be supported. Conditions are proposed to ensure the energy strategy is implemented including post-construction assessment of

each phase to demonstrate that the proposed target levels have been achieved.

Sustainable Urban Drainage

7.8.6 A Surface Water Drainage Strategy for the site and scheme has been prepared in line with PPS25 requirements and the London Plan recommendations that will reduce the discharge rate from the site by 50% over current rates. This is achieved through a combination of measures including green roofs (amounting to approximately 16% of the roof area), permeable paving and on-site storage. Surface water management measures have also been incorporated into the overall landscape proposals and the proposed water body has been incorporated within the drainage strategy design as an attenuation feature. Rainwater harvesting has also been proposed for the site to irrigate planted areas. Overall these measures form an integral part of the proposed development and will improve the efficiency of water use, increase the sustainability of the proposed development, and attenuate run-off from the site. The measures are welcomed with details to be secured by condition.

8. ENVIRONMENTAL IMPACT ASSESSMENT

8.1 Introduction

8.1.1 There are a number of sensitive receptors in the vicinity of the site including residents in the adjoining housing, the community centre on Grove Street/Oxestalls Road and Deptford Park School and the planning application is accompanied by an Environmental Statement (ES) that sets out the baseline conditions, reports on likely significant impacts arising from the development and identifies proposed mitigation. The ES has been reviewed by specialist consultants appointed by the Council to assess whether the ES meets the relevant regulatory requirements and guidelines in respect of the scope and format of an ES; whether there is sufficient clarity about the development for which planning permission is being applied; whether the methodology adopted to assess the likely significant effects for the identified topics is sufficiently robust for the effects to be assessed and for appropriate mitigation to be identified; and to identify any significant gaps in the methodologies and assessments which would prevent the Council from making an appropriately informed decision on the likely significant effects of the proposed development.

8.1.2 Following initial assessment, officers, with advice from Capita Symonds, took the view that the original ES was sufficiently deficient such that the Council would not be able to make a decision on the planning application without seeking further information. As explained at 4.1.7 above, officers indicated to the applicant its intention to serve a Regulation 19 request requiring the applicant to submit further information. In addition, (although not a Regulation matter) aspects of the ES required clarification/correction. Prior to service of any Regulation 19 request in relation to the ES, however, the applicant submitted additional information covering the deficiencies in the ES and clarifying and correcting certain information. The Revised ES also includes additional information either to address the points raised or to reflect the further assessment work undertaken following minor amendments to the scheme in May 2010. Affected topics include air quality, archaeology,

drainage and flood risk, ecology, noise, micro-climate, socio-economic and townscape and visual effects, and waste. In addition, clarification is provided on the consideration of cumulative effects which is addressed in individual topic chapters, thereby omitting any consideration of interactions between different types of impact and between the application site and others nearby in terms of overlap of the construction programmes. The Council's review of the ES takes account of the original documents and other environmental information that has been submitted. Accordingly references to the ES are references to the ES together with the other information provided in the Revised ES.

8.2 Construction and Implementation

8.2.1 The ES describes the anticipated programme of construction works and the key activities that would be carried out on the site to deliver the submitted scheme. It identifies, in general terms, potential effects associated with demolition and construction activities and outlines proposals for their mitigation. The construction programme indicates that the development would take approximately 8 years to complete and the ES assumes that the building contractors would apply general mitigation in the form of best practice on-site operations and the application of best practicable means to minimise construction impacts. Generic site management techniques are proposed to minimise noise and vibration impacts from construction activities and hoardings, and other mitigation such as wheel washing and dust avoidance measures would be used to minimise effects on the public realm and surrounding area during the construction of the development.

8.2.2 Although general good site 'housekeeping' should limit the intrusion of construction activities it is considered that given the scale, complexity and length of time that construction will be taking place on the site it is considered that submission, approval and adoption of a construction environmental management plan (CEMP) is necessary. Following a review of the submitted ES the Council identified the need for further information on the CEMP which was submitted as part of the ES Further Information (May 2010). The draft document and commitment to submit a full CEMP for agreement by the Council prior to commencement of development and its review on a phase-by-phase basis is considered appropriate and will allow the scheme to draw on lessons from earlier phases when considering the CEMPs for subsequent phases. Submission of and compliance with a CEMP will be secured by condition.

8.3 Air Quality

8.3.1 The application site is adjacent to Evelyn Street which is a major and heavily used road and the site is located in an Air Quality Management Area, designated by the Council primarily because of the emissions from road transport. The ES presents the findings of an assessment of the potential air quality impacts of the proposed development during both the construction and operational stages. For both stages the type, source and significance of potential impacts are identified, and the measures that should be employed to minimise these impacts are described. Officers have been advised that with the clarifications and further information set out below, the methodology, results and overall conclusions of the assessment are broadly acceptable.

8.3.2 The ES indicates that during construction residential properties up to 200 metres away could be affected by dust, whilst dwellings on the site that have been built and occupied could also be affected by dust and particulate matter from construction elsewhere on the development site. Notwithstanding these potential impacts the ES concludes that the overall impact of an increase in dust deposition would be temporary, short to medium term, local in effect and of moderate to minor adverse significance. In addition, the impact on air quality from traffic associated with the construction phase of the development will be in the areas immediately adjacent to the principal means of site access for construction traffic.

8.3.3 Whilst officers note and broadly concur with these conclusions, this is to a large extent dependent on the effective implementation of the CEMP. Subject to the inclusion of appropriate measures relating to such matters as routing of construction traffic and other on-site mitigation measures to suppress dust and other emissions within the CEMP then officers consider that impacts will be temporary, short to medium term, and of generally local minor to moderate adverse significance.

8.3.4 Once construction has been completed air quality impacts on local pollution concentrations will arise both on and around the site from traffic generated by the development and from the proposed energy centre. In the case of impacts arising from development traffic the main pollutants of concern are identified as nitrogen dioxide (NO2), PM10, carbon monoxide (CO) and benzene (C6H6) with emissions of NO2 and PM10 being the most likely to result in exceedences of the relevant air quality standards or objectives in urban areas. The results for the 2018 “with development plus committed developments” scenario have been compared against those predicted for the “without development plus committed developments” scenario in establishing the impact of the proposed development on local air quality. The ES also assesses two options for the energy centre, one a dual biofuel and gas-fired CHP, and the other a gas-fired only CHP. The former is included as a way of achieving 20% renewable energy on site, but was used for assessment purposes only and does not form part of the proposed development which is based on a gas-fired CHP only. Exact release parameters for these boilers are not specified (as the detailed design for the energy centre has not been undertaken) and therefore the ES estimates these levels using information for similar sized plant from a manufacturer. Accordingly whilst further air quality assessment will be required at the detailed design stage of the energy centre to update the modelling undertaken for the ES it is considered that the ES has appropriately identified and assessed the likely significant air quality effects from the energy centre.

8.3.5 Under Option 2 (i.e. the selected CHP process) the ES concludes that the impact of the proposed development at the existing assessment receptors would be minor adverse to insignificant. Further, the inclusion of traffic generated by the LDF sites considered in this assessment do not alter this conclusion as they do not cause a significant change in the annual mean NO2 concentrations predicted. Based on the annual mean NO2 concentrations predicted by the model, the ES concludes that exceedences of the hourly mean NO2 concentration objective are unlikely to occur. The ES also concludes that the impact of the proposed development at the

existing assessment receptors in terms of annual and daily mean PM10 concentrations is considered to be neutral. Further, the inclusion of traffic generated by the LDF sites considered in the assessment do not alter the above conclusions as they do not cause a significant change in the predicted annual mean PM10 concentrations.

8.3.6 The ES identifies a range of mitigation measures to ensure impacts during construction and operation are minimised. During construction these include various measures that would be covered in a CEMP including dust suppressant measures, cleaning of local highways and site boundaries, and control of construction traffic to routes agreed with the Council. With these measures in place the ES concludes that the residual effects of the construction phase on local air quality will be of minor adverse significance. Officers consider that the proposed mitigation is appropriate and, subject to strict implementation of an agreed CEMP, concur with the conclusion regarding residual effects.

8.3.7 In terms of the operational phase of development the ES concludes that the residual effects of the proposed development, incorporating the Option 2 Energy Centre, are minor adverse to insignificant for NO2, and neutral for PM10. This conclusion is predicated on a combination of reductions in vehicle use (through implementation of Travel Plans aimed at promoting sustainable travel patterns for occupants of the proposed development site) and reductions in emissions from vehicles (through improvements in vehicle technology). Therefore although annual mean NO2 concentrations are forecast to exceed the objective (target) levels at the majority of existing receptors in the baseline year (2009), concentrations in the future baseline year will meet the objective as a result of improvements in vehicle technology.

8.3.8 Following the review of the ES and the further information by the Council's advisers it was noted that based on more recent data the conclusion regarding future NO2 concentration levels may be optimistic. Equally, the magnitude of change in NO2 at an existing receptor (+1.5µg/m3), which is assessed in the ES as minor adverse to insignificant, actually represents a relatively large change (+60%) and therefore might reasonably be considered as moderate or major adverse change. In the case of future NO2 levels, the ES has been based on an assumed 'no growth' in road traffic which is considered a pragmatic approach given that traffic counts on Evelyn Street over the last 10+ years have shown a marginal decline in the AM peak and 40% decline in the PM peak. In the circumstances it is considered that the ES adopts a conservative approach and that, based on past trends, traffic levels will decrease. Accordingly it is considered that the assumptions in the ES are reasonable. In terms of the magnitude of change, whilst these are high, the overall levels of NO2 are estimated to be below objective levels and are therefore considered acceptable. On balance, officers consider that subject to implementation of appropriate mitigation measures the findings and conclusions in the ES are reasonable.

8.4 Archaeology

8.4.1 The ES states that the main archaeological resources of potential significance within the application site comprise the remains of the former

19th century Surrey Canal, 19th/20th century wharves, warehouses and associated buildings on either side of the canal and houses of early to mid 19th century date situated around the boundaries of the site. All are adjudged in the ES to be of very low importance. The proposed development area has however the potential to contain possible previously unrecorded archaeological remains dating from the prehistoric period onwards. As the proposed development is assumed in the ES to involve piled foundations and that part of the site will be excavated to provide basement parking (as well as, potentially, to address site contamination) these operations have the potential to disturb unrecorded archaeological remains.

8.4.2 Based on an overall assessment of the site as having moderate potential for archaeological remains (in particular for palaeoenvironmental remains within the alluvial deposits) together with the scale of development proposed the ES recommends that a phased programme of archaeological mitigation should be carried out. This programme would comprise a watching brief during demolition and ground remediation/removal of contaminated material in order to record 19th century industrial, housing and canal remains. This would be followed by trench evaluation which would aim to identify prehistoric or later remains particularly where areas of higher gravel may have attracted occupation or activity. The ES concludes that following the implementation of an agreed programme of archaeological investigation and mitigation any environmental impacts would be reduced to a neutral residual effect and could be improved to Minor Positive through the publication and dissemination of the results of the preservation by record of remains which would increase knowledge of the archaeology of the locality.

8.4.3 Following clarification on a range of issues identified by the Council's adviser's officers are satisfied that ES has adequately assessed both the existing baseline conditions and likely significant effects of the proposed development. Of note is the fact that the application site is located within an Archaeological Priority Area covering the historic docks, floodplain and medieval settlement in the Deptford Wharf/Pepys Park area. Although extending over a wide area, rather than designating or targeting particular historic assets, the potential impact of the Oxestalls Road development proposals on the status and value of the Archaeological Priority Area (as well as cumulatively with other nearby development sites notably Convoys Wharf) is a relevant consideration. Accordingly, whilst the findings of the assessment are generally accepted, in the light of the potential impacts on as yet undiscovered assets it is proposed that a pre-commencement condition is imposed preventing any development occurring until the applicant has secured the implementation of an appropriate programme of archaeological work in accordance with a written scheme for investigation to be approved by the Council.

8.5 Daylight and Sunlight

8.5.1 This section provides an assessment of the daylight and sunlight impacts that the development will have on neighbouring residential properties and within the development itself. Adjoining properties that are likely to be affected are identified as 100-138 Evelyn Street, Diploma Works, and Rochfort House, Keppel House and North House on the Trinity Estate to the

south. An assessment is also provided of overshadowing of public open spaces on and off site. The ES adopts the methodology for assessment of daylight, sunlight and overshadowing set out in the Building Research Establishment (BRE) Handbook 'Site Layout Planning for Daylight and Sunlight 1991'. The ES has assessed the impacts of the scheme only as it is considered that the committed and cumulative developments are too far away to have an impact. Officers consider that the methodology adopted is appropriate and that the assumptions made are reasonable.

8.5.2 The ES states that terraced and semi-detached properties at 100-138 Evelyn Street (on the opposite side of the road from the application site and which face north east across the site) would experience a reduction in daylight of between 50% and 75% when assessed using the Vertical Sky Component (VSC) method. When assessed in terms of Average Daylight Factor (ADF) however, daylight levels in these properties will remain in excess of the relevant guidelines and remain sufficiently well lit for this type of property in an urban environment. In the case of Diploma Works, half of the habitable rooms in the building would experience a reduction in VSC in excess of 27%. These windows do however retain ADF values in excess of the British Standard apart from where they were already below the minimum level. Assessed in terms of sunlight levels, all tested windows retain in excess of the BRE standard based on Annual Probable Sunlight Hours (APSH).

8.5.3 Rochfort House, Keppel House and North House (on the south side of Dragoon Road) are blocks of flats which run roughly north west-south east and at right angles to Dragoon Road and the Oxestalls Road site. Access to the flats is via external landings at first-fourth floor level along the eastern face of the buildings decks (with balconies on the western elevation). Where the windows sit under balconies or access decks the ES notes that daylight to the flats is already restricted and the VSC figures are already very low. The ES notes that daylight measurements will worsen as a result of the proposed development whereas windows of the same flats on the other (western) elevation generally enjoy high levels of daylight. Whilst these rooms will experience a reduction in daylight, when assessed using the ADF method they will remain in excess of the BRE guidelines. In terms of sunlight all of the tested windows without balcony or deck overhangs retain in excess of BRE required levels.

8.5.4 The assessment of internal daylight impacts within the site has assessed Plots 1-5 and concludes that as the units are generally dual aspect the majority of proposed habitable room windows will exceed the appropriate ADF level.

8.5.5 Officers have taken into account these impacts in assessing the acceptability or otherwise of the proposed development and the scale and significance of impacts on affected properties. Given that the flats on Trinity Estate are dual aspect it is considered that the reduction in daylight to selected rooms (based on the VSC method of assessment) is, on balance, acceptable. Internally within the site, following clarification in the Revised ES the impacts in terms of Plots 1-5 are considered acceptable although it is noted that the assessment for Plots 6-8 is, necessarily, high level given that details of scale

are yet to be submitted. Further assessment will be needed as appropriate when details are available at reserved matters stage.

8.5.6 The ES includes sunpath analysis showing where shadows would be cast by the development at 10.00, 12.00, 14:.00 and 16:00 hours for the Spring Equinox (21 March) as well as for the Summer Solstice (21 June). This shows that off-site locations such as parts of Pepys Park and Deptford Park School will experience over-shadowing as a consequence of the development, but this will be transient and these locations will not experience permanent overshadowing. No amenity areas within the site which are designated as public open space will experience significant permanent over-shadowing and the main north-south/east-west routes and spaces will experience direct sunlight at different times of the day.

8.5.7 Officers have considered the on and off-site impacts of the proposed development in terms of overshadowing and conclude that given the transient nature of these impacts these are not untypical of the existing situation and urban environments generally and are acceptable.

8.6 Drainage and Flood Risk

8.6.1 This chapter of the ES assesses the likely significant effects of the proposal in terms of hydrology and flood risk, as required by PPS25, and investigates the effect of the project on flood risk within the site and in the surrounding area. In terms of the construction phase the ES concludes that flood risk to the site from the tidal River Thames during construction will be negligible due to the high standards of flood defences and the temporary nature of the works. It notes that without appropriate measures in place the construction phase could cause sedimentation and potential blockage of the existing sewer network with debris and waste, which in turn could increase the risk of surface water flooding. Without mitigation this would have a minor adverse effect and accordingly the CEMP will need to set out measures to address this issue and also reduce the risk of pollutants reaching surface/groundwater. Officers consider that this approach is acceptable.

8.6.2 The ES states that the surface water drainage strategy will reduce the discharge rate from the site by 50% over current rates. This will be achieved through a combination of sustainable urban drainage (SUDS) measures including green roofs, rainwater harvesting, permeable paving and on-line storage through the proposed water body and these attenuation features have also been tested against a 1 in 100 year rainfall event including a climate change allowance. The measures are considered acceptable and will be secured by condition.

8.6.3 In terms of potential impacts from tidal flooding the ES states that a sequential approach has been adopted, with more vulnerable uses located only where the risk of flooding is negligible. In that part of the site which could be affected by any breach (along Grove Street affecting Plots 2, 3 and 8) the ground floor of these buildings will be used only for car parking or commercial/community space. A podium structure set at least at 3.0m AOD will enable residential accommodation to be raised above the 1:1000 breach water level. Communal open space at ground floor in areas potentially affected by any breach (within Plots 5 and 8) will have access to a safe

refuge at first floor level. Nonetheless the ES recommends that the submission of a Flood Risk Management Plan for the site is developed providing advice and guidance to managers, residents and users in the event of extreme flood.

8.6.4 The Environment Agency have advised that, subject to implementation of the various measures set out in the FRA, that they accept its findings and officers recommend conditions are imposed to this effect. On this basis the assessment of drainage and flood risk is considered acceptable.

8.7 Ecology

8.7.1 The ES has assessed the ecological conditions of the site and surrounding area based on desktop assessment and an extended Phase 1 habitat survey. The ES concludes that the existing site is of negligible ecological value and that based on potential effects that may arise as a result of the proposed development that no adverse ecological impacts are anticipated. Particular attention has been given in the ES to the potential presence of bat roosts on the site and three separate surveys were conducted. Whilst access to two buildings with potential as bat roosts was not possible the ES concludes that the site overall has low potential for supporting bat roosts and habitat. Following clarification officers consider the conclusions of the ES on this point are robust.

8.7.2 The ES notes that the proposed creation of areas of living roofs (comprising green roofs on buildings in Plots 1, 6 and 7 and brown roofs on buildings in Plot 5 and 8) will establish habitats that have the potential to be ecologically valuable and overall concludes that as a consequence of the development there will be a moderate beneficial impact to on-site habitats.

8.7.3 Officers consider that the methodology including scope and timing of habitat surveys is generally acceptable and that the conclusions in the ES in terms of the potential of the site, the impact of development and mitigation measures are reasonable. It is important however that the ecological enhancement measures set out in the application are implemented and a condition is proposed requiring a site-wide strategy for ecological enhancement and mitigation (including a habitat management plan) to be submitted and approved prior to commencement of development.

8.8 Ground Conditions, Hydrogeology and Contamination

8.8.1 The ES records the current ground conditions (including contamination from the varied industrial uses that have occurred on the site), assesses how redevelopment may affect sensitive receptors such as construction workers, groundwater, future residents and site users and identifies how these impacts might be addressed through mitigation. The site investigation work reveals that made ground across the site and within the backfilled former Surrey Canal has been impacted by heavy metal contamination (mercury, arsenic, cadmium, chromium, lead and zinc) and that contaminants are present within the groundwater on the site. Hydrocarbon contamination and a range of other organic contaminants have also been recorded at elevated concentrations in various locations and asbestos and Japanese Knotweed contamination has been detected on the site.

8.8.2 Given the findings of the intrusive site investigation surveys the ES recommends that further assessment should be carried out in advance of the construction phase to confirm the precise level of the contamination present in the soils and groundwater, and to delineate the identified contamination hotspots. These results will then enable the implementation of appropriate protective measures to mitigate the potential effects during construction as well as inform the specification of a detailed remediation strategy potentially including source removal or treatment of contaminants, capping of soft landscaped areas, localised groundwater treatment and gas mitigation measures.

8.8.3 Although if unmitigated the potential effects on construction and maintenance workers would be high, the ES concludes that, with appropriate mitigation, impacts are likely to be short-term and of negligible significance. Officers consider that subject to mitigation, including measures to be set out in the CEMP, these temporary impacts can be satisfactorily addressed.

8.8.4 In terms of the effect of construction and development on ground conditions the ES concludes that providing all appropriate mitigation measures are implemented then redevelopment of the site will have a positive impact on the local environment. Whilst this may ultimately be the case, at this stage, the remediation strategy has not been fully worked up. The ES identifies four possible methods of remediation, but proposes that the final remediation strategy for the site should be based on further and more detailed site investigation work that is informed by the final scheme. This would enable the nature and extent of the contamination and the associated risk to human health and groundwater to be more accurately delineated and defined, and for the appropriate method to mitigate the potential effects (including those on third party land) to be closely specified.

8.8.5 Officers acknowledge that given the stage to which the designs have been developed a detailed remediation strategy cannot be specified and therefore a condition is recommended requiring the carrying out of more detailed investigation and assessment of the site and the submission of the findings together with the specification of any remediation required and the submission of a closure report following the works. Mitigation during construction should also include further soil sampling to provide additional coverage of areas previously inaccessible in order to classify ground conditions across the entire site to assist in the determination of appropriate treatment and/or disposal techniques. This would also involve supplementary investigations for the purposes of remediation and be undertaken in consultation and with the agreement of the relevant Council Departments and/or the Environment Agency to ensure adequate measures are implemented.

8.8.6 On balance Officers consider that that the ES provides a reasonable assessment of the ground conditions on the site, the potential risks, and remediation options. However as noted, more detailed site investigation work informed by the details of the proposed development (including specific construction methods) will need to be undertaken prior to commencement of development to enable a specific set of mitigation measures to be identified and implemented. Subject to the submission, approval and implementation

of such a programme (including its re-evaluation should new sources of contamination be identified) it is considered that this topic has been appropriately assessed.

8.9 Noise

8.9.1 This chapter of the ES considers the potential effect of the noise and vibration environment on the future occupants of the project site as well as the impact of the construction and occupation of the development on existing nearby noise sensitive receptors including Deptford Park School, residents in the former Diploma Works site and in buildings on the Pepys and Trinity estates adjacent to the site, and on local community facilities.

8.9.2 The construction process has the potential to cause noise impacts for the duration of the construction period as well as the potential to cause annoyance through vibration. Construction access has been assessed on a worst case basis where all the construction traffic heads north on Evelyn Street past the site then turns into Oxestalls Road, Grove Street and then into Dragoon Road. In this case traffic noise levels on Evelyn Street, Oxestalls Road and Grove Street increase by less than 1dB and the impact is considered negligible. However for Dragoon Road, which starts from a lower base, the traffic noise levels increase by approximately 9dB, thus constituting a major adverse impact during the construction phase of the development. To mitigate this impact the ES recommends the implementation of a CEMP including measures control vehicle routing and access. Whilst access from Dragoon Road will be necessary at certain times during Phase 1 of the development alternative routes will be more appropriate during subsequent phases thereby reducing the time period over which disturbance from construction vehicles will occur. Officers consider that given the constraints of the site and access this is an appropriate form of mitigation.

8.9.3 In terms of the completed development the ES notes that the existing noise environment around the site is dominated by traffic with the highest flows on Evelyn Street, whereas Dragoon Road is currently a cul-de-sac and therefore experiences a relatively low level of traffic noise. Based on the site boundary measurements the site as a whole currently falls within NEC C where British Standard (BS) 8233 1999 ('Sound insulation and noise reduction for buildings – Code of practice') states that planning permission should not normally be granted and that where it is considered that permission should be given conditions should be imposed to ensure a commensurate level of protection against noise. This however is a site-wide assessment and noise conditions vary across the site with much of the internal areas of the proposed site falling within NEC A or B, facades along Oxestalls Road and Grove Street in NEC C and facades along Evelyn Street at the upper end of the range near the NEC C/D boundary. Accordingly mitigation will vary across the site to respond to specific site conditions. As facades of buildings facing into the development would not be significantly affected by noise (as they would be shielded from traffic noise particularly from Evelyn Street) the ES concludes that no specific mitigation measures are required in these locations. In the case of windows that face the adjoining road network noise attenuation measures will need to be part of the detailed design and specification of the buildings and specified to

achieve an acceptable noise environment within the flats. Officers propose that appropriate mitigation in the form of sound insulation against external noise to achieve specified maximum levels within habitable rooms is secured by condition.

8.9.4 Regarding predicted traffic noise impacts from the development itself the ES concludes that the development will give rise to noise impacts which are no worse than negligible adverse and in some locations beneficial changes may arise given existing operations on the site. Overall, the ES concludes that traffic noise impacts from the development will be negligible and officers consider that given existing condition this conclusion is reasonable.

8.9.5 Operational plant (e.g. ventilation to the basement car park and retail units) have the potential to generate increased noise levels within the site and the ES proposes that specific mitigation measures are defined by target noise levels at noise sensitive receptors. In addition the energy centre sited in the Plot 1 building will include plant which the ES estimates will generate noise levels of 75 dBA at 1 m from the acoustic enclosure when at full operation. This has the potential to create adverse impact and the ES proposes that the specification for the building fabric should achieve noise levels at least 10 dB below the background noise at any nearby sensitive façade. Officers consider that this level of attenuation is appropriate and should be secured by condition.

8.9.6 The ES considers a scenario where the existing industrial activities of the scrap yard or refuse vehicle storage premises on the northern area of the site remain in situ whilst the remainder of the site is built out and occupied. Given the significant adverse noise impact of these activities on new dwellings the ES proposes that this is mitigated against by upgrading the double-glazing specification, and increasing the performance of natural-ventilation airpath noise attenuation within the new buildings. Given that the applicant has accepted in its Delivery Strategy that construction of Phase 2 of the development should not proceed unless and until all land to which the application relates is in the control of the applicant, and that conditions/obligations are proposed to that effect, this scenario would not arise and so is not considered relevant to the determination of this application

8.10 Microclimate

8.10.1 The construction of new buildings and in particular tall buildings have the potential to cause adverse wind conditions due to the deflection of winds down to pedestrian levels. This can lead to potentially adverse effects on pedestrian comfort and safety. Based on wind tunnel studies the likely pedestrian level wind conditions around the proposed buildings and open spaces, as well as in the area immediately surrounding the site, have been assessed using the Lawson Criteria for pedestrian comfort/distress.

8.10.2 Of the 180 measurement locations tested around the proposed development all locations are assessed as being suitable for ‘strolling’ and ‘business walking’ (although a few locations were ‘tolerable’ rather than ‘acceptable’). Most locations were also tolerable for long term sitting and entrance doors. However seven locations have wind conditions that are ‘unacceptable’ for

either purpose. Whilst four of these locations are not intended to be used for long-term sitting or entrance doors (and the ES concludes that they are suitable for their intended pedestrian usage) three which are intended to be used as entrance doors will require mitigation to achieve an appropriate environment for pedestrians. These locations are within the outline application part of the site and as such the details of the building layout and design are not yet known. Specific measures will therefore need to address this issue at reserved matters stage. The modelling indicates however that the area of public open space on this part of the site will be suitable for a range of different uses. Officers consider that the assessment has been conducted on an appropriate basis however although the conclusions are reasonable in terms of the assessment of conditions (and proposed mitigation is appropriate) the threshold at which conditions are deemed acceptable tend to be at the upper end of the Lawson scale for each use type. Accordingly it is considered appropriate that a condition is applied requiring refinement of the mitigation and resultant conditions prior to commencement.

8.10.3 In terms of cumulative impacts, the ES notes that the planning application for Convoys Wharf includes three towers ranging in height from 26 to 40 storeys. However these are downwind of the Oxestalls Road site (for the prevailing winds) and far enough away that the ES concludes that they will not have any significant effect on this site. Likewise, the site was considered too far away from the Convoys site to have any significant impact upon it. Officers consider that this conclusion is reasonable.

8.10.4 The detailed modelling which has been undertaken identifies a limited number of locations on the site where conditions for pedestrians will be suitable only for certain activities. However no locations failed specified 'distress criteria' (based on wind speed) and officers conclude that, with mitigation, the proposed development will be acceptable.

8.11 Socio-economic

8.11.1 The ES estimates that when fully occupied the development will have a resident population of around 1,780 including 136 primary and 108 secondary school aged children. The proposed development will therefore give rise to extra demand for school places and given existing provision in the area, without mitigation the development would have an adverse effect on facilities. The ES concludes that additional primary school places will be needed in the area however it considers that there is surplus capacity of secondary school places within 3 miles of the proposal site and the proposed development will have a negligible effect on secondary school capacity locally. In terms of healthcare facilities the ES concludes that although there will be an increase in population resulting from the development the existing GP services in the area are undersubscribed. Nonetheless, whilst concluding that further capacity is not required the application proposes a health facility on site which the ES considers would have a significant positive effect on health facilities in the local area.

8.11.2 The Council's own review of school places in the area identifies that local primary schools are at capacity and whilst for secondary and post 16 there would appear to be sufficient capacity in local schools to accommodate the

child yield of this age group this is only for a limited period. For post 16 year children there would appear to be capacity to 2016/17 but the quality is considered to be poor. Accordingly, without mitigation the sensitivity of the receptor is considered to be high and the scale of impact medium, leading to a major adverse impact. Following discussions with the applicant mitigation is now proposed in the form of financial contributions to fund primary, secondary and over-16 school places and this is considered appropriate.

8.11.3 With regard to health facilities, the PCT has indicated that whilst capacity is not currently identified as an issue, qualitative improvements are required to meet the impact of the development. As noted above the applicant is proposing that part of the non-residential space (in Plot 2) is made available for a new health care facility to meet demand from the development (which would also provide services to other sites in the locality), but given the position of the PCT it is considered appropriate that mitigation should be in the form of either the provision of subsidised space or an equivalent financial contribution to support improvements to existing healthcare premises. The applicant has indicated their agreement to this approach.

8.11.4 The scheme proposes approximately 14,410m2 of amenity space on site including dedicated play space for 0 – 4 year olds of 1,455m2. This is in line with the GLA Guidance of 10m2 per child given the estimated number of children within this age group. The ES notes that here are a number of open spaces surrounding the site that provide general amenity as well as play spaces for older children and teenagers. The ES concludes that the proposed development will therefore have a negligible impact on open space in the local area. Officers note that the site is not located within an area of open space deficiency and that Pepys Park is adjacent to the site and Deptford Park close by with a range of facilities. However given the extra demand that will arise from this site and cumulatively with other sites in the wider area it is appropriate that there is mitigation in the form of a financial contribution to the provision, improvement and maintenance of allotments and playing pitches.

8.11.5 The site is currently in employment use and the ES states that it supports 162 full time jobs although it could potentially support over 400 full time employment jobs (FTEs) if the site and buildings were more intensively occupied. The proposed development will provide 16,393m2 of non-residential floorspace which it is estimated would support between 547 and 743 FTEs. Estimates of current employment on the site vary, with significantly higher numbers identified by third parties, but these have not been verified. Officers consider that the methodology adopted in the ES is reasonable and that the proposed development will bring forward new and different job opportunities as well as contribute additional revenue to the local economy with a positive effect on the local area.

8.12 Townscape and Visual Assessment

8.12.1 The ES states that the site in its existing condition is run down and underused, and offers very little that is positive to its surroundings in terms of its townscape and visual impact. The ES assesses the impact of the proposal on significant view points surrounding the site as well as the cumulative impact of both the proposal and Convoys Wharf. The ES

concludes that although in certain locations the changes may be major, the views are currently of moderate to low sensitivity and that overall the impacts are generally beneficial. The ES notes that views from within open space on the Trinity Estate are likely to be considered as adverse by those who use this space. When taken with Convoys Wharf the ES concludes that the schemes together would increase the critical mass of built form in the area in a positive manner.

8.12.2 The site lies outside Strategic Viewing Corridor and Lateral Assessment Area from Greenwich Park to St. Paul's Cathedral (LVMF view 5A.2) and Blackheath Point to St. Paul's Cathedral (LVMF view 6A.1) however it lies close to and is located between these two viewing corridors. For the view from Greenwich Park the ES concludes that there would be a negligible change to a view of moderate to high sensitivity and overall the impact would be negligible. When seen with the Convoys Wharf proposals the towers proposed as part of that development would be prominent in the view and would conceal part of the view of the Oxestalls Road development and the cumulative effect would be to reduce the impact of the Oxestalls Road site on this strategic view. In the case of Blackheath Point the ES concludes that there would be a minor to moderate change to a view of moderate to high sensitivity but that the impact is beneficial. Taken together with the Convoys Wharf proposals, the towers proposed as part of that development would be prominent in the view from this location and would conceal part of the view of the proposed development thereby reducing the impact of the Oxestalls Road development on this view.

8.12.3 Buildings on the site will be of a significantly larger scale than those existing and in the case of the taller buildings will be highly visible in local and longer distance views. This is particularly the case from the east and south east where the site will be visible across the open space of Pepys Park. Officers have also considered the impact of the proposed development (both with and without the proposed buildings on the Convoys Wharf site) and the sensitivity of the views from Greenwich Park and Blackheath Point. Although the development will be clearly visible from a number of locations, and the magnitude of the impact will be moderate to severe when compared with the existing situation, on balance it is considered that the layout, massing and overall design of the proposed development has been well thought out and that the detailed architectural treatment of buildings in Phases 1 and 2 is of a high quality. On balance therefore Officers consider that the townscape and visual impact of the proposed development is acceptable.

8.13 Transportation

8.13.1 The transport impacts of the proposed development have been assessed in Section 7.7 above and the following considers the impacts and mitigation set out in the ES. The main potential effects assessed in the ES are short-term increases in vehicle movements due to demolition and construction activities, and the long-term effects of additional travel demand generated by the development on the highway and public transport networks as well as on cycling and pedestrian movement.

8.13.2 In addition to HGV construction traffic, there will also be a proportion of service vehicles within the total traffic flow to and from the site from existing operations. The ES estimates that peak HGV movements of 88 two way flows per day during the demolition and remediation works period after which HGV movements will reduce depending on the Plot that is being constructed at that time and will vary from 46 to 70 two way movements per day. The ES states that the implementation of a CEMP for the site will seek to ensure that construction traffic will not cause undue disruptions to the local highway network and capacity, with any potential effects of the demolition and construction works being negligible. Officers consider that subject to the detailed routing of vehicles being developed as part of the CEMP the impacts can be appropriately mitigated both in terms of impacts on the road network and local environmental conditions for existing residents and businesses.

8.13.3 The ES notes that Transport Assessment submitted with the application indicates that the majority of main mode peak hour trips associated with the development will be by non-car modes. Underground and rail services are the most used public transport modes although walking also accounts for a high proportion of trips. All trips to and from the site by bus have been assumed to utilise the bus services that run along Evelyn Street and Grove Street. The trip generation from the site is estimated at 231 two-way bus trips in the AM peak hour and 240 two way bus trips in the PM peak hour. The ES states that this equates to 7 additional passengers per bus during the peak hours. There is also increased demand for London Overground and rail services.

8.13.4 In terms of road traffic the ES states that when existing flows from the site are taken into account the additional traffic from the completed proposal would give rise to no material impact on the road network although cumulatively with Convoys Wharf capacity problems would arise at the Evelyn Street/Oxestalls Road junction. The ES notes that this assessment is based on the parking and trip generation figures in the 2002 planning application for Convoys Wharf which is currently being reassessed with a likely reduction in trips from that site and consequential reduced impact on the Evelyn Street/Oxestalls Road junction.

8.13.5 As noted in Section 7 above officers consider that when taken with existing traffic movements generated by the site impacts from the proposed development on the local road network are not significant. In addition, subject to additional bus capacity to meet the increased demand complemented by Travel Plans to promote non-car modes of transport from the site then adverse impacts on public transport and the road network from the proposed development can be satisfactorily mitigated.

8.14 Waste

8.14.1 The ES has assessed the effect of the proposed development in terms of the generation of solid waste generated during the construction and operational phases and the increase in traffic movement associated with the disposal. The effects have been assessed against the context of encouraging sustainable waste management and construction methods including waste minimisation, re-use and recycling.

8.14.2 The ES states that during demolition consideration will be given to opportunities for the reuse and recycling of the generated waste materials although it also notes that due to the limited space for storing and processing materials on site it is anticipated that the majority of material will require off-site removal for disposal. Any contaminated demolition waste will be treated off-site and/or disposed to landfill. The ES concludes that the demolition works will have a small effect on the quantity of waste generated and with mitigation this is likely to be a direct, temporary, short-term effect of minor negative significance. In terms of material excavated from the site the ES considers that a limited proportion of this material could be reused on site however the likely contamination present in the excavated material means that it will need to be taken off-site for disposal resulting in a moderate negative effect on landfill and waste facilities and sensitive receptors. The ES proposes that the waste arising during the construction works will be controlled and monitored through a Site Waste Management Plan.

8.14.3 Once completed residents and occupiers of the site will have access to waste management and recycling facilities, and the bin storage and collection facilities. In addition it is proposed that individual household or community composting facilities will be available. The occupiers of the business units and community facilities will be encouraged to employ waste segregation techniques so that packaging waste can be recycled as far as possible.

8.14.4 Although the ES has identified potential sources of waste during the construction phase there remains some uncertainty about the detailed quantities and make up of waste from the site during demolition, remediation and construction, in particular the volume of contaminated excavation waste which will require off-site treatment and/or disposal. For the purposes of the assessment the ES has assumed (as a worst case assumption to make the assessment robust in this respect) that the excavated material will be taken off site although it is anticipated that in reality there will not be a need to remove all of the excavated material. The ES Further Information document acknowledges that an earthworks mass balance calculation will have to be undertaken at detailed design stage and that this will inform a detailed Site Waste Management Plan (SWMP). As a detailed site remediation strategy is to be the subject of further detailed assessment and approval by the Council it is recommended that a condition requiring this mass balance calculation is submitted and approved prior to the drafting of any detailed remediation strategy or SWMP. In terms of the operational phase of the development the conclusions in the ES regarding waste arisings from the site appear to be based on a miscalculation (a significant over-estimation) and should be clarified as part of the SWMP. With further refinement regarding waste arisings as part of the CEMP and SWMP during construction and a SWMP on occupation it is considered that the impacts from the proposed development will be acceptable.

8.15 Cumulative and Residual Effects

8.15.1 The combined effects of individual impacts as well as the cumulative effects of the construction and operation of the proposed development together with the other committed or proposed developments have been assessed on a topic-by-topic basis in the ES. In addition each topic has been assessed in terms of the residual effects following mitigation. Subject to the points set out below it is considered that the ES has satisfactorily considered the cumulative effects of individual impacts and that, with mitigation, the residual impacts of the proposed development are acceptable.

8.15.2 The review of the original ES by consultants appointed by the Council concluded that the consideration of cumulative effects was not well handled because it was addressed on a topic-by-topic basis and therefore did not consider interactions between topics or combinations of them. The review also considered that, without further clarification, there was reasonable doubt as to whether, and to what extent, construction of the Oxestalls Road development might overlap with the construction of other nearby regeneration schemes. In the further information report submitted in May 2010 the applicant acknowledged this potential shortcoming, noting that it related particularly to the construction phases in relation to potential increases in traffic, noise, dust and emissions in the same location as the development proceeds. In response the applicant has provided further information on construction through the provision of a draft Construction Environmental Management Plan (CEMP), and a commitment to submit this for approval by the Council in advance of commencement, and on a phase-by-phase basis, which will enable the Council to draw on earlier experience when considering the CEMPs for subsequent phases. Given the likely timescale for build out of the strategic sites over a 10-15 year period and the opportunity to mitigate construction impacts across the sites it is considered that this matter can be appropriately controlled. In the circumstances it is considered that this approach satisfactorily addresses potentially over-lapping construction projects and impacts and that the ES has adequately assessed the likely significant impacts from the development.

9. FINANCIAL VIABILITY AND DELIVERABILITY

9.1 Introduction

9.1.1 The application site is one of four Strategic Sites identified in the Core Strategy as being catalysts for regeneration of the Deptford and New Cross area through mixed use redevelopment. Due to its size and capacity for development the Oxestalls Road site has the potential to be a key component in the regeneration this part of the borough with the potential to reconnect the site with existing communities as well as form part of the network of key sites in the Deptford and New Cross area.

9.1.2 Core Strategy Strategic Site Allocation 1 sets out the requirements for the strategic sites including the need for a comprehensive masterplan and a delivery strategy setting out how the development will be implemented and managed once occupied (including housing stock and publicly accessible space), any matters to be resolved such as land assembly and preparation, infrastructure requirements and delivery, development phasing and likely

need for planning obligations (including financial contributions) and/or conditions. The delivery strategy should also identify the likely need for public sector intervention, by which agency and when.

9.1.3 The application has been submitted as a comprehensive scheme for the redevelopment of the Oxestalls Road Strategic Site although excluding the former Diploma Works building at the corner of Oxestalls Road and Grove Street. Given this building represents a small part of the overall Strategic Site designation and its exclusion from the application would not prejudice the implementation of fundamental aspects of the masterplan such as the east-west/north-south pedestrian links or the link under Oxestalls Road (as set out in the Council's North Lewisham Links Strategy) it is considered that its omission from the application is acceptable in context of implementing emerging Policy SSA4. The current application is not dependent on this building to deliver key elements of Policy SSA4 and the building itself is of some local architectural merit and can be successfully integrated into the wider redevelopment.

9.1.4 In addition to the masterplanning process discussed elsewhere in this report a Delivery Strategy (and confidential financial appraisal) for the Oxestalls Road site has been submitted in support of the application. Whilst there can be no guarantee that the proposed development will be implemented or completed, the Delivery Strategy sets out a mechanism for achieving the comprehensive development of the site. Of particular importance for this site is land ownership. Whilst the applicant owns the land in Phases 1 and 2 (save for the house on Evelyn Street) it does not own a significant part of the land within Phase 3.

9.2 Financial Viability

Introduction

9.2.1 The following section considers viability and deliverability in the light of the information provided by the applicant and its assessment by the Council and its advisers, Lambert Smith Hampton. The financial appraisal provides information on land purchase costs together with projected build costs, sales values, and rents and yields (for the commercial space). The scheme has been appraised on a cash flow basis to reflect the timing of costs and income from the scheme including financing (interest payments and credits) as well as current rents from occupiers of the site who are likely to remain until redevelopment. Part of the cost of the scheme comprises the proposed section 106 contributions/works.

9.2.2 The build costs have been benchmarked against BCIS rates and sales values and rental levels/yields assessed in terms of comparables for the type of scheme and locality. The advice from the Council's appointed consultants is that the build costs are within the BCIS range and, based on the evidence provided, are generally considered to be reasonable. Commercial rents and yields are comparable to those for similar space in the local area. Accordingly the base information is considered acceptable.

9.2.3 Land purchase cost in the appraisal reflects the sequence of acquisitions over a number of years and has also been assessed adjusted to reflect current values rather than historic purchase costs. Whilst not strictly an

'Existing Use' value (using the RICS Red Book definition), Valuation Office data on land values in the area has been used as a proxy for this exercise and in the absence of more detailed information this is considered a reasonable basis for this assessment. The effect of this adjustment is to reduce the land value and increase the viability of the scheme overall.

9.2.4 The appraisal has also been reviewed in terms of the developer return derived from the Homes & Communities Agency development appraisal tool which assumes a return of 15% on gross development value (20% on cost) although under current market conditions and the associated risks a case might be made for this to be higher. Based on the proposed mix of uses and current costs and values the appraisal shows that the scheme achieves a return below this level. It should be noted that (although the appraisal assumes no grant for the affordable housing) this return is achieved even with affordable housing and commercial space being provided at levels below that set out in the London Plan and Core Strategy. In the circumstances and for the reasons set out in para. 8.36 above a policy compliant scheme based on the costs and values in the appraisal would show a lower level of return and potentially a loss. Whilst on current terms if the applicant were to seek to dispose the site based on their historic land purchase costs the scheme would not be commercially viable, given the build out period and potential increase in sales values and or reduction in build costs the applicant has indicated their clear commitment to proceed with the development .

9.2.5 In the circumstances, and given that the scheme does not provide affordable housing at a level sought under development plan policy, then if planning permission is granted for the submitted scheme it is appropriate that there is a review mechanism to secure funding to be applied to affordable housing should the scheme achieve higher sales values than currently stated or grant funding become available. This approach has been used on other Strategic Sites and considered an appropriate approach, secured through the S106 agreement.

9.3 Deliverability

Land Ownership

9.3.1 As has been noted elsewhere in this report the applicant owns around two-thirds of the site however there are parts of the site that are owned by third parties that are required to deliver the comprehensive development of the site and to help deliver the wider regeneration benefits of the scheme. There are also a number of leases on properties on the site that still have a period to run although bringing in these leasehold properties (of which the applicant owns the freehold) is not considered to be an impediment to the scheme being delivered due to the term of the lease or the ability to determine or otherwise secure possession.

9.3.2 The applicant has submitted confidential information to the Council outlining the attempts they have made over the years to secure the remaining freehold interests required to deliver Phase 3 of the development. Extensive discussions have been held with one of the owners, but this has not yet led to that site being acquired. In the Delivery Strategy the applicant notes that notwithstanding their preference to acquire the remaining land under private

treaty if this is not successful then, in order to deliver the comprehensive development of the site that a Compulsory Purchase Order may be required in order to assist in the land acquisition process.

9.3.3 Paragraph 9.6 of the Core Strategy states that the Core Strategy is intended to encourage third party landowners and developers to bring forward their land and buildings for re/development where appropriate. It further states that the Council has been working with landowners and their agents to assist the process of bringing forward development within the earliest possible period and that this applies particularly to the strategic site allocations. However, the Core Strategy also notes that it is accepted there may be instances where landowners may be reluctant or unwilling to bring forward their land for development. In such circumstances the Council may choose to use its compulsory purchase powers to achieve the Core Strategy's wider regeneration objectives.

9.3.4 In this case, as a strategic site where the applicant has acquired the majority of the land to deliver the policy objectives set out in Strategic Site Allocation 1 and 4, third party land is potentially preventing comprehensive development of the site in accordance with an agreed masterplan. If following the grant of planning permission, officers were satisfied that the applicant had used all reasonable efforts to acquire land by agreement and that the use of compulsory purchase powers was appropriate, any such proposals would need to be reported to Mayor and Cabinet, who would need to resolve to make a Compulsory Purchase Order to facilitate the delivery of this strategic site.

9.3.5 The consideration of the case or merits for using compulsory purchase powers does not form part of this report which is concerned only with the determination of the planning application for the site. Should the Council consider it relevant or expedient to use its compulsory purchase powers then, as set out above, this would need to form the basis of a separate report to Mayor and Cabinet.

Comprehensive Development

9.3.6 The delivery of the comprehensive development of the site is dependent on the applicant/developer controlling the entire site (excluding the Diploma Works site) and, as noted above, this will require the acquisition of land not currently controlled by the applicant. In the circumstances, and to avoid the piecemeal development of the site as well as the potential for the scheme not to be fully built out, it is appropriate that a mechanism is put in place to control against such an eventuality. The applicant has proposed a mechanism that combines planning conditions and obligations to this effect. The precise terms would need to be refined, but the applicant has proposed:

1. Provision within the Section 106 Agreement that the applicant will use all reasonable endeavours to acquire the remaining land by agreement with the relevant owners and occupiers;
2. A Grampian condition preventing commencement of Phase 2 and 3 (Plots 3-8) of the development until all land within the application boundary is controlled by the applicant;
4. A Planning Obligation in the Section 106 agreement that requires the applicant to enter into a CPO Indemnity Agreement with the Council to

ensure that the costs associated with the promotion and implementation of any necessary CPO are underwritten by them.

3. A Grampian condition to prevent any development commencing unless and until a CPO Indemnity Agreement has been completed, in accordance with the provisions to be contained in a Section 106 Agreement to be executed prior to the grant of the planning permission;

9.3.7 The applicant has indicated that it intends to work with a development partner and Registered Provider to undertake the scheme and any such party would be subject to the same controls should they acquire the site.

9.3.8 The proposed mechanism is considered acceptable in principle and whilst it would permit Phase 1 (Plots 1 and 2) of the development to commence ahead of the whole site being under the applicant's control, it is considered that the conditions and planning obligations provide sufficient control over the implementation of the development and also act as an incentive for the applicant to actively seek a resolution of the land ownership issue. The Council has, however, considered the potential scenario where, planning permission is granted (on the basis of the conditions and obligations are as set out above) and Phase 1 is undertaken but the applicant is unable to acquire the third party land under private treaty or any CPO is not confirmed. Whilst comprehensive development of the whole site remains the clear objective, the development of Phase 1 would still deliver an appropriate mixed use development for that part of the site and secure other policy objectives, including the provision of affordable housing and creation of new open spaces and pedestrian routes across the site. Such development would be consistent with the scheme for the wider site and it is considered that it would not prejudice the longer term comprehensive development of the whole of the site and achievement of the objectives in Strategic Site Allocation 4.

Phasing

9.3.9 Construction of the proposed development would be carried out in 8 phases (plus site preparation, demolition and remediation, and sub-structure works) over a 7-8 year period. If site preparation started in mid-2012 then the final phase would be completed in mid-2020 (see paragraph 3.9.2 above for further details).

9.3.10 The applicant has included in the Delivery Strategy a schedule setting out the number/type of residential units to be provided on each Plot to which has been added the mix of non-residential uses coming forward in each Plot:

Phase	**Plot**	**Units (Affordable)**	**Non-Residential Uses** (separate units/spaces and mixed use space noted)
1	1	116 (52)	Energy Centre Commercial
1	2	144 (0)	Retail/commercial Retail/community/leisure
2	3	92 (26)	Retail
2	4	140 (0)	-
2	5	100 (53)	Retail/commercial
3	6	160 (0)	Retail

			Retail/commercial Retail/community/leisure
3	7	84 (30)	Commercial Retail
3	8	69 (28)	Community Leisure/retail

9.3.11 The ES includes an Indicative Skeleton Programme which identifies three main stages to the development – land acquisition, site preparation and construction. The programme allows for a period of 18 months following grant of planning permission for the third party land to be acquired but that Site Preparation (demolition, remediation and clearance on Phases 1 and 2 (Plots 1-5) would commence approximately 12 months ahead of completion of land acquisitions and would take approximately 18 months. Notwithstanding the proposed controls and triggers over implementation, site preparation works are typically excluded from the definition of development for the purposes of s.106 agreements. This allows the developer to undertake necessary works prior to relevant clauses in the s.106 agreement (such as those relating to payments to mitigate scheme impacts arising from the built development) being triggered. Whilst the principle of allowing preparatory works on Phase 2 is considered acceptable in this case, the drafting of any agreement/conditions will need to ensure that any such works are limited. The programme also indicates that works to Section 1 of the water body (located between Plots 4 and 5 which form part of Phase 2 of the development) would form part of Phase 1 and would in any case only commence following third party land acquisitions. This is consistent with the implementation strategy and triggers for Phases 1 and 2 of the proposed development.

9.3.12 The programme also proposes that construction of Plot 1 would commence ahead of all land being acquired however Plot 2 and all subsequent Plots would commence at least 12 months after completion of third party land acquisition. This would allow at least 36 months following grant of planning permission for third party land to be acquired. Whilst the timing and outcome of negotiations and/or a CPO cannot be predicted it is considered that this allows an appropriate and reasonable amount of time for land acquisitions to be completed. If the third party land was not acquired in that time then the Indicative Skeleton Programme would need to be revisited with potential implications for the ES and timing of the construction of Plot 2.

Infrastructure

9.3.13 The proposed development will give rise to additional demands on existing social infrastructure (e.g. schools, health services and public transport). Officers have been in discussion with the applicant regarding the impacts arising from the proposed development. The Core Strategy (Strategic Site Allocation 4) states there are no site-specific ‘essential’ infrastructure projects that must happen if the policy objectives (land use priorities and/or urban design principles) set out above are to be met in full, but that there are borough-wide projects that are considered essential for the delivery of the Core Strategy as a whole, including this strategic site allocation.

9.3.14 The discussions have been informed by the Council’s Adopted Planning Obligations Supplementary Planning Document and Infrastructure Delivery

Plan and Schedule and the applicant has agreed to make financial contributions towards infrastructure as well as carrying out associated works such as the provision of a public footpath along the approximate route of the former Grand Surrey Canal as it crosses the site and the provision of a connection under Oxestalls Road Bridge. These form an integral part of the proposed development and the scope and timing of these financial contributions and works in kind are set out in Section 10 below.

Housing Demand

9.3.15 The applicant has advised that it is in discussion with a potential development partner and with a Registered Provider to be responsible for the affordable housing. The Indicative Skeleton Programme indicates a 3-month period following a resolution from the Council to grant planning permission to conclude a joint venture agreement which will be coincident with the signing of the s.106 agreement (and any other related legal agreements that may be required). The programme also indicates that Pre-commencement design and procurement work would commence immediately following grant of planning permission. The provision of 905 residential units including a proportion of affordable housing will make a contribution to the housing targets set out in the Core Strategy and whilst the Council cannot require commencement of the development the applicant has indicated their intention to undertake the scheme.

Non-Residential Uses

9.3.16 The application proposes a mix of non-residential uses across the scheme including space in Phase 1 intended to allow an existing site occupier (a cab repair/refurbishment company) to remain on the site and expand their operations. The phasing of the development would allow this to happen without the company having to leave the site and this approach is welcomed and is a positive aspect of the scheme. In addition dedicated B1 space would be provided in Phase 3.

Management and Maintenance

9.3.17 A management and maintenance strategy for the site including roads, publicly accessible routes and open space and communal residential amenity and play space will form part of a s.106 agreement and details of the strategy will cover both how the relevant areas are to be managed and maintained as well as the ongoing maintenance regime for the site as a whole. The applicant also proposes 'meanwhile' uses on the site including temporary allotments which will provide for a degree of site maintenance on an interim basis and this approach is welcomed.

Other Legal Agreements and Consents

9.3.18 Minor works on the public highway are proposed and therefore highways agreements under s.278 of the Highways Act will be required.

10. CONSIDERATION OF OBJECTIONS

10.1 Introduction

10.1.1 Section 5 of this report outlined the consultation arrangements and summarised the consultation responses. This section addresses the key objections to the proposals and sets out the how these have been

considered. Some of the points are also addressed elsewhere in the report under the individual topic headings however they are included again here for completeness.

10.2 Consideration of Objections

Issue	Consideration/Response
Traffic • Increase in traffic congestion • Overcrowding of buses; bus routes need improving • Increase in parking congestion • Concern about traffic congestion in the adjoining Southwark Council road network • Negative impact on pedestrian safety • Too many car parking spaces proposed • The pavement should be widened on Evelyn St to the north and south of the Oxestalls Rd junction to enhance pedestrian safety • There could be an increase in traffic which would increase the risk of injuries to pedestrians and cyclists at the Oxestalls Rd / Evelyn St junction • A bicycle lane should be provided along this section of Evelyn St • Road improvements are required	The Council is satisfied that the findings of the Transport Assessment and that given the existing traffic from existing uses on the site and proposed low on-site parking provision the net increase in traffic from the development will result in a marginal increase traffic from the site. Existing junctions would operate within capacity, but when taken cumulatively with other developments in the area, certain junctions would be over-capacity. It is considered that suitable mitigation can be provided and is currently examining options to address the cumulative impact and existing bus capacity with, as appropriate, the need for investment in public transport services and infrastructure to meet future demand. It is considered that the reduction in the number of crossovers and selective widening of footpaths around the perimeter of the site will improve pedestrian safety as well as offering pedestrian routes across the site which avoid main roads. The provision of a cycle lane will be considered as part of the wider 'cycle superhighway' proposals being promoted by the London Mayor. The emphasis of changes to transport in the area is in improvements to public transport and pedestrian and cycle safety rather than constructing new roads.
Scale, Massing and Design • The 18 storey building is too tall and out of context with the local area • The high rise buildings are too tall and have a negative impact on the surroundings • Result in overshadowing and loss of sunlight and daylight to Pepys Park • Excessive density • The tall buildings along the development's perimeter will form	The tallest building on the site is located in the south east corner of the site and relates to the main route into Convoys Wharf. However, whilst in 2005 the Council resolved to grant permission for a development including 3 towers of 26, 32, 40 storeys on Convoy's Wharf, that scheme has been revised and has yet to be re-determined. Eddystone Tower on the Pepys estate immediately to the north of the site is 26 storeys in height. It is considered that the tall building on the application site is of a high quality

Issue	Consideration/Response
a barrier and exclude the adjoining community • The design has not taken into account the naval / working class history of the area	architecturally and is of an appropriate design and well located as a marker for the site. A tall building in the north west corner will provide a marker on Evelyn Street. Given the location of the tall building and surrounding built development, impacts from this building are considered acceptable and do not create a barrier to accessing the site. Sunpath analysis shows that whilst the buildings will cast a shadow over Pepys Park from midday on 21 March/September (earlier/later and to a lesser/greater extent during summer/winter respectively), parts of the Park are unaffected and it is considered that given the size of the space its useability will not be adversely affected. The density of the development is above London Plan guidelines. Given, however, the combination of on and off site open space in the area and the quality of internal and external environment that is created this is considered acceptable subject to the scheme implementing the relevant design features and impacts such as on education, health and public transport being mitigated through financial contributions or other planning obligations.
Social Infrastructure • A new secondary school should be provided on the site • Opposed to a secondary school on the site, which would have the same negative impacts as the existing uses on site • The existing health facilities will not cope with the additional demand • The existing school facilities will not cope with the additional demand • No youth facilities provided • Need for a local police facility	The proposed development will give rise to demand for new primary and secondary school places and the developer will be expected to make a financial contribution to fund the provision of these new places. Views on the alternative use of the site for a secondary school are opposed to each other. Secondary schools have a wide catchment area and provision is being considered at a borough-wide level with additional spaces being provided at Deptford Green and Prendergast Vale in Lewisham town centre. Options for additional primary school places are also being reviewed with the potential for additional capacity being created on Convoys Wharf and the expansion of existing schools. The proposed development will give rise to demand for health services and the developer will be expected to make a

Issue	Consideration/Response
	financial contribution to fund the additional/enhanced provision locally. The PCT has indicated that it is not seeking new/additional health facilities on the site. Although there is already a community building in the vicinity, the application includes space for community use.
Residential Amenity • Result in overshadowing, and loss of sunlight and daylight to residential properties • Has an overbearing impact on residential properties causing loss of amenity • Results in overlooking of adjoining residential properties and loss of privacy • Loss of views • Increase in light pollution • Development's construction will have a negative impact on amenity • Result in small overcrowded homes; the development would not provide good quality homes to meet the need for lifetime occupation	The ES has assessed the impact of the development on adjoining properties in terms of daylight/sunlight and includes sunpath diagrams showing overshadowing. Given the low height of existing buildings on the site the proposed development will give rise to a loss of daylight to a number of properties when measured using Visible Sky Component. However in most cases such properties receive acceptable levels of daylight when measured using Average Daylight Factor. Some existing properties (e.g. the converted former Diploma Works building which has some large rooms with small windows, and Trinity Estate where access decks/balconies already reduce amenity within existing flats) do not currently receive adequate daylight. The development has only a limited impact on flats on the Trinity Estate and in the case of Diploma Works. Lighting on the site will increase as a consequence of the development. However as an inner urban site with existing buildings on three sides the impact is likely to be negligible. Loss of a view is not a valid planning objection. Construction impacts will be minimised through the implementation of a Construction Code of Practice and Construction Environmental Management Plan. The minimum size of the proposed dwellings would meet London Plan standards. The mix of units is considered acceptable.
Air Quality • Increase in air pollution	Air quality has been assessed in the ES and impacts are considered to be within acceptable limits.
Noise • Increase in noise pollution	Noise levels have been assessed in the ES and impacts are considered to be within acceptable limits. The loss of the

Issue	Consideration/Response
	scarp yard and car breakers on the site as a consequence of development will remove an existing noise nuisance. Controls over the phasing and implementation of the development will further safeguard against potential impacts if there is delay (or failure) in acquiring this.
Mix of Uses • Too many bars and takeaways proposed resulting in anti-social behaviour, litter, noise, traffic and obesity • The take away, restaurant and bar uses will not benefit local people • Business uses should be provided that leads to real jobs • The large number of shops proposed will be unviable • The scheme lacks uses that are needed locally	The mix of non-residential uses on the site has not been fixed and it is proposed that the overall amount of each type and transfer between uses is controlled by condition and/or legal agreement. The impact of A3-A5 retail uses will be managed on site through an 'estate management plan'. The development includes a mix of commercial uses including the space for an existing business which provides a range of job types / opportunities. The mix of uses is considered appropriate, responding to local need and the placemaking agenda.
Cumulative Impact • The cumulative impact of the development and the others planned in Deptford and Canada Water will have a negative impact on the area • The developer should provide money to upgrade adjoining social housing	The cumulative impact of proposed developments in the area on social infrastructure (e.g. schools, health) has been assessed as part of the Council's Infrastructure Delivery Plan. Impacts on public transport services have been assessed as part of a wider assessment for the Deptford and New Cross area. Appropriate mitigation (financial contributions, on/off-site works) have been identified and have been sought from the applicant as part of the s.106 package for this site. A financial contribution to the upgrade of existing housing in the area is not considered appropriate under relevant guidance on planning obligations.
Landscaping • Low quality landscaping • There are several bushes and trees within the site therefore a tree survey should have been provided	It is considered that the landscape proposals are of a high quality which will be secured by condition. The existing vegetation on the site has been assessed in the ES and is considered to be of limited value.
Affordable Housing • Democratically controlled, securely tenured social rented housing suitable for those who are currently on Council waiting lists • More affordable housing should be	The proposals include 20% affordable housing which is below the level set out in the Core Strategy. The applicant has demonstrated that this is the maximum amount that the scheme can support and subject to a review mechanism to bring

Issue	Consideration/Response
provided • The affordable housing is below the 50% target of the Council and the GLA • The reduction from 35% to 20% affordable housing is outrageous and the scheme should be refused • There is not sufficient real housing provision to meet Lewisham's real housing need which is for more 3 and 4 bed homes in particular at a reasonable rent	forward additional affordable housing should grant funding and/or residential sales values permit then this is considered acceptable.
Management • Rubbish could get dumped in the canal • Junk could be stored on the proposed balconies • Adequate waste and recycling facilities should be provided • There would be too much waste produced by the scheme	The site will be subject to an 'estate management plan'. The scheme includes waste/recycling facilities for residential and commercial uses within the blocks. How residents use their amenity space is beyond planning controls.
Ecology • The proposal will have a negative impact on the rare species and wildlife identified on the Convoys Wharf site and Pepys Park adjoining Convoys	Protected species on Convoys Wharf (e.g. black redstarts) and Pepys Park will need to be managed by proposals for those sites. The application proposals include brown/green roofs which could provide a refuge for black redstarts and achieve an ecological enhancement of the existing situation on the site.
Employment • Loss of local businesses on site • Loss of a high value petrol filling station serving the local community • The Veolia business within the application site is an important part of a vital public service provision for London that will be lost • The opportunity for Veolia to find a suitable alternative premises in the area will be difficult. It is important that they operate in the area owing to their use of SELCHP • Application is contrary to London Plan policies 4A.22, 4A.24 and 3B.10, which safeguard existing waste facilities • The site should remain in employment use and once lost to housing, land is never replaced. In	A number of uses currently on the site are 'bad neighbour' uses and the applicant has indicated a willingness to work with the Council and the operator to find alternative premises for them. Space is to be provided for an existing business on the site as well as a mix of other employment space. Whilst employment numbers on site vary (depending on whether related off-site employment is included in the assessment) but on balance it is considered that the loss of the existing employment space (including waste facilities) is outweighed by the benefits that the scheme will bring.

Issue	Consideration/Response
November 2010 a survey showed that the site provided between 757 – 857 jobs in primary and secondary employment	
Contamination • Flooding of the canal and its contamination from the soils on site	Details of decontamination works on site will need to be submitted to and approved by the Council. The proposed canal has been incorporated within the sustainable urban drainage strategy design as an attenuation feature, which aims to help decrease flood risk.
Other • The applicant didn't listen to residents during the pre-application process • Negative impact on the sense of well being and community in Deptford • Decisions are made by the Council behind closed doors and are always approvals • There will be too much development in the area • No justification is given for the use of CPO powers	It is considered that the proposed development has the potential to deliver the objectives and site specific policy set out in the Core Strategy and make an important contribution of the regeneration and enhancement of the local area. The application has been subject of several rounds of public consultation, including intensive work by the applicant team. The decision will be taken in public by the Strategic Planning Committee. The Deptford and New Cross area will be subject of much change in forthcoming years and schemes are being assessed in terms of cumulative impact. While the Core Strategy make reference to the use of Compulsory Purchase Powers where sites cannot be assembled, the merits for using CPO powers would need to be discussed in a separate report to Mayor and Cabinet.

11. LEGAL AGREEMENTS

11.1 Introduction

11.1.1 Paragraph B2 of Circular 05/2005 states that in dealing with planning applications, local planning authorities consider each on its merits and reach a decision based on whether the application accords with the relevant development plan, unless material considerations indicate otherwise. Where applications do not meet these requirements, they may be refused. However, in some instances, it may be possible to make acceptable development proposals which might otherwise be unacceptable, through the use of planning conditions or, where this is not possible, through planning obligations. Accordingly, planning obligations can prescribe the nature of the development, compensate for or offset likely adverse impacts of the development, and mitigate the proposed development's impact.

11.1.2 The Community Infrastructure Levy (CIL) Regulations 2010 put certain of the Government's policy tests on the use of planning obligations set out in

Circular 05/2005 on a statutory basis for developments which are capable of being charged CIL. The Regulations (Regulation 122) make it unlawful for a planning obligation to be taken into account when determining a planning application for a development, that is capable of being charged CIL (whether there is a local CIL in operation or not) if it is not:

(a) necessary to make the development acceptable in planning terms
(b) directly related to the development; and
(c) fairly and reasonably related in scale and kind to the development

11.1.3 London Plan policy 8.2 (Planning Obligations) and Core Strategy Policy CS21 (Planning Obligations) together with the Council's Adopted Planning Obligations SPD set out the policy context for considering planning obligations. Whether a development makes appropriate provision for, or contribution towards, requirements that are made necessary by, and are related to, the proposed development will be a material consideration relevant to the planning application being considered. Negotiations should seek a contribution towards the full cost of all such provision that is fairly and reasonably related in scale and in kind to the proposed development and its impact on the wider area. Planning obligations should reflect strategic and local needs. In accordance with the statutory and policy context, the proposed heads of terms for a Section 106 Agreement are set out below.

11.1.4 Given that the applicant proposes works to public highways, an agreement or agreements with LB Lewisham under Section 278 of the Highways Act 1980 will also be necessary.

11.2 Planning Obligations (Section 106 Agreement)

11.2.1 The Heads of Terms for a Section 106 Agreement are:

1. Housing
   - provision of 189 affordable housing units comprising 61 affordable rent (14 x 1 bed flats; 24 x 2 bed/4 person flats; 13 x 3 bed/5 person flats; 4 x 3 bed/6 person flats; 6 x 4 bed/7 person flats) and 128 intermediate (44 x 1 bed flats; 9 x 2 bed/3 person flats; 39 x 2 bed/4 person flats; 36 x 3 bed/5 person flats)
   - all affordable housing to be built with no discernible difference in quality of external appearance to private dwellings
   - affordable housing to be provided as per submitted plans and construction phasing strategy
   - provision of a financial review mechanism to enable additional funds to be applied to affordable housing
   - 10% of all housing to be wheelchair accessible or easily adaptable for wheelchair use

2. Public Realm
   - implementation of landscaping works to the route of the former Grand Surrey Canal connecting the site with land to the north of Oxestalls Road via a suitably designed link under the Oxestalls Road bridge (details of the scheme, phasing and cost to be agreed)
   - other public access routes and public open space

- maintenance and management of the public realm in accordance with a management plan agreed with the Council
- areas of public realm to remain available for use by the public

3. Transport:
   - £620,000 financial contribution towards improvement of local bus services,
   - £56,000 financial contribution towards public transport infrastructure enhancements including bus stops within the vicinity of the site
   - £30,000 financial contribution towards the cost of consultation and implementation of a Controlled Parking Zone in the vicinity of the site
   - site wide Travel Plan for residential and non-residential uses to be submitted and approved by the Council
   - provision of a minimum of 2 and up to 8 car club spaces with free membership for one-year for all residential and non-residential occupiers of the site
   - restriction on parking permit applications (including mechanism to secure implementation)
   - submission, approval and implementation of a parking management plan to restrict on-street parking (except Blue Badge holders)
   - implementation of works to the public highway (under S278 Agreement)
   - contribution towards the implementation of Air Quality Management Area Plan objectives

4. Social Infrastructure (Education and Health):
   - £2.1m financial contribution towards Primary, Secondary and Post-16 Places facilities in the borough
   - provision of subsidised accommodation for health facility on the site (Plot 2) or a £1.0m financial contribution towards the improvement or extension of existing health facilities in the borough

5. Leisure and Open Space:
   - £262,870 financial contribution towards provision, improvement and maintenance of allotments and playing pitches in the local area

6. Community Facilities/Trust:
   - financial contribution of £530,000 towards a Community Trust

7. Employment and Training:
   - implementation of a local labour scheme on site to be agreed with the Council
   - financial contribution of £300,000 towards construction and operational training (details to be agreed as part of an Employment Method Statement)
   - specification of commercial space fit out

8. Children's Playspace/Communal Private Residential Amenity Areas:
   - communal private residential amenity areas to be maintained and managed in accordance with a plan submitted to and approved by the Council

9. Phasing*
   - phasing of the development in accordance with a strategy to be agreed with the Council
   - to use all reasonable endeavours to acquire the remaining land by agreement with the relevant owners and occupiers;
   - to enter into a CPO Indemnity Agreement with the Council to ensure that the costs associated with the promotion and implementation of any necessary CPO are underwritten by the applicant.

10. Costs:
   - meeting the cost of external consultants appointed by the Council to assess and advise on the proposed development
   - meeting the Council's legal, professional and monitoring costs associated with the drafting, finalising and monitoring of the Agreement

* Phasing also to be controlled by Grampian obligations and conditions preventing commencement of Phases 2 and 3 (Plots 3-5) of the development until all land within the application boundary is controlled by the applicant and bound by the Section 106 requirements, and to prevent any development commencing unless and until a CPO Indemnity Agreement has been completed to be executed prior to the grant of the planning permission.

11.2.2 These heads of terms as set out in summary under Recommendation C below (with appropriate timing to be agreed with the Council) take account of the proposed Planning Conditions set out below and the planning considerations in section 7-9 of this report, are considered to satisfy the requirements of Regulation 122 of the CIL Regulations and to be appropriate to secure policy objectives, prescribe the nature of the development, compensate for or offset likely adverse impacts of the development, and mitigate the proposed development's impact. These take account of comments raised by the GLA in the Mayor of London's Stage 1 comments.

11.2.3 The total package secured uses, where applicable, the amounts and calculations set out in the Council's Adopted Planning Obligations SPD. However this needs to be seen in the context of advice from the government regarding the need for a pragmatic approach to Section 106 negotiations, the financial viability of the scheme and the 'in-kind' benefits of the development including implementation of part of the North Lewisham Links project through works to the route of the former Grand Surrey Canal. Confidential viability information, which has been independently reviewed, has accompanied the application and this has demonstrated that the level of affordable housing proposed and the other financial contributions that officers have negotiated is commensurate with the overall viability of the scheme.

12. CONCLUSIONS AND RECOMMENDATIONS

12.1 Introduction

12.1.1 In July 2010 a report on a planning application submitted by City & Provincial Properties plc for the development of the Oxestalls Road was presented to the Strategic Planning Committee. Following presentations the Committee noted the issues raised by the Head of Planning and agreed to further discussions and assessment on them as well as the potential scope of legal agreements. The Committee agreed to the Head of Planning continuing discussions with the applicant and that a report should be presented to the Strategic Planning Committee on the resolution of outstanding matters and any changes to the proposed development as a consequence of those discussions that would materially affect the determination of the planning application. At the meeting in July 2010 Councillor Paschoud (Chair) outlined a number of issues which the Committee would particularly wish to see addressed when the application was reported back to Strategic Planning Committee, namely a transparent approach to the viability of the scheme, its delivery and S106 Agreement, how the phased development of the scheme will be undertaken and the developed and undeveloped phases would be managed as it is brought forward.

12.1.2 This report sets out how these matters have been addressed and Section 9 deals specifically with scheme viability, deliverability and phasing. Officers are satisfied that the assessment of scheme viability (set out in Section 9.2) has been robust and accept the conclusions of Council's advisers on this aspect. In addition Officers consider that the delivery mechanism (set out in Section 9.3) will secure the comprehensive development of the site. Other matters relating to the impact of the proposed development on social and transport infrastructure cumulatively with other strategic sites has been adequately assessed and that, with mitigation, these impacts are considered acceptable.

12.1.3 The planning application submitted by City & Provincial Properties plc for the development of the Oxestalls Road site raises both site specific issues in terms of the nature and scale of the proposed development and its impact on the local environment, and to the delivery of the comprehensive development of the site. This report has considered both matters in the light of adopted development plan policies and other material considerations including the information in the ES and other information or representations relevant to the environmental effects of the proposals.

12.1.4 Core Strategy Policy SSA1 sets out an approach regarding the process by which proposals for strategic sites should come forward, that is in the context of a comprehensive masterplan for the entire site. In this case the application is for the identified strategic site (less the Diploma Works building) and has considered the development of the site without reference to land ownership boundaries. This provides a clear framework and set of development principles for the site within which the hybrid application for the site has been developed.

12.1.5 Officers consider that the analysis of the Oxestalls Road site and its context is based on an appropriate understanding of the problems, constraints and

opportunities of this part of the borough and that the masterplan provides a coherent basis within which the strategic site can come forward. With appropriate controls regarding the phasing of the development and ensuring that the applicant/developer controls all parts of the site then the phased development of the site as submitted would not prejudice its comprehensive redevelopment. In the circumstances, it is concluded that although the applicant cannot develop the entire scheme itself at this present time appropriate measures can be put in put in place to prevent unacceptable piecemeal development and promote a comprehensive scheme. Accordingly it is appropriate for the Council to determine the application as submitted.

12.1.6 In terms of site specific issues these include: the mix of uses and the provision of affordable housing; the height, massing and design of buildings and the impact that the development would have on protected views and local townscape; the ability of local transport and social infrastructure to cope with the level of change proposed; the impact the development would have on the occupiers of surrounding properties and the wider local environment; and the ability to deliver an environmentally sustainable development.

12.1.7 The proposed development achieves a number of the urban design and spatial planning objectives set out in Strategic Site Allocation 4 in the Core Strategy as well as the provision of new housing as part of a mixed use development of the site, however it achieves only partial compliance with other requirements such as the amount of employment space and affordable housing. It also does not entirely comply with policies in the London Plan. However as set out in Section 9 above, these have been optimised in the context of overall scheme viability. The proposed development would provide much needed housing and an element of affordable accommodation, and would improve the appearance of a large and highly visible site. It has been demonstrated that the scale of the development is acceptable, that the buildings have been designed to respond to the site's context, constraints and potential and that the development will provide a high standard of accommodation. The proposed development would also deliver a key element of the Council's strategy for the wider area in terms of opening up pedestrian and cycle routes to connect the existing communities within this part of the borough.

12.1.8 The current use of the site is for storage, vehicle storage, petrol filling station, scrap yard retail warehouse and the scrap yard is the source of numerous complaints from local residents and has been the subject of enforcement action by both the Council and Environment Agency. As commencement and implementation of the proposed development cannot be guaranteed, and third parties rather than the applicant control the scrap yard, it is crucial that if planning were to be granted for the proposed development that there are mechanisms in place to facilitate the comprehensive development of the site and incorporation of the third party land into the scheme.

12.1.9 The proposals have attracted a significant number of objections from neighbouring properties on a wide range of issues. Those material concerns expressed by residents have been considered and addressed in earlier

sections of this report, in particular Sections 8, and in provisions set out in the recommended conditions and Section 106 agreement.

12.1.10 Officers consider that, with the recommended mitigation, planning conditions and obligations in place the scheme is broadly consistent with local and national policies. In the determination of this application the Council has also taken into account the other material considerations, including guidance set out in adopted supplementary planning documents and in other policy and guidance documents and the responses from consultees, which lead to the recommendation to grant. Accordingly the application is recommended for approval.

12.2 RECOMMENDATIONS

RECOMMENDATION (A)

12.2.1 To agree the proposals and refer the application, this report and any other required documents to the Mayor for London (Greater London Authority) under Article 5 of the Town and Country Planning (Mayor of London) Order 2008 (Categories 1A, 1B, 1C and 3E of the Schedule of the Order).

RECOMMENDATION (B)

12.2.2 Subject to no direction being received from the Mayor of London, to authorise officers to negotiate and complete a legal agreement under Section 106 of the 1990 Act (and other appropriate powers) to cover the following principal matters (as set out in more detail in part 11 of this report), including such other amendments as considered appropriate to ensure the acceptable implementation of the development:

1. Housing (including Affordable Housing)
2. Public Realm
3. Transport:
4. Social Infrastructure (Education and Health):
5. Leisure and Open Space:
6. Community Facilities/Trust:
7. Employment and Training:
8. Communal Private Residential Amenity Areas:
9. Phasing and Land Acquisition
9. Meeting the Council's legal, professional and monitoring costs

RECOMMENDATION (C)

12.2.3 Subject to completion of a satisfactory legal agreement, authorise the Head of Planning to **GRANT PERMISSION** for the reasons set out in paragraph 12.2 below and subject to conditions including those set out in paragraph 12.3 below and such amendments as considered appropriate to ensure the acceptable implementation of the development.

12.3 Summary of Reasons for Grant of Planning Permission

12.3.1 The decision to grant planning permission has been taken, having regard to the policies and proposals in the London Plan (July 2011) the Core Strategy

(June 2011) and saved policies in the adopted Unitary Development Plan (July 2004) as set out below, and all relevant material considerations, including comments received in response to third party consultation.

12.3.2 The application was granted for the following reasons:

The Local Planning Authority has considered the particular circumstances of the application against relevant planning policy set out in The London Plan, the Council's Core Strategy and saved policies in the Council's adopted Unitary Development Plan. The Local Planning Authority has further had regard to the Mayor of London's Supplementary Planning Guidance and Best Practice Guidance, as well as the Local Planning Authority's Adopted Residential Standards Supplementary Planning Document (August 2006) and Planning Obligations Supplementary Planning Document (January 2011), Government Planning Policy Guidance and Statements, and all other material considerations including policies in the Core Strategy, and the obligations that are to be entered into in the planning agreement in connection with the development and the conditions to be imposed on the permission. The Local Planning Authority has also taken account of the information set out in the Environmental Statement, the identified impacts and proposed mitigation. The Local Planning Authority considers that:

(1) The mixed use development of the site for A1, A2, A3, A5, B1, D1 and D2 use is in accordance with London Plan Policy 3.7 in respect of large scale residential developments and Policy 4.4 which notes the potential for surplus industrial land to help meet strategic and local requirements for a mix of other uses such as housing and social infrastructure. Further, the objectives in respect of mixed use development for the Oxestalls Road Strategic Site set out in Core Strategy Strategic Site Allocation 4 have been satisfactorily addressed within the context of financial viability.

(2) The site is an appropriate location for a development of the density proposed in accordance with London Plan policy 3.4, which seeks to ensure that development proposals achieve the highest possible intensity of use compatible with local context, identified design principles and public transport capacity.

(3) The provision of residential accommodation at the density proposed at this site is in accordance with London Plan Policy 2.13 which states that development proposals should seek to optimise residential and non-residential output and densities, provide necessary social and other infrastructure to sustain growth, and, where appropriate, contain a mix of uses, and with Core Strategy Strategic Site Allocation 4 which identifies the site as suitable for higher density development.

(4) The layout of the site, the design of the development, and the provision of housing is in accordance with London Plan Policy 3.8 which seeks to achieve a range of housing choice, and UDP policy HSG 5, which requires that all new residential development is attractive, neighbourly and meets the functional requirements of its future inhabitants.

(5) The proposed dwelling mix and provision of affordable housing, which is regulated by planning obligations agreed to be entered into on grant of the permission, is considered to be the maximum reasonable that can be achieved on this site taking account of targets and scheme viability and the need to encourage rather than restrain residential development in accordance with London Plan policy 3.12 regarding the provision of affordable housing, and with Core Strategy Policy 1 regarding housing provision, mix and affordability.

(6) The provision of new public realm and publicly accessible open space complies with London Plan policy 7.5 which seeks the provision of high quality, accessible and well maintained public realm. The provision of open space along the route of the former Grand Surrey Canal and provision and funding of a connection under the Oxestalls Road bridge specifically addresses one of the key urban design principles for the masterplan for the site in Core Strategy Strategic Site Allocation 4.

(7) The energy demand of the proposed development has been assessed in accordance with London Plan Policy 5.2 and Core Strategy Policy 8 regarding energy and carbon dioxide savings through a lean, clean and green strategy and the CO2 saving achieved and use of renewables is considered acceptable.

(8) The proposed highway works including provisions for pedestrians, cyclists and other road users and the overall traffic impact of the development have been assessed in accordance with Core Strategy Policy 14 and Strategic Site Allocation 1, and the identified highway impacts and proposed mitigation measures secured by planning conditions and obligations, are considered acceptable in accordance with Core Strategy Policy 14.

(9) The proposed level of cycle parking and associated measures to reduce car use are in accordance with London Plan Policy 6.2 and Table 6.2 and Core Strategy Policy 14 regarding sustainable movement and transport. Measures to reduce car use, provide off-street parking, provide spaces for and membership of a Car Club and to submit a Travel Plan are proposed to be secured by planning obligations agreed as part of the permission and by conditions.

(10) The regeneration benefits inherent in the scheme and the financial contributions towards achieving other planning policy objectives are in accordance with London Plan Policy 8.2 and Core Strategy policy 21 regarding planning obligations.

12.3.3 Consideration has also been given to the objections made to the proposed development, as set out in Section 6 and responded to in Section 10 of the Report to Strategic Planning Committee dated 15 September 2011. It is considered that none of the material objections outweigh the reasons for granting planning permission.

12.4 Conditions

12.4.1 The Planning Conditions referred to in Recommendation C are as follows (definitions will be incorporated into the conditions as issued):

General

1. Approved drawings and documents

The Development shall be carried out in accordance with the following application documents, plans or drawings hereby approved:

945_DWGPL_1-000A; 945_DWGPL_1-001A; 945_DWGPL_1-002A; 945_DWGPL_1-003A; 945_DWGPL_1-004A; 945_DWGPL_1-005A; 945_DWGPL_1-006A; 945_DWGPL_1-007A; 945_DWGPL_1-008A; 945_DWGPL_1-009A; 945_DWGPL_1-010A; 945_DWGPL_1-101A; 945_DWGPL_1-102A; 945_DWGPL_1-103A; 945_DWGPL_1-104A; 945_DWGPL_1-105A; 945_DWGPL_1-106A; 945_DWGPL_1-107A; 945_DWGPL_1-108A; 945_DWGPL_2-000A; 945_DWGPL_2-001A; 945_DWGPL_2-002A; 945_DWGPL_2-003A; 945_DWGPL_2-004A; 945_DWGPL_2-005A; 945_DWGPL_2-006A; 945_DWGPL_2-007A; 945_DWGPL_2-008A; 945_DWGPL_2-009A; 945_DWGPL_2-010A; 945_DWGPL_2-011A; 945_DWGPL_2-012A; 945_DWGPL_2-013A; 945_DWGPL_2-014A; 945_DWGPL_2-015A; 945_DWGPL_2-016A; 945_DWGPL_2-017A; 945_DWGPL_2-018A; 945_DWGPL_2-101A; 945_DWGPL_2-102A; 945_DWGPL_2-103A; 945_DWGPL_2-104A; 945_DWGPL_2-105A; 945_DWGPL_2-106A; 945_DWGPL_2-107A; 945_DWGPL_2-108A; 945_DWGPL_3-000A; 945_DWGPL_3-001A; 945_DWGPL_3-002A; 945_DWGPL_3-003A; 945_DWGPL_3-004A; 945_DWGPL_3-005A; 945_DWGPL_3-006A; 945_DWGPL_3-007A; 945_DWGPL_3-008A; 945_DWGPL_3-009A; 945_DWGPL_3-010A; 945_DWGPL_3-101A; 945_DWGPL_3-102A; 945_DWGPL_3-103A; 945_DWGPL_3-104A; 945_DWGPL_3-105A; 945_DWGPL_3-106A; 945_DWGPL_3-107A; 945_DWGPL_3-108A; 945_DWGPL_4-000A; 945_DWGPL_4-001A; 945_DWGPL_4-002A; 945_DWGPL_4-003A; 945_DWGPL_4-004A; 945_DWGPL_4-005A; 945_DWGPL_4-006A; 945_DWGPL_4-007A; 945_DWGPL_4-008A; 945_DWGPL_4-101A; 945_DWGPL_4-102A; 945_DWGPL_4-103A; 945_DWGPL_4-104A; 945_DWGPL_5-000A; 945_DWGPL_5-001A; 945_DWGPL_5-002A; 945_DWGPL_5-003A; 945_DWGPL_5-004A; 945_DWGPL_5-005A; 945_DWGPL_5-006A; 945_DWGPL_5-101A; 945_DWGPL_5-102A; 945_DWGPL_5-103A; 945_DWGPL_5-104A; 945_DWGPL_5-105A; 945_DWGPL_5-106A; 945_DWGPL_5-107A; 945_DWGPL_5-108A; 945_DWGPL_6-000A; 945_DWGPL_6-001; 945_DWGPL_7-000A; 945_DWGPL_7-001; 945_DWGPL_8-000A; 945_DWGPL_8-001; 945_DWGPL_x-000A; 945_DWGPL_x-001A; 945_DWGPL_x-002A; 945_DWGPL_x-003A; 945_DWGPL_x-101A; 945_DWGPL_x-102A; 945_DWGPL_x-103A; 945_DWGPL_x-104A; 945_DWGPL_x-201A; 945_DWGPL_x-202A; 945_DWGPL_x-203A; 945_DWGPL_x-204A; 945_DWGPL_x-300; 945_DWGPL_x-301; 945_DWGPL_x-302; 945_DWGPL_x-303; 945_DWGPL_x-304; 945_DWGPL_x-305

Sustainability Statement (December 2009); Transport Assessment (December 2009); Environmental Statement Vol 1 – Main Report (December 2009), Vol. 2 – Figures (December 2009), Vol. 3 – Appendices (December 2009), Environmental Statement: Further Information (May 2010); Delivery Strategy (July 2011).

Reason

To ensure that the development is carried out in accordance with the approved documents, plans and drawings submitted with the application (or other documents, plans and drawings subsequently approved in writing by the local planning authority) and to ensure that the development is acceptable to the local planning authority and further the development accords with the EIA undertaken.

2. Time Limit (Outline)

No part of the development hereby permitted shall be commenced on any Plot within Phase 3 unless and until an application or applications for written approval of the matters reserved by this planning permission in respect of the relevant plot have been made to and approved by the Local Planning Authority and the reserved matters applications shall include detailed plans, sections and elevations showing:

- scale
- appearance and
- landscaping

Application(s) for approval of the matters reserved by this planning permission for any Plot within Phase 3 must be made not later than the expiration of FIVE YEARS from the date of this decision notice; and

Development of any Plot within Phase 3 must be begun not later than the expiration of TWO YEARS from the final approval of reserved matters for the relevant Plot, or, in the case of approval on different dates, the approval of the last such matter to be approved.

Reason

To comply with Section 92 of the Town and Country Planning Act 1990.

3. Time Limit (Phase 1 and 2)

The development in Phases 1 and 2 must be begun not later than three years from the date of the grant of this permission.

Reason

To comply with Section 91 of the Town and Country Planning Act 1990.

4. Restriction on development of Phases 2 and 3

Save for works of site clearance, demolition, remediation works, archaeological investigations surveys and diversion or laying of service media (but not involving the laying of any foundations for development) no works shall be carried out under this permission on any land within Phases 2 or 3 unless and until:

i) all interests in the land within Phases 2 or 3 have been acquired and are held by the same person who owns all interests in the land comprised within Phase 1 and title to the said land has been deduced to the local planning authority

ii) all interests in the said land have been bound by the terms of an Agreement entered into between the local planning authority and the applicant pursuant to section 106 of the Town and Country Planning Act 1990 (and other appropriate powers)

Reason

To avoid piecemeal development across the site and to ensure that the development of Phases 2 and 3 does not commence until comprehensive development of the site can be delivered in accordance with Core Strategy Policy SSA4 and further to ensure that all parts of the site are appropriately bound by the planning obligation requirements relating to the development.

Retail Floorspace

5. Restriction on A1 floorspace

The total floorspace within the development used for Class A1 purposes shall not exceed 1,700m2 (gross internal area) of which not more than 700m² shall be for convenience retail purposes.

Reason

To ensure that the amount of A1 floorspace provided at the site does not adversely affect the viability and vitality of existing town and district centres, and to comply with Core Strategy Policy 6 (Retail hierarchy and location of retail development), Saved Policy STC 2 Location of New Stores (Sequential Test) in the adopted Unitary Development Plan (July 2004) and 4.7 Retail and Town Centre Development in the London Plan (July 2011).

6. Restriction of A1 foodstore floorspace

The total floorspace within the development used for Class A1 purposes for the sale of food shall not exceed 500m2 (gross internal area).

Reason

To ensure that the amount of A1 floorspace provided at the site does not adversely affect the viability and vitality of existing town and district centres, and to comply with Core Strategy Policy 6 (Retail hierarchy and location of

retail development), Saved Policy STC 2 Location of New Stores (Sequential Test) in the adopted Unitary Development Plan (July 2004) and 4.7 Retail and Town Centre Development in the London Plan (July 2011).

7. Restriction of A1 unit size

Class A1 retail shop units on the site, other than for the sale of food within Condition 6, shall not exceed 250m2 (gross internal area).

Reason

To ensure that the amount of A1 floorspace provided at the site does not adversely affect the viability and vitality of existing town and district centres, and to comply with Core Strategy Policy 6 (Retail hierarchy and location of retail development), Saved Policy STC 2 Location of New Stores (Sequential Test) in the adopted Unitary Development Plan (July 2004) and 4.7 Retail and Town Centre Development in the London Plan (July 2011).

Details

8. Detail for all Phases

No Phase of the development shall be commenced until details of the following matters in respect of that Phase have been submitted to and approved in writing by the local planning authority:

i) detailed elevational drawings and sections to a scale of 1:50 and 1:100
ii) details of existing and finished ground levels for the application site
iii) details of finished ground levels around each building

The development shall be carried out in accordance with the approved details.

Reason

In order that the local planning authority is satisfied with the details of the proposed development.

9. External materials (buildings)

No Phase shall be commenced until details, including samples, of all facing materials (including their colour and texture) to be used on the building(s) in that Phase have been submitted to and approved in writing by the local planning authority. The development shall be carried out in accordance with the approved details, unless the local planning authority agrees in writing to any variation.

Reason

To ensure that the Development is of a satisfactorily high design standard to ensure that it makes a positive contribution to the appearance of the locality and to comply with Core Strategy Policy 15 (High quality design for

Lewisham), Saved Policy URB 3 (Urban Design) in the adopted Unitary Development Plan (July 2004) and Policy 7.6 (Architecture) in the London Plan (July 2011).

10. External lighting

(i) Details of all external lighting to be installed within each Phase, including details of directional hoods and measures to prevent light spillage, shall be submitted to and approved in writing by the local planning authority not later than six months following the commencement of that Phase.

(ii) All such external lighting shall be installed in accordance with the approved details before any dwelling in the relevant Phase is occupied and thereafter any external lighting (including any directional hoods) shall be retained in accordance with the approved details.

(iii) Details submitted for approval pursuant to paragraph (i) of this condition, shall be accompanied by a supporting statement which demonstrates that the proposed lighting is the minimum needed for security and working purposes and that the proposals minimise pollution from glare and spillage.

Reason

To ensure that the lighting is installed and maintained in a manner which will minimise possible light pollution to neighbouring properties and to comply with Saved Policy HSG 4 Residential Amenity in the adopted Unitary Development Plan (July 2004).

11. Shopfronts

(i) Elevational and sectional details (1:50 and 1:20 scale) of the shopfronts to all non-residential accommodation hereby approved shall be submitted to and approved in writing by the local planning authority before being installed.

(ii) The said shopfronts shall be installed in accordance with the approved details.

Reason

In order to ensure an acceptable external appearance and that the design provides adequate access for everyone, particularly people with disabilities and to comply with Saved Policy URB 8 Shopfronts in the adopted Unitary Development Plan (July 2004).

12. Lifetime Homes and wheelchair accessible/adaptable units

No Phase shall be commenced until drawings for each dwelling type in that Phase demonstrating compliance with all the Lifetime Homes standards, and the location and layout of wheelchair accessible units (or units easily adaptable for wheelchair users) designed to SELHP August 2009 standards, has been submitted to and approved in writing by the local planning authority.

The development shall be constructed in accordance with the approved drawings and on completion of the development not less than 91 of the dwellings shall be wheelchair accessible or easily adaptable for wheelchair users.

Reason

In order to comply with the requirements of Section 76 of the Town and Country Planning Act 1990 which relates to the provision of satisfactory access to buildings for people with disabilities and to comply with Core Strategy Policy 1 (Housing Mix, provision and affordability) and Saved Policy HSG 5 Layout and Design of New Residential Development in the adopted Unitary Development Plan (July 2004) and London Plan Policy 3.8 (Housing choice).

Sustainability

13. Code for Sustainable Homes

No dwelling hereby approved shall be occupied until a Code for Sustainable Homes Level 4 post-construction certificate and verified Code for Sustainable Homes report for that dwelling has been submitted to and approved in writing by the local planning authority.

Reason

To ensure the use of sustainably-sourced and recycled materials and aggregates and the sustainable use of water, and to meet the requirements of Core Strategy Policy 8 (Sustainable design and construction and energy efficiency) and London Plan Policy 5.2 (Minimising Carbon Dioxide Emissions).

14. BREEAM

The non-residential floorspace hereby approved shall not be occupied until a BREEAM 2008 Excellent design and procurement certificate and report has been submitted to and approved in writing by the local planning authority. A post construction certificate to demonstrate compliance with the design and procurement assessment shall be submitted to the local planning authority within 3 months of the occupation of the non-residential floorspace.

Reason

To meet the requirements of Core Strategy Policy 8 (Sustainable design and construction and energy efficiency).

15. Performance of the Combined Cooling Heat and Power (CCHP) and future connection to a district CCHP or Combined Heat and Power (CHP) scheme

No development shall commence on site until a written specification for the on-site CHP facility demonstrating the carbon-dioxide emission reductions to be achieved, and information, drawings and sections showing a scheme for

the provision of conduits and/or piping for future connection to a district CCHP or CHP scheme and network have been submitted to and approved in writing by the local planning authority.

Reason

To ensure that the projected carbon-dioxide emission reductions are achieved and to enable the future connection of the development to a district CCHP or CHP scheme and network, and to comply with Core Strategy Policy 8 (Sustainable design and construction and energy efficiency) and London Plan Policy 5.2 (Minimising Carbon Emissions) and 5.5 (Decentralised Energy Networks).

16. Living Roofs

The provision of living roofs shall be no less than 4,200m2 as shown on the submitted drawings and development on any Phase shall not commence until details of living roofs (including roof plans to a scale of 1:50, cross-sections to a scale of 1:20, specification and details of a substrate base with a depth of 80-150mm, and details of management) for that Phase have been submitted to and approved in writing by the local planning authority.

No part of the relevant Phase shall be occupied until the living roofs forming part of the approved scheme for that Phase have been implemented in full, and the living roofs shall be planted or seeded with the approved mix of species within the first planting season following the practical completion of building works. The living roofs shall not be used for play or recreation and shall only be used in the case of essential maintenance or repair, or escape in case of emergency. The living roofs shall be maintained as such thereafter and no change therefrom shall take place without the prior written consent of the local planning authority.

Reason

To ensure the development provides the maximum possible provision of living roofs to enable the creation of habitats and areas for biodiversity and to reduce the rate and volume at which rainwater reaches watercourses in times of heavy or prolonged rainfall, in accordance with Core Strategy Policies 7 (Climate change and adapting to the effects), 10 (Managing and reducing the risk of flooding) and 12 (Open space and environmental assets), and Policies Policy 5.11 (Green roofs and development site environs) in the London Plan, and Planning Policy Statement 9: Biodiversity and Geological Conservation (2005) and Planning Policy Statement 25: Development and Flood Risk (2006).

17. Electric Vehicle Charging Points

(i) Details of the number and location of electric vehicle charging points to be provided in each phase and a programme for their installation and maintenance shall be submitted to and approved in writing by the local planning authority prior to commencement of the phase within which they are to be located.

(ii) The electric vehicle charging points as approved shall be installed prior to first occupation of the relevant Phase and maintained in accordance with the details approved under (i).

Reason

To reduce pollution emissions in an Area Quality Management Area in accordance with Core Strategy Policy 9 (Improving local air quality) and London Plan Policy 7.14 (Improving air quality).

18. Waste Management Plans

(i) Prior to commencement of development (including any site remediation works) an earthworks mass balance calculation shall be undertaken and submitted to and approved by the local planning authority.
(ii) Prior to commencement of any phase of development a Construction Waste Management Plan, including a detailed strategy for the on/off-site disposal of contaminated waste for the relevant phase shall be submitted to and approved by the local planning authority.
(iii) No later than three months following the commencement of any Phase of development an Operational Waste Management Plan (to include details for the disposal, processing, recycling and storage of operational waste and for the provision of composting facilities) for that Phase shall be submitted to and approved in writing by the local planning authority.
(iv) Each Phase shall be carried out and operated in accordance with the approved Construction and Operational Waste Management Plan unless minor variations are otherwise approved in writing by the local planning authority.

Reason

In order to ensure that waste is minimised as far as practicable and managed in an environmentally sustainable way in accordance with Policy 5.3 (Sustainable design and Construction) in the London Plan.

Residential Amenity

19. Minimum Dwelling Size

All dwellings shall achieve at least the minimum floorspace (gross internal area) set out in Table 3.3 of the London Plan.

Reason

To ensure a satisfactory environment for the residential occupiers of the development and to comply with Saved UDP Policy HSG 5 (Layout and Design of New Residential Development) and Policy 3.5 of the London Plan.

20. Noise Insulation (external source)
(i) All residential buildings shall be constructed so as to provide sound insulation against external noise to achieve levels not exceeding 30dB LAeq

(night) and 45dB LAmax (measured with F time-weighting) for bedrooms, 35dB LAeq (day) for other habitable rooms, with windows shut and other means of ventilation provided.

(ii) No development shall commence on any Phase of the development until details for that Phase of a sound insulation scheme complying with paragraph (i) of this Condition has been submitted to and approved in writing by the local planning authority.

(iii) No Phase of the development shall be occupied until the sound insulation scheme for that Phase as approved pursuant to paragraph (ii) of this Condition has been implemented in its entirety. Thereafter, the sound insulation scheme shall be maintained in accordance with the approved details.

21. Noise Insulation (residential amenity)

Details for each Phase, including relevant drawings and specifications of:-

(a) The construction of the ceilings and walls separating the residential and non-residential uses hereby permitted and
(b) The proposed works of soundproofing against airborne and impact sound and vibration

shall be submitted to and approved in writing by the local planning authority prior to commencement of the relevant Phase.

The uses hereby permitted shall not commence in the relevant Phase until the soundproofing works within that Phase have been implemented in accordance with the approved details. The soundproofing shall be retained permanently in accordance with the approved details.

Reason

To ensure a satisfactory environment for the residential occupiers of the development and so as to comply with Saved UDP Policy ENV.PRO11 (Noise Generating Development).

22. Noise and vibration from fixed plant and machinery

(i) The rating level of the noise emitted from fixed plant and machinery on the development including the Combined Heat and Power plant shall be 10dB below the existing background level at any time, as measured at the façade of any noise sensitive receptor. The measurements and assessments shall be made according to BS4142:1997.

(ii) For each Phase, the design, operation and maintenance details of a scheme for compliance with paragraph (i) of this Condition shall be submitted to and approved in writing by the local planning authority within three months of commencement of the Phase in question.

(iii) No Phase shall be occupied until the approved scheme has been implemented in its entirety in relation to that phase.

(iv) Thereafter, the approved scheme shall be retained and maintained in accordance with the approved details.

Reason

To ensure a satisfactory environment for the occupiers of the development and so as to comply with Saved UDP Policy ENV.PRO11 (Noise Generating Development).

23. A3, A4 and A5 hours of use

Any A3, A4 or A5 use within the development shall not be open to the public other than between the hours of 8.00am and 11.00pm on any day of the week.

Reason

To ensure that the development does not prejudice the enjoyment by neighbouring occupiers of their properties and to comply with Saved UDP Policies ENV.PRO 11 (Noise Generating Development) and HSG 4 (Residential Amenity).

24. Ventilation

No A3, A4 or A5 use shall be fitted out or commence on site until detailed plans and a specification of the equipment comprising a ventilation system which shall include measure to alleviate noise, vibration, fumes and odours (and incorporating active carbon filters, silencer(s) and anti-vibration mountings where necessary), have been submitted to and approved in writing by the local planning authority. The ventilation system shall be installed in accordance with the approved plans and specification before the A3 or A5 use commences and shall thereafter be permanently maintained in accordance with the approved specification.

Reason

To ensure that the proposed development does not prejudice the enjoyment by neighbouring occupiers of their properties and to comply with Saved UDP Policies ENV.PRO 11 (Noise Generating Development), HSG 4 (Residential Amenity) and STC 9 (Restaurants, A3 Uses and Take Away Hot Food Shops).

25. A1, A2, A3, A4 and A5 delivery hours

No deliveries shall be made to any A1, A2, A3, A4 or A5 use within the development other than between the hours of 7.00am and 11.00pm Monday to Friday, 7.00am to 7.00pm on Saturdays and 7.00am to 5.00pm on Sundays and Bank Holidays.

Reason

To ensure that the development does not prejudice the enjoyment by neighbouring occupiers of their properties and to comply with Saved UDP Policies ENV.PRO 11 (Noise Generating Development) and HSG 4 (Residential Amenity).

26. Air quality

No development of any phase shall commence on site until a detailed air quality assessment for the Combined Heat and Power facility has been submitted to and approved by the local planning authority and the CHP shall be constructed in accordance with the approved details and specifications, unless minor variations are approved in writing by the local planning authority.

Reason

To reduce pollution emissions in an Area Quality Management Area in accordance with London Plan Policy 7.14 (Improving air quality).

Landscaping

27. Landscaping details

No development of any Phase shall commence on site until detailed landscaping proposals for that Phase have been submitted to and approved by the local planning authority. Details shall include but not be limited to:
(a) a drawing showing any trees within or adjacent to the site to be retained, removed and replaced, and measures to safeguard them against damage prior to or during building works
(b) drawings showing hard and soft landscaping of any part of the site not occupied by buildings including any retained features and the treatment thereof (including planting, tree species and location, paving, walls and fences, temporary and permanent site boundary treatments, details of the permeability of hard surfaces),
(c) in the case of Plots 1 and 2, drawings showing hard and soft landscaping and
(d) details of the management and maintenance of the landscaping for the Phase in question

have been submitted to and approved in writing by the local planning authority.

All works which form part of the landscaping scheme shall be completed in the first planting season following the completion of the Phase in question, unless the local planning authority has given written consent to any variation. Any trees or plants which within a period of 5 years from the completion of the development die, are removed or become seriously damaged or diseased, shall be replaced in the next planting season with others of similar size and species, unless the local planning authority has given written approval to any variation.

Reason

In order that the local planning authority may be satisfied as to the details of the proposal and to comply with Saved UDP Policies URB 3 (Urban Design), URB 12 (Landscape and Development) and URB 13 (Trees).

28. Ecological enhancement

No development shall take place until a site-wide strategy for ecological enhancement and mitigation including a habitat management plan setting out details of monitoring arrangements has been submitted to and approved in writing by the local planning authority. The habitat management plan will be implemented and complied with in full as approved.

Reason

In order that the local planning authority may be satisfied as to the details of the proposal and to comply with Saved UDP Policies URB 3 (Urban Design) and URB 12 (Landscape and Development) and Policy 7.19 (Biodiversity and Access to Nature) in the London Plan.

Archaeology and Heritage

29. Archaeology

No development shall take place on the site until the applicant, or any successors in title, has secured the implementation of a programme of archaeological work in accordance with a written scheme of investigation, observation and recording which has been submitted to and approved in writing by the local planning authority.

Reason

To ensure adequate access for archaeological investigations and to comply with Core Strategy Policy 16 (Conservation areas, heritage assets and the historic environment).

30. On-site heritage assets

Any stones, bricks and paving materials that formed part of the original Grand Surrey Canal towpath, canal edge and bridges that are intact and remain on site shall be retained and reused in the landscaping of the site, unless the local planning authority agrees in writing to any variation.

Reason

To ensure that heritage assets remaining on site are retained and reused in the development.

Construction Management

31. Construction and Environmental Management Plan

(i) No works (including demolition and construction) shall commence in any Phase until a Construction and Environmental Management Plan, including but not limited to details of hours of works, wheel washing, dust minimisation, noise mitigation relating to on-site crushing, and deliveries, details of compliance with the relevant Code of Construction Practice, and incorporating a Construction Traffic Management Plan and Construction Logistics Plan in respect of that phase has been submitted to and approved in writing by the local planning authority.

(ii) No works (including demolition and construction) in the relevant Phase shall be carried out other than in accordance with the approved Construction Management Plan.

Reason

To ensure that the demolition and construction processes are carried out in a manner which will minimise noise, vibration, dust and mud pollution and minimise disturbance from road traffic and safeguards road safety and the amenities of adjacent occupants in accordance with Saved UDP Policies ENV.PRO 9 (Potentially Polluting Uses), ENV.PRO 11 (Noise Generating Development) and HSG 4 (Residential Amenity), and that all reasonable measures have been taken to improve construction freight efficiency in accordance with Policy 6.3 (Assessing effects of development on transport capacity) in the London Plan

Flood Risk

32. Flood risk

The development permitted by this planning permission shall only be carried out in accordance with the approved Flood Risk Assessment (FRA) carried out by Peter Brett Associates dated December 2009 and Points of Clarification (May 2010) and the mitigation measures detailed within the FRA including the submission and approval of a Flood Risk Management Plan prior to first occupation of the development.

Reason

To ensure the development is designed safely in reference to flood risk and to ensure the development minimises risk associated with flooding in accordance with Core Strategy Policy 10 (Managing and reducing the risk of flooding) and Policy 6.12 (Flood risk management) in the London Plan.

33. Surface water

(i) No Phase shall commence until a scheme of surface water management for that Phase, including specifications of the surface treatments and sustainable urban drainage solutions, has been submitted to and approved in writing by the local planning authority, in consultation with the Environment Agency and Thames Water.

(iii) Each Phase shall be carried out in accordance with the approved scheme for that Phase and thereafter the approved scheme is to be retained in accordance with the details approved therein.

Reason

To prevent the increased risk of flooding and to improve water quality in accordance with Core Strategy Policy 10 (Managing and reducing the risk of flooding) and Policy 6.12 (Flood risk management) in the London Plan.

Contamination

34. Contaminated land

(a) No development shall take place until each of the following has occurred:

(i) a site investigation has been carried out to survey and assess the extent of potential contamination and its effect (whether on or off site);

(ii) a report comprising the results of that site investigation and recommendations for treatment of any contamination (whether by remedial works or not) has been submitted to and approved in writing by the local planning authority; and

(iii) all measures or treatments identified in that report as being necessary or desirable for the remediation of the site have been implemented in full.

(b) If during any works at the site (whether pursuant to paragraph (a) of this condition or implementation of this planning permission generally) contamination is encountered which has not previously been identified ("the new contamination"), then paragraph (a) shall apply to the new contamination and no further development shall take place until the requirements of paragraph (a) have been complied with in relation to the new contamination.

(c) The development shall not be occupied until a closure report has been submitted to and approved in writing by the local planning authority. The closure report shall include details both of the remediation (including waste materials removed from the site, an audit trail demonstrating that all imported or reused soil material conforms to current soil quality requirements as approved by the local planning authority) and any post-remediation sampling that has been carried out.

Reason

To ensure that the local planning authority may be satisfied that potential site contamination is identified and remedied in view of the historical uses of the site, which may have included industrial processes and to comply with Saved UDP Policy ENV.PRO 10 (Contaminated Land).

35. Piling operations

(i) Piling or any other foundation designs using penetrative methods shall not be permitted, other than with the prior written consent of the local planning authority. Any such application for consent shall be accompanied by details of the relevant penetrative methods.

(ii) The said piling shall be carried out only in accordance with the written consent of the local planning authority.

Reason

To prevent pollution of controlled waters and to comply with Saved UDP Policies ENV.PRO 10 (Contaminated Land) and ENV.PRO 17 (Management of the Water Supply)

Transport

36. Car parking

The development shall provide a maximum of:

(i) 269 car parking spaces for use by occupiers of dwellings within the development and their visitors

(ii) 65 car parking spaces for use by occupiers of non-residential floorspace within the development and their visitors and

No development shall take place until details of the operational car parking spaces for the non-residential space in Plot 1 (including evidence of operational need) have been submitted to and approved by the local planning authority.

Reason

In order to comply with Policy 6.1 and Table 6.2 (Car parking standards) In the London Plan.

37. Use of car parking

i) All car parking spaces within the development shall be reserved for and used by vehicles of the occupiers or persons visiting premises at the development.

ii) No Phase shall commence until details of the allocation of the car parking spaces to the uses within that Phase have been submitted to and approved in writing by the local planning authority and no Phase shall be occupied until the car parking spaces to be provided within that Phase have been provided and made available for use. Thereafter such spaces shall be retained and used only as car parking as approved under this Condition, unless otherwise agreed in writing by the local planning authority

Reason

To ensure the permanent retention of the space(s) for parking purposes, to ensure uses within each phase are not over-provided with car parking

spaces, to ensure that the development does not increase on-street parking in the vicinity and to comply with Policy 6.13 in the London Plan.

38. Cycle parking

A minimum of 1,127 cycle parking spaces shall be provided within the development, as follows:-
(i) 905 cycle parking spaces for use by occupiers of dwellings within the development and their visitors
(ii) 147 cycle parking spaces for use by occupiers of non-residential floorspace within the development and their visitors
(iii) A minimum of 75 of the total cycle parking spaces shall be dedicated as cycle parking spaces for visitors to the development .

39. Use of cycle parking spaces

(i) All cycle parking spaces within the development shall be reserved for and used solely by cycles of the occupiers or persons visiting premises at the development.

(ii) No Phase shall commence until details of the allocation of cycle parking spaces to the uses within that Phase have been submitted to and approved in writing by the local planning authority and no Phase shall be occupied until the cycle parking spaces to be provided within that Phase have been provided and made available for use. Thereafter, such spaces shall be retained and used only as cycle parking as approved under this Condition, unless otherwise approved in writing by the local planning authority.

Reason

In order to ensure adequate provision for cycle parking and to comply with Core Strategy Policy 14 (Sustainable movement and transport).

40. Motorcycle parking

(i) A minimum of 36 motorcycle parking spaces shall be provided within the development for use by occupiers of dwellings within the development.

(ii) All motorcycle parking spaces within the development shall be reserved for and used solely by vehicles of the occupiers or persons visiting premises at the development

(iii) No Phase shall commence until details of the allocation of motor cycle parking spaces to the uses within that Phase have been submitted to and approved in writing by the local planning authority and no Phase shall be occupied until the motorcycle parking spaces to be provided within that Phase have been provided and made available for use. Thereafter such spaces shall be retained and used only as motorcycle parking as approved under this condition, unless otherwise approved in writing by the local planning authority.

Reason

In order to ensure adequate provision for motorcycle parking and to comply with Policy 6.13 (Parking) in the London Plan.

41. Delivery Service Plan

No Phase of the development shall be occupied until a Delivery Service Plan demonstrating how the number and time of delivery and servicing trips to the development (including refuse collections for the residential units and non-residential space) is to be rationalised with the aim of reducing the impact of servicing activity has been submitted to and approved by the local planning authority in writing and the development shall be implemented and operated in accordance with the approved Delivery Service Plan.

Reason

In order to reduce development servicing traffic in accordance with Policy 6.3 (Assessing effects of development on transport capacity) in the London Plan.

Informatives

1 Applicants should be aware of their responsibilities under Part IIA of the Environmental Protection Act 1990 to ensure that human health, controlled waters and ecological systems are protected from significant harm arising from contaminated land. Guidance therefore relating to their activities on site should be obtained primarily by reference to DEFRA and EA publications.

2 Assessment of the sound insulation scheme under Condition 18 should be carried out by a suitably qualified acoustic consultant, and should be guided by the advice in PPG24 and comply with the standards given in the current BS8233 for internal noise design levels.

3 With regard to Condition 27, the Construction Management Plan will be required to confirm that no deliveries to the site in connection with demolition or construction works shall take place outside the hours of 8 am and 6 pm on Mondays to Fridays and 8 am and 1 pm on Saturdays and that no such deliveries shall take place at all on Sundays or public holidays.

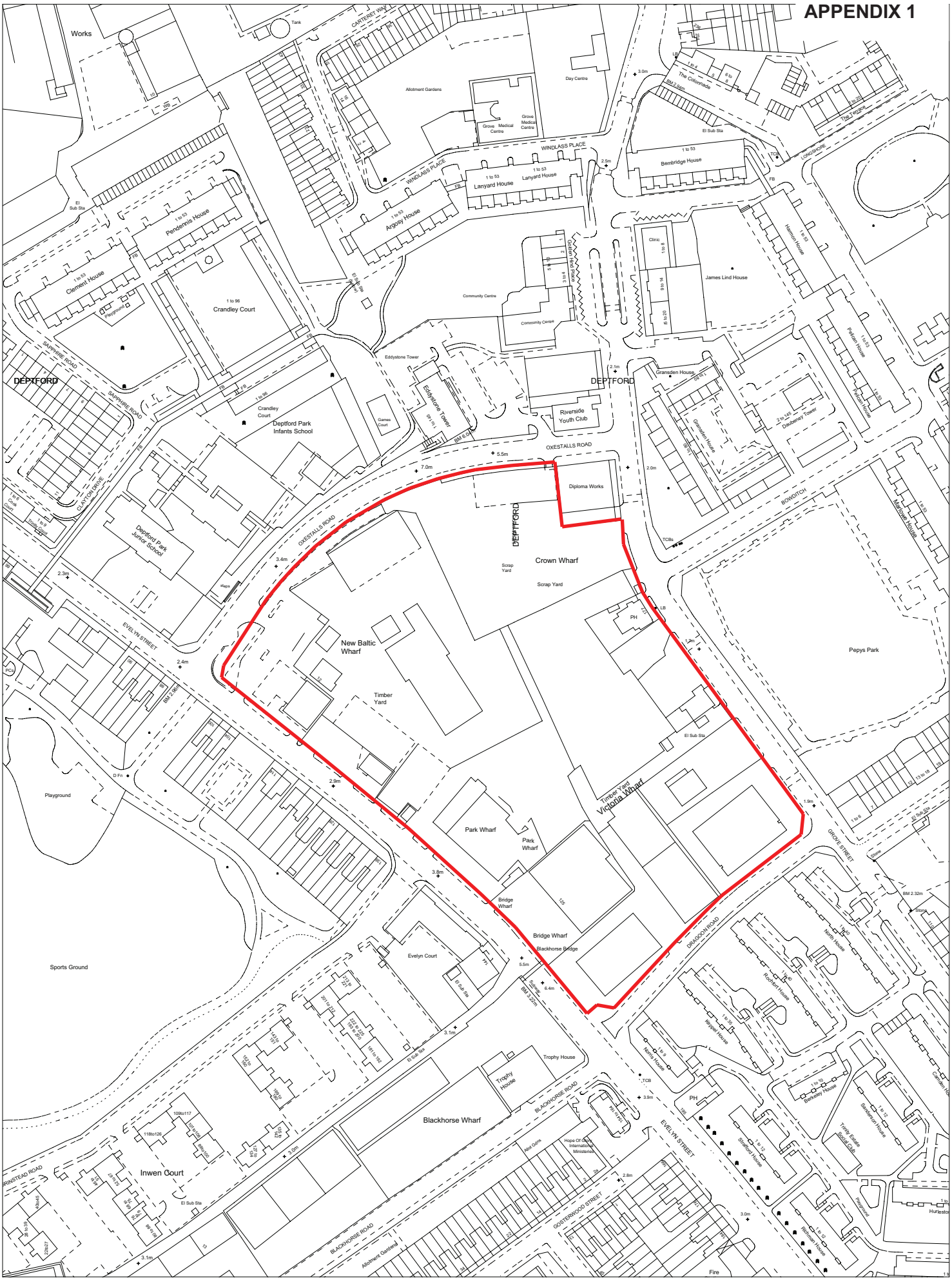
4 With regard to Condition 27, the relevant Code of Construction Practice can be viewed online at: http://www.lewisham.gov.uk/Environment/Pollution/PollutionNoiseDocument.htm

5 Your attention is drawn to comments provided by Thames Water on 13/04/2011 regarding water supply capacity.

6 Green roofs should be designed to provide a minimum of 13% run off rate reduction for the 1 in 100 year plus 30% climate change storm event. This will achieve a total of 50 % run-off rate reduction stipulated by the London Plan's Supplementary Planning Guidance (SPG).

This page is intentionally left blank

APPENDIX 1



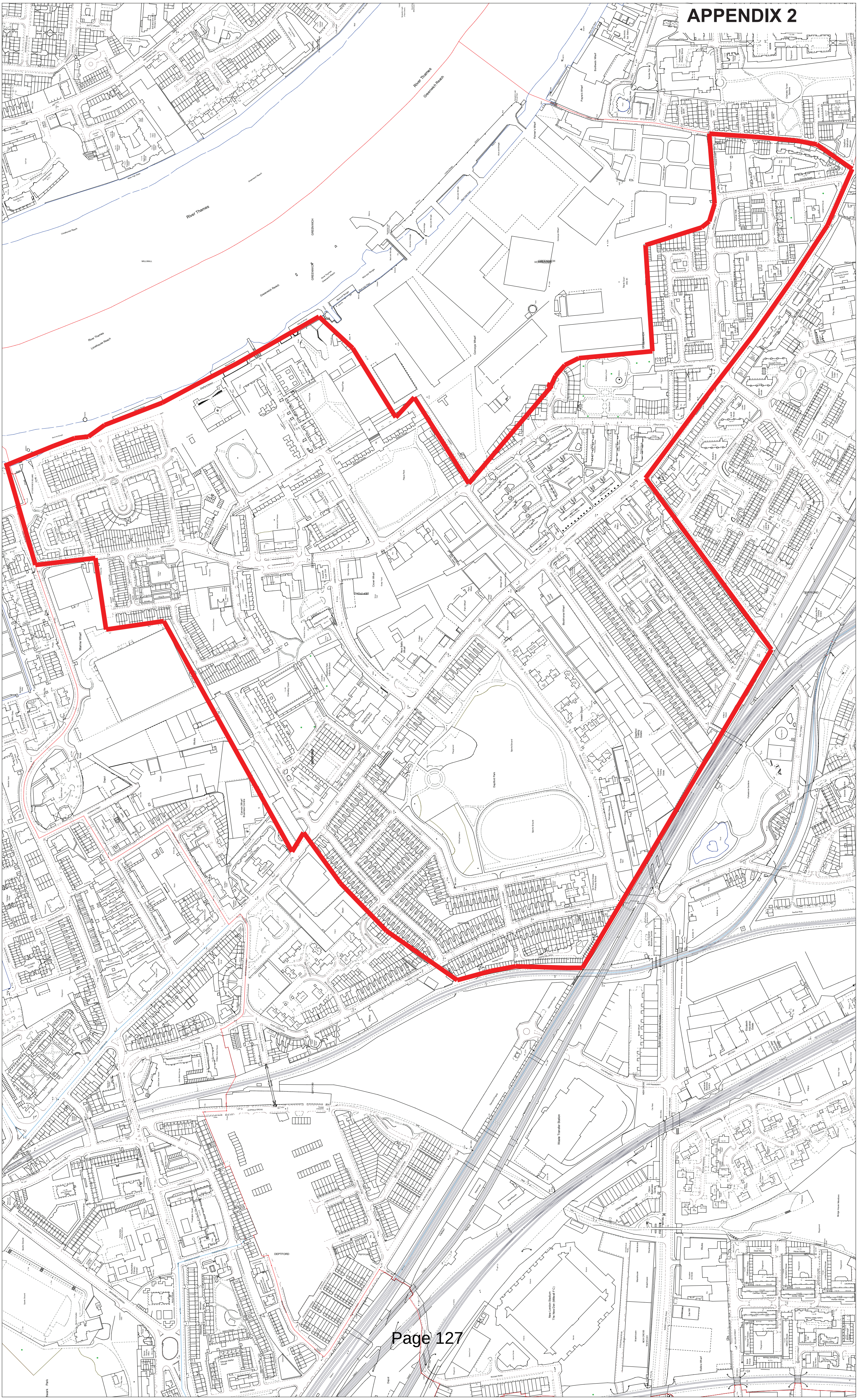
Scale 1:2500

Reproduced from the Ordnance Survey map with the permission of the Controller of HMSO
Crown Copyright Reserved
Licence No:100017710

This plan forms no part of a planning application

This page is intentionally left blank

APPENDIX 2



Base on the Ordance Survey map
Licence no:100017710
London, SE6 4RU

Scale 1:1800

This page is intentionally left blank

APPENDIX 3

Notes of Local Meeting

Persons Present
Chris Brodie (Chair, LBL)
Brett Henderson (LBL)
Hugh Cave (City and Provincial) Charles Moran (CMA)
Katie Tonkinson (Hawkins Brown) David Bickle (Hawkins Brown) Elliot Page (WSP)
Christina Norton (Soundings) Nia Griffith (Savills)

Local Residents
Marie Dagorn, Ray Woolford, Ernest, Moira Ison, Russell Guthrie, John Hamilton, Catherine Bennett, Lee Heywood, H. Potter, T Glyn, J. Johnson, Derrick Minney, Khiem Ung, Steven P, Dawn s.

Katie Tonkinson (KT) gave a presentation describing the scheme and the recent amendments to it.

The meeting then was thrown open to the floor for a question and answer session.

Marie Dagorn (MD) queried what is the difference between the blue and red brick in the hard landscaping.
KT outlined that the materials will be conditioned, however they are trying to provide as much detail on materials as possible at this stage.
Ray Woolford (RW) stated that this site is large enough for a school, which should be provided. Furthermore, there are not enough jobs provided, the business units should be delivered to the Council in the S106, not enough youth facilities have been provided and there are too many shops.
MD agreed that there aren't enough schools, many local residents have to take their children to schools outside the Borough.
Charles Moran (CM) confirmed that the Council did not consider a school on this site, however other sites are being identified in the schools for the future programme. In terms of shops we agree, but we also have other land uses. It should be noted that the retail units have been designed to be flexible to enable their conversion to other uses. We had a workshop last Thursday with local community groups to discuss future benefits to the local community.
RW believes that a school can be accommodated within a mixed use development. He had issues with the heights proposed and the overbearing impact the development will have on Pepys park. The development has no sense of identity - the area needs great award wining design.
Ernest The developers have not sat down with the residents to inform and gain a perspective of what we want. For example, the petrol station should stay.
CM outlined that the developer has undertaken over 400 hours of pre-application consultation and negotiations over a 2 year period that involved local residents.
RW wanted a meeting with residents and all of the developers of the major sites in north Deptford. Why hasn't the Council done anything?
CB outlined that this was not entirely correct for example in December 2008 there was a consultation exercise with local residents to involve them and for this application we consulted the entire Evelyn Ward.

Moira Ison (MI) agrees with the other issues raised and would like to know who makes the decision on how tall and how dense the development will be. The impact it has will be tremendous, there is concern about how Deptford has changed and there needs to be housing that makes people feel part of the community. Concern that there is too much rental housing.
CB outlined that the Council decides along with the GLA. Discussed the existing employment use and the Council's desire to encourage a mixed use development that brings under used land into use again through higher density.
KT stated that the heights vary from 4 to 18 storeys and that the urban grain that currently exists is quite fragmented. Private family homes and flats are proposed within the scheme as will as affordable rental accommodation.
CM replied that we want social cohesion and have deliberately put open space on the edge of the site to bring in existing local residents.
MD thought that there weren't enough jobs, there were too many flats, and that there should be open space for children to play football in.
Elliot Page (EP) outlined that the scheme was designed not to be car dependent, we want to encourage other modes of transport.
Russell Guthrie (RG) liked the vast majority of the scheme, which will be good and beneficial for the area, but does not understand why an 18 storey tower is proposed. CM replied that there is a demand and need for new homes in the Borough and that the developer was trying to strike a balance between the delivery of these homes and the commercial practicalities of developing such a large site. They have tried to understand the urban grain of the area and assess the impacts of the existing and proposed tall buildings and their impact upon the existing and future residents of the locality.
John Hamilton (JH) re-iterated concerns over the 18 storey height proposed.
CM replied by highlighting how far the developer has come since its pre-application discussions with local residents. Now at this late stage there are only a few residents who are present at this local meeting, which indicates that not as many local residents are concerned at present.
JH stated that could be because they're worn down.
Christina Norton disagreed, there have been extensive pre-application consultations and discussions with local residents that have taken place over an extended period of time. The residents have had valuable input into the scheme.
Ernest (E) wanted all the tall buildings on the Pepys park side.
RG commented that developments such as this are all part of living in a capital city. RW wanted to clarify that he doesn't disagree with the site's redevelopment, but the scale is too much. Also asked whether all issues outlined in the objections will be taken into account.
CB replied by stating that the Council will not set out what objectors can say, however all comments made will be taken into account during the application's assessment. The Council prefers resident input at an early stage of the design process and requests developers to undertake a meaningful dialogue with local residents prior to lodging an application.
MI asked how do you take into account cumulative impact?
CM replied outlining that the Council has done a lot of research in the drafting of its core strategy for development in the Borough to assess cumulative impact. In assessing planning applications the Council takes into account comments from the Greater London Authority, Commission for Architecture and the Built Environment, English Heritage, and the Environment Agency.
CB outlined that the Council was concerned with the overall impact on for example Transport and Healthcare.
MI expressed concern on car parking impacts.

EP reiterated that alternative modes of transport other than private motor vehicles will be encouraged and that most new developments in this location are looking at a 0.3 car parking provision per dwelling.
JH concerned that the Council was not independent enough for joined up thinking and that not enough work was being done on schools. There was a letter to the Council from the developer that said thanks for the assembly site.
CM confirmed that this was probably a letter saying thanks for attending a pre-application meeting.
RW said the cumulative impact on transport and schools including the Canada Water Developments should be taken into account.
Catherine queried the construction impacts on adjoining residents, where would the construction traffic be routed?
HC and WSP confirmed that the advantage net impact compared to existing traffic movements to the site will be minimal. An advantage of the site's size is that most of the activity will be inside it, traffic movements will be co-ordinated.
Catherine concerned about fly tipping and recycling within the completed development. Also didn't want the proposed directional signage to be vandalised.
KT we tried to embed these things from the start, each unit has recycling and waste capacity inside it, space within the scheme for bulky refuse.
BH outlined the likely date of the Strategic Planning Committee meeting as July 15, 2010.

The meeting ended at 20:30

This page is intentionally left blank